

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Gulf) DOCKET NO. 160186-EI
Power Company)
_____)

**SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
AND LEAGUE OF WOMEN VOTERS OF FLORIDA'S
COMMENTS REGARDING PROPOSED ISSUES**

The Southern Alliance for Clean Energy (“SACE”) and League of Women Voters of Florida (“LWVF”), by and through their undersigned counsel, and pursuant to Order No. PSC-16-0473-PCO-EI, Order Establishing Procedure, hereby submit their comments on the Office of Public Counsel’s, Florida Industrial Power Users Group’s, and Walmart’s proposed additional issues.

OFFICE OF PUBLIC COUNSEL’S PROPOSED ISSUE

New Issue: In the event federal legislation is passed and signed into law between now and a reasonable period after new base rates become effective that results in a change in the corporate income tax rate to which Gulf is subject, or changes in the depreciation allowance for tax purposes associated with plant additions incorporated in test year rate base, what adjustments or provisions, if any, should the Commission make to address such changes? Should the Order in this case require a limited reopening within a reasonable period after new base rates become effective to address income tax expense as well as the accumulated deferred income taxes in the capital structure in the event such legislation is passed that would impact Gulf’s revenue requirements?

Comments: SACE and LWVF support the inclusion of this issue. Given the potential changes to the tax rate, the Commission should consider this issue in order to prevent a potential windfall for Gulf’s shareholders.

FLORIDA INDUSTRIAL POWER USERS GROUP’S PROPOSED ISSUE

New Issue: What need exists, if any, for Scherer Unit 3 to serve Gulf’s retail customers?

Comments: SACE and LWVF support the inclusion of this issue. SACE and LWVF contend that the Commission never issued an order approving of the purchase of Scherer Unit 3, and certainly never granted a need determination for that unit. Before being allowed to recover additional rates from its customers, Gulf should prove that Scherer Unit 3 is needed to serve its retail customers.

WALMART'S PROPOSED ISSUE

New Issue: Should the Commission require Gulf to initiate a stakeholder process involving Gulf and its customers with the purpose of collaboratively developing additional energy supply options for Gulf and its customers, with particular emphasis on renewable energy measures and initiatives?

Comments: SACE and LWVF support the inclusion of this issue. If the Commission were to require such a process, such a process would be beneficial to interested customers and other parties.

Respectfully submitted this 1st day of March, 2017.

/s/Bradley Marshall
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 1st day of March, 2017, via electronic mail on:

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