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May 26, 2006

VIA HAND DELIVERY

Blanca S. Bayó, Director Division of the Commission Clerk & Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: <u>Docket No.: 060220-EC</u>

Dear Ms. Bayó:

In lieu of errata sheets, enclosed for filing on behalf of Seminole Electric Cooperative, Inc. are the original and fifteen (15) copies of revised pages of its Need Study and various direct testimonies. The following revised pages should be substituted:

	(1)	Need Study – pages 2, 19, 33, 34, 43, 50, 73, 74, 78, and 81; D4646 - 06
	(2)	Direct Testimony of Timothy S. Woodbury – page 17; 04647-06
OMP	(3)	Direct Testimony of Michael P. Opalinski – pages 8, 10, 12 and 13; 04648-06
сом <u>б</u>	tovi(4)	Direct Testimony of William T. Lawton - pages 3 and 7; 046 49-06
CTR	(5)	Direct Testimony of Lane Mahaffey – pages 8 and 21; and 04660-06
ECP)	(6)	Direct Testimony of Wm. Jack Reid – page 5 04657 - 06
GCL		
OPC	If ther	e are any questions regarding this transmittal, please contact me at 222.2300.
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SCR		PECETY P. A. T.

FPSC-BUREAU OF RECORDS

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SQUIRE, SANDERS & DEMPSEY L.L.P. Including
STEEL HECTOR & DAVIS LLP

Very truly yours,

SQUIRE, SANDERS & DEMPSEY L.L.P.

Charles A. Guyton

Partner

CAG:gcm Enclosure

Copy to: Martha Carter Brown, Esq. (w/enclosures) Lee Colson (w/enclosures)

TALLAHASSEE/55458.1

1		significant economic disparity between SGS Unit 3 and Seminole's other options, the		
2		process was also fair to the Members and their member/consumers because it		
3		accommodated consideration of such factors.		
4				
5	V.	SGS UNIT 3 MEETS THE STATUTORY NEED CRITERIA		
6	Q.	Mr. Woodbury, are you familiar with the criteria set forth in Section 403.519,		
7		Florida Statutes, that the Commission is to consider in a determination of need		
8		proceeding?		
9	A.	Yes. As a non-lawyer who has prior experience with the need determination process,		
10		I am familiar with the determination of need criteria.		
11				
12	Q.	Is SGS Unit 3 needed by Seminole, its Members and their members/consumers		
13		for purposes of system reliability?		
14	A.	Yes. As developed in detail in Mr. Mahaffey's testimony, there is clearly a need for		
15		additional capacity on Seminole's system in 2012. Seminole's total need for		
16		additional capacity by 2012 was approximately 1200 MW, 750 MW of which is best		
17		served by base load generation. Seminole's need for base load generating capacity by		
18		2012 is driven primarily by the expiration of existing purchased power contracts and		
19		load growth on Seminole's system. Absent the addition of SGS Unit 3 by the		
20		summer season of 2012, Seminole will not meet its minimum reliability criteria. If		
21		Seminole does not meet its minimum reliability criteria, its Members and their		
22		member/consumers will not receive the level of service reliability they require. In		
23		practical terms, this means an unacceptable level of service interruptions		