BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 120314-EQ

PETITION FOR APPROVAL OF NEGOTIATED RENEWABLE ENERGY CONTRACTS WITH U.S. ECOGEN OKEECHOBEE, LLC, U.S. ECOGEN CLAY, LLC, AND U.S. ECOGEN MARTIN, LLC, BY FLORIDA POWER & LIGHT COMPANY.
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PROCEEDINGS: COMMISSION CONFERENCE
ITEM NO. 10

COMMISSIONERS PARTICIPATING: CHAIRMAN RONALD A. BRISÉ
COMMISSIONER LISA POLAK EDGAR
COMMISSIONER ART GRAHAM
COMMISSIONER EDUARDO E. BALBIS

DATE: Tuesday, April 9, 2013

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: JANE FAUROT, RPR
Official FPSC Reporter
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P R O C E E D I N G S

CHAIRMAN BRISÉ: All right. Moving on to Item Number 10.

MR. ELLIS: Good morning, Commissioners. Phillip Ellis with Commission staff.

Item 10 is staff's recommendation on FPL's request for approval of three biomass contracts with subsidiaries of U.S. EcoGen LLC. Staff has reviewed the contracts in terms of FPL's need for power, their cost-effectiveness, and protections for ratepayers. The contracts will improve FPL's fuel diversity, and when combined with other contracts may defer or delay some future capacity.

Using a value of deferral analysis based on a 2025 combined cycle, the contracts show a net present value benefit of $89 million with cumulative net benefits beginning in year fourteen of the 30-year term. Staff recommends that the contracts also include sufficient protection in the form of performance requirements and security for both early payments and performance in the event of a default.

Overall, staff recommends the approval of three power purchase agreements for purposes of cost-recovery. Staff would like to note that representatives from FPL and U.S. EcoGen LLC are here today. Also FIPUG, which has intervened in this docket, is also present. Staff is available for any questions.

CHAIRMAN BRISÉ: Okay. So I guess we'll hear from the company and then we will hear from FIPUG.

MR. COX: Chairman Brisé and Commissioners, Will Cox here on behalf of Florida Power and Light. With me is Tom Hartman from our energy marketing trading group, as well as Ryan Tyler from our regulatory affairs group.

We are pleased to support the staff recommendation, and we're available for any questions that you might have today.

CHAIRMAN BRISÉ: Okay.

Jon. Mr. Moyle, rather.

MR. MOYLE: Thank you, Mr. Chairman. Jon Moyle on behalf of FIPUG, the Florida Industrial Power Users Group.

And FIPUG intervened because we had questions about this item, and we have asked questions. We are here today, I think, to raise some questions and, candidly, you know, some concerns. So if it's okay, I would like to just go through a series of questions that I think still remain that probably warrant some further examination. And I would preface that by saying my client is about having reasonably priced energy, and the key being those adjectives are very important. So to the extent that there are proposals that are not cost-effective or are not needed, you know, those are areas that we will bring up, and talk about, and have some concerns about.

So, I have an exhibit, if I could pass out --

CHAIRMAN BRISÉ: Sure.

MR. MOYLE: -- to make the first point. And the first question that I would ask, is there a need for the project? And like I said, I will have a series of questions.

(Pause.)

CHAIRMAN BRISÉ: Mr. Moyle, you can go ahead.

MR. MOYLE: Okay, thanks. So what I have handed out is a three-page exhibit that I took from the Ten-Year Site Plans that were filed last week by Florida Power and Light.

Now, I acknowledge that the recommendation has been put together with information that was in the 2012 site plans, but this information is the most recent and is what FPL recently filed. And the first page is entitled FPL generating resources by location, and it totals up to a total number of 24,065. And I'm assuming that that is megawatts. That's, I think, the size of their system. And one percent of that number is approximately 240 megawatts.

