

Crystal Card

From: Barry Moline <bmoline@publicpower.com>
Sent: Tuesday, October 08, 2013 5:20 PM
To: Filings@psc.state.fl.us
Cc: schef@gbwlegal.com; jlavvia@gbwlegal.com
Subject: FMEA Letter on Docket No. 130235-EQ 10-8-2013, Petition of Southeast Renewable Fuels, LLC
Attachments: Let - FMEA - Docket No. 130235-EQ 10-8-201.pdf

Please add the attached letter to the file of Docket No. 130235-EQ.

Barry Moline
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Florida's Public Power Utilities

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October 8, 2013

Ms. Rosanne Gervasi
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**RE: Docket No. 130235-EQ: Petition of Southeast Renewable Fuels, LLC,
for a Declaratory Statement Regarding Co-Ownership of Electrical Cogeneration
Facilities in Hendry County**

Dear Ms. Gervasi:

The Florida Municipal Electric Association (FMEA) is concerned about Southeast Renewable Fuels, LLC's proposed electric generator that would provide retail electric service to at least two retail customers that are not related. FMEA believes this would create an unintended regulatory hole in the Commission's jurisdiction over Florida's electric grid, and would impair the Commission's ability to fulfill the Legislature's directives in the Grid Bill.

Municipal electric utilities are concerned this will negatively affect the Commission's jurisdiction and its ability to enforce all of the provisions in the Grid Bill. In addition, the municipal utilities we represent are concerned about a potential loss of the jurisdiction in Section 366.04(6), which gives the Commission exclusive jurisdiction over the safety of transmission and distribution facilities. Our municipalities employ firefighters, police officers and other first responders that could be put at risk if no one oversees the safety of the electric utility operations of Southeast and others. If the Commission grants Southeast's requests, we are concerned the electrical connections and distribution facilities Southeast must build to interconnect two retail customers and the generator to each other and possibly to another electric utility may be non-standard and unlikely to provide a single point to disconnect service to the generator or to either retail customer.

Firefighters and other first responders require the ability to quickly assess the profile of an emergency. Before they can begin responding to a disaster in progress, such as a fire, they must safely secure the area, and the scenario presented by Southeast's proposal provides no assurance of safety for human life. The Legislature has directed the Commission to set standards for these facilities and the Commission should not surrender its jurisdiction and risk harm to any first responders.

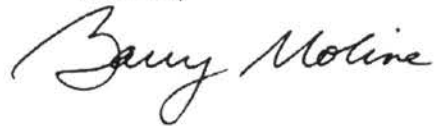
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Thank you for your attention to this issue and I request that you add this letter to the file of Docket No. 130235-EQ.

If you have any questions, please call me at (850) 224-3314, ext. 1.

Sincerely

A handwritten signature in cursive script that reads "Barry Moline".

Barry Moline
Executive Director

cc: Robert Scheffel Wright*
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