

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: December 12, 2006

NRDC'S SECOND SET OF INTERROGATORIES TO FLORIDA MUNICIPAL POWER AGENCY, JEA, REEDY CREEK IMPROVEMENT DISTRICT AND CITY OF TALLAHASSEE (NOS. 1-8)

The National Resources Defense Council (NRDC), pursuant to Rule 28-106.206, Florida Administrative Code (FAC), and Rule 1.340, Florida Rules of Civil Procedure, propounds the following interrogatories on the Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and City of Tallahassee. These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, and within the time period set out in Order No. PSC-06-0819-PCO-EU. Each I interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it. Give the name, address and relationship to the Applicants of those persons providing the answers to each of the following interrogatories.

DEFINITIONS

Unless otherwise specified in each individual interrogatory, "you", "your" or "Participants" refers collectively to FMPA, JEA, RCID and Tallahassee, their employees and authorized agents.

"Document" refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

"Identify" means:

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1
- OTH _____

- (a) With respect to a person, to state the person's name, address and business relationship (e.g., "employee") to the Participants;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

DOCUMENT NUMBER-DATE

11367 DEC 12 06

FPSC-COMMISSION CLERK

3. For each DSM measure available to or evaluated by a project applicant, including any measures that pass the Total Resource Test, please provide the levelized cost per saved unit of energy (cents per kwh saved) over the life of the measure.

4. For each DSM measure available to or evaluated by a project applicant, including any measures that pass the Total Resource Test, please indicate the number of MWhs that can be saved at a cost (in cents per kwh saved) that is equal to or less than the cost per kwh of electricity generated by the TEC.

5. Please provide a low fuel price sensitivity study assuming implementation of all DSM measures that pass the Total Resource Test.

6. Please provide a low load growth sensitivity study assuming implementation of all DSM measures that pass the Total Resource Test

7. Please provide a low fuel price sensitivity study similar to Ex. (MP-4) which also includes CO2 emissions allowances as projected by EIA and Synapse as referenced in questions 20 and 21 of NRDC's first set of interrogatories.

8. Please provide a low load growth sensitivity study which also includes CO2 emissions allowances as projected by EIA and Synapse as referenced in questions 20 and 21 of NRDC's first set of interrogatories.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been provided by electronic mail as listed and U.S. Mail, this 12th day of December, 2006 to the following:

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