

Dorothy Menasco

From: PBC EnviroCoalition [pbcenvirocoalition@gmail.com]
Sent: Friday, June 27, 2008 3:43 PM
To: Filings@psc.state.fl.us
Cc: Jessica_Cano@fpl.com; Jennifer Brubaker; charles.gauthier@dca.state.fl.us; Halpin, Mike; Charles Beck
Subject: [AMENDED] Florida Power and Light's Consolidated PSC Dockets 080203-E1; 080245-E1; 080246-E1
Attachments: PSC amended filing WCEC 3.doc

The e-mail message to which the document is attached shall include the following information, in the order listed:

- a. Panagioti Tsolkas, 822 North C Street, Lake Worth, FL 33460, 561-588-9666, PBCEnviroCoalition@gmail.com
- b. ADDED: Alexandria Larson, 16933 West Harlena Drive , Loxahatchee, Florida 33470, FPLsucks@bellsouth.net
- c. Florida Power and Light's Consolidated PSC Dockets: 080203-E1; 080245-E1; 080246-E1
- d. Panagioti Tsolkas, Alexandria Larson, Palm Beach County Environmental Coalition
- e. The total number of pages: 6
- f. Amended 'request for intervention' document, petition of Florida Power and Light's Consolidated PSC Dockets: 080203-E1; 080245-E1; 080246-E1

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

Amended Comments from the Palm Beach County Environmental Coalition,

June 27, 2008

Based on comments originally sent Friday, June 06, 2008

Re: Florida Power and Light's Consolidated PSC Dockets:

080203-E1 PETITION TO DETERMINE NEED FOR WEST COUNTY ENERGY CENTER UNIT 3
ELECTRICAL POWER PLANT, BY FLORIDA POWER & LIGHT COMPANY;

080245-E1 PETITION FOR DETERMINATION OF NEED FOR CONVERSION OF RIVIERA PLANT
IN PALM BEACH COUNTY, BY FLORIDA POWER & LIGHT COMPANY;

080246-E1 PETITION FOR DETERMINATION OF NEED FOR CONVERSION OF CAPE
CANAVERAL PLANT IN BREVARD COUNTY BY FLORIDA POWER & LIGHT
COMPANY.

CONSOLIDATION ISSUED: May 27, 2008

Panagioti Tsolkas, representing as an individual and on behalf of the Palm Beach County Environmental Coalition (PBCEC), requests to add PBCEC participant Alexandria Larson, as an individual under the Coalition intervenor status on these consolidated dockets.

Panagioti Tsolkas is a resident of Lake Worth, Palm Beach County, Florida, and a ratepayer of a municipal utility whose rates are impacted by FPL decisions and the regional consumption of fossil fuels which this docket will impact substantially. Address: 822 North C Street, Lake Worth, FL 33460

Alexandria Larson is a resident of Loxahatchee, Palm Beach County, Florida, and an FPL ratepayer. Address: 16933 West Harlena Drive
, Loxahatchee, Florida 33470
(signature added below)

The PBCEC is an active group comprised of participants in the greater Palm Beach County region, the group is predominated by FPL ratepayers.

We request that any future PSC Hearings on the docketed items be held in the area of the proposed projects, as was done recently in DOCKET NO. 070650-EL, regarding a proposal in the Miami/Dade region.

We are entering proceedings pro-se. We reserve the right to retain counsel.

Communication from PSC is requested via both postal and email:

Panagioti Tsolkas, 822 North C Street, Lake Worth, FL 33460;
PBCEEnviroCoalition@gmail.com

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FPSC-COMMISSION CLERK

Basic Position Statement

The proposed consolidated dockets present over 3,657 megawatts of fossil-fuel generated power. A large variety of efficient resource management as well as power management and generating options are available to the utilities that service the residential, institutional and business energy demands of Florida. In assessing the options for meeting these energy demands we have come to the conclusion that the fossil fuel projects proposed by FPL for West County Energy Center, Riviera Beach and Cape Canaveral does not represent the best choice available to service FPL customers, or other utility customers whose rates and services are impacted by these regional energy projects. We contend that when compared to other options and strategies the consolidated proposals poses an extended period of economic risk that is unreasonable and diminishes the economic well being of FPL's Florida customers now and in the future. Therefore, we request that the petition for determination of need these projects be denied, pending more complete assessment of available energy options, updated growth projections and accurate complete environmental costs of burning fossil fuels.