If you then flip over to another page out of the Ten-Year Site Plan, this is what FPL looks like they are going to need, their reserve margins starting in '13/'14, and, you know, they are pretty heavy in there; 30, 34 percent, 42 percent. The Commission has a reserve margin of 20 percent, and the FRCC has a reserve margin of 15 percent.

But I wanted to, you know, draw your attention -- the first time that these units show up in this document is in 2021, and it shows 180 megawatts coming in. But if you also look over, they have a 21 percent reserve margin in 2021. So if you take away -- if you take away the 180 from that number, you're still good to go by meeting the 20 percent reserve margin. You have 60 extra megawatts. So because this deal has capacity payments and, you know, hundreds of millions of dollars, we believe, associated with a 30-year contract, the most recent information raises the question to FIPUG's mind, you know, is this really needed.

And then the related question is, you know, should capacity payments begin in 2021 as proposed? And we think, at least based on this information, that the answer is no. I mean, capacity payments are only available if there's a need. If you do the simple math here, there doesn't appear to be a need in 2021. You know, save the ratepayers some money and don't provide capacity payments for stuff that's not needed.

Another question, will the project save ratepayers money? I think the answer to that is it's not clear. I will point out the staff has said on Page 4 of its recommendation -- there's a section in the staff recommendation entitled cost-effectiveness. The second paragraph, I think, is informative. And if I could just quote that the first sentence says while a system level CPVRR is a valid form of cost-effective analysis, a value of deferral analysis based on the utility's next avoidable unit allows for a better comparison of smaller resource options. So I think staff is saying, you know, we think there's a better way of looking at whether this is cost-effective.

And then the last sentence in there, in that paragraph, says a comparison of the payments to the U.S. EcoGen facilities in the 2012 standard offer show a net present value cost of $12.4 million. So here staff is saying, you know, based on their analysis it looks like there's a $12.4 million cost.

If you also flip over to the fifth page of the staff recommendation, and this is in the third paragraph just above the Table 2 chart. It says staff's projecting a net present value savings of 89.4 million, with net savings projected to begin in 2032. And, you know, 2032 is a long time from today. And for people who are my age or older than me, you know, this may not be such a great deal. Maybe for high school kids it would be a good deal. But the way the project is proposed and the contract is constructed, as I understand it, is it is front loaded. There's a lot of money that's coming up front, and then you don't start saving money until, you know, approximately, you know, 19 or 20 years from now.

And I think these numbers are based on forecasts and sensitivity analysis. And so if you go to the chart there, you know, a base line number of 89 million is estimated, and then there is a high number, but then there is also a low number. And the low number, you know, is 60 million. So it could be a deal and a proposition, if you assume the low number, that there is a $60 million loser for the ratepayers. And that, you know, that is of concern.

One thing that was unclear in another question is that it appears that an assumption of high emission costs may have been used. And, you know, that's tough to see what's going to happen with emission costs. If you look on Page 4 of, you know, the staff recommendation, the first paragraph, I think this is talking about FPL's analysis. It's unclear whether it's incorporated into those numbers, but it says, quote, "A substantial portion of the savings associated with this analysis are based on deferral of generation assets beginning in 2034 and high emission costs."

Well, you know, respectfully who knows what the emission costs are going to be? I know people are talking about that. Is Congress going to act? Is Congress going to not act? But, you know, given the long range nature of it, we think the answer to the question is this cost-effective is unclear.

Another question is why three? There are three projects proposed, each of them of 60 megawatts. And in the petition itself it says that at present there are no closed loop biomass projects in operation in the United States. And that is on Page 5 of the petition. So if I'm reading that correctly, there's none of these that are working in this country, but we're going to ask the ratepayers to step up and be responsible for costs for 30 years for three plants. That's a question. I mean, why not one, see if it works, and then move forward assuming it works. But it seems to me and to FIPUG that there is additional risk associated with doing three as compared to a fewer number.

