

ORIGINAL

REDACTED VERSION

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for Glades Power Park Units 1 and 2 electrical power plants in Glades County, by Florida Power & Light Company.	DOCKET NO. 070098-EI DATED: APRIL 9, 2007
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**RESPONSES OF THE SIERRA CLUB, INC., SAVE OUR CREEKS,
FLORIDA WILDLIFE FEDERATION, ENVIRONMENTAL CONFEDERATION OF
SOUTHWEST FLORIDA, AND ELLEN PETERSON TO FLORIDA POWER AND
LIGHT'S (FPL'S) SECOND SET OF INTERROGATORIES (NOS. 3-12) AND FPL'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 3)**

The Sierra Club, Inc., Save Our Creeks, Florida Wildlife Federation, Environmental Federation of Southwest Florida, and Ellen Peterson, collectively referred to herein as Intervenor, pursuant to Rule 28-106.206, Florida Administrative Code (FAC), and Rules 1.340 and 1.350, Florida Rules of Civil Procedure, hereby respond to FPL's Second Set of Interrogatories (Nos. 3-12) and Second Request for Production of Documents (No. 3) and state as follows:

This Response is without waiver of and subject to Intervenor's objection that the information contained in Intervenor's Answers to FPL's Second set of Interrogatories and Second Request for Production is confidential and proprietary information. Intervenor's Answers to FPL's Second Set of Interrogatories are set forth below. Intervenor's Response to FPL's Second Request for Production is contained in their answers to Interrogatories and Exhibit

DOCUMENT NUMBER-DATE

03065 APR 10 5

FPSC-COMMISSION CLERK

1, attached. David Schlissel, who provided the answers, has furnished a scanned affidavit, and the original will be delivered under separate cover.

ANSWERS TO INTERROGATORIES

3. With respect to Figure 1 on page 21 of Mr. Schlissel's Corrected Direct Testimony, filed March 16, 2007, including the related explanation, please provide all underlying data, assumptions and inputs upon which the figure is based, including without limitation the specific algorithm or computation producing the lines representing Synapse's high-, mid- and low cases.

ANSWER: See the attached file named "Synapse response to FPL Interrogatory Set 2."

4. For the foregoing interrogatory, please identify the sources of the data, assumptions and inputs upon which the referenced figure is based.

ANSWER: See the response to Interrogatory 3.

5. With respect to Figure 5.1 on page 23 of Mr. Schlissel's Corrected Direct Testimony, filed March 16, 2007, including the related explanation, please provide all underlying data, assumptions and inputs upon which the figure is based, including without limitation the specific algorithm or computation producing the lines representing Synapse's high-, mid- and low cases.

ANSWER: There is no Figure 5.1 on page 23 of Mr. Schlissel's Corrected Direct Testimony. For the requested materials for Figure 5.1 on page 26 of Exhibit DAS-3, see the attached file named "Synapse response to FPL Interrogatory Set 2."

6. For the foregoing interrogatory, please identify the sources of the data, assumptions and inputs upon which the referenced figure is based.

ANSWER: See the response to Interrogatory 5.

7. With respect to Figure 5.2 on page 27 of Mr. Schlissel's Corrected Direct Testimony, filed March 16, 2007, including the related explanation, please provide all underlying data, assumptions and inputs upon which the figure is based, including without limitation the specific algorithm or computation producing the lines representing Synapse's high-, mid- and low cases.

ANSWER: There is no Figure 5.2 on page 27 of Mr. Schlissel's Corrected Direct Testimony. For the requested materials for Figure 5.1 on page 27 of Exhibit DAS-3, see the attached file named "Synapse response to FPL Interrogatory Set 2."

8. For the foregoing interrogatory, please identify the sources of the data, assumptions and inputs upon which the referenced figure is based.

ANSWER: See the response to Interrogatory 7.

9. With respect to Figure 6.1 on page 43 of Mr. Schlissel's Corrected Direct Testimony, filed March 16, 2007, including the related explanation, please provide all underlying data, assumptions and inputs upon which the figure is based, including without limitation the specific algorithm or computation producing the lines representing Synapse's high-, mid- and low cases.

ANSWER: There is no Figure 6.1 on page 43 of Mr. Schlissel's Corrected Direct Testimony. For the requested materials for Figure 6.1 on page 43 of Exhibit DAS-3, see the attached file named "Synapse response to FPL Interrogatory Set 2."

10. For the foregoing interrogatory, please identify the sources of the data, assumptions and inputs upon which the referenced figure is based.

ANSWER: See the response to Interrogatory 9.

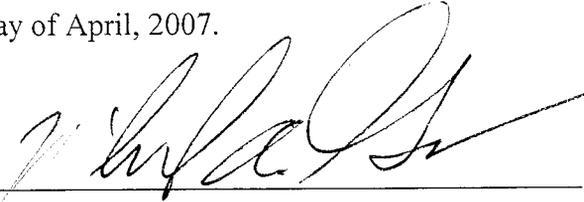
11. With respect to Figure 6.2 on page 44 of Mr. Schlissel's Corrected Direct Testimony, filed March 16, 2007, including the related explanation, please provide all underlying data, assumptions and inputs upon which the figure is based, including without limitation the specific algorithm or computation producing the lines representing Synapse's high-, mid- and low cases.

ANSWER: There is no Figure 6.2 on page 44 of Mr. Schlissel's Corrected Direct Testimony. For the requested materials for Figure 6.2 on page 44 of Exhibit DAS-3, see the attached file named "Synapse response to FPL Interrogatory Set 2."

12. For the foregoing interrogatory, please identify the sources of the data, assumptions and inputs upon which the referenced figure is based.

ANSWER: See the response to Interrogatory 11.

Respectfully submitted this 9th day of April, 2007.

A handwritten signature in black ink, appearing to read "Michael Gross", is written over a horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael Gross
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing was served on Natalie F. Smith 700 Universe Boulevard, Juno Beach, FL 33408, by US Mail and a true and correct copy of the foregoing was served on this 9th day of April, 2007, via electronic mail and US Mail on:

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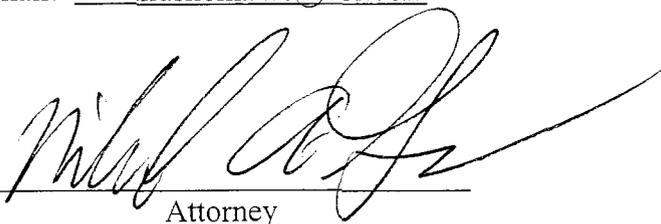
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Attorney

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 1 of 11
INFORMATION

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 2 of 11
INFLATOR

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 3 of 11
CARBON PRICE DATA

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 4 of 11

CARBON PRICE DATA (cont.)

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 5 of 11

CARBON PRICE DATA (cont)

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response

to FPL Interrogatory Set 2, Page 6 of 11

EMISSIONS DATA

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 7 of 11

FIGURE 6.1

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 8 of 11
FIGURE 5.1

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 9 of 11

FIGURE 6.2

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 10 of 11

FIGURE 1 SYNAPSE CO2 PRICES

Docket No. 070098-EI

Composite Exhibit 1: Synapse Response
to FPL Interrogatory Set 2, Page 11 of 11

FIGURE 5.2