The proposed projects do not meet the needs criteria established by the State of Florida in FS403.519(4) which require the project contribute to FPL's power system's reliability and integrity, it's fuel diversity, base load generation capacity, and its effort to deliver adequate electricity at a reasonable cost. That it continues to be a viable option after any renewable energy sources and technologies or conservation measures that may be taken or are reasonably available to FPL that might mitigate the need for the proposed generating units has been considered, while also providing the most cost effective source of power.

It is our belief, based on our research, that the projected cost of this proposal as alleged by FPL does not represent an accurate assessment of the actual costs of the project. Future costs attributed to CO2 are not taken into consideration in a tangible and concrete manner and environmental and health cost impacts associated with drilling, extracting and burning this fossil fuel are not mentioned. The availability and cost of water need also to be considered.

It is our contention that every dollar of FPL rate payer money proposed to be spent on the proposed fossil fuel power project could be better spent on efficiency, conservation and renewables; financing programs that may include new or expanded Demand Side Management (DSM) programs, leveraging through cost sharing the expansion of net metering / distributive energy programs. The integration of solar thermal and geothermal applications can mitigate peak load. A more efficient use of the existing base load can eliminate the need for new base load capacity. We also see a slowing of growth in Florida that calls into question the proponent's projection for need. New building design criteria is also intended to reduce the need for new generation.

We, the PBCEC, are in agreement with the report from the Treasure Coast Regional Planning Council (TCRPC, or 'Council') regarding the above proposed power projects and their relation to the FPL Ten Year Power Plant Site Plan, 2008-2017. This report was approved and authorized to be transmitted to the Florida Public Service Commission (PSC) on May 16, 2008, at the public Council meeting. This report found FPL to be "inconsistent with Strategic Regional Policy Plan Goal 9.1, Decreased vulnerability of the region to fuel price increases and supply interruptions; and Strategy 9.1.1, Reduce the Region's reliance on fossil fuels." The TCRPC urged FPL and the State of Florida to continue developing new programs "to 1) reduce the reliance on fossil fuels as future energy sources; 2) increase conservation activities to offset the need to construct new power plants; and 3) increase the reliance on renewable energy sources to produce electricity."

We believe that the reality of greenwashing must be taken into serious consideration when reviewing these consolidated dockets for closure. According to Wikipedia, online encyclopedia, "**Greenwash** (a portmanteau of **green** and **whitewash**) is a term that is used to describe the act of misleading consumers regarding the environmental practices of a company or the environmental benefits of a product or service. The term **Green sheen** has similarly been used to describe organisations which attempt to appear that they are adopting practices beneficial to the environment."

In December 2007, FPL presented a document entitled "Climate Change and FPL's Greenhouse Gas Strategy" as Appendix 10.8 to which is intended to highlight "the specific actions that FPL is taking now in Florida to address climate change and how the West County Energy Center (WCEC) Unit 3 will be incorporated into FPL's solutions for global climate change." Appendix 10.8 claims that "in fact, the addition of WCEC Unit 3 will contribute to an overall increase in efficiency of FPL's generation portfolio, thereby reducing the expected system-wide carbon dioxide (CO₂) emissions," and that the WCEC unit 3 will be a part of providing low and zero emitting electric generation and help to achieve generation diversity in Florida." This appendix also expresses that "FPL believes that greater use of conservation and cost-effective renewable resources is good for America."

While FPL's self-promotion reads, unsurprisingly, like an advertisement for their highly-profitable product. Independent, public interest assessments of their proposals, such as that of the TCRPC, reads quite differently. As stated above, this public agency's staff report found FPL to be inconsistent with the Strategic Regional Policy Plan Goal 9.1, Decreased vulnerability of the region to fuel price increases and supply interruptions; and Strategy 9.1.1, Reduce the Region's reliance on fossil fuels. The TCRPC urged FPL and the State of Florida to continue developing new programs "To 1) reduce the reliance on fossil fuels as future energy sources; 2) increase conservation activities to offset the need to construct new power plants; and 3) increase the reliance on renewable energy sources to produce electricity."

The Council recommended that "FPL should develop a program to install, own and operate photovoltaic units on the rooftops of private and public buildings... modeled after the Southern California Edison plans" where a utility will plans to install solar energy on more than 100 buildings in the greater Los Angeles area. TCRPC suggests that a "shift to rooftop photovoltaic systems distributed throughout the area of demand could reduce the reliance on large transmission lines and reduce costs associated with owning property; purchasing fuel [or water]; and permitting, constructing, and maintaining a power plant." This technology is available now, and is underway in other parts of the United States.