Another cost, another question. Does this comply with the avoided cost statutory requirements and the avoided cost requirements that are in your rule? And there has been a lot of discussion about avoided cost. The legislature has looked at avoided costs. And typically, you know, avoided costs are you don't get more than what it would cost the utility. The way this project is set forward and proposed is, as I said, it's front loaded. There is for money that comes into the project, you know, I think above avoided cost in the beginning years until, I think, 14 years. There is more money coming in, and then at the back end there is less money. So I think their argument is, well, if you look at it as a whole, it doesn't exceed, you know, avoided cost. But that, candidly, is a pretty significant policy issue. And if you can do it for 30 years, why not do it for 50 years? Why not load it so that it's, you know, paying you money up front for the first 25 and the last 25 is not. I mean, there's a lot of play in there if you approve this and say, no, we're okay on avoided costs being examined on an overall contract basis.

And another thing that is in here that we have a question about is there is something called an energy performance bonus. And I'll refer you to Page 5 of the staff recommendation. This is in the second paragraph, and it says, "Energy payments are increased during the initial two-year commissioning period by an amount referred to as an energy performance bonus payments based on megawatts, you know, delivered.

Questions arise as to how an energy performance bonus payment is reconciled with the construct of avoided costs. And I did take a look at the statute on avoided costs, 366.051, where the legislature has said here is the policy for avoided costs. And a couple of things I just wanted to bring to the Commission's attention is it says, quote, "In fixing rates for power purchased by public utilities from cogenerators or small power producers, the Commission shall authorize a rate equal to the purchasing utility's full avoided cost.

And there's another sentence that I found somewhat instructive. I think lawyers may be able to argue about words in a statute, which is probably not a surprise, but this sentence says if the cogenerator or small power producer provides adequate security based on its financial stability and no cost in excess -- and no costs in excess of full avoided costs are likely to be incurred by the electric utility over the term during which the electricity is to be provided, the Commission shall authorize the levelization of payments and elimination of discounts due to risk factors in determining the rates.

So here the legislature at least is using language about cost in excess of full avoided cost, and I think that has been sort of the walking around construct that, you know, avoided cost acts as a pretty tight bar. And if it is going to be something that is exceeded, you know, for 14 or 15 years, then I guess that's just a question that was raised.

I think I have made the point about seeing beyond the horizon. A 30-year deal is a long -- you know, a long deal. There was a little bit of a need in 2012, and, you know, the response is here we are going to do a 30-year deal. I think some questions were raised about that, particularly when you consider the last page of the handout. And, again, this is from the FPL site plan. But it's not like there's not, apparently, some energy out there from other providers.

And I didn't get into all the contractual details, but the purchases that are shown in this exhibit, there are some coal purchases from Cedar Bay, there's some purchases from solid waste facilities, the Palm Beach County folks, some facilities in Broward, nonfirm, the Okeelanta facilities, and some others. So the point simply of this is it is not like there's not options out there. And to come in and say, okay, we've got a 30-year deal that I think is hundreds of millions of dollars, when you guys act on this, you know, it's there, and then it's just a matter of recovery, you know, to refer to another clause. It becomes kind of set in stone and off you go.

So FIPUG has raised questions. We think that these are legitimate questions that should be asked and answered before y'all move forward with a long-term deal that commits ratepayers to, like I said, an incredible amount of money.

CHAIRMAN BRISÉ: Thank you, Mr. Moyle.

I don't know if FPL wants to respond to some of these questions before we come to the Commission and staff, as well.

MR. COX: Chairman Brisé, I will do my best. That was a long list of questions that Mr. Moyle posed. I will start with the premise that, you know, it's our position that these contracts that are proposed meet the requirements of the rule as staff outlined. They are cost-effective and there is a need.

We state clearly in our petition and also stated clearly in the staff recommendation that there is a need for power that is being offset by these contracts. And, in fact, it's not just any energy; it's renewable energy. This is going to increase our renewable energy as a percentage of our load by 77 percent.

