

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Determine Need for Treasure Coast Energy Center Unit 1, Proposed Electrical Power Plant in St. Lucie County, by Florida Municipal Power Agency.

DOCKET NO. 050256-EM  
FILED: JUNE 13, 2005

PREHEARING STATEMENT OF THE CITY OF VERO BEACH

Pursuant to Order No. PSC-05-0485-PCO-EM, filed May 4, 2005, the City of Vero Beach ("COVB") files its Prehearing Statement.

a. All Known Witnesses

COVB does not anticipate presenting a witness, but reserves the right to conduct cross examination of other witnesses.

b. All Known Exhibits

Such documents that may be relevant to the determination of need for the resource and the cost of the resource compared to other sources of capacity.

c. COVB's Statement of Basic Position

COVB's position is preliminary and based on materials filed by the parties. COVB's preliminary position is offered to assist the parties in preparing for the hearing. COVB's final position will be based upon all the evidence in the record and may differ from the preliminary position herein.

COVB's position is: a) that the project is not needed to meet the load requirements of the Florida Municipal Power Agency; and b) if the Commission determines there is a need for some additional generation capacity, COVB questions whether the project is the least cost way to meet this need.

d-f Issues of Fact, Law and Policy

**No.1:** Whether there is a need for the proposed Treasure Coast Energy Center Unit 1, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, Florida Statutes.

**No. 2:** Whether there is a need for the proposed Treasure Coast Energy Center Unit 1, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519, Florida Statutes.

**No. 3:** If there is a need, whether the proposed Treasure Coast Energy Center Unit 1 is the most cost-effective alternative available, as this criterion is used in Section 403.519, Florida Statutes.

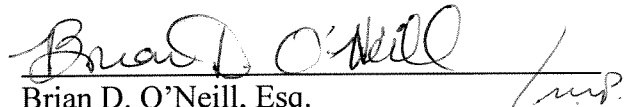
h. Pending Motions

COVB's Motion to Intervene, filed on June 9, 2005 (corrected on June 13, 2005), is pending.

j. Compliance with Order No. PSC-05-0485-PCO-EM

COVB has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 13<sup>th</sup> day of June, 2005.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the City of Vero Beach's Prehearing Statement was furnished to the following, by U.S. Mail, on this 13<sup>th</sup> day of June, 2005.

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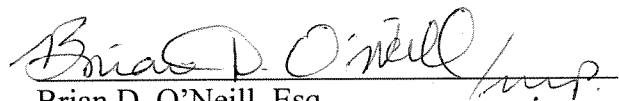
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