

**Matilda Sanders**

---

**From:** Shannon Douglas [sdouglas@stileslawfirm.com]  
**Sent:** Friday, March 30, 2007 9:09 AM  
**To:** Filings@psc.state.fl.us  
**Subject:** 070098-EI Prehearing Statement  
**Attachments:** Prehearing StatementAIF1.doc

ORIGINAL

- A. Tamela I. Perdue  
Stiles, Taylor & Grace, P.A.  
317 North Calhoun Street  
Tallahassee, Florida 32302
- B. Prehearing Statement
- C. Associated Industries of Florida
- D. There are a total of 4 pages in the attached document
- E. The document attached for filing is Associated Industries of Florida's Prehearing Statement

*Shannon Douglas*  
*Legal Assistant to Tamela I. Perdue*

Stiles, Taylor & Grace, P.A.  
Post Office Box 1140  
Tallahassee, Florida 32303  
850.222.2229  
888.579.4545 Direct Facsimile  
[sdouglas@stileslawfirm.com](mailto:sdouglas@stileslawfirm.com)

This communication originates from Stiles, Taylor, and Grace, P.A., and is protected under the Electronic Communication Privacy Act, 18 USC S2510-2521. The information contained herein is intended only for the use of the individual or entity to which it is addressed. This communication may contain information that is privileged, proprietary, confidential, and exempt from disclosure under applicable laws. If you are not the specific intended recipient, you are hereby notified that any use, reproduction, disclosure, or dissemination of this communication is strictly prohibited, and may be subject to legal restriction or sanction. If you are not the intended recipient, please notify the sender by reply email and immediately delete this email. Viral scanning of all emails or attachments is recommended by the recipient.

DOCUMENT NUMBER-DATE

02749 MAR 30 6

FPSC-COMMISSION CLERK

ORIGINAL

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's ) Docket No. 070098-EI  
Petition to Determine Need for FPL Glades )  
Power Park Units 1 and 2 Electrical Power Plant ) Date Filed: March 30, 2007

**PREHEARING STATEMENT**

Associated Industries of Florida ("AIF") hereby files with the Florida Public Service Commission its Prehearing Statement in connection with FPL's petition to determine need for the Glades power plant and states:

**I. STATEMENT OF BASIC POSITION**

AIF's members require adequate, reasonably priced electricity in order to conduct their business consistently with the needs of their customers and ownership. The Commission should approve FPL's proposed plant in order to create a stable investment climate so that electric utilities such as FPL can build more fuel diverse generation systems to meet Florida's growing energy needs. Approval of the Glades units will help mitigate the risk of supply disruption associated with natural gas-fired generation and will help mitigate the electric price volatility associated with reliance on natural gas-fired generation.

**II. ISSUES AND POSITIONS**

Issue: Is there a need for the proposed generating units, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, Florida Statutes?

Position: Yes. The Glades power plant is needed in order to ensure the availability of adequate, reasonably priced electricity in Florida. Approval of the unit will help provide a more fuel diverse generation system to meet Florida's growing energy needs.

DOCUMENT NUMBER-DATE

02749 MAR 30 6

FPSC-COMMISSION CL FRK

Issue: Is there a need for the proposed generating units, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519, Florida Statutes?

Position: Yes. Approval of the Glades units will help mitigate the electric price volatility associated with reliance on natural gas-fired generation.

Issue: Is there a need for the proposed generating units, taking into account the need for fuel diversity and supply reliability, as this criterion is used in Section 403.519, Florida Statutes?

Position: Yes. Approval of the Glades units will help mitigate the risk of supply disruption associated with natural gas-fired generation. The Commission should approve FPL's proposed plant in order to create a stable investment climate so that electric utilities such as FPL can build more fuel diverse generation systems to meet Florida's growing energy needs.

Issue: Are there any conservation measures taken by or reasonably available to FPL which might mitigate the need for the proposed generating units?

Position: No.

Issue: Has FPL appropriately evaluated the cost of CO2 emission mitigation costs in its economic analysis?

Position: Yes.

Issue: Do the proposed FGPP generating units include the costs for the environmental controls necessary to meet current state and federal environmental requirements, including mercury, NOx, SO2, and particulate emissions?

Position: Yes.

Issue: Are the proposed generating units the most cost-effective alternative available, as this criterion is used in Section 403.519, Florida Statutes?

Position: Taking into account the fuel-diversity benefits of the Glades units, yes.

Issue: Based on the resolution of the foregoing issues, should the Commission grant FPL's petition to determine the need for the proposed generating units?

Position: Yes.

Issue: Should this docket be closed?

Position: Yes.

**III. POLICY ISSUES**

AIF believes each of the issues in this case relate to policy issues regarding fuel-diversity and economic investment.

**IV. STIPULATED ISSUES**

None.

**V. PENDING MOTIONS**

AIF's Petition to Intervene

**VI. PENDING REQUESTS FOR CONFIDENTIAL CLASSIFICATION**

None.

**VII. REQUIREMENTS OF THE PREHEARING ORDER THAT CANNOT BE MET**

None.

**VIII. OBJECTIONS TO WITNESSES' QUALIFICATIONS**

None.

Respectfully submitted this 30<sup>th</sup> day of March, 2007.

By: \_\_\_\_\_ /s/ \_\_\_\_\_

Tamela Ivey Perdue  
Stiles, Taylor & Grace, P.A.  
Post Office Box 1140  
Tallahassee, FL 32301  
Phone: 850-222-2229  
Fax: 850-561-3642  
FL Bar No. 0142638

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail and United States Mail on the 30<sup>th</sup> day of March, 2007, to the following:

Katherine E. Fleming, Esquire  
Jennifer Brubaker, Esquire  
Lorena Holley, Esquire  
Florida Public Service Commission  
Division of Legal Services  
Gerald L. Gunther Building  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Michael Gross, Esquire  
Attorney for The Sierra Club, Inc., et al  
c/o The Florida Legislature  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, FL 32301

Office of Public Counsel  
Charles J. Beck, Esquire  
Deputy Public Counsel  
c/o The Florida Legislature  
111 W. Madison St., Room 812  
Tallahassee, FL 32399-1400

Office of Public Counsel  
c/o Harold McLean  
111 W. Madison St., #812  
Tallahassee, FL 32399-1400

R. Wade Litchfield  
Associate General Counsel  
Bryan S. Anderson  
Natalie F. Smith  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420

Department of Community Affairs  
Valerie Hubbard, Director  
Division of Community Planning  
2555 Shumard Oak Blvd.  
Tallahassee, FL 32399-2100

Department of Environmental Protection  
Michael P. Halpin  
Siting Coordination Office  
2600 Blairstone Road MS 48  
Tallahassee, FL 32301

Black & Veatch  
Myron Rollins  
11401 Lamar Avenue  
Overland Park, KS 66211

By: \_\_\_\_\_ /s/

Tamela Ivey Perdue  
Stiles, Taylor & Grace, P.A.  
Post Office Box 1140  
Tallahassee, FL 32301  
Phone: 850-222-2229  
Fax: 850-561-3642  
FL Bar No. 0142638