

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for declaratory statement)
regarding PURPA solar qualifying facility) DOCKET NO. 20180169-EQ
power purchase agreements, by Duke)
Energy Florida, LLC.) FILED: OCTOBER 2, 2018
_____)

ECOPLEXUS, INC.'S REQUEST FOR ORAL ARGUMENT

Ecoplexus, Inc. (“Ecoplexus”), pursuant to Rule 25-22.0022, Florida Administrative Code (“F.A.C.”), hereby requests that the Florida Public Service Commission (“Commission”) grant oral argument on the “Response of Ecoplexus, Inc. in Opposition to Petition for Declaratory Statement” (the “Response”) filed concurrently with this Request for Oral Argument.

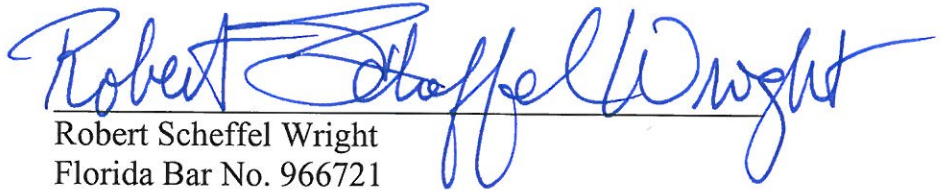
Ecoplexus is requesting an opportunity for oral argument on its Response because oral argument will aid the Commission’s deliberations in evaluating the important issues raised in Duke Energy Florida, LLC’s (“DEF”) “Petition for Declaratory Statement Regarding PURPA Solar Qualifying Facility Purchase Power Agreements” (the “Petition”). As more fully explained in Ecoplexus’ Response, the Petition raises significant legal issues involving interpretation of the Commission’s rules and statutes applicable to solar Qualifying Facilities, and the interpretation of the Public Utilities Regulatory Policy Act of 1978 (“PURPA”) and the rules adopted by the Federal Energy Regulatory Commission (“FERC”) implementing PURPA,

that will substantially impact DEF's ratepayers, Ecoplexus, and other solar Qualifying Facilities in Florida.

Allowing Ecoplexus and DEF, and potentially other interested parties, to present oral argument will facilitate the Commission's evaluation of the issues raised in the Petition and will aid the Commission's understanding of the serious deficiencies in the Petition identified in Ecoplexus' Response. Given the complexity of the issues and the fact that other parties have moved to intervene and to file amicus pleadings, Ecoplexus suggests that oral argument of at least 20 minutes per side should be allowed in this case.

WHEREFORE, Ecoplexus, Inc., respectfully requests that it be granted the opportunity to present oral argument to the Commission on the issues raised in its Response.

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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