Orlando Utilities Commission 500 South Orange Avenue P.O. Box 3193 Orlando, Florida 32802

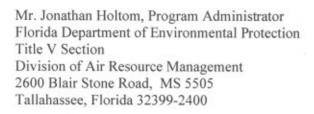
Phone: 407.423.9100

Administrative Fax: 407.236.9616 Purchasing Fax: 407.384.4141

Website: www.ouc.com

Certified Mail No. 7007 0220 0000 7661 8745 Return Receipt Requested

June 27, 2008



RE: ST. CLOUD GENERATING STATION NOTIFICATION OF EXTENDED COLD SHUTDOWN FACILITY ID No. 0970002

Dear Mr. Holtom:

Orlando Utilities Commission (OUC) is contracted to perform operations and maintenance functions at the above-referenced St. Cloud Generating Station under an interlocal agreement with the City of St. Cloud. The facility, consisting of diesel-fired generating units and other miscellaneous insignificant emission units, commenced operation in the 1950s. OUC management has evaluated future demand and potential operation of this facility and determined that it is no longer economically feasible to operate these units in today's environment due to their age, condition and overall reliability. The determination has been made that the most prudent course of action is to shutdown the facility and put it into a cold standby mode. OUC has reviewed the applicable requirements and our understanding is summarized below.

- Florida Rule 62-210.300(2)(a)4 indicates that a unit may be on cold standby or long-term reserve shutdown if reasonable notification is provided of re-activation and compliance testing is conducted in a timely manner (e.g., within 30 days of startup), and that no modification or reconstruction of the unit occurred prior to re-activation.
- OUC would need to submit a letter to the Department (this letter) requesting this cold standby
 mode to confirm relief from testing and reporting requirements. This letter would be to meet
 the requirements of 210.300(2)(a)3.b.(I)-(III). Also, as required, the date of shut down is
 estimated to be July 30, 2008. OUC also confirms that the emissions units will be operating
 in compliance with all applicable rules as of the time the source is shut down. Finally, OUC
 unit agrees to and is legally prohibited from providing the allowable emissions permitted by
 the renewed permit as an emissions offset to any other person under Rule 62-212.500, F.A.C.
- The rule provides additional requirements in the event that a Title V (TV) permit expires and needs to be renewed while in the cold standby mode. The current TV permit (0970002-003-AV) was issued on March 1, 2007 and expires on February 28, 2012.



OUC will continue to submit an annual operating report (AOR) every year; even if it is only to indicate that the facility did not operate. In addition, OUC will also submit an annual TV Statement of Compliance (SOC), pursuant to the Title V permit, indicating that the facility did not operate. Finally, OUC will submit the annual emissions fee and form every year, accompanied by the minimum \$250 fee.

In the event that OUC considers reactivation of these emission units, a plan for demonstration of compliance with applicable limits will be submitted, along with a notification of the planned reactivation. Please do not hesitate to contact me at (407) 737-4236 if you should have any questions on this request.

Sincerely,

ORLANDO UTILITIES COMMISSION

Denise M. Stalls

Vice President Environmental Affairs

CITY OF ST. CLOUD

Tom Hurt

City Manager, City of St. Cloud

Responsible Official

cc: Byron Knibbs, OUC

Jan Aspuru, OUC