

April 28, 2010

Re: Docket No. 090451

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

To Whom It May Concern:

Southern Alliance for Clean Energy strongly supports the proposed Gainesville Renewable Energy Center (GREC) in Alachua County. GREC will provide a cost-effective, carbon neutral alternative to fossil fuel based energy resources, help diversify Florida's energy resources, and support economic development in Florida.

Biomass electricity is a crucial tool – along with energy efficiency, solar, wind and other renewable resources – for reliably meeting our energy needs while addressing climate change. The proposed GRU biopower project has demonstrated a clear understanding of these challenges and is leading the region in providing solutions.

Florida has abundant supplies of renewable biomass for energy generation. The entire Southeastern region is rich with forest residues, agricultural waste, and animal manure with high value as renewable energy. Sadly, most electric utilities continue to perpetuate the myth that renewables are unreliable and expensive. Even some supporters of renewable energy are skeptical of biopower. For these reasons, the GREC is needed as a model for sustainable, reliable, affordable renewable energy.

Specifically, GREC is unique from other proposed biopower projects in Florida for several reasons, making it an important precedent for smart bioenergy development:

GREC promotes sustainable resource provisions

GRU's project has implemented unprecedented requirements to ensure their supplies of woody biomass are sustainable and as environmentally benign as possible. For example, GRU has authorized GREC to make incentive payments for woody biomass harvested either with forest stewardship planning or under Forest Stewardship Council's highly respected FSC certification. This approach will encourage private woodland owners to set the right example by going beyond the usual forestry Best Management Practices (BMPs).

Woodlands in the vicinity of Gainesville are mostly small and privately owned. This is true across the Southeast region, with most tracts about 100 acres in size, many of which are and under part-time or non-professional management. These small woodlot owners

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need encouragement and incentive to plan for proper management. By offering an incentive payment, GRU is incentivizing woodland owners to hire a consulting forester or work with the state to develop their own management plans. **This alone is a tremendous boost to stewardship, and sustainable use and management of our forest resources.**

Moreover, SACE has carefully evaluated the studies of biomass resource supplies in Florida and the Gainesville region. Despite our concerns about the size of demand in a 100MW biopower project, we note that Florida continues to grow more trees and timber than are cut. The proactive and strict sustainability provisions of this project counter-balance our concerns over scale. Therefore, we are assured that this project fits with other uses of the Florida landscape.

Lower emissions

GREC's combination of technologies, using fluidized bed combustion and filtering technology, ensures it will have lower emissions of sulfur dioxide, nitrous oxides, and particulate matter. Furthermore, GRU has explicitly prohibited the new biopower plant from consuming tires or treated wood.

Going beyond

GRU's leadership role is much bigger and bolder than this single biopower project. For over a year now, this regional municipal utility has led the nation in offering stable pricing for solar photovoltaic electricity. This solar Feed-In-Tariff (FIT) gives investors a reliable and predictable return on their clean-energy investment. GRU is also among the nation's leaders in energy efficiency. Its efficiency programs have had a significant achievement – more than tripling their impact since their inception in 2006.

SACE supports the GREC project as a necessary example of clean energy for our future, our environment, and our economy. We encourage the Commission to approve the GREC project.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Smith". The signature is fluid and cursive, with a large, stylized "S" at the beginning.

Stephen A. Smith, DVM
Executive Director,
Southern Alliance for Clean Energy