

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Docket No. 981890-EU

RECORDS AND REPORTING

In re: Generic investigation into the aggregate electric utility reserve margin planned for Peninsular Florida

ORIGINAL

LEAF'S PREHEARING STATEMENT

Intervenor, Legal Environmental Assistance Foundation, Inc., ("LEAF") files this

Prehearing Statement and states:

- a. WITNESSES: LEAF intends to call Ms. Marcia Elder who will testify regarding distributed resources.
- b. EXHIBITS: LEAF intends to offer Exhibits A - E that are attached to Ms. Elder's prefiled testimony.
- c. BASIC POSITION: Credible sources indicate that distributed resources, particularly Efficiency and Solar, can meet energy service reliability needs at least cost and provide significant additional benefits. The Commission should become better informed about how such resources can be cost-effectively incorporated into its policies and strategies to for ensuring reliability of Florida's energy services.
- d. POSITION ON ISSUES: LEAF takes the following positions on the issues listed in Order No. PSC-99-1274-PCO-EU:

AFA _____
 APP _____
 CAF _____
 CMU _____
 CTR _____
 EAG 2
 LEG 1
 MAS 5
 OPC _____
 PAI 2
 SEC 1
 WAW _____
 OTH _____

ISSUE NUMBERS 1, 9, 10, 11, and 13, : No position at this time

ISSUE NUMBERS 2, 3, 4, 5, 6, 7, 8, 12, 14, 15, 16, 17, 18, and 19 : Credible sources

indicate that distributed resources, particularly Efficiency and Solar, can meet energy service

reliability needs at least cost and provide significant additional benefits. The Commission should

become better informed about how such resources can be cost-effectively incorporated into its

policies and strategies to for ensuring reliability of Florida's energy services.

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FPSC-RECORDS/REPORTING

e. STIPULATIONS: Other than to note that prefiled testimony indicates that Tampa Electric Company and LEAF agree it would be worthwhile to explore potential benefits of distributed resources to help meet Florida's energy service needs, LEAF knows of no stipulations.

f. PENDING MOTIONS: LEAF seeks action on its pending Motions for an Order To Compel Discovery Responses by Florida Power and Light Company.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and fifteen true copies of LEAF's Prehearing Statement was hand delivered to the Florida Public Service Commission, Division of Records and Reporting, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0950, and that a true copies was sent by U.S. mail this 5th day of October to:

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