

Matilda Sanders

From: Armstrong, Brian [barmstrong@ngn-tally.com]
Sent: Monday, November 20, 2006 12:04 PM
To: Filings@psc.state.fl.us
Cc: Jennifer Brubaker; Katherine Fleming
Subject: Docket No. 060635-EU
Attachments: coal prelim issues.doc

ORIGINAL

Dear Sir or Madam:

This is sent on behalf of Brian Armstrong:

1. Brian Armstrong, 7025 Lake Basin Road, Tallahassee, Florida 32312, (850) 322-4097, is the person responsible for this electronic filing.
2. The filing is to be made in Docket 060635-EU.
3. The filing is to be made on behalf of Rebecca J. Armstrong and Anthony Viegbesie.
4. The total number of pages is 6.
5. The attached document is the Revised Statement of Preliminary Issues and Positions.

Brian P. Armstrong

**Nabors
Giblin &
Nickerson**
ATTORNEYS AT LAW

1500 Mahan Drive, Suite 200
Tallahassee, Florida 32308
(850) 224-4070 Tel.
(850) 224-4073 Fax

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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 20, 2006

REVISED 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, Rebecca J. Armstrong and Anthony Viegbesie ("Intervenors"), hereby file their Revised 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 1a: Is there a need for the proposed Taylor Energy Center (TEC) generating unit, taking into account the need for electric system reliability and integrity with regard to JEA, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No.

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

POSITION: No.

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

POSITION: No.

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

POSITION: No.

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

POSITION: No.

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

POSITION: No.

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

POSITION: No.

ISSUE 2d: Is there a need for the proposed TEC generating unit, taking into account the need for adequate electricity at a reasonable cost for RCID, 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 in principle the value of 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 and conservation and energy efficiency programs should be considered in the "diversification" mix.

ISSUE 3a: Does the TEC generating unit provide for fuel diversity and supply reliability on JEA's system, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No.

ISSUE 3b: Does the TEC generating unit provide for fuel diversity and supply reliability on FMFA's System, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No position at this time.

ISSUE 3c: Does the TEC generating unit provide for fuel diversity and supply reliability on City of Tallahassee's system, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No position at this time.

ISSUE 3d: Does the TEC generating unit provide for fuel diversity and supply reliability on RCID's system, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No position at this time.

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 4a: Are there any conservation measures taken by or reasonably available to FMPA and the recipients of FMPA's wholesale power which might mitigate the need for the proposed TEC generating unit?

POSITION: Yes.

ISSUE 4b: Are there any conservation measures taken by or reasonably available to JEA which might mitigate the need for the proposed TEC generating unit?

POSITION: Yes.

ISSUE 4c: Are there any conservation measures taken by or reasonably available to the City of Tallahassee which might mitigate the need for the proposed TEC generating unit?

POSITION: Yes.

ISSUE 4d: Are there any conservation measures taken by or reasonably available to RCID which might mitigate the need for the proposed TEC generating unit?

POSITION: Yes.

ISSUE 5: Does the proposed TEC generating unit include the costs for the environmental controls necessary to meet current and reasonably anticipated state and federal environmental requirements?

POSITION: No.

ISSUE 5a: Have the Applicants appropriately evaluated the cost of CO₂ emission mitigation costs in their economic analyses?

POSITION: No.

ISSUE 5b: Have the Applicants appropriately evaluated the cost of compliance with mercury, NO₂, SO₂ and particulate emission standards?

POSITION: No position at this time.

ISSUE 5c: Have the Applicants appropriately evaluated compliance costs associated with the Clean Air Interstate Rule (CAIR) and Clean Air Mercury Rule standards?

POSITION: No position at this time.

ISSUE 5d: Have the Applicants appropriately evaluated the economic costs of the potential detrimental effects on public health and the environment?

POSITION: No.

ISSUE 6: 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.

ISSUE 6a: Is the proposed TEC generating unit the most cost effective alternative available for FMPPA?

POSITION: No.

ISSUE 6b: Is the proposed TEC generating unit the most cost effective alternative available for JEA?

POSITION: No.

ISSUE 6c: Is the proposed TEC generating unit the most cost effective alternative for Tallahassee?

POSITION: No.

ISSUE 6d: Is the proposed TEC generating unit the most cost effective alternative for RCID?

POSITION: No.

ISSUE 6e: Are the projected purchase prices and transportation costs for natural gas and coal used in the IRP reasonable?

POSITION: No position at this time.

ISSUE 6f: Are TEC's proposed construction costs reasonable in light of current increased costs of building coal plants?

POSITION: No.

ISSUE 6c: Have the Applicants requested available funding from DOE to construct an IGCC unit or other cleaner coal technology?

POSITION: No.

NEW ISSUE: Has each Applicant secured final approval of its respective governing body for the construction of the proposed TEC generating unit?

POSITION: No.

ISSUE 7: 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 8: 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 20th day of November, 2006 by:

s/ Brian P. Armstrong
Brian P. Armstrong, Esq.
7025 Lake Basin Road
Tallahassee, Florida 32312
(850) 322-4097

Attorney for Intervenors Armstrong and Viegbesie

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been furnished via e-mail on this 20th day of November, 2006, to the following:

Gary V. Perko
Carolyn S. Raepple
Hopping Law Firm
P.O. Box 6526
Tallahassee, FL 32314

Harold A. McLean
Office of the Public Counsel
111 West Madison Street, Room 812
Tallahassee, Florida 32399

E. Leon Jacobs, Jr.
Williams Law Firm
P.O. Box 1101
Tallahassee, FL 32302-1101

Jennifer Brubaker, Esq.
Katherine Fleming, Esq.
Legal Division
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Patrice L. Simms
National Resources Defense Council
1200 New York Ave., NW, Suite 400
Washington, DC 20005

Brett Paben
Wildlaw
1415 Devil's Dip
Tallahassee, Florida 32308

Respectfully submitted,

s/ Brian P. Armstrong
7025 Lake Basin Road
Tallahassee, Florida 32312
(850) 322-4097