

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Gulf Power Company ) Docket No. 990325-EI
to determine need for proposed ) Filed: May 7, 1999
electrical power plant in Bay County )
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LEAF PRE-HEARING STATEMENT

Issue 1: Has Gulf Power Company demonstrated a need for the proposed Smith Unit 3, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, Florida Statutes?

Position: No position.

Issue 2: Has Gulf Power Company demonstrated a need for the proposed Smith Unit 3, 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 position.

Issue 3: Did Gulf Power Company's Request for Proposals, and the subsequent analysis of responses, result in Gulf selecting the most cost-effective alternative available?

Position: No position.

Issue 4: Did Gulf Power Company adequately evaluate and include the cost of gas transmission system interconnection for each of the self-build options and respondents to Gulf's Request for Proposals?

Position: No position.

Issue 5: Did Gulf Power company adequately evaluate and include the cost of electric system transmission system interconnection for each of the self-build options and respondents to Gulf's Request for Proposals?

Position: No position.

Issue 6: Has Gulf Power Company demonstrated that the proposed Smith Unit 3 is the most cost-effective alternative available, as this criterion is used in Section 403.519, Florida Statutes?

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FPSC-RECORDS/REPORTING

Position: No.

Issue 7: Are there any conservation measures taken by or reasonably available to Gulf Power Company which might mitigate the need for the proposed Smith Unit 3?

Position: Yes.

Issue 8: Should the Commission grant Gulf Power Company's petition to determine the need for the proposed Smith Unit 3?

Position: No.

Issue 9: Should this docket be closed?

Position: Yes.

Respectfully submitted,



Gail Kamaras  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Legal Environmental Assistance Foundation, Inc. (LEAF) Pre-Hearing Statement have been furnished by hand delivery (\*) or by U.S. Mail to the following parties of record on May 7, 1999.

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