But let me go through some of the details that he outlined. Again, in terms of the need for power, it does offset from our last Ten-Year Site Plan a 2021 purchase. But as staff points out, the more clear need, or given the duration of this contract would be the 2025 combined cycle unit, avoided unit which is next in line after that. And just to note for the record that with our new standard offer contract filing, that contains a 2025 avoided unit. Very similar to what the staff has in their analysis when they analyzed the need here.

In terms of cost-effectiveness, again, we have shown on a system-wide basis versus the EcoGen contracts in our system or not in our system, 159.1 million. And as staff points out, really the best comparison is looking at that 2025 unit as opposed to our 2012 standard offer which, as you will recall, was a 2021 one-year purchase. That is only one year of capacity, whereas the 2025 has a great fair value of capacity, and because these contract with EcoGen are essentially a 28-year period after the initial two-year commissioning period, you're talking about capacity of that duration. So the best comparison really is the EcoGen contracts to the 2025 unit. And when you look at that we show that the contracts are clearly cost-effective.

For the periods of time where the contracts are above avoided cost, I would note that it's Commission policy, it's in Commission rules. I was just looking at the standard offer rule where it talks about making early capacity payments so that renewable providers like U.S. EcoGen can finance their projects, that it provides for that as long as there is adequate security. And FPL, Mr. Hartman here on my side, worked at length with EcoGen on the security provisions as well as the performance guarantee provisions of these contracts to ensure that FPL's customers and FPL are protected in the event there is a problem with EcoGen's ability to perform at any time, including periods of the contract where the costs are in excess of avoided cost.

In terms of a front-loaded contract, these are levelized capacity payments over the length of the contract. The energy payments are lower such that over the term of the contract the contract is cost-effective. And I would note in the statute that Mr. Moyle cited, 366.051, it clearly stated, and I don't have it right in front of me, but it clearly stated that basically if you have periods that are in excess of avoided cost, as long as you have adequate security to protect the customers, that's okay under that law.

So, again, I don't see where any of his points have any merit. These are small power producers, qualifying facilities under Florida law, renewable energy generators. We are required to purchase from them. The purchase from them offsets our need for future power needs and provides renewable power, additional renewable power to our generation resources. And I'm happy to answer any other questions. I tried to hit as many of them as I could there. Thank you.

CHAIRMAN BRISÉ: Thank you. Staff.

MR. ELLIS: The only thing I'd just like to add, in terms of the energy performance bonus payments, that is the terminology used in the contract. They are already included in the cost-effectiveness analysis.

CHAIRMAN BRISÉ: Okay. Thank you.

Commissioner Balbis.

COMMISSIONER BALBIS: Thank you, Mr. Chairman.

And I appreciate this dialogue on these issues because there is -- these are important projects, and there's a lot of money associated with them. But I just want to point out in response to the comments I have heard here today. I mean, Florida Statutes are very clear that the utility companies are to continuously offer standard offer contracts to encourage renewable energy facilities to come into the system. And there is a very important protection and that is that customers should not pay more than the avoided cost.

And I want to just point out that the difference between the purchased power agreement which was initially used that showed a cost of $12.4 million, I think staff appropriately looked at the 2025 avoided unit which the costs were reduced so that customers saved money. This could have come in beforehand, and they could have argued, the utility could have argued and EcoGen could have argued the PPA portion of the agreement where they would have received additional energy and capacity payments. So I think that the statute is very clear to encourage these types of facilities to come in, so I discount some of the comments that I heard here today.

As far as the need is concerned, you know, I appreciate having a document that comes from something that was submitted last week, and we go through a thorough evaluation of that during the ten-year site plan discussion. But a lot of those reserve margins, in fact, all of those margins include interruptible load or demand-side management margins. And this is providing base load generation. The generation reserve margin, I believe, is much more important than including everything.

So I appreciate the discussion. I'm comfortable with the fact that there is an $89 million savings to customers. We have three renewable energy base load generation units providing 180 megawatts of power. And not only that, we have these discussions, but it's creating over 300 jobs in these three counties, and that's something that -- that is important. It increases the renewable energy portfolio of the state, and, again, without raising costs to customers.

