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STATE & FEDERAL ENERGY REGULATORY LAW  
SOLAR & RENEWABLE ENERGY

October 1, 2018

***VIA ELECTRONIC FILING***

Ms. Carlotta S. Stauffer  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: **Docket No. 20180169-EQ** - Petition for Declaratory Statement by Duke Energy Florida, LLC, Regarding PURPA Solar Qualifying Facility Power Purchase Agreements

Dear Ms. Stauffer:

On behalf of Vote Solar, attached please find Vote Solar's Motion to Address the Commission.

If you have any questions regarding this transmittal and attachment, or require anything further in this regard, please contact me at (772) 225-5400

Sincerely,

/s/ *Rich Zambo*

Richard A. Zambo, P.A.  
*Attorney for Vote Solar*

RAZ/bms

Attachment

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Petition for Declaratory Statement  
by Duke Energy Florida, LLC, Regarding  
PURPA Solar Qualifying Facility Power  
Purchase Agreements**

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Docket No. 20180169-EQ

Filed: October 1, 2018

**VOTE SOLAR'S MOTION TO  
ADDRESS THE COMMISSION**

Pursuant to Rule 25-22.0021(7), F.A.C., Vote Solar moves the Florida Public Service Commission (Commission) for permission to address the Commission regarding the issues raised by the Petition for Declaratory Statement (Petition) filed by Duke Energy Florida, LLC (Duke) in this proceeding, and states in support thereof as follows:

1. Vote Solar respectfully submits that its participation in the Agenda Conference at which the Petition will be considered would help facilitate the Commission's deliberations in this matter. The Petition raises a multitude of significant issues with respect to the legal and policy implications of the declaration requested, which have not previously been considered by this current Commission.

2. Vote Solar is a registered 501(c)3 nonprofit nationwide grassroots advocacy and public policy organization that is working to help bring solar energy into the mainstream across the Country. Vote Solar is interested in the preservation and enforcement of those Florida and Federal laws applicable to non-utility owned solar energy QFs, which are of the very type that are the subject of the Petition.

3. On October 1, 2018, Vote Solar filed its Motion For Leave to File Amicus Curiae Memorandum in this proceeding, with its proposed Memorandum attached thereto. Vote Solar,

seeks to address the Commission to share the experience it has gained from participation in similar proceedings in other states.

4. Vote Solar believes that permitting its participation at the Agenda Conference will aid in the Commission's understanding of the serious deficiencies in the Petition and the impact the disposition of the Petition will have on Vote Solar and the solar energy industry, particularly since some issues raised by Duke have not been addressed by the Commission for many years.

5. Vote Solar moves to be allowed to explain its concerns with regard to the Petition and to answer any questions the Commission may have.

**WHEREFORE**, Vote Solar respectfully requests that the Commission grant this Motion to Address the Commission at the Agenda Conference at which Duke's Petition will be considered.

Respectfully submitted this 1st day of October, 2018.

/s/ **Richard A. Zambo**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 1<sup>st</sup> day of October, 2018, to the following:

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