BEFORE THE 1 FLORIDA PUBLIC SERVICE COMMISSION 2 3 In the Matter of UNDOCKETED : 4 Commission review of Electric Utility Ten-Year 5 Site Plans. 6 7 \* \* ELECTRONIC VERSIONS OF THIS TRANSCRIPT \* ARE A CONVENIENCE COPY ONLY AND ARE NOT 8 \* THE OFFICIAL TRANSCRIPT OF THE HEARING \* AND DO NOT INCLUDE PREFILED TESTIMONY. 9 10 11 WORKSHOP PROCEEDINGS: 12 BEFORE: CHAIRMAN JOE GARCIA 13 COMMISSIONER J. TERRY DEASON COMMISSIONER SUSAN F. CLARK 14 COMMISSIONER E. LEON JACOBS, JR. 15 Monday, September 27, 1999 DATE: 16 17 Commenced at 9:30 a.m. TIME: Concluded at 3:50 p.m. 18 Betty Easley Conference Center PLACE: 19 Room 148 4075 Esplanade Way 20 Tallahassee, Florida 21 KIMBERLY K. BERENS, CSR, RPR REPORTED BY: 22 FPSC Commission Reporter (850) 413-6736 23 DOCUMENT NO. JOY KELLY, CSR, RPR 24 11972-99 FPSC Chief, Bureau of Reporting (850) 413-6732 25 10/41

IN ATTENDANCE: 1 ROBERT ELIAS, FPSC Division of Legal 2 3 Services. MICHAEL HAFF, ROLAND FLOYD, TOM BALLINGER, 4 ROBERT TRAPP and CONNIE KUMMER, FPSC Division of 5 6 Electric & Gas. 7 ROBERT SCHEFFEL WRIGHT, Duke Energy NSB 8 Power Company. 9 MATT BLANKNER, Orlando Utilities Commission. LEO GREEN, ROBERTO DENIS, HENRY SOUTHWICK 10 and STEVE SIM, Florida Power & Light Company. 11 12 DAVID BYRNE and EDWIN FRAZIER, City of Tallahassee, Florida. 13 GARL ZIMMERMAN, Seminole Electric Company. 14 MARIO VILLAR, and KEN WILEY, Florida 15 16 Reliability Coordinating Council. BILL POPE, MIKE MARLER, Gulf Power Company. 17 18 BEN CRISP, Florida Power Corporation. TODD KAMHOOT, Gainesville Regional 19 20 Utilities. PAUL ELWING, City of Lakeland. 21 MARK WARD, Tampa Electric Company. 22 ROBERT MILLER and MYRON ROLLINS, Kissimmee 23 24 Utility Association. 25

1	IN ATTENDANCE CONTINUED:
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3	RICK CASEY, Florida Municipal Power
4	Association.
5	JON MOYLE, JR., PG&E.
6	RANDY BOSWELL, Jacksonville Electric
7	Authority.
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1	PROCEEDINGS
2	(Workshop convened at 9:30 a.m.)
3	CHAIRMAN GARCIA: Good morning. I'd like to
4	welcome you to today's Commission's workshop on Ten
5	Year Site plans. We're going to hear brief
6	presentations from different groups that have filed
7	with us and we're going to start with the Florida
8	Reliability Coordinating Council which is probably
9	going to make the longer of the presentations.
10	I would ask you that because I think Staff
11	has some a lot of questions, that try to make your
12	presentations as brief as possible, so that they
13	can it will be more efficient for the questioning
14	time. Clearly, there's I hope there aren't any
15	surprises today, but if there is anything that you
16	want to bring up, please let us know, and then,
17	obviously, Commissioners will probably ask some
18	questions early on, and our hope is to be out of here
19	by 4:00, and if we can do better, that would be even
20	better.
21	So, if the Commissioners have nothing to
22	add, we're probably going to sit down here and you
23	can the Florida Reliability Coordinating Council
24	can begin.
25	MR. SOUTHWICK: Good morning. I'm Henry

1 Southwick with the Florida Reliability Coordinating 2 Council. I'm the chairman of the Reliability Assessment Group. And with me on my left is Mario 3 4 Villar, who is the chairman of our Resource Working 5 Group who has done the studies there are going to be presented here today. And to Mario's left is Ken 6 7 Wiley who is the executive director of the FRCC. So with no further to do, I'd like to turn it over to 8 Mario. 9

10 MR. HAFF: Excuse me, Mario. I think from 11 the notice and agenda that went out, we had public 12 comments going first. I don't know if anyone is here 13 though. I haven't seen LEAF yet or anyone else. And 14 if not, we'll just go ahead and go on. But I just 15 wanted to note that the notice had that first. Seeing 16 none, I guess, go ahead, Mario.

