

ORIGINAL

Matilda Sanders

From: Purcell, Meabh T. [MPURCELL@flgm.com]
Sent: Monday, June 13, 2005 3:11 PM
To: Filings@psc.state.fl.us
Subject: Petition of Florida Municipal Power Agency: Docket No. 050256-EM
Attachments: Prehearing.PDF; Petition.PDF; CovrLtr.PDF

Attached is the Prehearing Statement filed today on behalf of the City of Vero Beach ("COVB"). Also attached is a corrected copy of COVB's Petition to Intervene, dated June 9, 2005 (to correct minor typographical errors).

A hard copy of COVB's filing is being provided to the service list via U.S. mail.

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KMP*

6/13/2005

Prehearing Statement
 DOCUMENT NUMBER-DATE
 05629 JUN 13 05

FPSC

Corrected Petition Intervene
 DOCUMENT NUMBER-DATE
 05630 JUN 13 05

FPSC-COMMISSION CLERK

ORIGINAL

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June 13, 2005

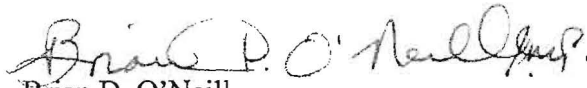
Blanca Bayó, Director
Division of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 050256-EM
Prehearing Statement of The City of Vero Beach

Dear Ms. Bayó:

Enclosed for filing on behalf of The City of Vero Beach ("COVB") is COVB's Prehearing Statement in the above-referenced proceeding. Also enclosed is a corrected copy of COVB's Petition to Intervene (correcting minor typographical errors) that was filed on June 9, 2005.

Sincerely yours,


Brian D. O'Neill

Enclosures

cc: Service List

BS103218

DOCUMENT NUMBER-DATE

05629 JUN 13 05

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Determine Need for Treasure Coast Energy Center Unit 1, Proposed Electrical Power Plant in St. Lucie County, by Florida Municipal Power Agency.

DOCKET NO. 050256-EM
FILED: JUNE 13, 2005

PREHEARING STATEMENT OF THE CITY OF VERO BEACH

Pursuant to Order No. PSC-05-0485-PCO-EM, filed May 4, 2005, the City of Vero Beach ("COVB") files its Prehearing Statement.

a. All Known Witnesses

COVB does not anticipate presenting a witness, but reserves the right to conduct cross examination of other witnesses.

b. All Known Exhibits

Such documents that may be relevant to the determination of need for the resource and the cost of the resource compared to other sources of capacity.

c. COVB's Statement of Basic Position

COVB's position is preliminary and based on materials filed by the parties. COVB's preliminary position is offered to assist the parties in preparing for the hearing. COVB's final position will be based upon all the evidence in the record and may differ from the preliminary position herein.

COVB's position is: a) that the project is not needed to meet the load requirements of the Florida Municipal Power Agency; and b) if the Commission determines there is a need for some additional generation capacity, COVB questions whether the project is the least cost way to meet this need.

d-f Issues of Fact, Law and Policy

No.1: Whether there is a need for the proposed Treasure Coast Energy Center Unit 1, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, Florida Statutes.

No. 2: Whether there is a need for the proposed Treasure Coast Energy Center Unit 1, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519, Florida Statutes.

No. 3: If there is a need, whether the proposed Treasure Coast Energy Center Unit 1 is the most cost-effective alternative available, as this criterion is used in Section 403.519, Florida Statutes.

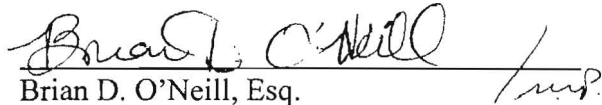
h. Pending Motions

COVB's Motion to Intervene, filed on June 9, 2005 (corrected on June 13, 2005), is pending.

j. Compliance with Order No. PSC-05-0485-PCO-EM

COVB has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 13th day of June, 2005.



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Attorney for City of Vero Beach

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Determine Need for Treasure
Coast Energy Center Unit 1, Proposed Electrical
Power Plant in St. Lucie County, by Florida
Municipal Power Agency.

DOCKET NO. 050256-EM
FILED: JUNE 13, 2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the City of Vero Beach's Prehearing Statement was furnished to the following, by U.S. Mail, on this 13th day of June, 2005.

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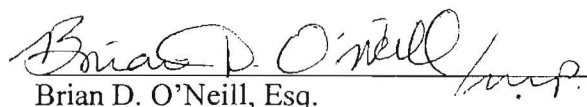
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