



RULES AND DIRECTIVES  
BRANCH

Florida Power & Light Company, 6501 S. Ocean Drive, Jensen Beach, FL 34957

2012 FEB -2 PM 2:44

January 30, 2012

1/6/2012

77 FR 813

RECEIVED



L-2012-043  
10 CFR 50.90

Cindy Bladey, Chief  
Rules, Announcements, and Directives Branch (RADB)  
Office of Administration  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re: ST. LUCIE PLANT, UNITS 1 AND 2-DRAFT ENVIRONMENTAL ASSESSMENT  
AND DRAFT FINDING OF NO SIGNIFICANT IMPACT RELATED TO THE  
PROPOSED EXTENDED POWER UPRATE (TAC NOS. ME5091 AND ME5843)  
Docket ID: NRC-2011-0302  
Docket Nos. 50-335 and 50-389  
License Nos. DPR-67 and NPF-16

References:

- (1) Richard L. Anderson (FPL) to U.S. Nuclear Regulatory Commission (L-2010-259), "License Amendment Request for Extended Power Uprate," St. Lucie Unit 1, November 22, 2010, Accession No. ML103560419.
- (2) Richard L. Anderson (FPL) to U.S. Nuclear Regulatory Commission (L-2011-021), "License Amendment Request for Extended Power Uprate," St. Lucie Unit 2, February 25, 2011, Accession No. ML110730116.
- (3) Tracy J. Orf (NRC) to Mano Nazar (FPL), "ST. LUCIE PLANT, UNITS 1 AND 2-DRAFT ENVIRONMENTAL ASSESSMENT AND DRAFT FINDING OF NO SIGNIFICANT IMPACT RELATED TO THE PROPOSED EXTENDED POWER UPRATE (TAC NOS. ME5091 AND ME5843)," December 28, 2011.
- (4) Federal Register / Vol. 77, No. 4 / Friday, January 6, 2012 / Notices, "Draft Environmental Assessment and Draft Finding of No Significant Impact Related to the Proposed License Amendment To Increase the Maximum Reactor Power Level: Florida Power & Light Company, St. Lucie Plant, Units 1 and 2."

On November 22, 2010 [Reference 1] and February 25, 2011 [Reference 2], Florida Power & Light Company (FPL) submitted license amendment requests (LARs) to the Nuclear Regulatory Commission (NRC) requesting amendments to the St. Lucie Unit 1 and St. Lucie Unit 2 renewed operating licenses (DPR-67 and NPF-16), respectively, requesting authorization to increase licensed core thermal power and implement an Extended Power Uprate.

*SUNSI Review Complete  
Template = ADM-013*

*ERIDS = ADM-03  
Call = T. Orf (7502)*

By letter dated December 28, 2011 [Reference 3], the NRC Office of Nuclear Reactor Regulation forwarded to FPL, a copy of the "Draft Environmental Assessment and Draft Finding of No Significant Impact Related to the Proposed License Amendment to Increase the Maximum Reactor Power Level" for St. Unit 1 and Unit 2. The NRC also forwarded a copy of this draft document to the Office of the Federal Register for publication.

On January 6, 2012 [Reference 4], a notice containing the Draft Environmental Assessment and Draft Finding of No Significant Impact and opportunity to comment was published in the Federal Register.


Florida Power & Light Company appreciates the opportunity to review and comment on the NRC's Draft Environmental Assessment and Draft Finding of No Significant Impact related to the proposed extended power uprates at St. Lucie Unit 1 and Unit 2. FPL's comments are provided in Attachment 1 to this letter. Our comments are indexed to the enclosure that was provided in Reference 3. Attachment 2 provides information supporting the Attachment 1 comments.

In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the designated State of Florida official.

Should you have any questions regarding this submittal, please contact Mr. Christopher Wasik, St. Lucie Extended Power Uprate LAR Project Manager, at 772-467-7138.

Executed on *30-January-2012*

Sincerely,

  
Richard L. Anderson  
Site Vice President  
St. Lucie Plant

Attachments (2)

cc: Mr. William Passetti, Florida Department of Health, Bureau of Radiation Control

**Florida Power & Light Comments on the  
St. Lucie Plant, Units 1 and 2 Draft Environmental Assessment and  
Draft Finding of No Significant Impact Related to the Proposed License Amendment to  
Increase the Maximum Reactor Power Level**

By letter dated December 28, 2011, the NRC Office of Nuclear Reactor Regulation forwarded to FPL a copy of the "Draft Environmental Assessment and Draft Finding of No Significant Impact Related to the Proposed License Amendment to Increase the Maximum Reactor Power Level" for the St. Lucie Unit 1 and Unit 2 extended power uprate (EPU). On January 6, 2012, a notice containing the Draft Environmental Assessment and Draft Finding of No Significant Impact and opportunity to comment was published in the Federal Register.

