

ORIGINAL

Matilda Sanders

From: KEYSER & WOODWARD P.A. [justice@gbso.net]
 Sent: Monday, June 05, 2006 1:45 PM
 To: Filings@psc.state.fl.us
 Subject: Re: Seminole Power Plant
 Attachments: amended seminole petition.doc

Attached is the amended petition to intervene of Sierra Club, Inc. for filing.

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ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In re:

Petition for Determination
of Need for Seminole Electric Cooperative, Inc.
Filed: April 21, 2006

Docket No.: 060220-EC

AMENDED PETITION TO INTERVENE OF SIERRA CLUB, INC.

Petitioner, Sierra Club, Inc., hereby files this Petition to Intervene into this proceeding, and in support avers:

1. The name and address of the affected agency are:

Florida Public Service Commission ("PSC")
2540 Shumard Oak Drive
Tallahassee, FL 32399-0850

2. The name and address of Petitioner's attorney are as follows:

Timothy Keyser, J.D.
Keyser & Woodward, P.A.
Post Office Box 92
Interlachen, FL 32148

3. Statement of Substantial Interest.

Sierra Club, Inc. is a Florida corporation not for profit dedicated to the wise use of natural resources and to the protection of the environment. It has many members who reside within the areas served by Seminole Electric Cooperative, Inc. (Seminole) and who are supplied electricity by Seminole's cooperatives.

4. Disputed Issues of Material Fact.

- a. This plant will not supply adequate electricity at reasonable costs if the environmental impacts are included in the determination.

- b. There is a lack of fuel diversity and supply reliability because Seminole already has coal fired units and current environmentally harmful mining practices are likely to be curtailed in the future.

- c. Solar and other renewable or "green" energy production methods

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FPSC-COMMISSION OF FLORIDA

are more cost effective than coal fueled plant expansion.

d. A "no build" alternative would produce more power at less cost and with fewer harmful environmental impacts. Seminole should dedicate part of the costs of a new coal fired unit toward installation of solar hot water units and power producing panels for consumers. Other no build savings should be applied toward new equipment to abate pollution from the existing units.

5. Statement of Ultimate Facts.

Seminole failed to consider reasonable alternatives to coal.

DATED this 5th day of June, 2006.

Respectfully submitted,

s/Timothy Keyser
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