

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for Determination of Need of Hines Unit 2 Power Plant.)
_____)

DOCKET NO. 001064-EI

Submitted for Filing: October 25, 2000

RECORDS AND REPORTING

FPC'S RESPONSE IN OPPOSITION TO PANDA'S MOTION FOR CONTINUANCE

Florida Power Corporation ("FPC"), by and through undersigned counsel, hereby files its response in opposition to Panda Energy International, Inc.'s ("Panda") motion to continue the final hearing scheduled for October 26-27, 2000 on FPC's Petition for Determination of Need of Hines Unit 2 Power Plant.

INTRODUCTION

FPC filed its need petition -- including pre-filed testimony and exhibits -- on August 7, 2000. Despite having participated in FPC's RFP process early this year and having known of this proceeding for months, Panda waited until the day of the Prehearing Conference to make its first appearance in the case, and then waited another day to file its petition to intervene. Predictably, it now requests that the final hearing be continued.

Panda's request should be denied on several grounds. To begin with, the requested one-month continuance would violate Rule 25-22.080, which requires that the hearing be conducted within 90 days of the filing of the need petition. Although Panda argues that the Commission may unilaterally waive the requirements of Rule 25-22.080, it cites no supporting authority for

the novel proposition that an agency is free to ignore its procedural rules. To the contrary, the Commission has previously ruled that the requirements of the Rule can be waived only through the variance procedure set forth in Section 120.542 and Rule 28-104.002, which Panda cannot satisfy, and, indeed, does not even address.

- APP _____
- CAF _____
- CMP 1
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- ECR 3
- LEG 2
- OPC _____
- PAI 1
- RGO _____
- SEC 1
- SER 1
- OTH _____

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FPSC-RECORDS/REPORTING

Similarly, another Commission Rule precludes the grant of Panda's requested continuance. In the absence of an emergency, Rule 28-106.210 requires a Motion for Continuance to be filed at least five (5) days prior to hearing and then indicates that the continuance can only be granted for "good cause shown." Panda's motion comes too late and in any event cannot survive scrutiny under the "good cause" standard.

Moreover, Panda's arguments concerning the status of FPC's Supplemental Site Application are baseless and contrary to law. This Commission continues to be constrained by the 150 day reporting requirement established in Section 403.507, Fla. Stat. until such time as it is tolled under Florida Statute section 403.507. Such tolling can only occur when and if an applicant fails to make its application sufficient within 40 days after the department filed its statement of insufficiency. As Panda admits, FPC has until November 6, 2000 to meet this obligation – as it most assuredly will – and no tolling of the PSC's 150-day reporting requirement will begin or even can begin until then.

Finally, an intervenor, Panda takes the case as it finds it. See Rule 25-22.039, F.A.C. Regardless of its reason for waiting, Panda is not entitled to intervene at the eleventh hour and then, through an untimely Motion for Continuance, demand that the proceeding come to a halt while it attempts to prepare a case. Any alleged prejudice or hardship to Panda that results from adhering to the schedule required by the Rule is a direct consequence of Panda's own delay in moving to intervene and its apparently deliberate decision to wait until the last possible moment to make an appearance.

ARGUMENT

Rule 25-22.080 (2) provides in pertinent part that:

Within 7 days following receipt of a petition [for a determination of need], or in its order commencing a proceeding on its own

motion, the Commission shall set a date for hearing, which shall be within 90 days of receipt of the petition or of issuance of its order.

(Emphasis supplied).

FPC's need petition was filed on August 7, 2000, making the 90-day hearing deadline November 5, 2000. The final hearing is currently scheduled for October 26 and 27, in compliance with the Rule's requirements.

This schedule is no accident. FPC approached Commission Staff about its intent to file a need case shortly after filing its supplemental site certification application in late July 2000. To ensure that the certification schedule set by the Florida Electrical Power Plant Siting Act would be met, FPC inquired about hearing dates in early October 2000 for the need proceeding. Dates were unavailable at that time and FPC was advised that the Commission would be hard-pressed to meet the deadlines set by Rule 25-22.080 if the need petition was filed as planned.

To accommodate the Commission's calendar, FPC agreed to delay the filing of its need petition after ensuring that Staff and the Commission could still meet the time limits set forth in the Siting Act and Rule 25-22.080. The need petition was filed at the latest date possible that would meet Staff's scheduling concerns and FPC's project schedule. Throughout the process, FPC has taken every possible step to ensure that its case would be fully prepared and the Staff and Commission fully informed by the time of the hearing. In this connection, FPC filed all of its direct testimony and exhibits on August 7, 2000 – the very same day it filed its need petition – in order to afford the Staff and the Commission the fullest opportunity to review FPC's case within the time constraints of Rule 25-22.080.¹

¹ At Staff's request, FPC also went to the expense and trouble of serving 15 additional copies of its petition, testimony, and exhibits directly to Staff so that Staff would not have to wait even a moment for materials to reach them through the Commission's docketing procedures.

Against this background, FPC is now faced with Panda's request for a continuance of the final hearing in FPC's case just two days before it is to commence. Panda's request is fundamentally flawed, both procedurally and substantively, and should be denied.

A. The Commission May Not Waive the Requirements of Rule 25-22.080 Without Following the Procedures and Applying the Criteria Set Forth in Section 120.542 and Rule 28-104.002.

Panda acknowledges that its requested continuance would violate the requirement set forth in Rule 25-22.080 that the final hearing be held within 90 days of the filing of the need petition. It argues, however, that "the Commission is free to treat Rule 25-22.080 ... as a procedural rule which can be waived or modified for good cause and has done so in the past." Motion for Continuance, at 6, ¶ 12. Panda's motion specifically alleges that "[t]here is no statutory or administrative rule which bars the Commission from granting the continuance requested." This is an incorrect statement of the law.

Contrary to Panda's assertion, a waiver or variance of an agency rule may be granted only through the procedure set forth in Section 120.542, which provides in pertinent part that:

Variations and waivers shall be granted when the person subject to the rule demonstrates that the purpose of the underlying statute will be or has been achieved by other means by the person and when application of a rule would create a substantial hardship or would violate principles of fairness. For purposes of this section, "substantial hardship" means a demonstrated economic, technological, legal, or other type of hardship to the person requesting the variance or waiver. For purposes of this section, "principles of fairness" are violated when the literal application of a rule affects a particular person in a manner significantly different from the way it affects other similarly situated persons who are subject to the rule.

