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Sent: Tuesday, November 27, 2012 12:35 PM
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Cc: 'J. Beasley'; Larry Harris; 'probins@psc.state.fl.us'; Christensen, Patty; 'Schef Wright (schef@gbwlegal.com)'
Subject: Dkt. No. 120234-EI -Office of Public Counsel's Position Statement
Attachments: Dkt. No. 120234-EI OPC's Position Statement.pdf

Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 120234-EI

In Re: Petition to determine need for Polk 2-5 combined cycle conversion, by Tampa Electric Company.

c. Document being filed on behalf of Office of Public Counsel

d. There are a total of 3 pages.

e. The document attached for electronic filing is Office of Public Counsel's Position Statement

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SEARCH NUMBER-DATE

07862 NOV 27 2012

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for Polk 2-5
combined cycle conversion, by Tampa Electric
Company.

DOCKET NO. 120234-EI
Filed: 11/27/2012

OFFICE OF PUBLIC COUNSEL'S POSITION STATEMENT

Issue 1: Is there a need for the proposed Polk 2-5 Combined Cycle Conversion, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(3), Florida Statutes?

OPC: *Yes, there appears to be a need for additional generation for the reliability and integrity of Tampa Electric's system.*

Issue 2: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Tampa Electric Company, which might mitigate the need for the proposed Polk 2-5 Combined Cycle Conversion?

OPC: *It is unknown whether there is currently any renewable energy sources and technologies or conservation measures taken by or reasonably available to Tampa Electric Company, which might mitigate the need for the proposed Polk 2-5 Combined Cycle Conversion.*

Issue 3: Is there a need for the proposed Polk 2-5 Combined Cycle Conversion, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(3), Florida Statutes?

OPC: * There appears to be a need for additional generation for the reliability and integrity of Tampa Electric's system. OPC supports the lowest cost generation available be used to meet this need based on the evidence adduced at the hearing..*

Issue 4: Is there a need for the proposed Polk 2-5 Combined Cycle Conversion, taking into account the need for fuel diversity, as this criterion is used in Section 403.519(3), Florida Statutes?

OPC: * There appears to be a need for additional generation for the reliability and integrity of Tampa Electric's system. OPC supports the lowest cost generation considering fuel diversity available be used to meet this need based on the evidence adduced at the hearing..*

Issue 5: Will the proposed Polk 2-5 Combined Cycle Conversion provide the most cost-effective source of power, as this criterion is used in Section 403.519(3), Florida Statutes?

OPC: * There appears to be a need for additional generation for the reliability and integrity of Tampa Electric's system. OPC supports the lowest cost generation available be used to meet this need based on the evidence adduced at the hearing..*

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

Issue 6: Based on the resolution of the foregoing issues, should the Commission grant Tampa Electric Company's petition to determine the need for the proposed Polk 2-5 Combined Cycle Conversion?

OPC: * There appears to be a need for additional generation for the reliability and integrity of Tampa Electric's system. OPC supports the lowest cost generation available be used to meet this need based on the evidence adduced at the hearing.*

Issue 7: Should this docket be closed?

OPC: *Yes, unless a timely appeal is filed.*

Respectfully submitted,

J.R. Kelly
Public Counsel



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Attorneys for Florida's Citizens

CERTIFICATE OF SERVICE
DOCKET NO. 120234-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Office of Public Counsel's Position Statement has been furnished by U.S. mail and electronic mail to the following parties on this 27th day of November, 2012.

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