The TCRPC report also suggests the partnering of offshore wind and ocean current generation. PBCEC believes these options, which are under development now, could be available in a hastened time frame if non-renewable conventional fuels sources were not pursued in this crucial decade, which has been acknowledged by global climate scientists to within the tipping point of irreversible climate change.

In recent media releases, FPL has claimed that these dockets before the PSC will reduce CO₂ emissions by more than 15 million tons over the life of the projects. But the critical eye of public interest, and public agencies that are tasked to work in our service, must also note that the projects will emit near that amount on an annual basis for the duration of their operations. 'Reduction' standards must not be in the eye-of-the-profitteer. They must be concrete and tangible, measured in observance of the evolving climate science of the Intergovernmental Panel on Climate Change and other reputable scientific bodies.

The PBCEC is concerned that FPL's current agenda is not as economically sound or environmentally friendly as their public relations would have us believe. In a letter-to-the-editor published in the Palm Beach Post following an annual FPL shareholders meeting, entitled, ironically "Conservation a top priority for industry leader FPL", Company president Armando Olivera explains FPL's perspective that "over-reliance on conservation to meet our needs will leave customers vulnerable to higher rates and decreased reliability." In the face of clean, renewable energy options and efficiency and conservation opportunities, this attitude can only be seen as a threat of rate increases. We feel that FPL is keeping ratepayers in the PBCEC leashed to centralized non-renewable, unsustainable power for our FPL.

We expect the Public Service Commission to protect our interests.

Statement of Positions and issues

ISSUE 1: Is there a need for the proposed generating units, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519(4), Florida Statutes?

Position: No, the current and future needs of Floridian's power can be met with greater reliability and integrity with the implementation of efficiency/conservation measures, the graduated increased use of renewable technologies, a generous net metering / distributive energy program.

ISSUE 2: Is there a need for the proposed generating units, taking into account the need for fuel diversity, as this criterion is used in Section 403.519(4), Florida Statutes?

Position: No, These proposals would push FPL's energy fleet well over 70% dependence on natural gas, which is often not from domestic sources. Distributive generation of thermal and photovoltaic solar, and other sustainable options, are preferred methods of establishing fuel diversity over fossil fuels in the existing energy needs environment.

ISSUE 3: Is there a need for the proposed generating units, taking into account the need for base-load generating capacity, as this criterion is used in Section 403.519(4), Florida Statutes?

Position: No, there already exists sufficient base-load. Future base-load and current base-load can incrementally be provided and replaced by efficiency and cleaner new renewable applications. Population decline and greater efficiencies allow current existing base-load capacity to satisfy the need.

ISSUE 4: Is there a need for the proposed generating units, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519(4), Florida Statutes?

Position: No, reasonable cost has not been established here. Natural Gas is in a mode of constant cost increase, with no reduction in sight. The cost of total CO2 and other greenhouse gases related to fuel have not been assessed for all projects. Water costs remain a question. We already have adequate electricity. The economic costs of insuring the risks associated with an unforeseen event may be limited to FPL but extend to the overall population in the amount of dollars and need to be considered in the cost/risk assessment and in relationship to the other options.

ISSUE 5: Are there any renewable energy sources and technologies or conservation measures taken by or reasonably available to Florida Power & Light Company which might mitigate the need for the proposed generating units?

Position: Yes. Enormous opportunities for efficiency and conservation, distributive energy and clean technologies exist.

ISSUE 6: Will the proposed generating units provide the most cost-effective source of power, as this criterion is used in Section 403.519(4), Florida Statutes?

Position: No, this project's costs must be compared with an equal amount of analysis to a renewable/efficiency option, especially those which have no fuel, water or carbon costs.

ISSUE 7: Based on the resolution of the foregoing issues, should the Commission grant Florida Power & Light Company's petition to determine the need for the proposed generating units?

Position: No.

ISSUE 8: Should this docket be closed?

Position: Yes, this docket should be closed and FPL's petition denied due to the lack of adequate analysis of all reasonable options; the economic and environmental risks and inability to project accurate costs which in turn stifles the development and investment in efficiency and new clean technologies.

CERTIFICATE OF SERVICE

I, PETER 'PANAGIOTI' TSOLKAS and ALEXANDRIA LARSON, HEREBY CERTIFY that a true and correct copy of the foregoing Amended Statement has been furnished by electronic mail this 27th day of June, 2008, to the following:

Florida Public Service Commission

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SIGNED June 27, 2008

s/Peter 'Panagioti' Tsoikas

s/Alexandria Larson