A request under the statute must be initiated by a petition stating, among other things, specific facts that would justify a waiver or variance and reasons why the variance or waiver would serve the purposes of the underlying statute. § 120.542 (5), Fla. Stat. See also Rule 28-104.002, FAC

(implementing Section 120.542 and setting forth specific requirements for filing a petition for variance or waiver). Importantly, the statute draws no distinction between variances or waivers of procedural requirements as opposed to substantive requirements and with its enactment neither can this Commission.

In fact, this Commission has previously held that "agencies are required to consider requests for variances or waivers from their rules according to the requirements set forth in Section 120.542, Florida Statute." In re GTE Florida Inc., Docket No. 902019, at 2 (emphasis supplied). See also In re United Water Florida, Inc., Docket No. 971596-WS (refusing to grant a variance or waiver where the requirements of Section 120.542 were not satisfied). Since Panda's Motion for Continuance requests a de facto variance or waiver of the requirements of Rule 25-22.080 without addressing the requirements of Section 120.542, the motion is legally insufficient and must be denied on that basis alone.

Even if Panda's Motion for Continuance were measured by the criteria set forth in Section 120.542, its request to waive the time limits set by Rule 25-22.080 would be summarily rejected. The request obviously does not serve the purpose of the underlying statute, since the objective of Section 403.507 is to facilitate the efficient and expedited review of power plant certification applications under the Siting Act. Indeed, one of the express legislative aims in adopting the Siting Act was to promote "the efficiency of the permit application and review process..." § 403.502, Fla. Stat. To that end, the Florida Department of Environmental Protection ("FDEP") is statutorily obligated to "administer the processing of applications for electric power plant site certifications and to ensure that the applications are processed as expeditiously as possible." § 403.504 (5), Fla. Stat. (emphasis supplied). Panda's request to delay the need proceeding affirmatively frustrates this statutory objective.

Likewise, Panda cannot credibly argue that application of the time limits set by Rule 25-22.080 would create a substantial hardship or violate principles of fairness, since any alleged hardship is the result of Panda's own unreasonable delay in moving to intervene. And the "principles of fairness" criteria works decidedly against Panda. It is affirmatively unfair for Panda to have waited over two months after the need petition was filed before filing its motion to intervene, then move for a continuance two days before the scheduled hearing date.

Panda erroneously cites to In re Okeechobee Generating Company, L.L.C., Docket No. 991462-EU ("the OGC case") for the proposition that last-minute developments, without more, can justify a waiver of the time limits imposed by Rule 25-22.080. To the contrary, the Commission recognized in the OGC case that the time limits set forth in Rule 25-22.080 were adopted to ensure that the Commission's final report to the FDEP is timely filed pursuant to Section 403.507, Florida Statutes. The statutory deadlines are triggered upon FDEP's determination that the site application for power plant certification is complete, which had not occurred in the OGC case, since the applicant there initiated the need proceeding before filing a certification application.

Panda also disingenuously fails to remind the Commission that in OGC the requested continuance was made well in advance of the scheduled final hearing and handled appropriately through an emergency request for waiver of Rule 25-22.080's time requirements in accord with the requirements of Section 120.542 and Rule 28-104.202.

Here, of course, the facts are different. FPC has filed a site application, which was determined to be complete on August 1, 2000. (West Aff.; Ex A). Accordingly, unlike the OGC case, where the applicant initiated a need proceeding before filing a site certification application, the time limits set by Section 403.507 and Rule 25-22.080 are fully applicable here.

This result is unaltered by the fact that FPC received a Notice of Insufficiency with regard to its certification application on September 16, 2000. As Panda acknowledges, Section 403.5067 (1) (a) gives FPC 40 days, or through November 6, 2000, to file additional information to make the application sufficient. The statute expressly provides that "[i]f the applicant makes its application or amendment sufficient within this time period, the time schedules under this act shall not be tolled by the department's statement of insufficiency." *Id.* (emphasis supplied). There is thus no merit to Panda's argument that the 150-day reporting requirement of Section 43.507 (2) (a) is not applicable while the Notice of Insufficiency is outstanding.

Incidentally, FPC fully expects to meet the 40-day deadline for supplying supplemental information to FDEP. FPC is working very closely with FDEP staff to make certain that the materials it provides on or before November 6, 2000 will satisfy FDEP's concerns. As described in the Affidavit of Patricia West, FPC's current Manager of Environmental Programs, it is not unusual for a utility to receive an initial Notice of Insufficiency from FDEP seeking supplemental information. In fact it is her understanding that this does not trigger any delay in the Site Certification process, but is actually anticipated and built into the time-frame designed by FDEP and the administrative law judge assigned to the proceeding towards a March 6, 2001 final hearing date. (West Aff.; Exhibit A). Regardless, no tolling of the PSC's 150-day reporting requirement can possibly occur until after November 6, 2000. And, when FPC's application is then found to be sufficient – as FPC fully expects – the PSC will be incapable of turning back the clock to comply with Rule 25-22.080's time requirements.

At bottom, since Panda's Motion for Continuance requests the Commission to disregard the time limits set forth in Rule 25-22.080, and since Panda has failed to follow the statutory

requirements for a variance or waiver set out in Section 120.542, its Motion for Continuance is legally insufficient and should be denied.

B. Panda's Motion for Continuance Should Be Denied As Untimely and Panda, an Intervenor, Must "Take the Case as it Finds it."

Rule 28-106.210 provides that:

The presiding officer may grant a continuance of a hearing for good cause shown. Except in cases of emergency, requests for continuance must be made at least five days prior to the date noticed for the hearing.

(Emphasis supplied).

Panda's Motion for Continuance, filed just two days before the scheduled hearing date, does not comply with Rule 28-106.210. Since Panda has identified no "emergency" that would justify the untimely filing, its Motion for Continuance should be denied on this basis alone.

Moreover, the Commission's own rules provide that "intervenors take the case as they find it." Rule 25-22.039, F.A.C. As Panda admits, it strategically chose not to intervene until two weeks before the final hearing date and cannot now complain that it is unprepared for trial. It must take the case as it found it -- postured for final hearing on October 26 and 27. For this reason alone, Panda's continuance request fails to meet the "good cause" standard applicable to all such requests.

Panda does complain about the status of various matters in the case – misstating some and taking others out of context or blowing them out of proportion. FPC attempts briefly to address each of the points raised. To begin, Panda's major complaint clearly is that it has not had the opportunity to develop its case. Quite plainly, however, any constraints on Panda's preparation are a foreseeable consequence of Panda's late request for intervention.