The relationship with the utility companies and these renewable energy providers working together to bring these projects forward I think is a synergistic relationship that we should encourage. So I appreciate what staff has done; I appreciate what the parties have done, and the discussion from the intervenors. But this is something that we need to support and applaud as something that is good for the state.

CHAIRMAN BRISÉ: Thank you.

Commissioners, any further discussion on this item?

Okay. So we're ready to entertain a motion.

COMMISSIONER BALBIS: Mr. Chairman, I move staff's recommendation on all issues for this matter.

CHAIRMAN BRISÉ: Okay. It has been moved. Is there a second?

COMMISSIONER GRAHAM: Second.

CHAIRMAN BRISÉ: It has been moved and seconded. All in favor say aye.

(Vote taken.)

CHAIRMAN BRISÉ: All right. Thank you very much. And let me go through my list again.

(Laughter.)

MR. MOYLE: Thank you.

CHAIRMAN BRISÉ: All right. Considering that there are no other items before us today, now we stand adjourned.

STATE OF FLORIDA)

: CERTIFICATE OF REPORTER

COUNTY OF LEON)

I, JANE FAUROT, RPR, Chief, Hearing Reporter Services Section, FPSC Division of Commission Clerk, do hereby certify that the foregoing proceeding was heard at the time and place herein stated.

IT IS FURTHER CERTIFIED that I stenographically reported the said proceedings; that the same has been transcribed under my direct supervision; and that this transcript constitutes a true transcription of my notes of said proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED THIS 17th day of April, ~~2011~~ 2013 JF.

Jane Faurot

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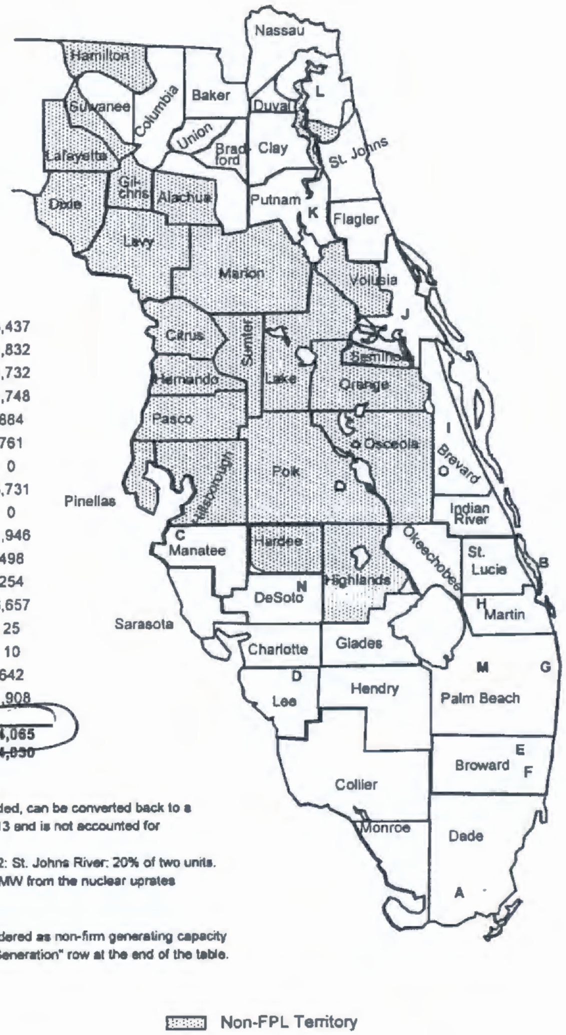
FPL Generating Resources by Location