Florida Power & Light Company (FPL) appreciates the opportunity to review and comment on the subject NRC document. FPL's comments are provided below and are grouped by topic, since some of the comments are valid in more than one location in the document. For each topical area, a matrix is provided that identifies the applicable page numbers, line numbers and text references from the NRC's December 28, 2011 transmittal.

**1. Comment Related to the Ocean Water Discharge Temperature Increase Due to the EPU**

Page	Line(s)	Text Reference
7	4-7	"...FPL would release heated water with a proposed temperature increase of 2 degrees Fahrenheit ( $^{\circ}$ F) (1.1 degrees Celsius ( $^{\circ}$ C)) above the current discharge temperature ..."
12	5-6	"The NRC staff evaluated the potential effects of releasing heated water with a proposed temperature increase of 2 $^{\circ}$ F (1.1 $^{\circ}$ C) above the current discharge temperature ..."
13	23	"The predicted 2 $^{\circ}$ F (1.1 $^{\circ}$ C) temperature increase from the diffusers..."

**Comment:**

The following is provided to clarify the difference between FPL's calculated increase in the condenser delta-T for Unit 1 and Unit 2 by approximately 3  $^{\circ}$ F and FPL's request to the Florida Department of Environmental Protection (FDEP) to increase the discharge temperature limit by 2  $^{\circ}$ F.

On March 17, 2010, FPL requested from the FDEP, a revision to the St. Lucie Plant State Industrial Wastewater Facility Permit (IWFP) No. FL0002208. FPL requested that the current 113  $^{\circ}$ F instantaneous discharge temperature limit be increased by 2  $^{\circ}$ F to a 115  $^{\circ}$ F monthly average limit. In its application to the FDEP, FPL noted "After the uprate is completed, the CWS flow rate will be unchanged; however, the temperature rise across the condensers will have increased by approximately 3  $^{\circ}$ F." A copy of the IWFP revision request was provided to the NRC on March 18, 2010 by letter L-2010-059 (ML100830441).

On December 21, 2010, the FDEP issued FPL the modification to IWFP No. FL0002208 authorizing a change in the discharge temperature limit from 113 °F at the point of discharge before completion of the EPU for both units, to a temperature limit of 115 °F at the monitoring location after completion of the EPU for both units. A copy of the IWFP modification that was issued to FPL by the FDEP was transmitted to the NRC in letter L-2011-014, dated January 11, 2011 (ML110210023).

With regard to the NRC's evaluation referenced on page 12 of the Environmental Assessment, FPL believes the NRC evaluated the potential effects of releasing the heated water on the authorized discharge temperature limit of 115 °F, or 2 °F above the current discharge temperature limit of 113 °F, rather than "2 °F (1.1 °C) above the current discharge temperature."

## 2. Comment Related to the Number of Construction Workers During the EPU

Page	Line(s)	Text Reference
7	7-10	"Approximately 800 people are currently employed at St. Lucie Units 1 and 2 on a full-time basis. FPL estimates this workforce will be augmented by an additional 1,000 construction workers on average per outage during the proposed EPU-related activities with a potential peak of 1,400 additional construction workers."
11	20-21	"With an average estimated increase of 1,000 workers supporting EPU construction activities ..."

### Comment:

Based upon the current scope and schedule for the EPU implementation outages, FPL has determined a need for additional workers for both EPU implementation and refueling outage support. FPL currently projects that the peak number of construction workers per day that will be reporting to work at the St. Lucie site during implementation of the EPU will be approximately 3,000, with an estimated average number per outage of approximately 2,100.

Since these personnel are assigned to alternating shifts, the number of personnel on site at a time is minimized. With respect to socioeconomic impacts, the additional workers represent an added economic benefit to the local communities around the St. Lucie Plant. While there will be a temporary increase in the daily traffic, as a result of the increased numbers of workers that are projected to report to the site on a daily basis, using previously applied traffic analysis techniques, FPL has analyzed that the projected traffic on impacted roadways will remain at an acceptable level of service. Thus, it is FPL's assessment that the NRC's conclusion in Table 1, - "No significant socioeconomic impacts from EPU-related temporary increase in workforce" remains valid.