Specifically, Panda complains that a continuance is supported by it having only obtained certain confidential bid evaluation documents on October 24, 2000 and indicating it still has not obtained the “other bidders” confidential bid documents.² In this connection, Panda correctly reports that FPC went to great lengths to provide Panda with all of its own confidential materials and its confidential evaluation of Panda’s bid pursuant to an agreed protective order by the morning after it received a signed but unissued Order granting Panda’s Petition to Intervene by facsimile at 2:46 p.m., Monday afternoon. At that time, FPC did not believe it was at liberty to disclose the confidential materials of Panda’s competing bidder without its consent and also withheld a single document based on another third party’s confidentiality concerns. FPC worked diligently to obtain the consent of these parties and did so in a single day. As such, FPC provided all remaining confidential materials to Panda by overnight mail that Panda received the morning of October 25, 2000 – less than 48 hours after Panda’s intervention request was granted.

Notably, the prehearing officer has also gone to great lengths to afford Panda the opportunity to prepare its case even after the discovery cut-off. The Order on intervention provided Panda with discovery up to 12:00 noon on October 25, 2000 – the day before the hearing. FPC did seek protection from this discovery, but the prehearing officer denied FPC’s request. Thus, FPC has or will make available the two FPC witnesses Panda’s counsel asked to depose – John. B. Crisp (deposed by Panda Tuesday, October 24th at 3:00 p.m.) and Alan S. Taylor (scheduled to be deposed, October 25th at 4:00 p.m.). Any other constraints on Panda’s preparation time are simply a product of its strategically late intervention.

² All bid materials have been granted confidential treatment by the prehearing officer’s Order No. PSC 00-1881-CFO-EI, issued October 16, 2000. Likewise, FPC’s confidential responses to certain of Staff’s Interrogatories were granted confidential treatment on October 24, 2000, Order No. PSC 00-1980-CFO-EI. FPC still has one outstanding request for confidential treatment of certain documents produced in response to Staff’s production request.

Similarly, Panda complains that there are several outstanding motions that must be addressed by the prehearing officer or the full panel prior to hearing. This is no justification to delay the hearing. To begin, FPC's Motion for Protective Order on discovery has already been denied. Second, FPC's two Motions for Reconsideration by the full panel are the type often considered just prior to the commencement of a final hearing and were filed as near in time to the issuance of the Orders as possible. FPC's Motion to Strike was granted in part and denied in part on October 19, 2000. FPC's Motion for Reconsideration was filed only five (5) days later. Likewise, Panda's Petition to Intervene was granted on Monday, October 23, 2000 and FPC's Motion for Reconsideration by the full panel was filed and served on Panda in less than 24 hours.

The Commission panel assigned to this case will have the perfect opportunity just prior to the hearing to listen to oral argument on these motions. FPC believes that these items can be handled efficiently so as to only slightly delay the commencement of the final hearing.

Moreover, Panda's claimed entitlement to seven (7) days to respond to these reconsideration motions is not well-founded. Rule 28-106.204 provides for a seven (7) day response time only "when time allows." Here, FPC could not move for reconsideration – or even know whether it needed to do so – until after the issuance of the Orders on the Motion to Strike and Petition to Intervene. Panda's has only itself to blame for the nearness to the hearing of the Order on intervention and the motion for reconsideration. And, FPC's Motion to Strike relates to Staff's testimony; it does not relate to Panda at all. Significantly, Panda ignores that by filing its own continuance motion two days before the final hearing (in violation of the continuance Rule) it has imposed a less than 24 hour response time on FPC. Panda can hardly be heard to complain about time limitations it simultaneously has imposed on FPC.

Finally, Panda complains that certain information Staff requested during Staff's October 19, 2000 deposition of John B. Crisp (which Panda attended) has not been provided by FPC. Panda is mistaken. FPC provided the additional materials Staff requested during Mr. Crisp's deposition the very next day. (October 20, 2000 correspondence w/attachments from Gary Sasso to Deborah Hart; Exhibit B). FPC subsequently provided this material to counsel for Panda following the grant of intervention.

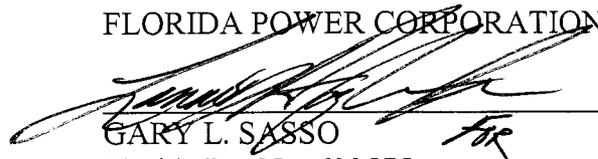
In sum, FPC would only note that none of these items amounts to good cause to continue a final hearing that has been in the making – with Panda's full knowledge – since August 7, 2000. Nor does good cause should it be found overcome the statutory and rule constraints that preclude the Commission from granting Panda's requested continuance.

Conclusion

For the foregoing reasons, Panda's Motion for Continuance should be denied.

Respectfully submitted,

FLORIDA POWER CORPORATION



GARY L. SASSO

Florida Bar No. 622575

JAMES MICHAEL WALLS

JILL H. BOWMAN

CARLTON, FIELDS, WARD, Telephone:

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ROBERT A. GLENN
Director, Regulatory Counsel Group
FLORIDA POWER CORPORATION
P.O. Box 14042
St. Petersburg, Florida 33733
(727) 820-5184
Facsimile: (727) 820-5519

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a true and correct copy of the foregoing have been furnished by facsimile transmission to Deborah Hart, as counsel to the Florida Public Service Commission, and to Suzanne Brownless, as counsel for Panda Energy International, Inc. and by U.S. Mail to all other interested parties of record as listed below on this 25th of October, 2000.



Attorney

PARTIES OF RECORD:

Deborah Hart, Esq.
Division of Legal Services
Florida Public Service Commission
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2540 Shumard Oak Boulevard
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2740 Centerview Drive
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Petition for Determination
of Need of Hines Unit 2 Power Plant.**

) DOCKET NO. 001064-EI

) Submitted for Filing: October 25, 2000

**AFFIDAVIT OF PATRICIA WEST
IN OPPOSITION TO PANDA'S MOTION FOR CONTINUANCE**

BEFORE ME, the undersigned authority duly authorized to administer oaths, personally appeared Patricia Quets West, who being first duly sworn, on oath deposes and says that:

1. My name is Patricia Quets West. I am over the age of 18 years old and I have been authorized by Florida Power Corporation (hereinafter referred to as "FPC" or the "Company"), to give this affidavit in the above-styled proceeding in support of FPC's opposition to Panda's Motion for Continuance.