A	Turkey Point [1/]	5	3,437
B	St. Lucie [2/]	2	1,832
C	Manatee	3	2,732
D	Fort Myers	3	1,748
E	Lauderdale	2	884
F	Port Everglades [3/]	2	761
G	Riviera [3/]	0	0
H	Martin	5	3,731
I	Cape Canaveral [3/]	0	0
J	Sanford	2	1,946
K	Putnam	2	498
L	St. John's River Power Park [2/]	2	254
M	West County	3	3,657
N	DeSoto [4/]	1	25
O	Space Coast [4/]	1	10
	Scherer [5/]	1	642
	Gas Turbines	48	1,908
	Total System Generation =	82	24,065
	System Firm Generation =	80	24,030



1/ Turkey Point Unit 2 is currently operating as a synchronous condenser. If needed, can be converted back to a generating unit per the existing Title V operating permit through the end of 2013 and is not accounted for in Reserve Margin Calculation.
2/ Represents FPL's ownership share: St Lucie nuclear: 100% Unit 1, 85% Unit 2: St. Johns River: 20% of two units. The 1,832 MW value shown incorporates the latest projection for incremental MW from the nuclear uprates available at the time this document is being finalized.
3/ Will be site of new Modernization Plants.
4/ The 25 MW of PV at DeSoto and the 10 MW of PV at Space Coast are considered as non-firm generating capacity and the capacity from these units has been removed from the "System Firm Generation" row at the end of the table.
5/ The Scherer unit is located in Georgia and is not shown on this map.

1% of 24,065 is 240 MW

Figure I.A.1: Capacity Resources by Location (as of December 31, 2012)

Parties/Staff Handout
Internal Affairs/Agenda
on 4/9/13
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120314-EQ

Table ES-2: Projected Capacity Changes and Reserve Margins for FPL

Year	Projected Capacity Changes	Net Capacity Changes (MW) Winter[2]	Summer[3]	Reserve Margin (%) After Maintenance Winter	Summer
2013	Changes to Existing Purchases[4]	(545)	(425)		
	Port Everglades Units 3 & 4 retired for Modernization	(765)	(761)		
	Turkey Point Unit 2 operation changed to synchronous condenser	(394)	(392)		
	Sanford Unit 5 CT Upgrade	---	9		
	Turkey Point Unit 4 Uprate - Completed	---	115		
	Turkey Point Unit 4 Uprate - Outage[5]	(717)	---		
	Sanford Unit 4 CT Upgrade	---	16		
	Manatee Unit 2	(3)	---		
	Scherer Unit 4	(28)	---		
	Cape Canaveral Next Generation Clean Energy Center[6]	---	1,210		
	Manatee Unit 1 ESP - Outage[7]	(822)	---		
	Martin Unit 1 ESP - Outage[7]	---	(826)	30.6%	28.0%
2014	Sanford Unit 5 CT Upgrade	19	10		
	Cape Canaveral Next Generation Clean Energy Center[6]	1,355	---		
	Changes to Existing Purchases[4]	22	37		
	Manatee Unit 1 ESP - Outage[7]	822	---		
	Sanford Unit 4 CT Upgrade	16	---		
	Vero Beach Combined Cycle[8]	46	44		
	Martin Unit 1 ESP - Outage[7]	(832)	826		
	Martin Unit 2 ESP - Outage[7]	---	(826)		
	Manatee Unit 3 CT Upgrade	---	19		
	Turkey Point Unit 5 CT Upgrade	---	33		
	Turkey Point Unit 4 Uprate - Completed[5]	115	---		
	Riviera Beach Next Generation Clean Energy Center[6]	---	1,212	34.1%	28.5%
2015	Manatee Unit 3 CT Upgrade	39	20		
	Martin Unit 1 ESP - Outage[7]	832	---		
	Martin Unit 2 ESP - Outage[7]	---	826		
	Turkey Point Unit 5 CT Upgrade	33	---		
	Changes to Existing Purchases[4]	70	70		
	Ft. Myers Unit 2 CT Upgrade	---	51		
	Riviera Beach Next Generation Clean Energy Center[6]	1,344	---	42.2%	31.2%
2016	Changes to Existing Purchases[4]	(858)	(928)		
	Ft. Myers Unit 2 CT Upgrade	51	---		
	Port Everglades Next Generation Clean Energy Center[6]	---	1,277	36.5%	31.3%
2017	Turkey Point Unit 1 operation changed to synchronous condenser	(398)	(396)		
	Changes to Existing Purchases[4]	(37)	(37)		
	Vero Beach Combined Cycle[8]	(46)	(44)		
	Port Everglades Next Generation Clean Energy Center[6]	1,429	---	40.0%	27.5%
2018	Changes to Existing Purchases[4]	(388)	(381)	37.0%	24.3%
2019	---	---	---	36.0%	22.7%
2020	---	---	---	34.9%	21.1%
2021	Changes to Existing Purchases[4]	180	180	34.5%	21.0%
2022	Turkey Point Nuclear Unit 6[6]	---	1,100	34.4%	23.5%

