

Diamond Williams

100009-EI

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Subject: Docket 100009-EI: SACE's Notice of Filing of Corrected Exhibit AG-2 To The Testimony of Arnold Gundersen
Attachments: Notice of Filing - Gundersen.pdf

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b. Docket No. 100009-EI: In re: Nuclear Cost Recovery Clause

c. Filed on Behalf of Southern Alliance for Clean Energy ("SACE")

d. Total Pages:

e. Docket 100009-EI: SACE's Notice of Filing of Corrected Exhibit AG-2 To The Testimony of Arnold Gundersen

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DOCKET NUMBER-DATE

E 6100 JUL 27 2010

FPSC-COMMISSION CLERK

7/27/2010

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Plant Cost)
Recovery Clause)
)
)
_____)

DOCKET NO. 100009-E1
FILED: July 21, 2010

**SACE'S NOTICE OF FILING OF CORRECTED EXHIBIT AG-2 TO THE
TESTIMONY OF ARNOLD GUNDERSEN**

The Southern Alliance for Clean Energy ("SACE"), by and through its undersigned counsel, hereby gives notice of filing of a corrected Exhibit AG-2 to the testimony of Arnold Gundersen.

On July 8, 2010, SACE timely filed with the Florida Public Service Commission the direct testimony of Arnold Gundersen, including seven (7) Exhibits ("Gundersen Testimony"). Page 5 of the Gundersen Testimony, which is attached hereto as Exhibit "A," properly lists Exhibits AG-1 through AG-7 with each exhibit's corresponding title.

However, subsequent to the filing of the Gundersen Testimony, SACE became aware that Exhibit AG-2, titled "Sun Sentinel FPL Olivera," was improperly labeled in the upper right hand corner of the Exhibit as Exhibit "AG-3." Thus, the Gundersen testimony inadvertently contained two Exhibits labeled "AG-3."

Therefore, out of an abundance of caution, and in an attempt to ensure that there is no confusion as proceedings in this Docket continue, SACE hereby gives notice that it is filing a corrected Exhibit AG-2, which correctly labels the Exhibit titled "Sun Sentinel FPL Olivera" as Exhibit AG-2 to correspond with the listing contained on Page 5 of the Gundersen Testimony. There is no substantive change to the Exhibit itself; rather, it is simply renumbered in the upper right hand corner.

DOCUMENT NUMBER-DATE
06100 JUL 27 0
FPSC-COMMISSION CLERK

SACE respectfully requests that this corrected Exhibit AG-2 be made a part of the Gundersen Testimony.

Respectfully submitted, this the 21st day of July, 2010.

s/ James S. Whitlock
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CERTIFICATE OF SERVICE
Docket No. 100009-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing **NOTICE OF FILING OF CORRECTED EXHIBIT AG-2 TO THE TESTIMONY OF ARNOLD GUNDERSEN** has been furnished by electronic mail (e-mail) and/or U.S. Mail this the 21st day of July, 2010.

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- 1 AG-1. Arnie Gundersen CV 2010 July
- 2 AG-2 Sun Sentinel FPL Olivera
- 3 AG-3 FPL Press Release 01-2010
- 4 AG-4 NRC to Westinghouse 10-09
- 5 AG-5 Westinghouse Schedule 6-21-2010
- 6 AG-6 2010-05-28 FPL-TPN-NRC
- 7 AG-7 Petition to ACRS re: AP1000

8

9 **Q. Please describe how your testimony is organized.**

10 **A.** First, I briefly summarize my testimony in Docket 090009-EI and then evaluate the
11 conclusions that I came to in that testimony in light of recent developments. Next, in
12 the context of the "site banking" approach that both PEF and FPL have resorted to in
13 this docket, I discuss my opinions relating to the long-term feasibility of completing
14 these proposed new nuclear reactors, and the imprudence of incurring additional costs
15 on the proposed reactors at this time given all of the uncertainty surrounding new
16 nuclear generation. I then analyze the potential for further licensing delays and
17 resulting cost overruns for these proposed new nuclear reactors in light of unresolved
18 issues with the generic AP1000 design chosen by PEF and FPL. Next, I briefly
19 discuss geological issues with both the Levy County site and the Turkey Point site

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