



FECA

Florida Electric Cooperatives Association, Inc.

2916 Apalachee Parkway
Tallahassee, Florida 32301
(850) 877-6166
FAX: (850) 656-5485

February 14, 2018

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

RE: Docket No. 20170273-EQ

Dear Ms. Stauffer:

Attached for official filing in the above-referenced docket is a letter in support of the Joint Motion of Gulf Power Company and Florida Public Utilities Company for Leave to file an Amici Curiae Memorandum.

Thank you for your assistance in this matter.

Sincerely,

Michelle Hershel, Esquire
Florida Electric Cooperatives Association, Inc.



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February 14, 2018

Adria Harper, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No. 20170273-EQ – Petition of Sunrun Inc. for Declaratory
Statement Concerning Leasing of Solar Equipment**

Dear Ms. Harper:

Please accept this letter from the Florida Electric Cooperatives Association, Inc. (“FECA”) on behalf of its member-cooperatives¹ in support of the joint motion of Gulf Power Company (“GPC”) and Florida Public Utilities Company (“FPUC”) for Leave to file an Amici Curiae Memorandum in the above-referenced docket. FECA has contacted legal counsel for Sunrun, Inc. to provide advance notice of this submittal. In addition, FECA has notified counsel for GPC and FPUC of submittal of this letter and they had no objection.

¹ Central Florida Electric Cooperative, Inc., CHELCO, Clay Electric Cooperative, Inc., Escambia River Electric Cooperative, Inc., Florida Keys Electric Cooperative Association, Inc., Glades Electric Cooperative, Inc., Gulf Coast Electric Cooperative, Inc., Okfenoke Rural Electric Membership Corporation, Peace River Electric Cooperative, Inc., PowerSouth Energy Cooperative, Seminole Electric Cooperative, Inc., Sumter Electric Cooperative, Inc., Suwannee Valley Electric Cooperative, Inc., Talquin Electric Cooperative, Inc., Tri-County Electric Cooperative, Inc., West Florida Electric Cooperative Assn. Inc., Withlacoochee River Electric Cooperative, Inc.

Sunrun Inc.'s Petition for a Declaratory Statement raises new issues that have never been expressly addressed by the Commission and are potentially very significant for electric cooperatives. FECA and its member-cooperatives have an abiding interest in the preservation and enforcement of the regulatory provisions set forth in Chapter 366, Florida Statutes including:

- a. The avoidance of territorial disputes;
- b. The avoidance of further uneconomic duplication of generation, transmission and distribution facilities;
- c. The planning, development and maintenance of a coordinated electric power grid throughout Florida; and
- d. The Commission's exclusive jurisdiction to protect the public by prescribing and enforcing safety standards for transmission and distribution facilities of all electric utilities.

FECA believes that in order to protect the regulatory provisions above and to shield the public from unsafe and predatory schemes, the Commission must have sufficient information to determine whether or not the leasing arrangement proposed by Sunrun Inc., is in fact a residential sale of electricity.

FECA agrees with GPC's and FPUC's contention in their Amici Curiae Memorandum that in order to properly evaluate the proposed leasing arrangement, Sunrun Inc. should provide the Commission with a copy of its lease arrangement in order to fully understand how the proposed transaction will be carried out and whether or not the arrangement is consistent with Florida case law.

FECA respectfully requests inclusion of this letter in the document filings for Docket 20170273-EQ. Thank you for your assistance in this matter.

Sincerely,



Mike Bjorklund
General Manager
Florida Electric Cooperatives Association

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition of Sunrun Inc. For)
Declaratory Statement Concerning)
Leasing of Solar Equipment) Docket No. 20170273-EQ

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 14th day of February, 2018 to the following:

Rutledge Law Firm
Marsha E. Rule
119 So. Monroe St., Ste 202
Tallahassee, FL 32301
marsha@rutledge-ecenia.com

Richard A. Zambo, P.A.
Rich Zambo
2336 S.E. Ocean Blvd, #309
Stuart, FL 34996
richzambo@aol.com

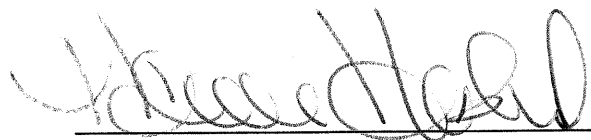
Sunrun Inc.
S. Becca Polisuk
5208 Tampa W. Bl
Tampa, FL 33634
Becca.polisuk@sunrun.com

Office of General Counsel
Adria Harper
2540 Shumard Oak Blvd
Tallahassee, FL 32399
aharper@psc.state.fl.us

Fl Public Utilities Co.
Mike Cassel, Director
1750 SW 14th St., Ste 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

Gunster Law Firm
Beth Keating, Esq
215 S. Monroe St, 601
Tallahassee, FL 32301
bkeating@gunster.com

Jeffrey A. Stone, Esq
Russell A. Badders, Esq
Steven R. Griffin, Esq
Attorneys for Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100
jastone@southernco.com
rab@beggslane.com
srg@beggslane.com



Michelle Hershel
Florida Bar No. 0832588
Florida Electric Cooperatives Association
2916 Apalachee Parkway
Tallahassee, FL 32301
(850)877-6166, ext 3
mhershel@feca.com