### 3. Comment Related to St. Lucie Plant Water Usage

Page	Line(s)	Text Reference
11	14-15	"The plant currently uses approximately 131,500 gallons (498 m <sup>3</sup> ) of freshwater per day and ..."

#### Comment:

Based on plant records that are developed from FPL's Ft. Pierce Utilities water bills for 2004 – 2009 for St. Lucie Plant, the combined average water usage rate by the plant (Unit 1 and Unit 2) is calculated to be 309,565 gallons per day, or approximately 154,800 gallons per unit per day (586 m<sup>3</sup> per unit per day). A table that provides the water usage numbers from 2004 - 2009 is provided as Attachment 2 to FPL letter L-2012-043.

### 4. Comment Related to FPL's IWFP Modification

Page	Line(s)	Text Reference
12	15-19	"In the IWFP, FDEP has issued the plant a temporary variance for a temperature increase of heated water discharge from 113 °F (45 °C) above ambient temperature to the proposed thermal discharge of 115 °F (46.1 °C) above ambient temperature after EPU completion for Units 1 and 2 on the condition that no adverse affects are found based on FPL study results."

#### Comment:

The following comments are made to clarify information on the IWFP modification that FPL received.

On December 21, 2010, the FDEP issued an IWFP modification that approved an increase in the St. Lucie Units 1 and 2 permitted temperature limit from 113 °F before the EPU to 115 °F after the EPU. The before and after temperature limits are not above ambient temperature but rather are instantaneous discharge temperature limits. The FDEP's approval was a modification to the St. Lucie Plant IWFP, not a temporary variance. IWFPs are valid for a period of five (5) years.

The permit modification that was issued on December 21, 2010 was accompanied by an Administrative Order that requires FPL to perform pre-EPU biological monitoring and a minimum of 2 years of post-EPU thermal and biological monitoring in the vicinity of the St. Lucie Plant. The purpose of the monitoring requirements are for FPL to show the presence of a balanced and indigenous population and to confirm the results of FPL's mathematical model and demonstrate that the heated water discharge from the St. Lucie Plant complies with the State's heated water quality standards.

A copy of the IWFP modification that was issued to FPL by the FDEP was provided to the NRC in letter L-2011-014, dated January 11, 2011 (ML110210023).

A new IWFP, with an issue date of September 29, 2011 was subsequently issued with the same requirements. The new permit is valid through September 28, 2016. A copy of the new permit was provided to the NRC in letter L-2011-450, dated October 20, 2011 (ML11301A205).

FPL suggests that the following would be an accurate representation of the IWFP modification that FPL received.

"FDEP has issued the plant a permit modification for a temperature increase of the heated water discharge temperature limit from 113 °F (45 °C) before the EPU to the proposed thermal discharge limit of 115 °F (46.1 °C) after EPU completion of Units 1 and 2 with a condition that FPL performs biological and thermal monitoring studies to demonstrate continued compliance with the Florida's Surface Water Quality Standards, Thermal Surface Water Criteria."

#### 5. Comment Related to the Florida Water Quality Standards

Page	Line(s)	Text Reference
14	14-16	"Although the proposed increase in temperature after EPU implementation would exceed the Florida Surface Water Quality Standards regulated by FDEP, FDEP is continuing to assess this action by requiring FPL to conduct studies as part of an IWFP variance."

#### Comment:

FPL does not agree that the proposed increase in temperature after the EPU will exceed the Florida Surface Water Quality Standards.

Although the St. Lucie Plant's heated water discharge currently exceeds the Thermal Surface Water Criteria for open waters (Chapter 62-302.520(c)) as provided in the Florida Water Quality Standards, FPL applied for and received a zone of mixing variance provided for under those same regulations. Therefore, FPL is meeting the Florida Water Quality Standards.

As a result of FPL's thermal calculations that showed that the delta-T across the condensers would increase by approximately 3 °F from the EPU, FPL requested from the FDEP, an increase of 2 °F (1.1 °C) in the instantaneous discharge temperature limit from 113 °F (45 °C) before the EPUs to a monthly average discharge temperature limit of 115 °F (46.1 °C) after implementation of the EPUs. The FDEP granted FPL the 2 °F (1.1 °C) temperature limit increase in an IWFP modification issued in 2010, with a condition that FPL performs biological and thermal monitoring studies. The purpose of these studies is for FPL to demonstrate its continued compliance with the State's thermal standards following implementation of the EPUs.