17 MR. VILLAR: Good morning. My name is Mario 18 Villar. I'm chairman of the Resource Working Group for FRCC and I will be making the presentation this 19 morning. Before we get in the specifics of the work 20 that was done by FRCC, there is some housekeeping 21 matters that I'd like to cover. They're basically 22 23 left over matters from the 1988 review. And I'd like to give you a little bit of background as to what the 24 FRCC did last year and how it leads to the work that 25

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1 was done this year.

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Is there anyway that this can be made a little bigger? Is there any way to adjust that some? Well, it's a little washed out, but we'll do the best we can.

In '98 the FRCC adopted a 15% reserve margin 6 for the peninsula. It conducted a reliability 7 assessment study and it developed a methodology where 8 we compared the projected components of the reserve 9 margin calculation against actual data for the last 10 five years to analyze the suitability of the 15% 11 reserve margin. In other words, to conduct a test of 12 the 15% reserve margin. 13

We presented the results of that analysis at the 1998 Ten Year Site Plan Workshop and then the Commission, in it's report to the Department of Environmental Protection and DCA in December, included in that report some Staff concerns. These concerns were basically along four lines.

High unit availability. Staff was concerned that recently there have been a change in unit availability on the positive side and there were concerns as to whether that was sustainable or not. We at FRCC believe that utilities have

invested significant dollars to achieve that high unit

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availability. We believe those units availabilities 1 2 are sustainable. We've shown the improvement in availability and we believe that that will remain. 3 In addition to that the Commission has 4 started some Staff audits of this particular issue and 5 I believe those audits are still ongoing. 6 7 With respect to continued assistance from Southern Company, I think Staff expressed some concern 8 as to whether that assistance will continue to be 9 available in the future. We don't see any reason to 10 11 doubt any assistance from the north. There is not only Southern Company, there is a whole SERC region 12 and actually the whole eastern interconnection that we 1.3 could draw upon. 14 This is not a reserve margin issue. 15 It's 16 basically considered in the lose of low probability analysis. And one of the sensitivity analysis that we 17 have used in that LOLP analysis is no further 18 assistance from the SERC region or the eastern 19 interconnection. So we don't think this is an issue 20 in the future. 21 There were two specific issues that Staff 22 had also in the report. That was extremely low winter 23 temperatures in Christmas 1989 and also the Staff had 24 conducted some probabilistic analyses on the FRCC data 25

and it reached some conclusions in that respect. I'd
 like to cover those two issues now.

These are some quotes from the Staff 3 documentation that was presented at the August 25th 4 workshop. Paragraph 6 basically deals with a 5 probabilistic assessment results and there Staff 6 concluded that summer reserves were adequate based on 7 their analysis and that they had some concern with the 8 generating capacity during two specific seasons; the 9 winter of 1999/2000 and 2000/2001. 10 The emphasis there is by us, and basically 11 that Staff conclusion at the time was the random 12 13 number assessment suggests planned summer reserves are adequate. 14 Paragraph No. 12 deals with the extreme 15 winter temperatures, and in particular, the Christmas 16 17 1989 backcast which was basically a calculation performed by Staff based on Christmas '89 conditions 18

19 from which they attempted to quantify what could20 happen under extreme winter conditions.

And I'd like to draw your attention to some language in there that says blackouts will range from about half as bad to twice as bad as what occurred in 1989.

