

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of JEA to Determine Need for Proposed Electrical Power Plant in Duval County, Florida, Consisting of the Conversion of Two of the Brandy Branch Combustion Turbines Currently Under Construction to a Combined Cycle Unit

DOCKET NO. 001703-EM  
FILED: January 16, 2001

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-00-2394-PCO-EM, issued December 13, 2000, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

None.

b. All Known Exhibits

- 1) JEA's responses to Staff's Interrogatories.
- 2) Any documents produced in response to Staff's Request for Production.
- 3) Affidavit of Publication of Notice in Florida Times-Union.

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: Does the proposed conversion of the Brandy Branch combustion turbine units to combined cycle operation provide adequate electricity to JEA at a reasonable cost?

Position: No position pending responses to Staff discovery and evidence adduced at hearing.

DOCUMENT NUMBER-DATE

00616 JAN 16 2001

FPSC-RECORDS/REPORTING

ISSUE 2: Does the proposed conversion of the Brandy Branch combustion turbine units to combined cycle operation contribute to the reliability and integrity of JEA's system?

Position: No position pending responses to Staff discovery and evidence adduced at hearing.

ISSUE 3: Is the proposed conversion of the Brandy Branch combustion turbine units to combined cycle operation the most cost effective alternative available to JEA?

Position: No position pending responses to Staff discovery and evidence adduced at hearing.

ISSUE 4: Are there any conservation or demand-side management alternatives reasonably available to JEA which would mitigate the need for the conversion of the Brandy Branch combustion turbine units to combined cycle operation?

Position: No position pending responses to Staff discovery and evidence adduced at hearing.

ISSUE 5: Should the Commission grant a determination of need for the conversion of the Brandy Branch combustion turbine units to combined cycle operation?

Position: No position pending responses to Staff discovery and evidence adduced at hearing.

e. Pending Motions

None.

f. Compliance with Order No. PSC-00-2394-PCO-EM

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

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Respectfully submitted this 16th day of January, 2001.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for  
determination of need for power  
plant in Duval County by JEA.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail to Richard Melson, Esquire, Hopping, Green, Sams & Smith, P.A., P.O. Box 6526, Tallahassee, FL 32314, and to Mr. Tracy E. Danese, Chief Public Affairs Office, 21 West Church Street, Tower 16, Jacksonville, Florida 32202-3139, this 16<sup>th</sup> day of January, 2001.



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