2. I am currently employed by FPC as the Manager of Environmental Programs. In this connection, I have continuing responsibility for overseeing the Supplemental Site Certification process for FPC's Hines Energy Complex (Power Block 2). FPC is working closely with the Florida Department of Environmental Protection ("FDEP") to ensure that FPC's Supplemental Site Application is processed in a timely manner in accord with the requirements of law.

3. FPC filed its Supplemental Site Application in July of this year. On August 1, 2000, the FDEP issued a Notice of Completeness of Power Plant Siting Supplemental Application. A copy of this notice is attached to my affidavit as Exhibit A. It is my understanding that this Notice triggers the statutory time-frames applicable to the Public Service Commission need determination proceeding and the Florida Electrical Power Plant Siting Act certification proceeding.

4. On September 27, 2000, FPC received a Notice of Insufficiency in which the FDEP requested some additional information from FPC within 40 days. This Notice is attached hereto as Exhibit B. FPC has until November 6, 2000 to provide FDEP with the additional

information it has requested and FPC fully intends to meet this deadline. Indeed, I along with my staff at FPC have been working closely with the FDEP to insure that the responses we will provide on or before November 6, 2000 will meet with the FDEP's sufficiency concerns.

5. In my experience, it is not unusual for a utility to receive an initial Notice of Insufficiency from FDEP seeking supplemental information. In fact it is my understanding that this does not trigger any delay in the Site Certification process, but is actually anticipated and built into the time-frame designed by law. That is certainly the case for the Supplemental Site Certification process for Power Block 2. A time period for such notices and the Company's responses was built into the schedule filed by FDEP and adopted by the Administrative Law Judge for the final Site Certification Hearing.

6. In any event, FPC will most assuredly comply with the November 6, 2000 deadline for responding to FDEP's questions and fully expects the process to proceed forward to the final site certification hearing commencing on March 6, 2001 without delay.

7. This concludes my affidavit.

Further affiant sayeth not.

Dated the 25th day of October, 2000.



(Signature)

Patricia Quets West

(Printed Name)

Address:

Manager Environmental

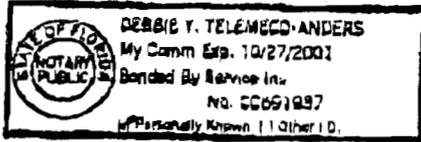
Programs

Florida Power Corporation

263 - 13th Avenue, S.

St. Petersburg, FL 33701-5511

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 25th day of October, 2000 by Patricia Quets West. She is personally known to me, or has produced her N/A driver's license, or her N/A as identification.



(AFFIX NOTARIAL SEAL)

(Commission Expiration Date)

Debbie Y. Telemeco-Anders
(Signature)
Debbie Y. Telemeco-Anders
(Printed Name)
NOTARY PUBLIC, STATE OF _____
Florida

EXHIBIT A

**FDEP Notice of Completeness of
Power Plant Siting Supplemental Application**

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

IN RE: FLORIDA POWER CORPORATION
HINES ENERGY COMPLEX
(POWER BLOCK 2)
POWER PLANT SITING SUPPLEMENTAL
APPLICATION NO. PAS2-13SA1

OGC CASE NO. 00-1490

**NOTICE OF COMPLETENESS OF POWER PLANT SITING SUPPLEMENTAL
APPLICATION**

The STATE OF FLORIDA, DEPARTMENT OF ENVIRONMENTAL PROTECTION,
pursuant to § 403.517, Florida Statutes, and §62-17.231(5), Florida Administrative Code, hereby
gives notice that the application for power plant site supplemental certification from Florida
Power Corporation for the Hines Energy Center is complete.

Respectfully submitted,


SCOTT A. GOORLAND
Florida Bar I.D. No. 0066834
Senior Assistant General Counsel

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
Douglas Office Building, MS 35
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000
(850) 488-9314 / FAX 921-5000

AUG 3 2000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Completeness of Plant Siting Supplemental Application has been sent by mail to the following listed persons this _____ day of August 2000:

Robert A. Glenn, Esq.
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Frank K. Anderson, Esq.
SWFWMD
2379 Broad Street
Brooksville, FL 34609-6899

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2470 Centerview Drive
Tallahassee, FL 32399-2100

Cathy Bedell, General Counsel
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Douglas S. Roberts, Esq.
Hopping Green Sams & Smith
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Barrow, Florida 33830-0060

Served by Inter-office mail.

Hamilton S. Owen
Department of Environmental Protection
Siting Coordination Office
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

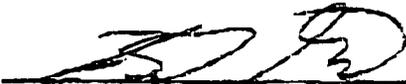

SCOTT A. GOORLAND
Senior Assistant General Counsel

EXHIBIT B

FDEP Notice of Insufficiency

RECEIVED

SEP 27 2000

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

HOFFMAN BLOOM
1700 N. BAY ST. SUITE 1000

IN RE: FLORIDA POWER CORPORATION
HINES ENERGY COMPLEX
(POWER BLOCK 2)
POWER PLANT SITING SUPPLEMENTAL
APPLICATION NO. PA92-33SA

DOAH CASE NO 00-3125EPP
OGC CASE NO. 00-1490

NOTICE OF INSUFFICIENCY

Pursuant to section 403.5067, Florida Statutes, the Florida Department of Environmental Protection (Department) hereby finds the application insufficient in the following areas:

- A. Air
See Exhibit "A", attached and incorporated by reference herein.
- B. Water
See Exhibit "B", attached and incorporated by reference herein.
- C. Water Management District
See Exhibit "C", attached and incorporated by reference herein.

NOTICE OF RIGHTS

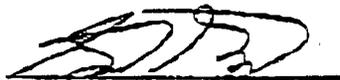
Pursuant to Section 403.5067, F.S., as a result of the Department's determination of insufficiency, the applicant may withdraw the application or amendment. If the applicant declines to withdraw the application or amendment, the applicant may, at its option:

1. Within 40 days after the department filed its statement of insufficiency or such later date as authorized by department rules, file additional information necessary to make the application or amendment sufficient. If the applicant makes its application or amendment sufficient within this time period, the time schedules under this act shall not be tolled by the department's statement of insufficiency;

2. Advise the department and the administrative law judge that the information necessary to make the application or amendment sufficient cannot be supplied within the time period authorized in paragraph 1. The time schedules under this act shall be tolled from the date of the notice of insufficiency until the application or amendment is determined sufficient; or

3. Contest the statement of insufficiency by filing a request for hearing with the administrative law judge within 15 days after the filing of the statement of insufficiency. If a hearing is requested by the applicant, all time schedules under this act shall be tolled as of the department's statement of insufficiency, pending the administrative law judge's decision concerning the dispute. A hearing shall be held no later than 30 days after the filing of the statement by the department, and a decision shall be rendered within 10 days after the hearing.