FPL suggests that the following statement would be a more accurate representation of the impact of the temperature increase that will be realized from the EPU.

"Although the proposed discharge temperature after EPU implementation would continue to exceed the Thermal Surface Water Quality Criteria for open waters as contained in the Florida Water Quality Standards established by FDEP, FPL will continue to meet its limits under the mixing zone variance authorized by the FDEP. FPL will continue to assess any potential impacts by performing the studies required by the IWFP modification."

**6. Comment Related to Table 1, Threatened and Endangered Species**

Page	Line(s)	Text Reference
26	Table 1 16-17	The proposed EPU would change impacts from those caused by current operations.

**Comment:**

Based upon FPL's review of the information provided in the NRC's Draft Environmental Assessment for the threatened and endangered species, FPL believes that the following would be a more reasonable representation of NRC's conclusion in Table 1 for Threatened and Endangered Species.

"The proposed EPU would not significantly change impacts from those caused by current operations."

**St. Lucie Plant Water Usage 2004-2009**

PSL 2004 FT. PIERCE UTILITIES			PSL 2005 FT. PIERCE UTILITIES			PSL 2006 FT. PIERCE UTILITIES		
DATE	METER #	CURRENT MONTH'S USAGE	DATE	METER #	CURRENT MONTH'S USAGE	DATE	METER #	CURRENT MONTH'S USAGE
1/27/04	W009904531	10406	1/25/05	W70121891A	313	1/23/06	W70121891A	970
			1/25/05	W70121891B	6635	1/23/06	W70121891B	17267
1/27/04	W060197744	35	1/25/05	W060197744	51	1/23/06	W060197744	814
1/27/04	W096609867	80	1/25/05	W096609867	118	1/23/06	W096609867	111
1/27/04	W70008569A	318	1/25/05	W70008569A	454	1/23/06	W70008569A	374
1/27/04	W70008569B	35	1/25/05	W70008569B	128	1/23/06	W70008569B	62
2/20/04	W009904531	5976	2/17/05	W70121891A	387	2/13/06	W70121891A	620
			2/17/05	W70121891B	11031	2/13/06	W70121891B	13631
2/20/04	W060197744	15	2/17/05	W060197744	45	2/13/06	W060197744	21
2/20/04	W096609867	13	2/17/05	W096609867	195	2/13/06	W096609867	94
2/20/04	W70008569A	270	2/17/05	W70008569A	569	2/13/06	W70008569A	230
2/20/04	W70008569B	30	2/17/05	W70008569B	210	2/13/06	W70008569B	60
3/18/04	W009904531	7385	3/21/05	W70121891A	416	3/22/06	W70121891A	1171
			3/21/05	W70121891B	7154	3/22/06	W70121891B	19207
3/18/04	W060197744	18	3/21/05	W060197744	39	3/22/06	W060197744	49
3/18/04	W096609867	49	3/21/05	W096609867	154	3/22/06	W096609867	175
3/18/04	W70008569A	307	3/21/05	W70008569A	442	3/22/06	W70008569A	421
3/18/04	W70008569B	64	3/21/05	W70008569B	133	3/22/06	W70008569B	133
4/19/04	W009904531	9659	4/19/05	W70121891A	587	4/25/06	W70121891A	1170
			4/19/05	W70121891B	21075	4/25/06	W70121891B	4744
4/19/04	W060197744	37	4/19/05	W060197744	52	4/25/06	W060197744	51
4/19/04	W096609867	60	4/19/05	W096609867	238	4/25/06	W096609867	176
4/19/04	W70008569A	562	4/19/05	W70008569A	395	4/25/06	W70008569A	619
4/19/04	W70008569B	2592	4/19/05	W70008569B	86	4/25/06	W70008569B	302
5/18/04	W009904531	11264	5/26/05	W70121891A	308	5/24/06	W70121891A	996
			5/26/05	W70121891B	7930	5/24/06	W70121891B	3263
5/18/04	W060197744	27	5/26/05	W060197744	42	5/24/06	W060197744	96
5/18/04	W096609867	124	5/27/05	W096609867	266	5/24/06	W096609867	265
5/18/04	W70008569A	392	5/26/05	W70008569A	506	5/24/06	W70008569A	563
5/18/04	W70008569B	81	5/27/05	W70008569B	93	5/24/06	W70008569B	455
6/17/04	W70121891A	1660	6/21/05	W70121891A	246	6/30/06	W70121891A	1121
6/17/04	W70121891B	405	6/23/05	W70121891B	4222	6/26/06	W70121891B	11773
6/17/04	W060197744	26	6/21/05	W060197744	18	6/26/06	W060197744	62
6/17/04	W096609867	197	6/21/05	W096609867	221	6/26/06	W096609867	174
6/17/04	W70008569A	407	6/21/05	W70008569A	329	6/26/06	W70008569A	511
6/17/04	W70008569B	83	6/21/05	W70008569B	60	6/26/06	W70008569B	235
7/22/04	W70121891A	300	7/25/05	W70121891A	284	7/26/06	W70121891A	853
7/22/04	W70121891B	13250	7/29/05	W70121891B	5400	7/26/06	W70121891B	11403
7/22/04	W060197744	25	7/25/05	W060197744	53	7/26/06	W060197744	39
7/22/04	W096609867	237	7/25/05	W096609867	149	7/26/06	W096609867	123
7/22/04	W70008569A	464	7/25/05	W70008569A	448	7/26/06	W70008569A	379
7/22/04	W70008569B	83	7/25/05	W70008569B	106	7/26/06	W70008569B	113



