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Sent: Tuesday, June 12, 2007 4:03 PM
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Subject: Docket 060635
Attachments: Docket 060635 - Applicants' Objections to the Sierra Club, Hedrick, Armstrong, Lupiani, and Viegbesies.pdf



Docket 060635
Applicants' Ob.

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 Applicants' Objections to the Sierra Club, John Hedrick, Rebecca J. Armstrong, Brian Lupiani, and Anthony Viegbesie's First Set of Interrogatories (Nos. 1-8).

Thank you for your cooperation.

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DOCUMENT NUMBER-DATE

04731 JUN 12 5

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA 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 12, 2007

**FLORIDA MUNICIPAL POWER AGENCY, JEA, REEDY CREEK
IMPROVEMENT DISTRICT AND CITY OF TALLAHASSEE'S (APPLICANTS')
OBJECTIONS TO THE SIERRA CLUB, JOHN HEDRICK, REBECCA J.
ARMSTRONG, BRIAN LUPIANI, AND ANTHONY VIEGBESIE'S
FIRST SET OF INTERROGATORIES (NOS. 1-8)**

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 First Set of Interrogatories (Nos. 1-8) propounded by the Sierra Club, John Hedrick, Rebecca J. Armstrong, Brian Lupiani, and Anthony Viegbesie.

OBJECTIONS

1. Please provide a detailed description and documentation of the modified assumptions used by the City of Tallahassee in its integrated resource planning process ("IRP") used to assess the impact of, and adjust for: (i) the inaccurate load point for Purdom unit 8 used in the TEC original analysis, (ii) the elevated projections of TEC output for Tallahassee, now reduced in deference to Tallahassee local generating units; and (iii) reduction of TEC as a fully dispatchable system resource.

OBJECTION TO INTERROGATORY NO. 1: Applicants object to this interrogatory as 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 updated modeling and results discussed in the supplemental testimony of Myron Rollins. Without waiving such objection, Applicants will provide the requested information.

3. Isn't it correct that in Tallahassee's updated IRP analysis of a natural gas expansion plan (Case 4), and in the TEC analysis of a gas expansion plan, the projections of natural gas prices were not updated beyond the 2005 market prices utilized in the original analysis of Case 4?

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

DOCKET NO. 060635-EI
APPLICANTS' OBJECTIONS TO SIERRA CLUB'S
FIRST SET OF INTERROGATORIES (NOS. 1-8)

OBJECTION TO INTERROGATORY NO. 3: Applicants object to this interrogatory as 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 updated modeling and results discussed in the supplemental testimony of Myron Rollins. Without waiving such objection, Applicants will provide the requested information.

4. Isn't it correct that the results of Tallahassee's revised IRP analysis of Case 4, using the 2005 gas market data, include a reduction in the cost of a natural gas generation option of more than \$14 million from the previous analysis of the gas option, and, a difference in excess of \$40 million between the increased cost of TEC in the revised IRP, and the revised cost of a gas plan? Please explain the basis of this result.

OBJECTION TO INTERROGATORY NO. 4: Applicants object to this interrogatory as 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 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 12th day of June, 2007.

HOPPING GREEN & SAMS, P.A.

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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 12th day of June, 2007:

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