

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition To Determine Need For an Electrical Power Plant in Taylor County by Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and City of Tallahassee.

DOCKET NO. 060635-EU

DATED: June 6, 2007

**FLORIDA MUNICIPAL POWER AGENCY, JEA, REEDY CREEK  
IMPROVEMENT DISTRICT AND CITY OF TALLAHASSEE'S (APPLICANTS')  
OBJECTIONS TO THE NATURAL RESOURCES DEFENSE COUNCIL'S  
REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 3)**

Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and the City of Tallahassee, collectively referred to as the "Applicants", pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil Procedure, and the Order Establishing Procedure in this matter (Order No. PSC-06-0819-PCO-EU), hereby serve their Objections to The Natural Resources Defense Council's Request for Production of Documents (Nos. 1 - 3).

**OBJECTIONS**

**2. Please provide all documents and slides related to the City of Tallahassee's March 14 and March 28, 2007 presentations to the Tallahassee City Commission regarding Taylor Energy Center (TEC).**

**OBJECTIONS:** Applicants object to this request as not reasonably calculated to lead to the discovery of admissible evidence. The City of Tallahassee's internal integrated resource planning effort is not relevant to the sole issue to be addressed at the reconvened hearing: The updated modeling and results discussed in the supplemental testimony of Myron Rollins. Without waiving such objection, Applicants will produce responsive documents.

**3. Please provide all updates to the City of Tallahassee's analyses of the cost effectiveness of the City's participation in TEC, which should include, but not be limited to:**

- a. New fuel forecasts;
- b. New load and energy forecasts;
- c. Potential additional green energy purchases;
- d. Revised IGCC capital and sequestration costs;
- e. Participation in the proposed Progress Energy Florida nuclear unit;
- f. Revisions to the projected costs of CO<sub>2</sub> emission compliance; and
- g. Revised demand side management projections.

APPLICANTS' OBJECTIONS TO  
NRDC'S REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-3)

**OBJECTION:** Applicants object to this request as not reasonably calculated to lead to the discovery of admissible evidence. The City of Tallahassee's internal integrated resource planning effort is not relevant to the sole issue to be addressed at the reconvened hearing: The updated modeling and results discussed in the supplemental testimony of Myron Rollins. Without waiving such objection, Applicants will produce responsive documents.

Respectfully submitted this 6<sup>th</sup> day of June, 2007.

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Applicants' Objections to The Natural Resources Defense Council's Request for Production of Documents (Nos. 1 - 3) in Docket No. 060635-EU was served upon the following by electronic mail on this 6<sup>th</sup> day of June, 2007:

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