PSL 2004 FT. PIERCE UTILITIES		PSL 2005 FT. PIERCE UTILITIES		PSL 2006 FT. PIERCE UTILITIES	
8/20/04 W70121891A	539	8/24/05 W70121891A	298	8/28/06 W70121891A	658
8/20/04 W70121891B	12882	8/24/05 W70121891B	5265	8/28/06 W70121891B	4311
8/20/04 W060197744	21	8/22/05 W060197744	43	8/28/06 W060197744	36
8/20/04 W096609867	197	8/22/05 W096609867	197	8/28/06 W096609867	292
8/27/04 W70008569A	378	8/22/05 W70008569A	512	8/28/06 W70008569A	444
8/20/04 W70008569B	68	8/22/05 W70008569B	150	8/28/06 W70008569B	145
9/21/04 W70121891A	294	9/22/05 W70121891A	310	9/26/06 W70121891A	715
9/21/04 W70121891B	8846	9/22/05 W70121891B	5370	9/26/06 W70121891B	3952
9/21/04 W060197744	14	9/22/05 W060197744	37	9/26/06 W060197744	21
9/21/04 W096609867	77	9/22/05 W096609867	229	9/26/06 W096609867	94
9/21/04 W70008569A	481	9/22/05 W70008569A	440	9/26/06 W70008569A	489
9/21/04 W70008569B	184	9/22/05 W70008569B	112	9/26/06 W70008569B	159
10/25/04 W70121891A	842	10/20/05 W70121891A	488	10/26/06 W70121891A	710
10/25/04 W70121891B	18036	10/20/05 W70121891B	5121	10/26/06 W70121891B	3959
10/25/04 W060197744	19	10/20/05 W060197744	119	10/26/06 W060197744	43
10/25/04 W096609867	264	10/20/05 W096609867	255	10/26/06 W096609867	148
10/25/04 W70008569A	373	10/20/05 W70008569A	480	10/26/06 W70008569A	480
10/25/04 W70008569B		10/20/05 W70008569B	181	10/26/06 W70008569B	248
11/18/04 W70121891A	226	11/16/05 W70121891A	444	11/28/06 W70121891A	648
11/18/04 W70121891B	4112	11/16/05 W70121891B	5897	11/28/06 W70121891B	3497
11/18/04 W060197744	26	11/16/05 W060197744	89	11/28/06 W060197744	27
11/18/04 W096609867	181	11/16/05 W096609867	167	11/28/06 W096609867	126
11/18/04 W70008569A	345	11/16/05 W70008569A	487	11/28/06 W70008569A	477
11/18/04 W70008569B		11/16/05 W70008569B	208	11/28/06 W70008569B	132
12/22/04 W70121891A	313	12/19/05 W70121891A	592	12/27/06 W70121891A	555
12/22/04 W70121891B	6635	12/19/05 W70121891B	7359	12/27/06 W70121891B	3995
12/22/04 W060197744	51	12/19/05 W060197744	60	12/27/06 W060197744	34
12/22/04 W096609867	118	12/19/05 W096609867	129	12/27/06 W096609867	93
12/22/04 W70008569A	454	12/19/05 W70008569A	572	12/27/06 W70008569A	476
12/22/04 W70008569B	128	12/19/05 W70008569B	181	12/27/06 W70008569B	221
TOTAL GALLONS 123,040,000		TOTAL GALLONS 107,380,000		TOTAL GALLONS 122,081,000	

