

ORIGINAL

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Sent: Thursday, November 02, 2006 10:35 AM
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Subject: Docket No. 060635-EU
Attachments: SupportAndJoinderOfMotionToReconsider.pdf

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The docket number and title if filed in an existing docket:

Docket No. 060635-EU
PETITIONERS' RESPONSE IN SUPPORT AND JOINDER IN REQUEST OF PETITIONERS (JACOBS) MOTION TO RECONSIDER ORDER GRANTING IN PART AND DENYING IN PART MOTION TO EXTEND DISCOVERY SCHEDULE AND FILING DATE FOR TESTIMONY AND EXHIBITS OF SIERRA CLUB, HEDRICK, AND LUPIANI

The name of the party on whose behalf the document is filed:

Dianne V. Whitfield/Carole E. Taitt/John Carl Whitton, Jr.

The total number of pages in each attached document: 3

A brief but complete description of each attached document:

Petitioners Whitfield, Tait and Whitton's Response in Support and Joinder in Request of Motion to Reconsider (Doc. No. 10064-06, filed October 27, 2006) and Certificate of Service.

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BEFORE THE STATE OF FLORIDA,
PUBLIC SERVICE COMMISSION

In re: Petition for Determination of Need for
Electrical Power Plant in Taylor County by
Florida Municipal Power Agency, JEA,
Reedy Creek Improvement District, and
City of Tallahassee.

Docket No. 060635-EU
Dated: November 2, 2006

**PETITIONERS' RESPONSE IN SUPPORT AND JOINDER IN REQUEST OF
PETITIONERS (JACOBS) MOTION TO RECONSIDER ORDER GRANTING IN PART
AND DENYING IN PART MOTION TO EXTEND DISCOVERY SCHEDULE AND
FILING DATE FOR TESTIMONY AND EXHIBITS OF SIERRA CLUB, HEDRICK,
AND LUPIANI**

Petitioners Dianne V. Whitfield, Carole E. Taitt and John Carl Whitton, Jr. (collectively "Petitioners"), by and through their undersigned counsel, hereby respond in support and join in request of Petitioners (Jacobs) Motion to Reconsider Order Granting in Part and Denying in Part Motion to Extend Discovery Schedule and Filing Date for Testimony, Doc. No. 10064-06, dated October 31, 2006, (hereinafter "Motion") and in support of this Motion, Petitioners state:

1. Petitioners submitted their Petition to Intervene in this docket on October 31, 2006. Order PSC-06-0903-PCO-EU granted Intervenors in this docket a 10-day extension in the schedule of this proceeding, requiring Intervenors to file their testimony and exhibits by November 2, 2006. Petitioners are similarly situated as Intervenors Sierra Club, Hedrick and Lupiani (hereinafter "Jacobs") and Armstrong, in that the expedited schedule of this proceeding denies Petitioners any meaningful opportunity to present independent review and analysis of the assumptions and inputs to the complex economic analysis the Florida Public Service Commission's ("Commission" or "PSC") must conduct in this matter.

2. The Applicants in this proceeding, which include the Jacksonville Electric Authority ("JEA"), Florida Municipal Power Agency ("FMPPA"), City of Tallahassee ("Tallahassee") and

Reedy Creek Improvement District (“RCID”), who will operate the proposed coal power plant as the Taylor Energy Center (“TEC”), have filed numerous and lengthy testimony and exhibits. A proceeding schedule which provides the Applicants essentially an unlimited amount of time to prepare testimony and exhibits prior to submitting their Petition for Determination of Need for an Electrical Power Plant and only provides other parties who have substantial interests in this proceeding 35 or 42 days to prepare and respond to the same complex prejudices the intervenors in this proceeding.

3. In addition to the issues listed at (i)-(iv) of paragraph 2 of the reconsideration motion by Jacobs, Petitioners add issue (v): whether the Owner’s consideration and evaluation of the availability and cost effectiveness of renewable resources to offset the need for this plant was sufficient.

WHEREFORE, Petitioners Dianne V. Whitfield, Carole E. Taitt and John Carl Whitton, Jr., request that the Commission Extend the Discovery Schedule and Filing Date for their Testimony by sixty days or, in the alternative, modify the schedule as requested in Jacobs’ Motion, Doc. No. 10064-06.

Dated this 2nd day of November, 2006.

Respectfully submitted,

s/ Brett M. Paben
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been furnished via e-mail and U.S. mail to:

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on this 2nd day of October, 2006.

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