

**BEFORE THE STATE OF FLORIDA,  
PUBLIC SERVICE COMMISSION**

**In re: Petition for Determination of Need for  
Electrical Power Plant in Taylor County by  
Florida Municipal Power Agency, JEA,  
Reedy Creek Improvement District, and  
City of Tallahassee.**

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**Docket No. 060635-EU  
Dated: December 27, 2006**

**RESPONSE TO APPLICANTS' MOTION FOR LIMITED REOPENING  
OF RECORD AND FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY  
FILED BY JOHN CARL WHITTON, JR.**

John Carl Whitton, Jr. ("Whitton"), by and through the undersigned counsel, hereby files this Response to Applicants' Motion for Limited Reopening of Record and For Leave to File Supplemental Testimony and in support thereof states as follows:

1. On March 9, 2007, Applicants submitted a Motion for Limited Reopening of Record and For Leave to File Supplemental Testimony and Supplemental Testimony of Myron Rollins and waived applicable deadlines for Commission action under Rule 25-22.080, F.A.C.
2. Whitton does not oppose the Applicants' Motion and supports the Commission basing their ultimate decision on this Docket on the most accurate available information.
3. However, Whitton does request that in granting Applicants' Motion, the Commission provide adequate opportunity and time for limited discovery. With that in mind, the timeframe proposed by Intervenor Natural Resource Defense Counsel in their Response to Applicants' Motion seems reasonable to Whitton as well.

**Wherefore,** Whitton respectfully requests that the Motion for Limited Reopening of Record and For Leave to File Supplemental Testimony be granted and that a procedural order outline the timeframe for limited discovery be issued.

Dated this 16<sup>th</sup> day of March, 2007.

Respectfully submitted,

s/ Brett M. Paben

Jeanne Zokovitch Paben

Florida Bar No. 0418536

Brett M. Paben

Florida Bar No. 0416045

WildLaw

1415 Devils Dip

Tallahassee, FL 32308-5140

Telephone: 850-878-6895

E-mail: [jeanne@wildlaw.org](mailto:jeanne@wildlaw.org), [brett@wildlaw.org](mailto:brett@wildlaw.org)

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been

furnished via e-mail to:

Gary V. Perko  
Carolyn S. Raepple  
Hopping Law Firm  
P.O. Box 6526  
Tallahassee, FL 32314  
[GPerko@hgslaw.com](mailto:GPerko@hgslaw.com)  
[CRaepple@ggslaw.com](mailto:CRaepple@ggslaw.com)

Brian P. Armstrong, Esq.  
7025 Lake Basin Road  
Tallahassee, FL 32312  
[barmstrong@ngn-tally.com](mailto:barmstrong@ngn-tally.com)

E. Leon Jacobs, Jr.  
Williams Law Firm  
P.O. Box 1101  
Tallahassee, FL 32302-1101  
[ljacobs50@comcast.net](mailto:ljacobs50@comcast.net)

Patrice L. Simms  
National Resources Defense Council  
1200 New York Ave., NW, Suite 400  
Washington, DC 20005  
[psimms@nrdc.org](mailto:psimms@nrdc.org)

Suzanne Brownless  
Suzanne Brownless, P.A.  
1975 Buford Boulevard  
Tallahassee, FL 32308  
[sbrownless@comcast.net](mailto:sbrownless@comcast.net)

Jennifer Brubaker, Esq.  
Katherine Fleming, Esq.  
Legal Division  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[JBrubake@psc.state.fl.us](mailto:JBrubake@psc.state.fl.us)  
[KEFlemin@psc.state.fl.us](mailto:KEFlemin@psc.state.fl.us)

Respectfully submitted,

s/ Brett M. Paben  
Brett M. Paben  
Florida Bar No. 0416045