

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Duke Energy Florida, LLC's Petition for
Declaratory Statement Regarding PURPA
Solar Qualifying Facility Power Purchase
Agreements

Docket No. 20180169-EQ

Filed: October 2, 2018

**SOLAR ENERGY INDUSTRIES ASSOCIATION'S MOTION TO
ADDRESS THE COMMISSION**

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

1. SEIA respectfully submits that its participation in the Agenda Conference at which the DEF Petition will be considered would facilitate the Commission's deliberations in this matter. The DEF 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. SEIA is the national trade association of the U.S. solar energy industry which now employs more than 250,000 Americans. SEIA's members include dozens of stakeholders of the solar energy industry that have headquarters or locations in Florida, among them installers, manufacturers, contractors, developers, financiers and service providers. SEIA's member companies are actively working to develop qualifying cogeneration and small power production facilities ("Qualifying Facilities" or "QFs") throughout the state of Florida in accordance with

the applicable state and federal regulations implementing the Public Utility Regulatory Policies Act of 1978 (“PURPA”) which are the subject of the DEF Petition.

3. On October 2, 2018, SEIA filed its Petition to Intervene and Response in Opposition in this proceeding. SEIA believes that permitting its participation at the Agenda Conference will aid in the Commission’s understanding of the serious deficiencies in the DEF Petition. SEIA seeks to address the Commission to (i) explain why the DEF Petition is contrary to state and federal law and (ii) explain the impact that the disposition of the DEF Petition will have on SEIA and its members’ ability to finance QF projects.

4. SEIA moves to be allowed to explain its concerns with regard to the DEF Petition and to answer any questions the Commission may have regarding its Response in Opposition.

WHEREFORE, SEIA respectfully requests that the Commission grant this Motion to Address the Commission at the Agenda Conference at which the DEF Petition will be considered.

Respectfully submitted this 2nd day of October, 2018.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following, by electronic delivery, on this 2nd day of October, 2018.

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