

In re: Petition by City of Lakeland for determination of need for McIntosh Unit 5 and proposed conversion from simple to combined cycle.

DOCKET NO. 990023-EM
MARCH 10, 1999

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-99-0102-PCO-EM, issued January 21, 1999, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff has no witnesses at this time.

b. All Known Exhibits

Staff has no exhibits at this time.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

ISSUE 1: Has the City of Lakeland demonstrated a need for the proposed power plant, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: Lakeland does not appear to need the proposed conversion of McIntosh Unit 5 to combined cycle for its own reliability purposes, but appears to need the proposed conversion to satisfy its contract with the Florida Municipal Power Agency. Lakeland may need the plant for cost-effectiveness purposes. Adding the plant will help resolve Peninsular Florida's questionable planned reserve margin.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAC _____
- LEG _____
- LI: 3 _____
- ONG _____
- POH _____
- SES 1 _____
- WAS _____
- OTH _____

ISSUE 2: Has the City of Lakeland demonstrated a need for the proposed power plant, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: Lakeland may need the proposed conversion of McIntosh Unit 5 to combined cycle for cost-effectiveness purposes.

ISSUE 3: Has the City of Lakeland demonstrated that the proposed power plant is the most cost-effective alternative available, 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 City of Lakeland which might mitigate the need for the proposed power plant?

POSITION: No.

ISSUE 5: Should the Commission grant the City of Lakeland's petition to determine need for the proposed conversion of McIntosh Unit 5 to combined cycle?

POSITION: No position at this time.

ISSUE 6: Should this docket be closed?

POSITION: No position at this time.

e. Pending Motions

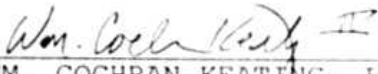
Staff is not aware of any pending motions.

f. Compliance with Order No. PSC-99-0102-PCO-EM

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

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Respectfully submitted this 10th day of March, 1999.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION


In re: Petition by City of
Lakeland for determination of
need for McIntosh Unit 5 and
proposed conversion from simple
to combined cycle.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of Staff's
Prehearing Statement has been furnished by U.S. Mail this 10th day
of March, 1999, to the following:

Young Van Assenderp
Mr. Roy Young, Esquire
P.O. Box 1833
Tallahassee, Florida 32302


WM. COCHRAN KEATING, IV
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Florida Bar No. 0064017

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