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From: Smallwood, Mary [Mary.Smallwood@ruden.com]
Sent: Friday, September 05, 2008 2:29 PM
To: Filings@psc.state.fl.us
Cc: Cindy Miller; Judy Harlow
Subject: Docket No: 080503-EI
Attachments: Covanta - Comments to PSC on renewable energy rule.DOC

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FPSC-COMMISSION CLERK

9/5/2008

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: ESTABLISHMENT OF RULE ON
RENEWABLE ENERGY PORTFOLIO
STANDARD

Docket No: 080503-EI

Filed September 5, 2008

POST WORKSHOP COMMENTS OF COVANTA ENERGY GROUP, INC.

Covanta Energy Group, Inc. (hereafter "Covanta") submits the following Post Workshop Comments on draft Rules 25-17.400, 25-17.410, and 25-17.420, Fla. Admin. Code, relating to a renewable portfolio standard ("RPS"):

1. Covanta has been a participant in the RPS rulemaking process since its inception.
2. Another participant in the rulemaking process, Wheelabrator Technologies, Inc. ("Wheelabrator"), had submitted detailed substantive comments on the draft rule, including specific proposals for amending the draft rule (the "Wheelabrator comments"). Those comments were submitted on September 5, 2008, by hand delivery to the Public Service Commission.
3. Covanta hereby adopts the Wheelabrator comments and incorporates them in this submission as its own and requests that the Public Service Commission make appropriate revisions to the draft rule in accordance with the Wheelabrator comments.
4. Covanta is committed to continuing to work with the Public Service Commission develop a rule that is consistent with the intention of the Florida Legislature in adopting HB 7135.

Submitted on behalf of Covanta Energy Group, Inc.

s/ Mary F. Smallwood
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CERTIFICATE OF SERVICE

I hereby certify that a true correct copy of these comments has been submitted by electronic submission this 5th day of September, 2008, to the following:

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s/ Mary F. Smallwood