



Dianne M. Triplett
Deputy General Counsel

July 22, 2020

VIA ELECTRONIC FILING

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

*Re: Duke Energy Florida, LLC's Petition
for a limited proceeding to approve clean
energy connection program and tariff and
stipulation; Docket No. 20200176-EI*

Dear Mr. Teitzman:

Enclosed for filing on behalf of Duke Energy Florida, LLC ("DEF") is DEF's Response to The League of United Latin American Citizens' ("LULAC") Petition to Intervene for a Limited Proceeding to Approve the Clean Energy Connection Program and Tariff and Stipulation.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

Sincerely,

s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmw

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re. Duke Energy Florida, LLC's Petition
for a limited proceeding to approve clean
energy connection program and tariff and
stipulation

Docket No. 20200176-EI

Dated: July 22, 2020

**DUKE ENERGY FLORIDA, LLC's RESPONSE TO THE LEAGUE OF
UNITED LATIN AMERICAN CITIZENS' PETITION TO INTERVENE**

Duke Energy Florida, LLC ("DEF"), pursuant to Rules 28-106.204 and 28-106.205(1), Florida Administrative Code, hereby files its response to the Petition to Intervene by the League of United Latin American Citizens ("LULAC") filed in this docket on July 15, 2020. DEF does not oppose LULAC's standing as a representative organization on behalf of its members to intervene in this docket; however, DEF challenges several assertions made in LULAC's Petition.

In particular, DEF disagrees with the allegations that DEF's Clean Energy Connection Program ("CEC Program) is subsidized by low income customers. As demonstrated by DEF's Petition, testimony, and exhibits, no DEF customers subsidize the CEC Program. The program is projected to provide \$533 million in present value system savings, of which almost 90% will accrue to all customers, and the remainder to those that participate in the program. Additionally, DEF has included a large carve out specifically to encourage the participation of low income customers. The CEC Program was designed to give low income customers the same benefit/kw subscription on a CPVRR basis as other customers in the program but adjusted to have relatively more benefits early and less benefits later allowing for bill reductions every year. DEF also intends to market the CEC Program to low income customers in a variety of ways, including co-marketing

with existing low income energy efficiency programs. Further, DEF has committed to making materials about the program available in Spanish.

DEF also disagrees with the allegation that the CEC Program guarantees a rate of return for large corporate customers. Putting aside the vagueness of the statement, the CEC Program is cost effective for all customers, and is intended to meet the enormous demand for solar power of all types of customers in DEF's territory -- large, medium and small businesses, local governments, non-profit customers and residential customers. Capacity in the CEC Program is therefore allocated to local governments, small and medium business customers, residential customers, and low income customers, not just to large commercial customers.

Respectfully submitted this 22nd day of July, 2020,

/s/ Dianne M. Triplett
DIANNE M. TRIPLETT
Deputy General Counsel
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, FL 33701
T: 727. 820.4692
F: 727.820.5041
E: Dianne.Triplett@Duke-Energy.com

MATTHEW R. BERNIER
Associate General Counsel
Duke Energy Florida, LLC
106 E. College Avenue, Suite 800
Tallahassee, FL 32301
T: 850.521.1428
F: 727.820.5041
E: Matthew.Bernier@Duke-Energy.com
FLRegulatoryLegal@Duke-Energy.com

CERTIFICATE OF SERVICE

Docket No. 20200176-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 22nd day of July, 2020.

/s/ Dianne M. Triplett

Attorney

<p>Bianca Lherisson / Shaw Stiller Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 blheriss@psc.state.fl.us sstiller@psc.state.fl.us</p>	<p>Bradley Marshall / Jordan Luebke Earthjustice 111 S. Martin Luther King Jr. Blvd. Tallahassee, FL 32301 bmarshall@earthjustice.org jluebke@earthjustice.org</p>
---	--