

**Diamond Williams**

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**Sent:** Tuesday, July 26, 2011 4:28 PM  
**To:** Filings@psc.state.fl.us  
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**Subject:** Docket No. 110009-EI, Nuclear Cost Recovery Clause  
**Attachments:** SACE Position on Disputed Issues.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

- a. The name, address, telephone number and email for the person responsible for the filing is:  
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- b. This filing is made in Docket No. 110009-EI.
- c. The document is filed on behalf of SACE.
- d. The total pages in the document are 5 pages.
- e. The attached document is SACE's **Statement of Position as to Disputed Issues.**

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DOCUMENT NUMBER-DATE  
05174 JUL 26 =  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Plant Cost )  
Recovery Clause )  
\_\_\_\_\_ )

DOCKET NO. 110009-EI  
FILED: July 26, 2011

SACE'S STATEMENT OF POSITION AS TO DISPUTED ISSUES

The Southern Alliance for Clean Energy ("SACE"), by and through its undersigned counsel, hereby respectfully submits its Statement of Position as to Disputed Issues in the above-referenced docket.

FPL Specific Issues

\*Issue 4: What is the current total estimated all-inclusive cost (including AFUDC and sunk costs) of the proposed Turkey Point Units 6 & 7 nuclear project and is that reasonable?

\*Issue 5: What is the current estimated planned commercial operation date of the planned Turkey Point Units 6 & 7 nuclear facility and is that reasonable?

**SACE Position: SACE joins in the briefing, and adopts the position, of FIPUG on these disputed issues.**

\*Issue 10A: Should the Commission accept the quantitative methodology that FPL employed to assess the long-term feasibility of the EPU project?

\*Issue 10B: Should the Commission require FPL to perform separate long-term feasibility analyses for the Turkey Point and St. Lucie uprate activities?

\*Issue 16: Was it prudent for FPL to undertake the EPU projects at Turkey Point and St. Lucie on a "fast track" basis?

\*Issue 17: Was it prudent for FPL to undertake the EPU projects at Turkey Point and St. Lucie in the absence of a break-even calculation?

\*Issue 18: If the Commission finds FPL was imprudent in Issues 16 or 17, what action can and should the Commission take?

**SACE Position: SACE takes no position on these disputed issues.**

DOCUMENT NUMBER-DATE

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PEF Specific Issues

\*Issue 21: What is the total estimated all-inclusive cost (including AFUDC and sunk costs) of the proposed Levy Units 1 & 2 nuclear project and is this reasonable?

\*Issue 22: What is the estimated planned commercial operation date of the planned Levy Units 1 & 2 nuclear facility and is this reasonable?

**SACE Position: SACE joins in the briefing, and adopts the position, of FIPUG on these disputed issues.**

\*Issue 26: Should the Commission approve for recovery in 2012 any estimated 2011 and 2012 costs necessary for receipt of the Combined License (COL) for Levy Units 1 & 2? If not, what action can and should the Commission take with respect to these costs?

**SACE Position: SACE joins in the briefing, and adopts the position, of OPC on this disputed issue.**

\*Issue 30: Should the Commission approve as prudent any costs incurred between October 2, 2009 and December 31, 2010 for the Crystal River Unit 3 Uprate project?

**SACE Position: SACE takes no position on this disputed issue.**

Dated: July 26, 2011

Respectfully Submitted,

/s/ James S. Whitlock

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**CERTIFICATE OF SERVICE**  
**Docket No. 110009-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing *SACE'S STATEMENT OF POSITION AS TO DISPUTED ISSUES* has been furnished by electronic mail (e-mail) and/or U.S. Mail this the 26<sup>th</sup> day of July, 2011.

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