Respectfully submitted,



SCOTT A. GOORLAND
Senior Assistant General Counsel
Florida Bar No. 0066834

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION
3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, Florida 32399-3000
Telephone: (850) 488-9314

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Insufficiency has been sent by mail to the following listed persons this 26 day of August 2000:

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Cathy Bedell, General Counsel
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Florida Public Service Commission
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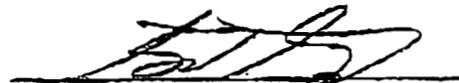
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SCOTT A. GOORLAND
Senior Assistant General Counsel



Department of Environmental Protection

DEPARTMENT OF ENVIRONMENTAL PROTECTION

AUG 29 2000

SITING COORDINATION

Jeff Laban
Governor

Twin Towers Office Building
2400 Blair Stone Road
Tallahassee, Florida 32399-3400

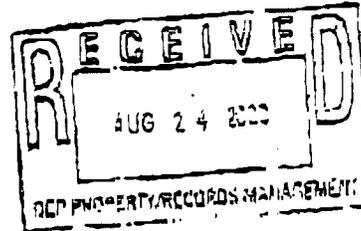
David B. Scrife
Secretary

August 23, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Jeffrey Purdie
Director Environmental Services Department
Florida Power Corporation
PO Box 14042
St. Petersburg, Florida 33711-4042

Re: Request for Additional Information
DEP File No. 1430231-0001 AC (PSD-FL-200)
Fluor Energy Complex Power Block 2



Dear Mr. Purdie,

On July 24, 2000 the Department received your application and complete fee for an air construction PSD permit for the construction of two combustion turbines to create Power Block 2 at the existing Fluor Energy Complex. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please provide the air quality (impact modeling) data files for Department review. The Department may have additional questions related to air quality modeling after review of this information.
2. Please provide the CO concentrations for natural gas firing and fuel oil firing at the outlet of the turbine/inlet of the HRSG, for conditions of 50% and 60% of full load, or provide curves that cover these operating conditions. Also provide mass emission estimates for these loads.
3. Please provide the vendor's quote used in the cost effectiveness analysis for selective catalytic reduction. This quote must be for this project and not a scaled estimate from another project, or from a turbine of different size or manufacturer.
4. Based upon the hours of operation and load levels requested in the application, the Department is likely to require control of CO with an oxidation catalyst to an expected level of 5 ppmvd @ 15% O₂ or less. Please address, if you wish, any changes to your requested allowable operation given this possibility.
5. Please provide the vendor's quote used in the cost effectiveness analysis for oxidation catalyst for CO control, and provide a cost effectiveness estimate using this quote. This quote must be for this project and not a scaled estimate from another project, or from a turbine of different size or manufacturer.
6. The Department has advised other applicants that it considers SCINOx to be a commercially available technology. Please obtain a vendor quote from Avout Power for SCINOx with commercial and performance guarantees similar to that of the SCR system with an oxidation catalyst and provide a cost effectiveness estimate using this quote. This quote must be for this project and not an estimate from another project, or from a turbine of different size or manufacturer.
7. Please provide an updated estimate of HAP emissions for this project and include complete supporting information for any emission factors and assumptions used in the estimate. The application does not indicate whether this project is major for HAPs. Please address.
8. Provide an estimate of the duration and quantity of emissions under expected startup and shutdown scenarios. How many (and what duration) startup and shutdown cycles are anticipated per day, month, and year for each

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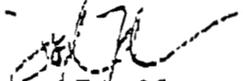
Mr. W. Jeffrey Pardue
Request for Additional Information
Page 2 of 2
August 23, 2000

combustion turbine? The Department plans to address excess emissions from startup and shutdown in its DACI determination.

9. The maximum heat input rate at 55°F of 1820 mmBtu/hr, firing gas, and 1920 mmBtu/hr, firing oil, (HHV) is less than the newly increased allowable maximum heat input rate of 1915 mmBtu/hr, firing gas, and 2020 mmBtu/hr, firing oil, (HHV) for the turbines for Power Block 1. Please address and revise the estimated potential excess emissions if the requested maximum heat input rate is revised in this application.
10. What are the actual CO and NOx concentrations at the outlet of the turbines of Power Block 1 over the range of operating conditions requested for Power Block 1?
11. Are there any other proposed emissions units related to this project such as fuel heaters, cooling towers, fuel storage tanks? Will emissions increase at any existing emissions units as a result of this project?
12. Please provide supporting information for the SAM emissions factor.
13. What are cases A, B, C and D in Table A-25?
14. Please provide more information to support the estimate of costs of instrumentation considered in the cost estimate for CO catalyst. Also, provide more detail regarding the estimate for heat rate penalty in your analysis.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.050(1), F.A.C. now requires applicants to respond to requests for information within 30 days. If there are any questions, please call me at 850/921-2510. Matters regarding modeling issues should be directed to Cleve Holladay (meteorologist) at 850/921-1986.

Sincerely,



Joseph Kuhn, P.E.
New Source Review Section

OK

cc: Gregg Warley, EPA
John Snyzak, NPS
Bill Thomas, P.E., DEP SWD
Ken Kosky, P.E., Golder Associates, Inc.
Buck Over, DEP SCC



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Scruggs
Secretary

INTEROFFICE MEMO

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SEP 21 2000

TO: Hamilton S. Owen, Jr., P.E.
Administrator, Power Plant Siting Section

THROUGH: Timothy J. Parker, P.E. *[Signature]*
Water Facilities Administrator, Southwest District

(SITING COORDINATION)

Henry B. Dominick, P.E. *[Signature]* 09-11-00
Manager, Industrial Wastewater Program

F Mohammed Kader, P.E. *[Signature]* 09-11-00
Supervisor, Industrial Wastewater Permitting

FROM: Kim Barlow *KB*
Engineer, Industrial Wastewater Permitting

SUBJECT: Florida Power Corporation-Hines Energy Complex
Supplemental Site Certification Application to PA 92-33 dated August 7, 2000
Polk County

DATE: September 5, 2000

I have reviewed the two (2) volumes of information submitted with the above-referenced application. Upon review of the submittal and based upon my site visit on August 30, 2000, I have no incompleteness items to request at this time.

