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The Honorable Jennifer Granholm
Secretary of Energy
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

**Re: Endorsement of Duke Energy Florida's Relief Request for Emergency Order Under
Section 202(c) of the Federal Power Act**

Dear Secretary Granholm:

The Florida Reliability Coordinating Council (FRCC) formally endorses the request for relief submitted by an FRCC member, Duke Energy, Florida (DEF) as follows:

“During low demand periods following the hurricane, Duke Energy may have to shut down certain units due to conditions established by federal and state environmental laws and permits that prohibit operating at low load for extended periods. These units are described in **Exhibit A** (the “Specified Resources”). Specifically, the operation of these units is or may be impacted by CT MACT formaldehyde limitations in the Title V permit and the Continuous Compliance Plan that requires compliance with a four-hour rolling average minimum operational load of 150 MWs.

Because low load operation of these units subject to these restrictions would help to reduce the likelihood of any firm load shedding that may be required during this hurricane event, Duke Energy seeks an immediate order from the Department ordering the continued operation of the Specified Resources, as well as any other generating units, regardless of emissions or other permit limitations.”

The primary mission of the FRCC is to provide oversight of the Reliability Coordinator function and to maintain the reliability of the interconnected Bulk Electric System (BES). It is the FRCC's firm opinion that granting this relief request will provide an immeasurable benefit to this mission and in turn, the public served by the FRCC and its member entities. Allowing this relief will not only serve the reliability of DEF's service territory, but also the many local electric cooperatives served by DEF and other interconnected electric utilities and service providers.

The FRCC greatly appreciates the Department of Energy's expedited consideration of this request for one of our member entities. Please do not hesitate to contact me or my staff if you have any questions or require additional information to act on this request.

Respectfully,

A handwritten signature in black ink, appearing to read "Paul L. Davis, Jr.", with a stylized, cursive script.

Paul L. Davis, Jr.

Manager, Reliability Coordinator Operations and Oversight
Florida Reliability Coordinating Council