

BEFORE THE PUBLIC SERVICE COMMISSION

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

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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 6th day of June, 2007.

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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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