The Compliance/Enforcement Section and the Technical Services Ground Water Section have also reviewed the above-referenced application and their comments are attached in memos dated August 11, 2000, and September 1, 2000, respectively.

This staff assessment is preliminary and is designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the Department and may be subject to revision pursuant to additional information and further review.

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EXHIBIT B

724

REVIEW OF SUPPLEMENTAL SITE CERTIFICATION APPLICATION FOR FPC - HINES ENERGY COMPLEX
DATED 8/7/00

BY
CINDY CATHEY
8/7/00

I have the following comments concerning the application:

- On page 2.3.2-7, FPC states that seven consecutive quarters of ground water sampling and analysis have been completed at the facility. Only the analysis for samples collected on 3/13/00, first quarter 2000, were included in Appendix 10.5.2. FPC has made a request for the Department to reduce ground water monitoring parameters. The District requested FPC submit a trend analysis for those parameters that they wish to have removed. The requested information has not been submitted at the time of this review. We recommend that this information be included as part of the supplemental site certification application review.
- FPC indicates in the application that they will be doubling the amount of RO brine discharged to the brine pond. Condition XVII.G 2.e. of the facility's site certification provides details for evaluating the impact of the brine on the disposal pond. This condition specifies pre-operation and operational phase programs. Joe May, FDEP Technical Services, stated that FPC performed pre-operational characterization during the initial site certification process, however, there are no records in the district files that the operational phase program was implemented. The operational phase program requires tests to be taken annually for the first five years after initiation of brine production. On page 5.3.7, FPC states that they are still conducting the brine pond study and will submit the results to the Department. If this study is the same as that required by the site certification, we recommend that it be reviewed as part of the supplemental site certification application.
- A review of district files indicates the following:
 - The comprehensive operation plan required under Condition XVII.G.2.h. of the facility's site certification could not be located in the district files nor could the Departmental letter approving the plan.
 - The waste stream characterizations for the cooling pond and brine pond required under Condition XVIII.A.8. of the facility's site certification could not be located in district files.

We recommend that this information be submitted to both the District and Tallahassee staff.

Review of supplemental site certification application for
FPC - Hines Energy Complex dated 8/7/00
Page 2

- FPC mentions chemical and biomass wastes in section 3.6 of the supplemental site certification application. A characterization of these waste streams should be submitted.
- FPC discusses oil spill prevention in section 3.6.7 of the supplemental site certification application. FPC should provide a discussion of procedure for discharging oil tank secondary containment to the existing water pond.
- The potential for water quality concerns (i.e.: nutrients, chlorophyll, etc.) associated with the release of water from old clay sealing areas to surface waters should be addressed.
- In section 4.3 of the supplemental site certification application, FPC discusses dewatering activities. It should be noted that under NPDES, any dewatering activity, which discharge to surface waters, must obtain approval under Chapter 42-421, F.A.C.

This staff statement is preliminary and is designed to assist in the review of the application prior to final agency action. The comments provided herein are not the final position of the department and may be subject to revision pursuant to additional information and further review.

State of Florida
Department of Environmental Protection - Southwest District Office

Interoffice Memorandum

TO: Kim Berlow, Engineer
Industrial Wastewater - Permitting

FROM: Joseph R. May, P.G., Environmental Supervisor
Technical Services - Ground Water Protection

DATE: September 1, 2006

SUBJECT: PPC - Hines Energy Complex
PA No. 92-33
Ground Water Protection - Power Block Two Addition

I have reviewed application and have the following comment:

The monitoring wells that are present were installed with the intention of incorporating the planned addition of Power Block Two. The submitter should address the additional monitoring parameters needed for fuel oil wastewater effluent cooling pond discharge.

Should you have any questions, please contact me at extension 342.

cc: Charise Krueger, TC-SW
John Hems, W&E SW

This work product is preliminary and should not be used in the absence of the application for a final permit. The Department, its staff and the State Attorney's Office are not responsible for any errors or omissions in this work product. It is the user's responsibility to verify the accuracy of the information and to obtain any necessary approvals.

Ronald C. Anderson
 Chair, Lake Wales
 Monroe "Al" Grogan
 Vice Chair, Lakeland
 Betty Thompson
 Secretary, Tampa
 Rosalee E. DeLeon
 Treasurer, Tarleton State
 Thomas G. Dancy, II
 Sarasota
 Pamela L. Fontana
 Lake Wales
 John B. Mathew, IV
 Apopka
 Stephen S. Maynes, II
 Ft. Pierce
 John E. Soper, III
 New Port Richey
 E. B. "Bossy" Vengere
 Palm Bay
 Gene J. Heath
 Lakeland
 William S. Blaney
 Central Orlando

September 1, 2000

2000
 1 1 2000
 Siting Coordination

Hamilton Owen
 Florida Department of Environmental Protection
 Siting Coordination Office
 2800 Blair Stone Road, MS48
 Tallahassee, FL 32399-7400

Re: SUPPLEMENTAL SITE CERTIFICATION APPLICATION, FLORIDA
 POWER CORPORATION, HINES ENERGY COMPLEX, POWER
 BLOCK 2, PA92-33SA

Dear Mr. Owen:

The Southwest Florida Water Management District ("District") has reviewed the subject application, and, in accordance with the provisions of Chapter 403.5067, Florida Statutes, recommends the application be determined insufficient. The following additional information is required before a full analysis of the project by the District can go forward:

1. The current Supplemental Site Certification Application (SSCA) No. PA92-33SA refers to and contains documentation of the Water Use Permit (WUP) No. 2011407.000, as the WUP associated with the above-mentioned SSCA. The referenced WUP number is associated with the Florida Power Corporation (FPC)'s Polk City Combined Cycle Facility, whereas the current SSCA relates to the FPC's Hines Energy Complex. The WUP associated with this site is WUP No. 2010944.000. Accordingly, the correct WUP number and documentation associated with the current SSCA needs to be provided. [400-2.091 F.A.C., 400-2.101, F.A.C., 40D-2.301, F.A.C., 2.1.1, Basis of Review for Water Use Permit Applications.]
2. It is unclear how the proposed drainage enhancement for Camp Branch (areas N-11A, N-13, N-9B) will reach Tiger Bay or Camp Branch in the post-reclamation condition. The Storage/Release Mode diagram (Figure 3.3.8-2) depicts the temporary water crop system for those areas. Under that system, water from these areas is shown as flowing to water crop areas N-11B and N-10W. A flow

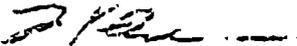
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 Water Resources

diagram that depicts the proposed post-reclamation drainage enhancement for Camp Branch must be provided. In addition, an estimate of the expected timing, frequency and volume of the proposed drainage enhancement and provide a comparison with existing or estimated flow data for Camp Branch is necessary. (40D-2.061 F.A.C., 40D-2.101, F.A.C., 40D-2.301, F.A.C., 2.1.1, Basis of Review for Water Use Permit Applications.)