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We believe the Staff's analysis in that

regard is incorrect and I'd like to turn to that now. 1 2 Kind of hard to read here. Basically this is a duplicate of one of the Staff slides from the 3 August 25th workshop. I believe it was Page 6. These 4 are Staff numbers, and while we disagree with the 5 Staff analysis, I won't discuss all the deficiencies 6 at this time. I'd like to point out a few of those 7 particular areas where we do have a disagreement with 8 Staff and take you through what they did. 9 If you look at Row C, that is one of the 10 assumptions that Staff is using and that is that 23% 11 of capacity will be unavailable. That is basically a 12 calculation drawn from the data from 1989 as to the 13 utility capacity that was available and the amount of 14 capacity Staff calculated as being unavailable in Row 15 16 B. From those two numbers you derive a 23% capacity unavailable number. 17 I'd like to also call your attention to Row 18

19 I, which is the percentage of peak load error that 20 Staff calculated. Again, that number is drawn from 21 the row right above it which is the actual peak, which 22 is not really an actual peak but is an estimated 23 number based on an aggregation of the load that was 24 actually served by utilities, plus the estimated 25 unserved load. So even though it's shown as an actual

number, it's not necessarily an actual number. 1 From that the Staff calculates against the 2 forecasted firm peak a peak error of 16.9%. Again, 3 this number is based on an aggregated amount on a 4 noncoincident basis. So it's not necessarily 5 reflective of reality. 6 The load not served in Row J is also 7 calculated on a similar basis of aggregation of 8 utilities of estimates of nonfirm load, again, on a 9 noncoincident basis. 10 The basic assumption that Staff used is that 11 nothing has changed since 1989. They then go to the 12 next column, which is their forecast of what would 13 happen under Christmas '89 conditions, and apply the 14 same 23% number that they calculated for Christmas '89 15 to the 1998/1999 number shown in their last year's 16 resource plan to arrive at an unavailable utility 17 capacity of 8,749 because this actually escalated 18 since it's based on the number right on top. 19 So they're not only assuming that nothing 20 has changed since 1989, but they're also assuming that 21 the numbers that were out are going to be even --22 there will be even more megawatts out. 23 With respect to the amount of actual peak 24 25 that will be experienced, again, they are assuming

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1 that 16.9% of the forecasted firm peak from 1999 would 2 also be unserved yielding the actual percentage peak 3 here in Row H.

Those assumptions are incorrect. This 4 Commission conducted an assessment of the 1989 5 Christmas freeze and issued an order, Order No. 22708, 6 in which they directed that a statewide emergency plan 7 be adopted for the state of Florida. That plan has 8 been adopted and has been incorporated into Commission 9 rule. I think it's rule 256.0813, I believe. That 10 plan tells you what to do in the event of an 11 emergency. It contemplates the number of levels of 12 alert. It provides for public notification, 13 conservation appeals, et cetera. 14

Also Staff is assuming that the same amount 15 of megawatts that were out on scheduled maintenance 16 are going to be out on scheduled maintenance in 1999. 17 Not only the same amount, but even a greater amount 18 because, again, this number has escalated since it's 19 based on a higher base. Utilities have changed their 20 maintenance practices significantly and no longer 21 schedule maintenance around the peak periods. 2.2

In addition to that, there were a number of megawatts that were out on forced outage in 1989. Those megawatts were out for different reasons. Some

of them were, there was a curtailment of gas supply
 into the state of Florida. All of that has been
 addressed since then.

There were some units that were gas only units. The firms -- the supplies for those units has been firmed up so it's not reasonable to assume that those megawatts will not be available.

8 In addition to that, there were some units 9 that were dual fired capable units when they were 10 switched from gas to oil, and those units were run on 11 oil. There were some problems associated with some 12 filter problems. Those problems have been corrected 13 so there's no reason why those units should be assumed 14 to be unavailable in 1999.

There were some problems associated with freezing water/control lines. The Commission ordered the utilities to review the winterization plans. We reviewed the winterization plans and fixed those concerns. So there's no reason to assume that those megawatts will be unavailable.