PSL 2007 FT. PIERCE UTILITIES			PSL 2008 FT. PIERCE UTILITIES			PSL 2009 FT. PIERCE UTILITIES		
DATE	METER #	CURRENT MONTH'S USAGE	G DATE	METER #	CURRENT MONTH'S USAGE	G DATE	METER #	CURRENT MONTH'S USAGE
1/26/07	W70121891A	606	1/25/08	W70121891A	838	1/26/09	W70121891A	500
1/26/07	W70121891B	3713	1/25/08	W70121891B	10937	1/26/09	W70121891B	5943
1/26/07	W60197744	34	1/25/08	W60197744	51	1/26/09	W60197744	18
1/26/07	W96609867	53	1/25/08	W96609867	7	1/26/09	W96609867	198
1/26/07	W70008569A	415	1/25/08	W70008569A	306	1/26/09	W70008569A	263
1/26/07	W70008569B	67	1/25/08	W70008569B	80	1/26/09	W70008569B	74

2/24/07	W70121891A	547	2/28/08	W70121891A	807	2/25/09	W70121891A	401
2/24/07	W70121891B	3933	2/28/08	W70121891B	8682	2/25/09	W70121891B	4511
2/24/07	W60197744	29	2/28/08	W60197744	46	2/25/09	W60197744	1
2/24/07	W96609867	101	2/28/08	W96609867	67	2/25/09	W96609867	100
2/24/07	W70008569A	280	2/28/08	W70008569A	354	2/25/09	W70008569A	321
2/24/07	W70008569B	91	2/28/08	W70008569B	134	2/25/09	W70008569B	116

3/27/07	W70121891A	651	3/27/08	W70121891A	412	3/24/09	W70121891A	289
3/27/07	W70121891B	6152	3/27/08	W70121891B	7063	3/24/09	W70121891B	4560
3/27/07	W60197744	48	3/27/08	W60197744	20	3/24/09	W60197744	12
3/27/07	W96609867	263	3/27/08	W96609867	88	3/24/09	W96609867	91
3/27/07	W70008569A	344	3/27/08	W70008569A	262	3/24/09	W70008569A	327
3/27/07	W70008569B	131	3/27/08	W70008569B	72	3/24/09	W70008569B	108

4/25/07	W70121891A	544	4/28/08	W70121891A	414	4/23/09	W70121891A	433
4/25/07	W70121891B	5161	4/28/08	W70121891B	7233	4/23/09	W70121891B	433
4/25/07	W60197744	69	4/28/08	W60197744	19	4/23/09	W60197744	41
4/25/07	W96609867	132	4/28/08	W96609867	109	4/23/09	W96609867	114
4/25/07	W70008569A	449	4/28/08	W70008569A	300	4/23/09	W70008569A	366
4/25/07	W70008569B	195	4/28/08	W70008569B	82	4/23/09	W70008569B	167

5/25/07	W70121891A	576	5/28/08	W70121891A	435	5/21/09	W70121891A	352
5/25/07	W70121891B	6158	5/28/08	W70121891B	6058	5/21/09	W70121891B	5872
5/25/07	W60197744	116	5/28/08	W60197744	16	5/21/09	W60197744	60
5/25/07	W96609867	73	5/28/08	W96609867	190	5/21/09	W96609867	129
5/25/07	W70008569A	451	5/28/08	W70008569A	323	5/21/09	W70008569A	467
5/25/07	W70008569B	194	5/28/08	W70008569B	109	5/21/09	W70008569B	203

6/26/07	W70121891A	823	6/26/08	W70121891A	502	6/23/09	W70121891A	753
6/26/07	W70121891B	15067	6/26/08	W70121891B	7710	6/23/09	W70121891B	15464
6/26/07	W60197744	13	6/26/08	W60197744	10	6/23/09	W60197744	41
6/26/07	W96609867	74	6/26/08	W96609867	191	6/23/09	W96609867	147
6/26/07	W70008569A	307	6/26/08	W70008569A	358	6/23/09	W70008569A	459
6/26/07	W70008569B	53	6/26/08	W70008569B	155	6/23/09	W70008569B	122

