

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of the tax impacts associated) Docket No. 20180046-EI
With Tax Cuts and Jobs Act of 2017 for Florida)
Power & Light Company.) Date: July 24, 2018

THE FEDERAL EXECUTIVE AGENCIES' PETITION TO INTERVENE

Pursuant to sections 120.569, 120.57, 366.04(1), and 366.06, Florida Statutes; and Rules 28-106.205, 28-106.201 and 28-106.205, Florida Administrative Code, the Federal Executive Agencies (FEA), through their undersigned counsel, hereby submit this Petition to Intervene in the aforementioned Docket. In support thereof, FEA states the following:

1. Names of affected agencies. The affected agency is the Florida Public Service Commission, 2540 Shumard Oak boulevard, Tallahassee, Florida 32399.
2. Name and address of Petitioner. Copies of all pleadings, notice and orders in this docket should be provided to the Petitioner:

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3. Notice of docket Petitioner received notice of this docket from a review of the Commissioner's website.

4. Statement of Substantial Interest. The FEA consist of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of Florida Power & Light Company (FPL) and purchase electric utility service from FPL. The Department of Defense has been delegated authority by the General Services Administration to represent, through Department of the Air Force counsel, the consumer interest of the FEA in this proceeding under 40 U.S.C.A. 481(a)(4) and 486(d).

5. In this case, the Commission will consider the tax impacts associated with the federal Tax Cuts and Jobs Act of 2017 on FPL and FPL's customers, including FEA members. For these reasons, FEA has a substantial interest in the above-captioned Docket.

6. Disputed Issues of Material Fact. Disputed issues of material fact have not been identified at this time. However, FEA reserves all rights to raise additional issues in accordance with the Commission's rules and the Order Establishing Procedure in this case.

7. Disputed Legal Issues. Disputed issues include, but are not limited to, the following:

a. Has FPL met its burden of proof in this matter?

8. Statement of Ultimate Facts Alleged. Ultimate facts include, but are not limited to, the following:

a. What impacts does the federal Tax Cuts and Jobs Act of 2017 have upon FPL and FPL's customers and the rates that FPL charges its customers, including the FEA.


9. Rules and statutes justifying relief. The rules and statutes that entitle FEA to intervene and participate in this case include, but are not limited to;

- a. Section 120.569, Florida Statutes;
- b. Section 120.57, Florida Statutes;
- c. Section 366.04(1), Florida Statutes;
- d. Section 366.06, Florida Statutes;
- e. Rule 28-106.201, Florida Administrative Code;
- f. Rule 28-106.205, Florida Administrative Code;

10. Relief. FEA request that it be permitted to intervene as a full party in this docket.

WHEREFORE, FEA request the Commission enter an order allowing it to intervene and participate as a full party in this docket.

Attorneys for Federal Executive Agencies

By:  _____

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CERTIFICATE OF SERVICE

Docket No. 20180046-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Federal Executive Agencies' Motion to Intervene has been furnished by electronic mail (e-mail) and/or U.S. Mail this 24th day of July 2018 to the following:

<p>Florida Public Service Commission Suzanne Brownless Office of General Counsel 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 SBrownle@psc.state.fl.us</p>	<p>Office of Public Counsel J. R. Kelly/P. Christensen/E. Saylor/ S. Morse c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee FL 32399 christensen.patty@leg.state.fl.us kelly.jr@leg.state.fl.us saylor.erik@leg.state.fl.us morse.stephanie@leg.state.fl.us</p>
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s/ Ryan K. Moore

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