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July 20, 2006

VIA HAND DELIVERY

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

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06 JUL 20 AM 9:51
COMMISSION
CLERK

Re: Docket No. 060424-EI

Dear Ms. Bayó:

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Enclosed for filing on behalf of Florida Power & Light Company are the original and fifteen copies of the Prehearing Statement of Florida Power and Light Company.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me. Please contact me if you have questions regarding this filing.

Thank you for your assistance with this filing.

Sincerely,

[Handwritten signature of Kenneth A. Hoffman]

Kenneth A. Hoffman

KAH/rl
Enclosures

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Florida Power & Light )  
Company for Determination of ) Docket No. 060424-EI  
Need for Bobwhite-Manatee )  
230 kV Transmission Line ) Filed: July 20, 2006  
\_\_\_\_\_)

**PREHEARING STATEMENT OF  
FLORIDA POWER & LIGHT COMPANY**

Pursuant to Order No. PSC-06-0521-PCO-EI issued June 16, 2006, Florida Power & Light Company ("FPL") hereby files its Prehearing Statement.

**APPEARANCES**

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Attorneys for Florida Power & Light Company

<b>A. WITNESSES</b>	<b>ON BEHALF OF</b>	<b>ISSUES</b>
<b><u>Direct</u></b>		
Vicente Ordax, Jr.	FPL	1, 2, 3, 4

**B. EXHIBITS**

**Sponsoring Witness**

**Description of Exhibit**

None

Notices of Final Hearing and Affidavits of Publication

Vicente Ordax, Jr.

Exhibit "A" to the Petition to Determine Need for the Bobwhite-Manatee 230 kV transmission line in Manatee and Sarasota Counties

FPL also reserves the right to introduce exhibits for cross-examination, impeachment, or for any other purposes authorized by the applicable Florida Rules of Evidence and rules or orders of this Commission.

**C. STATEMENT OF BASIC POSITION**

FPL's proposal to build a new 230kV transmission line extending from FPL's existing Manatee Substation in Manatee County to FPL's planned Bobwhite Substation (scheduled to be in service by December of 2011) in Sarasota County (the "Project") should be approved.

The Project is clearly the most cost-effective alternative available, taking into account the demand for electricity, the need for electric system reliability and integrity, and the need for abundant, low-cost electrical energy to assure the economic well-being of the citizens of this state. Further, the Project meets area load requirements by serving proposed future distribution substations east of I-75 and east of the existing 230kV transmission network from the northern portion of Manatee County to the northern portion of Sarasota County while maximizing system reliability and minimizing cost to customers.

Over the past five years (2001-2005), the load in FPL's West Region, an area that includes Manatee, Sarasota, DeSoto, Charlotte, Glades, Lee, Hendry and Collier Counties and the specific

Project Service Area,<sup>1</sup> has grown by a Compound Annual Average Growth Rate (“CAAGR”) of 3.8%. FPL is forecasting the West Region to continue to grow at CAAGR of 3.4% over the next five years (2007-2011). Transmission assessment studies conducted by FPL during 2006 have identified regional transmission system limitations in Manatee and Sarasota Counties. These studies show that by 2011, the existing 230kV transmission network which closely parallels the coast between Manatee and Ringling Substations will not have sufficient capacity to provide reliable service to existing and proposed substations.

A study of transmission alternatives has resulted in FPL’s selection of the Project as the most cost-effective and efficient means to: (a) provide additional reinforcement to the existing 230kV transmission network between Manatee and Ringling Substations in a reliable manner consistent with NERC, FRCC and other applicable transmission system standards; (b) serve the increasing load and customer base in the area south of the existing Manatee Substation and north of the planned Bobwhite Substation to the east of the existing 230kV transmission network; and (c) provide another electrical feed from the Manatee Plant in Manatee County to the Ringling area in Sarasota County via a separate right-of-way (“ROW”), thereby reducing the impact of a less of the existing transmission facilities on a Common ROW. The cost and reliability benefits of the Project would be enhanced by the construction of the Project in a geographically separate ROW. For these reasons, FPL’s Petition to Determine the Need for the Bobwhite-Manatee 230kV Project should be approved.

