

ORIGINAL

Matilda Sanders

From: KEYSER & WOODWARD P.A. [justice@gbso.net]
Sent: Friday, June 02, 2006 8:10 PM
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Subject: Seminole Electric Coop.
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ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In re:

Petition for Determination of Need for Seminole Electric Cooperative, Inc.
Filed: April 21, 2006

Docket No.: 060220-EC

PETITION TO INTERVENE OF SIERRA CLUB, INC.

Petitioner, Sierra Club, Inc., hereby files this Petition to Intervene into this proceeding, and in support avers:

1. The name and address of the affected agency are:

Florida Public Service Commission ("PSC")
2540 Shumard Oak Drive
Tallahassee, FL 32399-0850

2. The name and address of Petitioner's attorney are as follows:

Timothy Keyser, J.D.
Keyser & Woodward, P.A.
Post Office Box 92
Interlachen, FL 32148

3. Statement of Substantial Interest.

Sierra Club, Inc. is a Florida corporation not for profit dedicated to the wise use of natural resources and to the protection of the environment. It has many members who reside within the areas served by Seminole Electric Cooperative, Inc. (Seminole) and who are supplied electricity by Seminole's cooperatives.

4. Disputed Issues of Material Fact.

- a. This plant will not supply adequate electricity at reasonable costs if the environmental impacts are included in the determination.

- b. There is a lack of fuel diversity and supply reliability because

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Seminole already has coal fired units and current environmentally harmful mining practices are likely to be curtailed in the future.

c. Solar and other renewable or "green" energy production methods are more cost effective than coal fueled plant expansion.

d. Seminole would produce more power at less cost and with fewer harmful environmental impacts by dedicating part of the costs of a new coal fired unit to install of solar hot water and power producing panels on rate pages. The remainder should be applied toward new equipment to abate pollution from the existing units.

5. Statement of Ultimate Facts.

Seminole failed to consider reasonable alternatives to coal.

DATED this 2nd day of June, 2006.

Respectfully submitted,

s/Timothy Keyser

Florida Bar Number: 181740

Post Office Box 92

Interlachen, Florida 32148

Phone: (386) 684-4673

Fax: (386) 684-4674