(1) Additional information about these resulting reserve margins and capacity changes are found on Schedules 7 & 8 respectively.
(2) Winter values are forecasted values for January of the year shown.
(3) Summer values are forecasted values for August of the year shown.
(4) These are firm capacity and energy contracts with QF, utilities, and other entities. See Table I.B.1 and Table I.B.2 for more details.
(5) Outages for uprate work.
(6) All new unit additions are scheduled to be in-service in June of the year shown. All additions assumed to start in June are included in the Summer reserve margin calculation starting in that year and in the Winter reserve margin calculation starting with the next year.
(7) Outages for ESP work.
(8) This unit will be added as part of the agreement that FPL will serve Vero Beach's electric load starting January, 2014. This unit is expected to be retired within 3 years.

If 180 MW not there in 2021, still above the 20% reserve margin figure by 60 MW

Table 1.A.3: Purchase Power Resources by Contract (as of December 31, 2012)

Table 1.A.3: Purchase Power Resources by Contract (as of December 31, 2012)

	Location (City or County)	Fuel	Summer MW
I. Purchases from QF's: Cogeneration/Small Power Production Facilities			
Cedar Bay Generating Co.	Duval	Coal (Cogen)	250
Indiantown Cogen., LP	Martin	Coal (Cogen)	330
Broward South	Broward	Solid Waste	4
Broward North	Broward	Solid Waste	11
Palm Beach SWA - extension			40
		Total:	635
II. Purchases from Utilities:			
UPS from Southern Company	Various in Georgia	Coal	928
SJRPP	Jacksonville, FL	Coal	381
TECO	Tampa	Coal	125
		Total:	1,434
III. Other Purchases:			
DeSoto Unit 1	DeSoto	Natural Gas	150
DeSoto Unit 2	DeSoto	Natural Gas	155
			305
	Total Net Firm Generating Capability:		2,374

Non-Firm Energy Purchases (MWH)

Project	County	Fuel	Energy (MWH) Delivered to FPL in 2012
Okeelanta (known as Florida Crystals and New Hope Power Partners) *	Palm Beach	Bagasse/Wood	141,594
Broward South *	Broward	Solid Waste	127,533
Broward North *	Broward	Solid Waste	119,168
Tomoka Farms *	Volusia	Landfill Gas	0
Waste Management - Renewable Energy *	Broward	Landfill Gas	45,371
Waste Management - Collier County Landfill *	Broward	Landfill Gas	29,303
Tropicana	Manatee	Natural Gas	22,935
Calnetix	Palm Beach	Natural Gas	0
Georgia Pacific	Putnam	Paper by-product	9,550
Rothenbach Park (known as MMA Bee Ridge)	Sarasota	PV	320
First Solar	Miami	PV	67
Customer - Owned PV & Wind	Various	PV/Wind	877
Palm Beach SWA	Palm Beach	Solid Waste	370,109
INEOS Bio *	Indian River	Wood	70

* These Non-Firm Energy Purchases are Renewable and are reflected on Schedule 11.1 row 9 column 6.