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<sup>1</sup>The Project Service Area includes the area south of the existing Manatee Substation, north of the planned Bobwhite Substation and to the east of the existing 230kV transmission network.

## D. ISSUES

**Issue 1:** Is there a need for Florida Power & Light Company's proposed Bobwhite-Manatee 230kV electrical transmission line project, given the need for electric system reliability and integrity, as prescribed in Section 403.537, Florida Statutes?

**FPL's Position:** Yes. FPL's Petition and testimony demonstrate the need for a 230kV line by December 2011 to: (a) provide additional reinforcement to the existing 230kV transmission network between Manatee and Ringling Substations in a reliable manner consistent with NERC, FRCC and other applicable transmission system standards; (b) serve the increasing load and customer base in the area south of the existing Manatee Substation and north of the planned Bobwhite Substation to the east of the existing 230kV transmission network; and (c) provide another electrical feed from the Manatee Plant in Manatee County to the Ringling area in Sarasota County via a separate ROW, thereby reducing the impact of a less of the existing transmission facilities on a Common ROW.

**Issue 2:** Is there a need for Florida Power & Light Company's proposed Bobwhite-Manatee 230kV electrical transmission line project, given the need for abundant, low cost electrical energy to assure the economic well-being of the citizens of the State, as prescribed in Section 403.537, Florida Statutes?

**FPL's Position:** Yes. See FPL's Position on Issue 1. (Ordax).

**Issue 3:** Are Florida Power & Light Company's existing Manatee Substation in Manatee County and its planned Bobwhite Substation in Sarasota County the appropriate starting and ending points of the proposed Bobwhite-Manatee 230kV electrical transmission line project, as prescribed in Section 403.537, Florida Statutes?

**FPL's Position:** Yes. The load flow maps contained in Appendices A and B to Exhibit "A" to the Petition demonstrate that the appropriate starting and ending points are the Manatee Substation and the planned Bobwhite Substation, respectively. (Ordax).

**Issue 4:** Should the Commission grant Florida Power & Light Company's Petition for determination of need for the proposed Bobwhite Manatee 230kV electrical transmission line project?

**FPL's Position:** Yes. The Commission should grant FPL's Petition and determine that the cost and reliability benefits of the Project would be enhanced by construction of the line in a geographically separate right-of-way.

**E. STIPULATED ISSUES**

None at this time.

**F. ALL PENDING MOTIONS OR OTHER MATTERS FPL SEEKS ACTION UPON**

None.

**G. PENDING REQUESTS FOR CLAIMS FOR CONFIDENTIALITY**

On June 26, 2006, pursuant to Rule 25-22.006(4), Florida Administrative Code, FPL filed a request for Confidential Classification of information and materials provided in Exhibit "A" to FPL's Petition (portions of the text of Exhibit "A"; Attachments 1, 4 and 9 to Exhibit "A"; and Appendices A and B of Exhibit "A") and the prefiled direct testimony of Vicente Ordax, Jr. FPL intends to introduce such claimed confidential information and documents, as set forth in FPL's Request for Confidential Classification, into the record at the final hearing. FPL has provided unredacted copies of the claimed confidential information to the Commissioners and Staff under confidential cover.

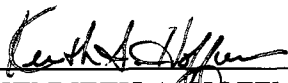
**H. ANY REQUIREMENTS SET FORTH IN THIS ORDER THAT CANNOT BE COMPLIED WITH, AND THE REASONS THEREFOR**

There are no requirements set forth in Order No. PSC-06-0521-PCO-EI (Order Establishing Procedure) with which FPL cannot comply.

**I. OBJECTIONS TO A WITNESS' QUALIFICATIONS AS AN EXPERT**

None.

Respectfully submitted,

  
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Attorneys for Florida Power & Light Company

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by Hand Delivery to the following this 20<sup>th</sup> day of July , 2006:

Martha Carter-Brown, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 370  
Tallahassee, Florida 32399-0850

  
\_\_\_\_\_  
KENNETH A. HOFFMAN, ESQ.