

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for Seminole combined cycle facility, by Seminole Electric Cooperative, Inc.

DOCKET NO. 20170266-EC

In re: Joint petition for determination of need for Shady Hills combined cycle facility in Pasco County, by Seminole Electric Cooperative, Inc. and Shady Hills Energy Center, LLC.

DOCKET NO. 20170267-EC

DATED: March 5, 2018

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2018-0018-PCO-EC, filed January 5, 2018, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

There are no known witnesses at this time.

2. All Known Exhibits

Staff has a demonstrative exhibit that has been circulated to the parties.

3. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. Staff's Position on the Issues

- ISSUE 1:**
- A. Is there a need for the proposed Seminole Combined Cycle Facility (SCCF), taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(3), Florida Statutes?
 - B. Is there a need for the proposed Shady Hills Combined Cycle Facility (SHCCF), taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(3), Florida Statutes?

POSITION: No position at this time.

- ISSUE 2:**
- A. Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Seminole Electric Cooperative, Inc. (Seminole), which might mitigate the need for the proposed SCCF?
 - B. Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Seminole and Shady Hills Energy Center, LLC (SHEC), which might mitigate the need for the proposed SHCCF?

POSITION: No position at this time.

- ISSUE 3:**
- A. Is there a need for the proposed SCCF, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(3), Florida Statutes?
 - B. Is there a need for the proposed SHCCF, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(3), Florida Statutes?

POSITION: No position at this time.

- ISSUE 4:**
- A. Is there a need for the proposed SCCF, taking into account the need for fuel diversity and supply reliability, as this criterion is used in Section 403.519(3), Florida Statutes?
 - B. Is there a need for the proposed SHCCF, taking into account the need for fuel diversity and supply reliability, as this criterion is used in Section 403.519(3), Florida Statutes?

POSITION: No position at this time.

- ISSUE 5:**
- A. Will the proposed SCCF provide the most cost-effective alternative available, as this criterion is used in Section 403.519(3), Florida Statutes?
 - B. Will the proposed SHCCF provide the most cost-effective alternative available, as this criterion is used in Section 403.519(3), Florida Statutes?

POSITION: No position at this time.

- ISSUE 6:**
- A. Based on the resolution of the foregoing issues and other matters within its jurisdiction which it deems relevant, should the Commission grant Seminole's petition to determine the need for the proposed SCCF?
 - B. Based on the resolution of the foregoing issues and other matters within its jurisdiction which it deems relevant, should the Commission grant Seminole and SHEC's joint petition to determine the need for the proposed SHCCF?

POSITION: No position at this time.

ISSUE 7: A. Should Docket No. 20170266-EC be closed?

B. Should Docket No. 20170267-EC be closed?

POSITION: No position at this time.

The scope of the administrative hearing in this proceeding shall be based upon these issues and any other appropriate issues, raised by the parties up to and during the Prehearing Conference, unless modified by the Prehearing Officer.

5. Stipulated Issues

Staff is not aware of any stipulated issues at this time.

6. Pending Motions

Staff has no pending motions at this time.

7. Pending Confidentiality Claims or Requests

Staff has no pending confidentiality claims or requests at this time.

8. Objections to Witness Qualifications as an Expert

Staff has no objections to any witnesses' qualifications as an expert in this proceeding.

9. Compliance with Order No. PSC-2018-0018-PCO-EC

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 5th day of March, 2018.

/s/ Rachael Dziechciarz

RACHAEL DZIECHCIARZ

STAFF COUNSEL

FLORIDA PUBLIC SERVICE COMMISSION

Gerald L. Gunter Building

2540 Shumard Oak Boulevard

Tallahassee, Florida 32399-0850

Telephone: (850) 413-6212

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for Seminole combined cycle facility, by Seminole Electric Cooperative, Inc.

DOCKET NO. 20170266-EC

In re: Joint petition for determination of need for Shady Hills combined cycle facility in Pasco County, by Seminole Electric Cooperative, Inc. and Shady Hills Energy Center, LLC.

DOCKET NO. 20170267-EC

DATED: March 5, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with the Office of Commission Clerk and that a true copy has been furnished to the following by electronic mail this 5th day of March, 2018:

Seminole Electric Cooperative, Inc.
David Ferrentino
Trudy Novak
16313 North Dale Mabry Highway
Tampa, Florida 33618
Dferrentino@seminole-electric.com
tnovak@seminole-electric.com

Shady Hills Energy Center, LLC.
c/o GE Energy Financial services
901 Main Avenue
Norwalk, CT 06851
Attn: William Bradley, General Counsel
William.Bradley@ge.com

CERTIFICATE OF SERVICE
DOCKET NOS. 20170266-EC, 20170267-EC
PAGE 2

Seminole Electric Cooperative, Inc.
David Ferrentino
Trudy Novak
16313 North Dale Mabry Highway
Tampa, Florida 33618
Dferrentino@seminole-electric.com
tnovak@seminole-electric.com

Shady Hills Energy Center, LLC.
c/o GE Energy Financial services
901 Main Avenue
Norwalk, CT 06851
Attn: William Bradley, General Counsel
William.Bradley@ge.com

/s/ Rachael Dziechciarz

RACHAEL DZIECHCIARZ
STAFF COUNSEL
FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 413-6212