3. The applicant needs to demonstrate that the proposed water crop system will not affect the hydration of wetlands within the Tiger Bay area. (40D-2.061 F.A.C., 40D-2.101, F.A.C., 40D-2.301, F.A.C., 2.1.1, Basis of Review for Water Use Permit Applications.)
4. The expected frequency and volume of the proposed McCullough Creek drainage enhancement must be provided and estimated. The applicant also needs to compare this with any existing or estimated flow data for McCullough Creek. (40D-2.061 F.A.C., 40D-2.101, F.A.C., 40D-2.301, F.A.C., 2.1.1, Basis of Review for Water Use Permit Applications.)
5. Excess water from storm events collected in the water crop areas is proposed to be released to Six Mile Creek, as ultimately a flow enhancement to the Peace River. An estimate of the expected frequency and volume of these discharges to Six Mile Creek needs to be provided along with a comparison with existing and historic flow data for Six Mile Creek. (40D-2.061 F.A.C., 40D-2.101, F.A.C., 40D-2.301, F.A.C., 2.1.1, Basis of Review for Water Use Permit Applications.)

Should you, your staff or the Applicant have any questions regarding this recommendation for a determination of insufficiency, contact either Said Abusada at (867) 534-1448 ext. 6167 (Shimcom 572-6200) or myself at (352) 796-7211 ext. 4666 (Shimcom 628-4150).

Respectfully,



F. K. Anderson
Senior Attorney

cc: see attached list

James V. Antista, General Counsel
Ross Stafford Burnaman, Asst. General Counsel
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Drawer AT012
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Bartow, Florida 33830-9005

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Tallahassee, FL 32314

Sheaueching Yu, Esquire
Department of Transportation
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Haydon Burns Building, MS-58
Tallahassee, FL 32309-0458

Cathy Bedell, Esquire
Florida Public Service Commission
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Robert A. Glenn, Esquire
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733

Andrew S. Grayson, Esquire
Department of Community Affairs
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Tallahassee, FL 32399-2100

Norman White, Esquire
Central Florida Regional Planning Council
555 East Church Street
Bartow, FL 33830

CARLTON FIELDS

ATTORNEYS AT LAW

ONE PROGRESS PLAZA
200 CENTRAL AVENUE, SUITE 2300
ST. PETERSBURG, FLORIDA 33701-4352

MAILING ADDRESS:
P.O. BOX 2861, ST. PETERSBURG, FL 33731-2861
TEL (727) 821-7000 FAX (727) 822-3768

October 20, 2000

Deborah D. Hart
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

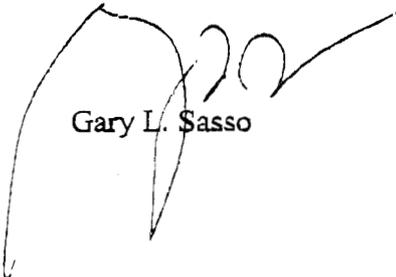
VIA FACSIMILE

Re: In Re: Petition for Determination of Need
of Hines Unit 2 Power Plant
Docket No. 001064-EI

Dear DeDe:

I am enclosing FPC's responses to the requests Staff made during Mr. Crisp's deposition. (I previously provided our response to you over the telephone on the imputed debt issue.) As we discussed by phone, we are prepared to agree to treat these responses as a late-filed exhibit to Mr. Crisp's deposition. Again, please understand that we have agreed to do this as a courtesy to Staff without waiving our objection to out-of-time discovery requests.

Sincerely,


Gary L. Sasso

Enclosures

EXHIBIT B

FPC Responses to Supplemental Staff Request

1. What would the Loss of Load Probability values be for Florida Power's system without Hines 2 for the ten year planning period?

Response: The requested values for the "Base Expansion Plan" and the sensitivity case are listed below. Since 2000 and 2001 are the same, the values start in 2002.

	Assisted LOLP With Hines 2 (Days/Year)	Assisted LOLP Without Hines 2 (Days/Year)
2002	0.0175	0.0175
2003	0.0145	0.0145
2004	0.0053	0.0545
2005	0.0123	0.1139
2006	0.0056	0.0564
2007	0.0228	0.1949
2008	0.0058	0.0562
2009	0.0240	0.2012

FPC Responses to Supplemental Staff Request

2. In the Base Expansion Plan resulting from the Integrated Resource Plan Update, Hines 2 was identified as the most cost effective addition to Florida Power's system. What would the revenue requirements be if peakers were chosen first?

Response: The cumulative present worth of revenue requirements for the least cost plan based on peaking capacity in November 2003 (instead of Hines 2) is \$18,633 Million which is \$148 Million higher than the revenue requirements for the Base Expansion Plan.

Background: As described in the Need Study, FPC's PROSCREEN system optimization assessments performed in support of the Hines 2 Need Determination and the 2000 Ten Year Site Plan compared the economics of a wide range of alternatives over the planning period. From all of the alternatives assessed, the least cost alternative plan that started with a peaker was a case which included an "F" frame peaker in 11/2003 followed with a mix of combined cycle plants and "EA" frame peakers. This plan is summarized below and a copy of the corresponding PROSCREEN Output Report is attached. (Please note that in-service dates for all of the additions listed are actually in November of the preceding year, providing for the winter peaks, in accordance with widely accepted reporting practices.)

Comparison of PROSCREEN Optimization Alternatives

	Base Expansion Plan	Alternative Expansion Plan
2001	IC P12-14	IC P12-14
2002		
2003		
2004	Hines 2	"F" Peaker
2005		Hines 2
2006	Hines 3	
2007		Hines 3
2008	Hines 4	Hines 4
2009		
2010	Hines 5	"EA" Peakers
CPWRR (\$000)	\$ 18,485,068	\$ 18,633,246

FPC Responses to Supplemental Staff Request

3. Please provide a tabulation of system reserve margins in the Base Expansion Plan as well as sensitivities that remove Hines 2 and accommodate the 50 MW capacity divestiture planned as a result of the pending merger with CP&L.