PSL 2007 FT. PIERCE UTILITIES			PSL 2008 FT. PIERCE UTILITIES			PSL 2009 FT. PIERCE UTILITIES		
7/26/07	W70121891A	558	7/25/08	W70121891A	461	7/24/09	W70121891A	722
7/26/07	W70121891B	4374	7/25/08	W70121891B	5771	7/24/09	W70121891B	14524
7/26/07	W60197744	10	7/25/08	W60197744	9	7/24/09	W60197744	66
7/26/07	W96609867	152	7/25/08	W96609867	107	7/24/09	W96609867	140
7/26/07	W70008569A	319	7/25/08	W70008569A	369	7/24/09	W70008569A	527
7/26/07	W70008569B	113	7/25/08	W70008569B	124	7/24/09	W70008569B	1126

8/27/07	W70121891A	628	8/26/08	W70121891A	716	8/25/09	W70121891A	865
8/27/07	W70121891B	6693	8/26/08	W70121891B	9735	8/25/09	W70121891B	9372
8/27/07	W60197744	15	8/26/08	W60197744	28	8/25/09	W60197744	31
8/27/07	W96609867	133	8/26/08	W96609867	111	8/25/09	W96609867	148
8/27/07	W70008569A	399	8/26/08	W70008569A	406	8/25/09	W70008569A	630
8/27/07	W70008569B	125	8/26/08	W70008569B	553	8/25/09	W70008569B	633

9/27/07	W70121891A	613	9/25/08	W70121891A	561	9/25/09	W70121891A	768
9/27/07	W70121891B	8689	9/25/08	W70121891B	6039	9/25/09	W70121891B	12572
9/27/07	W60197744	15	9/25/08	W60197744	22	9/25/09	W60197744	60
9/27/07	W96609867	139	9/25/08	W96609867	101	9/25/09	W96609867	143
9/27/07	W70008569A	325	9/25/08	W70008569A	332	9/25/09	W70008569A	507
9/27/07	W70008569B	122	9/25/08	W70008569B	75	9/25/09	W70008569B	865

10/26/07	W70121891A	618	10/23/08	W70121891A	490	10/28/09	W70121891A	770
10/26/07	W70121891B	9829	10/23/08	W70121891B	5975	10/28/09	W70121891B	10112
10/26/07	W60197744	10	10/23/08	W60197744	8	10/28/09	W60197744	48
10/26/07	W96609867	131	10/23/08	W96609867	13	10/28/09	W96609867	157
10/26/07	W70008569A	467	10/23/08	W70008569A	349	10/28/09	W70008569A	683
10/26/07	W70008569B	285	10/23/08	W70008569B	210	10/28/09	W70008569B	1804
						10/28/09	W7060444A	683
						10/28/09	W7060444B	1804

11/29/07	W70121891A	669	11/24/08	W70121891A	605	11/23/09	W70121891A	720
11/29/07	W70121891B	7714	11/24/08	W70121891B	9154	11/23/09	W70121891B	6313
11/29/07	W60197744	15	11/24/08	W60197744	7	11/23/09	W60197744	32
11/29/07	W96609867	151	11/24/08	W96609867	13	11/23/09	W96609867	124
11/29/07	W70008569A	495	11/24/08	W70008569A	460	11/23/09	W70008569A	
11/29/07	W70008569B	171	11/24/08	W70008569B	104	11/23/09	W70008569B	
						11/23/09	W7060444A	541
						11/23/09	W7060444B	152

12/27/07	W70121891A	656	12/26/08	W70121891A	517	12/28/09	W70121891A	879
12/27/07	W70121891B	8110	12/26/08	W70121891B	5685	12/28/09	W70121891B	7975
12/27/07	W60197744	42	12/26/08	W60197744	18	12/28/09	W60197744	43
12/27/07	W96609867	19	12/26/08	W96609867	118	12/28/09	W96609867	165
12/27/07	W70008569A	407	12/26/08	W70008569A	253	12/28/09	W70008569A	
12/27/07	W70008569B	113	12/26/08	W70008569B	39	12/28/09	W70008569B	
						12/28/09	W7060444A	565
						12/28/09	W7060444B	126

TOTAL			TOTAL			TOTAL		
GALLONS	101,237,000		GALLONS	103,978,000		GALLONS	120,851,000	