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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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IN RE: Petition for determination of need for electrical power plant in Taylor County by Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and the City of Tallahassee.

DOCKET NO. 060635-EU
FILED: November 17, 2006
COMMISSION CLERK

REVISED NRDC PRELIMINARY STATEMENT OF ISSUES AND POSITIONS

Pursuant to Order No. PSC-06-0819-PCO-EU, issued on October 4, 2006, establishing the prehearing procedure in this docket, the National Resources Defense Council (NRDC) hereby files its Preliminary List of Issues and Positions.

ISSUE 1: Is there a need for the proposed Taylor Energy Center (TEC) generating unit, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No.

ISSUE 2: Is there a need for the proposed TEC generating unit, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No.

ISSUE 3: Is there a need for the proposed TEC generating unit, taking into account the need for fuel diversity and supply reliability, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: The NRDC recognizes the need for fuel diversity in the state's current generation mix. However, fuel diversity would be better served by an IGCC unit when all environmental impacts of a pulverized coal plant are taken into account.

CMP _____
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SEC 1

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ISSUE 4: Are there any conservation measures taken by or reasonably available to the Florida Municipal Power Agency, JEA, Reedy Creek Improvement District, and City of Tallahassee (Participants) which might mitigate the need for the proposed TEC generating unit?

POSITION: Yes, due to the fact that the total benefits of DSM opportunities and total cost of the proposed TEC generating unit have not been adequately evaluated in the economic analyses conducted by the Participants.

ISSUE 5: Is the proposed TEC generating unit the most cost effective alternative available as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No.

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ISSUE 5a. Have the Participants adequately and appropriately accounted for the cost of complying with an appropriate range of CO₂ regulatory compliance costs in their economic analyses?

POSITION: No.

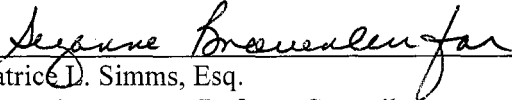
ISSUE 6: Based on the resolution of the foregoing issues, should the Commission grant the Participants' petition to determine the need for the proposed TEC generating unit?

POSITION: No.

ISSUE 7: Should this docket be closed?

POSITION: This docket should be closed when the Commission has issued its final order and all motions for reconsideration have been disposed of.

Respectfully submitted this 17th day of November, 2006 by:


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided by Hand Delivery and U.S. Mail, this 17th day of November, 2006 to the following:

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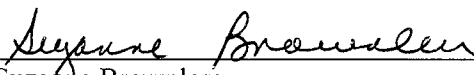
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