Response: The Reserve Margin tabulation is provided below:

	Base Expansion Plan	Hines 2 Removed from Plan	Base Expansion Plan	Hines 2 Removed from Plan
	(Without Divestiture)		(With Divestiture)	
Winter 00/01	16.0%	16.0%	16.0%	16.0%
Winter 01/02	19.6%	19.6%	19.0%	19.0%
Winter 02/03	21.9%	21.9%	21.2%	21.2%
Winter 03/04	25.3%	18.4%	24.7%	17.8%
Winter 04/05	23.0%	16.3%	22.4%	15.7%
Winter 05/06	24.8%	18.2%	24.2%	17.6%
Winter 06/07	20.6%	14.2%	20.1%	13.6%
Winter 07/08	24.0%	17.7%	24.0%	17.7%
Winter 08/09	20.0%	13.9%	20.0%	13.9%
Winter 09/10	21.9%	15.9%	21.9%	15.9%

	Base Expansion Plan	Hines 2 Removed from Plan	Base Expansion Plan	Hines 2 Removed from Plan
	(Without Divestiture)		(With Divestiture)	
Summer 00	19.0%	19.0%	19.0%	19.0%
Summer 01	18.4%	18.4%	17.7%	17.7%
Summer 02	22.7%	22.7%	22.1%	22.1%
Summer 03	25.7%	25.7%	25.0%	25.0%
Summer 04	28.7%	22.0%	28.0%	21.3%
Summer 05	26.1%	19.5%	25.4%	18.8%
Summer 06	27.2%	20.8%	26.6%	20.2%
Summer 07	22.8%	16.6%	22.8%	16.6%
Summer 08	25.6%	19.5%	25.6%	19.5%
Summer 09	21.3%	15.3%	21.3%	15.3%

PS000012PB * OC&CY

CAPITAL EXPENDITURE AND RECOVERY MODULE
SYSTEM REVENUE REQUIREMENTS

YEAR	EXISTING UNIT OPERATING EXPENSES	PURCHASED POWER AND OTHER PRODUCTION COSTS	NEW UNIT CAPITAL REVENUE REQUIREMENT	NEW UNIT FUEL AND O&M REVENUE REQUIREMENT	SYSTEM REVENUE REQUIREMENT	PRESENT WORTH OF NEW UNIT REVENUE REQUIREMENT	PRESENT WORTH OF SYSTEM REVENUE REQUIREMENT	ACCUMULATED PRESENT WORTH OF SYSTEM REV. REQ.
2000	605100.	460139.	33940.	0.	1099178.	33940.	1099178.	1099178.
2001	650428.	466474.	33777.	0.	1150679.	31123.	1060241.	2159419.
2002	618939.	473069.	36167.	0.	1128175.	30705.	957804.	3117223.
2003	680026.	483351.	33022.	0.	1196399.	25832.	935894.	4053117.
2004	687866.	500558.	39982.	12313.	1240719.	37693.	894282.	4947399.
2005	650180.	508699.	78757.	85755.	1323391.	109257.	878899.	5826298.
2006	672319.	523916.	75792.	89989.	1362037.	101446.	833470.	6659768.
2007	642966.	537701.	115133.	170023.	1465824.	160781.	826481.	7486250.
2008	606359.	546567.	153969.	226757.	1533652.	197794.	796761.	8283011.
2009	659678.	498582.	147967.	266921.	1573148.	198602.	753046.	9036057.
2010	739270.	387841.	160742.	308160.	1596012.	206816.	703944.	9740001.
2011	817163.	348404.	153214.	336511.	1655292.	199024.	672708.	10412709.
2012	801743.	360943.	147659.	325063.	1635409.	177014.	612391.	11025100.
2013	839421.	374406.	142267.	343640.	1699735.	167651.	586454.	11611554.
2014	827514.	389515.	137017.	341732.	1695778.	152199.	539103.	12150657.
2015	858292.	405431.	131862.	351211.	1746796.	141503.	511676.	12662333.
2016	845320.	423348.	126737.	348034.	1743439.	128141.	470555.	13132888.
2017	873804.	439755.	121614.	361812.	1796986.	120222.	446887.	13579775.
2018	860571.	458254.	116494.	360161.	1795479.	109221.	411419.	13991194.
2019	891754.	477747.	114457.	370599.	1851558.	101777.	390923.	14382117.
2020	876977.	499639.	106503.	368474.	1851593.	92401.	360205.	14742322.
2021	909633.	519819.	101552.	380098.	1911102.	86335.	342561.	15084883.
2022	895840.	542513.	96604.	378079.	1913037.	78399.	315957.	15400840.
2023	929006.	566437.	91660.	388661.	1975764.	73095.	300670.	15701520.
2024	914717.	593254.	86719.	385356.	1980046.	66194.	277639.	15979149.
2025	949213.	618115.	82212.	397540.	2047080.	61983.	264478.	16243627.
2026	936450.	646012.	78139.	394215.	2054817.	56231.	244612.	16488239.
2027	973139.	675426.	74349.	406210.	2129124.	52711.	233537.	16721776.
2028	957430.	708365.	71125.	403494.	2140415.	47968.	216321.	16938100.
2029	993705.	739034.	66270.	416193.	2215201.	44928.	206286.	17144386.
2030	979256.	773383.	54890.	413671.	2221200.	40204.	190587.	17334974.
2031	1015610.	809607.	52949.	425722.	2303888.	37844.	182145.	17517120.
2032	999175.	849747.	41946.	423263.	2314131.	33889.	168575.	17685696.
2033	1037035.	887942.	31567.	436814.	2393358.	31438.	160644.	17846340.
2034	1020501.	930297.	31351.	434972.	2417122.	28840.	149488.	17995828.
2035	1058820.	974974.	27163.	447649.	2508605.	27057.	142952.	18138780.
2036	1041936.	1024487.	27328.	444624.	2538374.	24780.	133279.	18272060.
2037	1083045.	1071674.	27497.	457560.	2639776.	23467.	127710.	18399770.
2038	1065518.	1123972.	27672.	456442.	2673606.	21580.	119180.	18518950.
2039	1106860.	1179148.	27853.	468904.	2782764.	20403.	114297.	18633246.

**** TOTALS IN 2000 DOLLARS ****

34572568. 24798564. 3302920. 12626622. 75300688. 3380485. 18633246.