

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition to determine need for Greenland Energy Center Combined Cycle Conversion in Duval County by JEA.

DOCKET NO. 080614-EM

DATED: DECEMBER 29, 2008

COMMISSION
CLERK

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-08-0669-PCO-EM, issued October 9, 2008, and Order No. PSC-08-0744-PCO-EM, issued November 12, 2008, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff is not sponsoring any witnesses.

b. All Known Exhibits

Staff has no direct exhibits.

c. 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.

d. Staff's Position on the Issues

ISSUE 1: Is there a need for the proposed combined cycle conversion project at the Greenland Energy Center, taking into account the need for electric system reliability and integrity, as this criterion is used in section 403.519, Florida Statutes?

POSITION: No position at this time.

ISSUE 2: Is there a need for the proposed combined cycle conversion project at the Greenland Energy Center, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in section 403.519, Florida Statutes?

POSITION: No position at this time.

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- ECR _____
- GCL _____
- OPC _____
- RCP _____
- SSC _____
- SGA _____
- ADM _____
- CLK _____

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COMMISSION CLERK

ISSUE 3: Is there a need for the proposed combined cycle conversion project at the Greenland Energy Center, taking into account the need for fuel diversity and supply reliability, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No position at this time.

ISSUE 4: Are there any conservation measures taken by or reasonably available to JEA which might mitigate the need for the proposed combined cycle conversion project at the Greenland Energy Center?

POSITION: No position at this time.

ISSUE 5: Is the proposed combined cycle conversion project at the Greenland Energy Center the most cost-effective alternative available, as this criterion is used in section 403.519, Florida Statutes?

POSITION: No position at this time.

ISSUE 6: Based on the resolution of the foregoing issues, should the Commission grant JEA's petition to determine the need for the proposed combined cycle conversion project at the Greenland Energy Center?

POSITION: No position at this time.

ISSUE 7: Should this docket be closed?

POSITION: Yes, this docket should be closed when the time for appeal of the Commission's final order has run.

e. Stipulated Issues

Staff is aware of no stipulated issues at this time.

f. Pending Motions

Staff has no pending motions at this time.

g. Pending Confidentiality Claims or Requests

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

h. Objections to Witness Qualifications as an Expert

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

i. Compliance with Order Nos. PSC-08-0669-PCO-EM and PSC-08-0744-PCO-EM.

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

Respectfully submitted this 29th day of December, 2008.



MARTHA C. BROWN
Senior Attorney
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S PREHEARING STATEMENT has been served by U. S. mail to Gary V. Perko, Hopping Green & Sams, P.O. Box 6526, Tallahassee, Florida 32314 and that a true copy thereof has been furnished to the following by U. S. mail this 29th day of December, 2008:

Teala A. Milton
JEA
V.P., Government Relations
21 West Church Street, Tower 16
Jacksonville, FL 32202-3158

Martha C. Brown

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Senior Attorney

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