

Ruth Nettles

From: Minimushomines@aol.com
Sent: Monday, December 03, 2007 4:09 PM
To: Filings@psc.state.fl.us; Wade_Litchfield@fpl.com; Charles Beck; Jennifer Brubaker; Katherine Fleming; JankArtist@aol.com
Subject: Petition to intervene-FPL Turkey Point
Attachments: Turkey Point intervention.doc

070650-EI

Hello,

Please find the attached petition to intervene electronic filing

A. Person responsible for this filing

Bob Krasowski
1086 Michigan Avenue
Naples, FL. 34103-3857
239-434-0786 H
239-963-6285 C
Minimushomines@aol.com

B.. Docket No.070650-EI
Re:Florida Power and Light Company's Petition to Determine Need for Turkey Point Nuclear Units
6 and 7 Electrical Power Plant

C. Documents are being filed on behalf of Jan M. Krasowski and Bob Krasowski

D There are 6 pages in the Petition for Intervention

E. The document attached for filing is the Petition for Intervention

Thank you for your attention to this matter,

Bob Krasowski

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DOCUMENT NUMBER-DATE

10655 DEC-3 8

FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Florida Power and Light Company's
Petition to Determine Need for Florida
Power and Light Company's
Turkey Point Nuclear Units 6 and 7
Electrical Power Plant

DOCKET NO.:070650-EI

Filed December 3, 2007

PETITION TO INTERVENE

Petitioners Jan M. Krasowski and/or Bob Krasowski, pursuant to Rule 25-22.039,
Florida Administrative Code hereby file this petition to intervene in this docket and state:

A. AGENCY AFFECTED

1. Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

B. IDENTIFICATION OF THE PETITIONERS....

2. Jan M. Krasowski
1086 Michigan Avenue
Naples, Florida 34103-3857
239-434-0786
3. Bob Krasowski
1086 Michigan Avenue
Naples, Florida 34103-3857
239-434-0786 H
239-963-6285 C
Minimushomines@aol.com
4. Bob Krasowski will be representing Jan and himself and is authorized to receive all notices, pleadings and other communications in this docket.

...AND HOW PETITIONERS SUBSTANTIAL INTERESTS ARE AFFECTED

5. Both Jan and Bob Krasowski are customers of Florida Power and Light.
6. Both Jan and Bob Krasowski have been active over the past twenty five years with their efforts to address the issue of resource protection, management and efficiency. These efforts have been local to Collier County Florida, regional to Southwest Florida and State-wide through Tallahassee. Energy policy strategies and environmental issues relevant to energy policy and practice have been at the core of their activities. To the extent that the proposed Turkey Point Nuclear Units 6 and 7 affects local, regional or state energy policy and rates for electrical power, the interests of Jan and Bob Krasowski are affected.

C. RECEIPT OF NOTICE OF AGENCY'S PROPOSED ACTION

7. Petitioners received notice of the Public Service Commission's action through The Public Service Commission's website when FP&L petitioned for a Need Determination.

D. DISPUTED ISSUES OF MATERIAL FACT

8. We dispute the need for the proposed Florida Power and Light (FPL) Turkey Point Nuclear Units 6 and 7, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, 403.519(b), Florida Statutes.

9. We dispute the 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, 403.519(b), Florida Statutes.
10. We dispute 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, 403.519(b)Florida Statutes.
11. We believe there are conservation measures that can be taken by or reasonably available to FPL company which might mitigate the need for the proposed generating units.
12. We dispute that the proposed generating units are the most cost effective alternative available, as this criterion is used in Section 403.519, 403.519(b), Florida Statutes.
13. We dispute whether an adequate and comprehensive representation of all costs, including but not limited to the cost of waste storage and disposal, is included in the project proposal.
14. We dispute the population projections upon which the need for this proposed facility is based.

E. CONSCISE STATEMENT OF ULTIMATE FACTS ALLEGED

15. The costs ascribed to this proposal by the applicant are insufficient in terms of identifying the true cost of the project.
16. The limited costs ascribed to this proposal by the applicant skews the outcome of a comparative analysis between this proposal and other courses of action available.

17. The permitting of this project would be contrary to the historical behavior of the Florida Public Service Commission as it has, in the past, protected the viability of the State's power needs while protecting the interests and safety of the residents and rate payers of the State.
18. Under rule 25-6.0423, FAC, Nuclear Power Plant Cost Recovery the public's responsibilities and obligations have been increased without appropriate compensation.
19. The long time effects and risks associated with this proposed nuclear technology calls into question the appropriateness, prudence of its' use and whether or not it is responsible for our generation or others to be using it.

F. STATUTES AND RULES THAT REQUIRE RELIEF REQUESTED

20. Statutes and rules referenced for relief requested include but are not limited to, Chapter 120, sections 403.519 and 366.80-366.93 Florida Statutes and Rules 25-22.039, 25-22.080 and 25-22.081, Florida Administrative Code.
21. Rule 25-22.039 FAC provides for intervention- this rule relates to information given as to our standing as intervenors.
22. The Florida Energy Efficiency and Conservation Act, sections 366.80-366.85 and 403.519 Florida Statutes, provides the Commission with jurisdiction over needs determinations...- this rule relates to the Commission's role in hearing and considering our issues, positions and requested resolutions.

23. Section 403.519 (3) provides for the guidelines the Commission must take into account in making its needs determination....-this rule sets the standards in criteria of the Commission's determination of need and our positions regarding the ultimate facts as they pertain to the assessment of potential injury to the intervenors.

24. Our rights and interests as intervenors can not adequately be represented by any other party in this docket.

G. RELIEF SOUGHT BY PETITIONER

26. We the undersigned, Jan and Bob Krasowski, request that the Commission accept our petition and accept us as intervenors in this docket.

Respectfully submitted this 3rd day of December, 2007

s/Bob Krasowski

Bob Krasowski
1086 Michigan Avenue
Naples, Florida 34103-3857

s/Jan M. Krasowski

Jan M. Krasowski
1086 Michigan Avenue
Naples, Florida 34103-3857

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Bob and/or Jan M. Krasowski Notice of Intervention has been furnished by electronic mail and U.S. Mail to the following parties on this 3rd day of December, 2007, to the following:

R. Wade Litchfield
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

Katherine Fleming
Jennifer Brubaker
Caroline Klancke
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Stephen Huntoon
Florida Power & Light Company
801 Pennsylvania Avenue, Suite 220
Washington, D.C. 20004

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