## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition for Limited Proceeding for)DOCKET NO. 20190038-EIRecovery of Incremental Storm Restoration)FILED: April 16, 2019Costs related to Hurricane Michael, by Gulf Power.)

## THE FEDERAL EXECUTIVE AGENCIES' MOTION TO INTERVENE

Pursuant to rule 28-106.205, Florida Administrative Code, the Federal Executive

Agencies (FEA), through their undersigned counsel, hereby submit this Motion to

Intervene in the aforementioned Docket. In support thereof, FEA states the following:

1. <u>Name and address of Petitioner.</u> Copies of all pleadings, notice and orders in

this docket should be provided to the Petitioner:

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2. <u>Statement of Substantial Interest.</u> The FEA consist of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of Gulf Power and purchase electric utility service from Gulf Power. 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).

3. In this case, the Commission will consider Gulf Power's request for authority to raise rates and/or asses costs and/or impose a surcharge so as to be able to recover from customers costs associated with Hurricane Michael. Utility costs represent one of the largest variable expenses of operating Federal offices, facilities, and installations on whose behalf intervention is sought herein, and all will be significantly affected by any action this Commission takes in this Docket. For these reasons, FEA has a substantial interest in the above-captioned Docket.

4. Intervenor is not aware of any preliminary agency action yet taken on this matter.

5. Intervenor has conferred with all other parties of record and none object to this motion.

<u>WHEREFORE</u>, FEA respectfully requests that the Commission enters an order granting this motion and thereby allowing it to intervene and participate as a full party in this docket.

## **Attorney for Federal Executive Agencies**

By: /s/ Robert J. Friedman

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## CERTIFICATE OF SERVICE Docket No. 20180061-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 16<sup>th</sup> day of April 2019 to the following:

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