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April 14, 2009

Mr. Michael P. Haplin
Florida Energy Office
Siting Coordination Office
Department of Environmental Protection
2600 Blairstone Road – MS 48
Tallahassee, Florida 32399-2405

Subject: OUC Request for Amendment to SEC Supplemental Site Certification
Application/Installing Reclaimed Water Main

Dear Mike:

On behalf of the Orlando Utilities Commission ("OUC"), I hereby submit a request to amend the Supplemental Site Certification Application for the Stanton Energy Center ("SEC") to include the installation of a new 24 inch, reclaimed water main running from Orange County's Eastern Water Reclamation Facility to OUC's SEC. Our request is submitted under the requirements of Section 403.5113, Florida Statutes, and Rule 62-17.205, Florida Administrative Code.

OUC maintains that this requested amendment is entirely consistent with the existing Conditions of Certification issued for the Stanton Energy Center and specifically furthers the purposes expressed in Conditions of Certification XXIX J.5. and XXIX R. relating to Limitation on Uses of Water and Use of Lowest Quality Water. Condition XXIX J.5. mandates that OUC "diligently and in good faith pursue a revised cooling water supply agreement with Orange County to obtain the additional reclaimed water and surface/stormwater needed for cooling Unit B." Condition XXIX R. directs OUC to use the lowest quality water source available such as reclaimed water and surface/stormwater, when feasible. Accordingly, OUC reached an agreement with Orange County to increase the flow of reclaimed water provided by the reclamation facility from 13MGD to 14.7 MGD.

The purpose of the proposed water main is to ensure that sufficient reclaimed water from Orange County's Eastern Water Reclamation Facility can be transported to Stanton to support full operation of OUC's generating facilities there under reasonable and foreseeable load conditions, and will provide a reliable supply of reclaimed water if the existing 30 inch water main should fail.

Orange County will undertake construction of the proposed water main and will be responsible for obtaining an NPDES permit for the necessary dewatering activities. The new water main will be constructed entirely within the existing reclaimed water main utility corridor and will have no effect on wetlands or other environmental resources. A more detailed description of the proposal with illustrations is attached hereto.

OUC anticipates no significant on-site or off-site impacts from installation of this new water main. OUC also believes the proposal is consistent with, and therefore requires no amendment to, the existing Conditions of Certification for the Stanton Energy Center. As a result, OUC requests that the Department issue a letter confirming its approval of the proposed amendment for the additional reclaimed water main for the Stanton Energy Center.

Please call me, Denise Stalls, Vice President, Environmental Affairs, OUC, [404-737-4236] or Mark Corbett with OUC, [407-658-6444 ext. 3019] if you have questions about this request or need additional information to complete your review.

We appreciate your assistance with this matter.

Very Truly Yours,



Tasha O. Buford

CC: Denise Stalls
Mark Corbett

CERTIFICATE OF SERVICE

CC by email (received receipt requested).

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