

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 090451-EM

JOINT PETITION TO DETERMINE NEED
FOR GAINESVILLE RENEWABLE ENERGY
CENTER IN ALACHUA COUNTY, BY
GAINESVILLE REGIONAL UTILITIES
AND GAINESVILLE RENEWABLE ENERGY
CENTER, LLC.

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COMMISSION
CLERK

**MOTION TO INTERVENE AND ISSUES TO BE CONSIDERED DURING
THE REOPENING AND CONTINUANCE OF THE HEARING**

Comes now Paula H. Stahmer, representing herself and proceeding *pro se*, and states the following:

1. The above-captioned Petition was heard at a hearing before the Florida Public Service Commission (hereinafter "Commission") on December 16, 2009, followed by an Agenda Conference on February 9, 2010.

2. At the Agenda Conference, the APPLICANT requested through the Commission's general counsel, Mr. Kiser, that the Commission not the scheduled vote and defer the matter to a subsequent hearing "whereby they [APPLICANT] can provide some additional information on the record that they feel will address many of the Commission's questions that have been raised so far, and that is a request by the party." (TR page 69, lines 9-15).

3 The Commission acceded to APPLICANT's request.

4. I, therefore, come forward and request to be granted intervener status in these proceedings, asserting my standing as follows in compliance with FPSC Rule 25-22.039:

a. My substantial interests are subject to determination or will be affected through these proceedings.

b. I am a resident in the City of Gainesville and a customer of the Gainesville Regional Utility.

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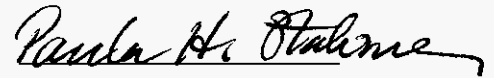
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c. As a GRU customer, I will be significantly affected by the proposed GREC project, potentially adversely.

5. I am submitting as an attachment to this motion my statement of issues proposed for consideration during the continuance of the hearing.

Respectfully submitted this third day of March, 2010,



Paula H. Stahmer

4621 Clear Lake Drive

Gainesville, Florida 32607

(352) 373-3958

Certificate of Service

I hereby certify that this original and seven true and correct copies of the foregoing including the referenced attachment will be furnished by hand delivery to the Clerk of the Commission.



3-3-2010

FLORIDA PUBLIC SERVICE COMMISSION DOCKET 090451-EM
ATTACHMENT TO MOTION TO INTERVENE of Paula H. Stahmer

Issues proposed for consideration during reopening and continuance:

A. Three issues that involve factors that should be further considered:

Issue Two: Is there a need for the Gainesville Renewable Energy Center, taking into account the need for electric system reliability and integrity, as this criterion is used in section 403.519, F.S.?

Issue Three: Is there a need for the Gainesville Renewable Energy Center, taking into account the need for adequate electricity at a reasonable cost as this criterion is used in Section 403.519, F. S.?

Issue Six: Is the Gainesville Renewable Energy Center the most cost-effective alternative available, as this criterion is used in Section 403.519, F.S.?

B. Two issues that should be clarified:

Issue Four: Is there a need for the Gainesville Renewable Energy Center, taking into account the need for fuel diversity and supply reliability *and sustainability*, as this criterion is used in Section 403.519, F.S.?

Issue Five: Are there any renewable energy sources and technologies, as well as conservation measures, *or other options*, taken by or reasonably available to Gainesville Regional Utilities which might mitigate the need for the proposed Gainesville Renewable Energy Center?

C. Four defacto issues that were not explicitly stated:

Issue Seven. Did the Gainesville City Commission fully consider all aspects of the impact the GREC Project would have on GRU's system and on the City's citizens, which are the customers of the utility.

Issue Eight. Did GRU's customers support the GREC project or fully understand the impact of the GREC project their bills?

Issue Nine: Will all GREC's wood fuel resource be carbon neutral and escape carbon fees?

Issue Ten. Is the plan of the city to meet the Kyoto Protocol goals of the US Mayors' Climate Change Agreement a realistic one, and is it a driver for support of the GREC Project by the City Commission and Gainesville citizens?