



March 24, 2005

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Trina Vielhauer – Chief
Bureau of Air Regulation
Division of Air Resources Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

BUREAU OF AIR REGULATION

RE: Proposed Liquefied Natural Gas (LNG) Simulation Testing of FPL Ft. Myers Unit 3B and JEA Brandy Branch Unit 1

Dear Trina:

Thank you for the Department's time earlier this week in meeting with FPL and JEA to discuss the proposed LNG testing of FPL's Ft. Myers Unit 3B and JEA's Brandy Branch Unit 1. As noted in the meeting, the testing is of vital importance to better understand the potential differences in combustion dynamics when burning regassified LNG in GE 7FA machines. We appreciate the Department's support of the upcoming testing on these two units.

The proposed PFM 3B testing calls for approximately 19 hours of testing divided between full load, partial load, and start-up scenarios expected to begin on or about April 6, 2005 and continuing through April 8, 2005 depending on Unit 3B availability due to dispatch needs. The testing will vary the inlet fuel temperature to create shifts in the Modified Wobbe Index (MWI) and the CT fuel control's response to the shifts.

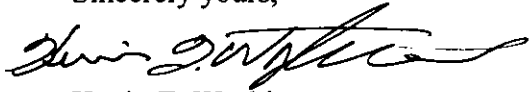
The proposed testing of JEA's Brandy Branch Unit 1 calls for approximately 14 hours of testing spread over 2 to 3 days which is expected to begin on or about May 2, 2005. The testing is designed to vary the proportions of propane and butane to create differences in the High Heating Value (HHV) and specific gravity that may be expected with LNG.

Both parties believe the testing regimen outlined above will provide groundbreaking data on the combustion of LNG in GE 7FA CTs which is heretofore non-existent. As with some types of novel testing, there may be periods when excess emissions might occur. We believe the potential for excess emissions is low, and if occurring, should be brief, as both parties intend to operate their respective units using Best Operating Practices to minimize any potential excess emissions. Because of the novel nature of the testing, FPL and JEA request the Department grant authorization for additional excess emissions for their respective units during the testing periods as provided by Rule 62-210.700(1).

Department representatives are certainly welcome to witness the testing at each site. Should unforeseen circumstances force a change of test dates at either location, we will notify the Department accordingly.

Thank you for consideration of this request. We look forward to the Department's concurrence. If you have any questions or would like to discuss this matter further, please contact me at (561) 691- 2877.

Sincerely yours,



Kevin T. Washington
Senior Environmental Specialist – FPL

cc: Ron Blackburn, South District Air Resources Management, FDEP
Robert S. Pace, PE; City of Jacksonville; Environmental Quality Division