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DIVISION OF AIR
RESOURCE MANAGEMENT

February 14, 2012

Tom Cascio
Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Mail Stop 5505
Tallahassee, FL 32399

**Re: Florida Power & Light Company
Riviera Beach Energy Center Project
DEP File No. 0990042-006-AC
Request for Revising the Process Heaters' Maximum Heat Input; Revising Emergency
Generators' Hours of Operation; and Revising Gas Turbines' Conditions for Visible and Excess
Emissions**

Dear Mr. Cascio:

Florida Power & Light Company (FPL) submitted a request for a revision to the existing air construction permit for the Riviera Beach Energy Center (RBEC) (Permit No. 0990042-006-AC) on January 23, 2012. The project number identified for the submittal is 0990042-007-AC. FPL received comments related to the submittal and below are the responses to those comments. Please note this response reflects the response provided previously by Ken Kosky via email.

DEP Comment #1: How many temporary construction jobs will be created? How long (months) will construction take?

FPL Response #1: The peak construction workforce (mid-2013) is estimated to be approximately 650 people, with an average construction workforce estimated at 290 people from 2012 to 2014. The categories of workers anticipated over the Project construction period are presented in the table below which is directly extracted from the Site Certification Application dated February 2009. The construction payroll for the Project is estimated to be \$19.5 million during the peak year (2013) and an annual average of \$8.7 million.

ANTICIPATED CONSTRUCTION WORKFORCE

Category	Percent	Category	Percent
Laborers	12	Pipefitters	19
Carpenters	6	Insulators	2
Operators	5	Electricians	22
Ironworkers	4	Painters	1
Millwrights	10	Supervision	13
Boilermakers	6	Total	100

Using an economic multiplier for this effect, wages paid directly to Project construction workers could indirectly generate up to \$9.1 million in additional indirect earnings during peak construction in 2013. A total indirect economic benefit is estimated to be \$49.2 million for the 4-year construction period from 2010 through 2014.

Florida Power & Light Company

700 Universe Boulevard, Juno Beach, FL 33408

The response provided previously by Ken Kosky stated that indirect jobs is estimated at 856 jobs per year over the construction period, however this number of indirect jobs is merely an estimate.

DEP Comment #2: How many new permanent jobs will be created at the facility once the project is complete?

FPL Response #2: RBEC will become operational in mid-2014. The total direct employment for operation of the converted Plant will be similar to the former Riviera Plant at approximately 40 full-time jobs. The annual operational payroll will be approximately \$2.8 million. Other fixed operational costs of RBEC, excluding fuel costs, are estimated to be approximately \$300,000 annually. The manatee viewing center will become operational as early as 2014.

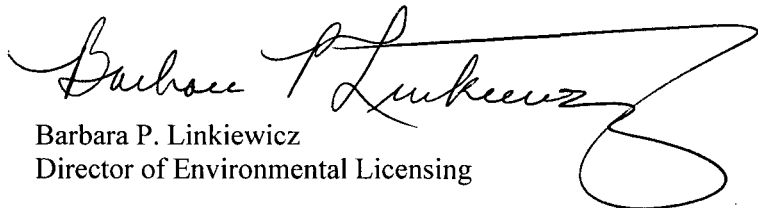
DEP Comment #3: How many new permanent local jobs will be created in the vicinity of the facility as a result of the project? What type of jobs will these be?

FPL Response #3: With RBEC in operation, the anticipated indirect earnings will average approximately \$2.5 million annually over the assumed life of the converted Plant. The total indirect economic job benefit (i.e., jobs and earnings) will be approximately \$7 million annually during the operational life of RBEC.

The response provided previously by Ken Kosky stated the estimated indirect jobs during operation is 122 jobs per year, however this number of indirect jobs is merely an estimate.

If you have any comments or questions regarding the attached, please feel free to contact me at (561) 691-7518 or Jessica Peck at (561) 691-2859.

Sincerely,
Florida Power & Light Company



Barbara P. Linkiewicz
Director of Environmental Licensing

cc: Cindy Mulkey, DEP Siting Office
Dianne Hughes, DEP Southeast District
Jeff Koerner, DEP Bureau of Air Regulation
Lynn Scarce, DEP Division of Air Resource Management
Ken Kosky, Golder Associates