

**Marguerite McLean**

090451-EM

**From:** Rhonda Dulgar [rdulgar@yvlaw.net]  
**Sent:** Friday, April 09, 2010 2:27 PM  
**To:** paulastahmer@aol.com; diandv@bellsouth.net; Raymond "Skip" Manasco; Erik Saylor; Filings@psc.state.fl.us; Martha Brown; Theresa Walsh; Schef Wright  
**Subject:** Electronic Filing - Docket 090451-EM  
**Attachments:** 090451.Req4Clarification.4-9-10.pdf

a. Person responsible for this electronic filing:

Robert Scheffel Wright  
 Young van Assenderp, P.A.  
 225 South Adams Street, Suite 200  
 Tallahassee, FL 32301  
 (850) 222-7206  
 swright@yvlaw.net

b. 090451-EM

In Re: Joint Petition to Determine Need for Gainesville Renewable Energy Center in Alachua County, by Gainesville Regional Utilities and Gainesville Renewable Energy Center, LLC.

c. Document being filed on behalf of Gainesville Regional Utilities and Gainesville Renewable Energy Center, LLC.

d. There are a total of 4 pages.

e. The document attached for electronic filing is Gainesville Regional Utilities and Gainesville Renewable Energy Center LLC's Requests for Clarification of Intervenor Dian Deevey's Interrogatories and Requests for Production of Documents.

(see attached file: 090451.Req4Clarification.4-9-10.pdf )

Thank you for your attention and assistance in this matter.

Rhonda Dulgar  
 Secretary to Schef Wright  
 Phone: 850-222-7206  
 FAX: 850-561-6834

DOCUMENT NUMBER-DATE  
 02687 APR-9 09  
 FPSC-COMMISSION CLERK

4/9/2010

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition to Determine )  
Need For the Gainesville Renewable )  
Energy Center in Alachua County ) DOCKET NO. 090451-EM  
By Gainesville Regional Utilities )  
And Gainesville Renewable Energy ) FILED: April 9, 2010  
Center, LLC. )  
\_\_\_\_\_)

GAINESVILLE REGIONAL UTILITIES' AND  
GAINESVILLE RENEWABLE ENERGY CENTER, LLC'S  
REQUESTS FOR CLARIFICATION OF INTERVENOR DIAN DEEVEY'S  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Gainesville Regional Utilities ("GRU") and Gainesville Renewable Energy Center, LLC ("GREC LLC"), collectively referred to as "Petitioners," pursuant to the First Revised Order Establishing Procedure in this docket, Order No. PSC-10-0135-PCO-EM, hereby pose the following requests for clarification of the following interrogatories and document production requests propounded by Intervenor Dian R. Deevey on April 5, 2010.

Interrogatories

15(a). Interrogatory No. 15(a) asks the following:

- (a) How do you define the term "firm need" as used in your application in this proceeding?

The Petitioners have searched for the term "firm need" in their application for the Commission's determination of need for the GREC Project and are unable to find this term anywhere in the document. Accordingly, the Petitioners seek clarification, or restatement, of this interrogatory.

15(d). Interrogatory number 15(d) asks the following:

- (d) If the net energy for load and the seasonal demands of Alachua and Seminole do not represent firm demand after 2012, please explain why their forecast needs after

2012 are included in Tables 4.1, 4.2, 5.1 and 5.2 and are included in the chart showing firm need plus 15% reserve on page 20 of Exhibit 29 (referred to by Commissioner Skop during the hearing on December 16, 2009 in 12177 12-16 Transcript 1-88).

This interrogatory apparently attempts to cite to the hearing transcript from the December 16, 2009 hearing, but the Petitioners are unable to find the subject citation. Please clarify the citation to which this interrogatory is intended to refer.

18(c). Interrogatory No. 18(c) asks the following:

- c) Did GRU determine that none of its claimed offsets violate the "additionality" requirement of all protocols listed above, and that none involve double counting of the effects of selected carbon emission-reduction programs on overall emissions?

The Petitioners are not aware of the use of the term "additionality" in the protocols referred to in Interrogatory No. 18. Please clarify what is meant by the term "additionality" and please cite to its use in any of the protocols identified in the subject Interrogatory No. 18.

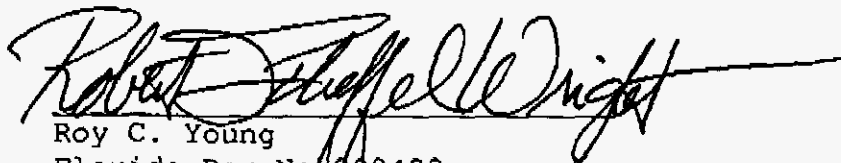
#### Document Production Requests

14. Document Request No. 14 asks for the following:

14. Please provide a table listing the projected savings in kWh and demand for the interval 2012 through 2043, in units of MWh and MW, and also as a percent of the corresponding total net energy for load and firm demand in the year in question, using the load and demand estimates provided in the Need Application. Provide a second version of this table using only the retail load and demand.

The Petitioners are unable to discern from this production request what savings are referred to, and accordingly ask for clarification of this production request.

Respectfully submitted this 9th day of April 2010.

A handwritten signature in black ink, reading "Robert Scheffel Wright". The signature is written in a cursive style and is positioned above the typed name and contact information.

Roy C. Young  
Florida Bar No. 098428  
Robert Scheffel Wright  
Florida Bar No. 966721  
John T. LaVia, III  
Florida Bar No. 853666  
Young van Assenderp, P.A.  
225 South Adams Street, Suite 200  
Tallahassee, Florida 32301  
Phone: 850/222-7206  
FAX: 850/561-6834

Attorneys for GREC LLC and GRU

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice was served upon the following by  
electronic delivery and U.S. Mail on this 9th day of April, 2010

Erik L. Saylor/Martha Carter Brown  
Senior Attorney, Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Paula H. Stahmer  
4621 Clear Lake Drive  
Gainesville, Florida 32607  
paulastahmer@aol.com

Dian R. Deevey  
1702 SW 35th Place  
Gainesville, Florida 32608  
diandv@bellsouth.net

Raymond O. Manasco, Jr.  
Utilities Legal Services  
Gainesville Regional Utilities  
P.O. Box 147117, Sta. A-138  
Gainesville, Florida 32614

  
Attorney