

**Matilda Sanders**

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From: GARY V PERKO [GARYP@hgslaw.com]  
Sent: Wednesday, June 06, 2007 3:32 PM  
To: Filings@psc.state.fl.us  
Subject: Docket No. 060635 - CORRECTED FILING

Attachments: 060635 -obj to NRDC's\_3rd\_ROGs.pdf

ORIGINAL



060635 -obj  
{DC's\_3rd\_RC

Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 060635-EU

In re: Petition To Determine Need For an Electrical Power Plant in Taylor County

c. Document being filed on behalf of Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and City of Tallahassee

d. There are a total of 3 pages.

e. The document attached for electronic filing is Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and City of Tallahassee's Objections to NRDC's Third Set of Interrogatories (Nos. 9-25). (CORRECTED)

Thank you for your cooperation.

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DOCUMENT NUMBER-DATE

04563 JUN-6 5

FPSC-COMMISSION CLERK

In re: Petition To Determine Need For an 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: June 6, 2007

**FLORIDA MUNICIPAL POWER AGENCY, JEA, REEDY CREEK IMPROVEMENT DISTRICT AND CITY OF TALLAHASSEE'S (APPLICANTS') OBJECTIONS TO THE NATURAL RESOURCES DEFENSE COUNCIL'S THIRD SET OF INTERROGATORIES (NOS. 9-25)**

Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and the City of Tallahassee, collectively referred to as the "Applicants," pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil Procedure, and the Order Establishing Procedure in this matter (No. PSC-06-0819-PCO-EU), hereby serve their Objections to The Natural Resources Defense Council's Third Set of Interrogatories (Nos. 9 - 25).

**OBJECTIONS**

**24. Please provide the names of each Applicant who has revised its own internal Integrated Resource Plan since January, 2007.**

**OBJECTION TO INTERROGATORY NO. 24:** Applicants object to this interrogatory as not reasonably calculated to lead to the discovery of admissible evidence. Whether or not Applicants have revised their internal Integrated Resource Plans is not relevant to the sole issue to be addressed at the reconvened hearing: The updated modeling and results discussed in the supplemental testimony of Myron Rollins. Without waiving such objection, Applicants will provide the requested information.

**25. In its March 28, 2007 City Commission Workshop presentation, the Tallahassee City Utility staff indicated that it would continue to review its IRP and provide regular updates to the City Commission.**

- a) when is the next IRP updated planned?**
- b) what updates to the IRP have been completed to date?**

**OBJECTIONS TO INTERROGATORY NO. 25:** Applicants object to this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. The City of Tallahassee's internal integrated resource planning effort is not relevant to the sole issue to be addressed at the reconvened hearing: The

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

DOCKET NO. 060635-EI  
APPLICANTS' OBJECTIONS TO NRDC'S  
THIRD SET OF INTERROGATORIES (NOS.10-25)

updated modeling and results discussed in the supplemental testimony of Myron Rollins. Without waiving such objection, Applicants will provide the requested information.

Respectfully submitted this 6<sup>th</sup> day of June, 2007.

HOPPING GREEN & SAMS, P.A.

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District, and the City of Tallahassee

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Applicants' Objections to The Natural Resources Defense Council's Third Set of Interrogatories (Nos. 9- 25) in Docket No. 060635-EU was served upon the following by electronic mail on this 6th day of June, 2007:

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