BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for DOCKET NO. 20170266-EC Seminole combined cycle facility, Seminole Electric Cooperative, Inc.

In re: Joint Petition to determine need for the Shady Hills combined cycle facility, by Seminole Electric Cooperative, Inc. and Shady Hills Energy Center, LLC.

DOCKET NO. 20170267-EC

DATED: JANUARY 19, 2018

PETITIONERS' JOINT RESPONSE TO MOTION TO INTERVENE OF QUANTUM PASCO POWER, L.P.

Seminole Electric Cooperative, Inc., and Shady Hills Energy Center, LLC (collectively, "Petitioners"), by and through undersigned counsel, and pursuant to Rule 28-2106.204, F.A.C., hereby respond to the Motion to Intervene of Quantum Pasco Power, L.P. ("Quantum Pasco"):

Petitioners take no position on the Motion to Intervene, subject to proof of standing at hearing. By taking no position on the motion, Petitioners do not agree with or concede any of the allegations or assertions in the motion. Furthermore, Petitioners dispute that the issues proposed by Quantum Pasco in addition to the issues listed in Attachment A of the Order Establishing Procedure are appropriate. See Motion, at pp. 14-15 (proposed issues Nos. 6A - 9B).

RESPECTFULLY SUBMITTED this 19th day of January, 2018.

HOPPING GREEN & SAMS, P.A.

By: /s/Gary V. Perko

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic mail to the following on this <u>19th</u> day of January, 2018:

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