As far as actual numbers, the gas only units represent an approximately 225 megawatts. The fuel filter problem with dual capability units were about 2,000 megawatts, and the winterization plan issues effected about 3,100 megawatts of capacity. So this

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1	number of 8,749 is highly inflated in our opinion.
2	One major flaw with the analysis is also
3	that Staff fails to take into account what utilities
4	call operational measures. That is, conservation
5	appeals, voltage reduction, availability of nonfirm
6	purchases from the SERC region, load SCRAM capability
7	in the DSM units, et cetera.
8	That is significant amount of additional
9	megawatts can be used in the event of an emergency.
10	Those are not accounted for in the Staff's conclusion
11	that there will 8,226 megawatts of unserved load.
12	What I'd like to do now is turn to another
13	chart which is a corrected version of the one we had
14	before. And, again, these represent the Staff numbers
15	with some changes that we made to it. The bold
16	numbers are additions to the Staff chart.
17	If you look on Row B, what I've done there
18	is I split the 7,900 megawatts that Staff said was
19	unavailable in 1989 into two categories; forced
20	outages of 4,334, and the actual number that Staff
21	showed in their August workshop was 4,333, but my
22	staff wouldn't put a number in there that didn't add
23	up to the full 7,900 megawatts so they rounded it up
24	by one megawatt.
25	The next number below is the amount of

1 scheduled maintenance outages in effect during
2 Christmas of '89.

And the equivalent amount of megawatts for 1999 is shown on the column on the right-hand side. It's 3,992 megawatts when you escalate it up from the Christmas '89 numbers. I have subtracted that number for illustrative purposes only from the unavailable capacity because we're not planning on having all that capacity out during winter peak type conditions.

I have made no other adjustments for any of the other changes that I have discussed that have taken place or corrected measures like the dual gas capability issue, the winterization plans, et cetera.

That leaves a forced outage amount of 4,757 megawatts or 12.5% utility capacity unavailable. Again, this is only for illustrative purposes. I'm not necessarily agreeing with any of the numbers in here shown by Staff, et cetera. And I am not showing all the corrections that could be made to this analysis.

That 3,992 megawatts needs to be brought down in Row F to show the total utility capacity available from which you can calculate the potential deficiency.

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I have also made, like I said before, one of

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the things that Staff doesn't consider is any changes that have taken place since 1989. One significant change that took place since 1989 is the utilities have changed the forecasted methodology and -- or at least one utility has. I didn't have figures for all the utilities so I used an FPL adjustment only.

FPL, in 1997, made a change to its forecast which results in a reduction relative to what was calculated here by Staff, or about 800 megawatts from the Staff amount.

In other words, what FPL did in 1997 was to 11 change the low winter temperature calculations, 12 resulting in an increase in the FPL forecast of about 13 800 megawatts in this particular year. So in order to 14 make this 3,566 number shown in Row G for 1999, to put 15 it on an equivalent basis to the way the forecast was 16 done in 1989, we needed to have an 800 megawatt 17 reduction in that forecast. Otherwise, you're not 18 comparing apples to apples. From that you come up 19 with an adjusted forecast to put it on the same basis 20 of 3,486 -- 66 megawatts. 21

22 COMMISSIONER CLARK: Excuse me. Let me ask, 23 what change allows you to adjust the peak downward? I 24 don't understand. If you changed your methodology, 25 what's the justification for that?

1	MR. VILLAR: I'm not adjusting the peak
2	downward. What I am doing, Commissioner Clark, is
3	basically that, what Staff has done is they have
4	assumed that everything that took place in 1989 is the
5	same, and applied those conditions to the peak and all
6	the other categories that they use in this analysis
7	for 1999.
8	Now, they use 16.9 forecast peak error and
9	they applied that same 16.9 forecast peak error to the
10	1999 data. But because we don't have the forecast
11	being calculated on the same basis, in order to apply
12	a 16.9 forecast peak error, you'd need to adjust the
13	forecast by the increased forecast that FPL had in
14	order to put it on the same basis.
15	In other words, in order to be comparing
16	apples to apples and in order to be able to use the
17	16.9 adjustment, you need to make this 800 megawatt
18	adjustment. In other words, you're not going to have
19	a 16.9 forecast error because we have changed the
20	forecasting methodology. So it's unrealistic to
21	assume that you're going to have a 16.9% error.
22	COMMISSIONER CLARK: What was the change in
23	methodology that allows you to do that?
24	MR. VILLAR: We lower the winter temperature
25	from Leo here? From 37 or to what was it?

34 degrees, Leo? 1 MR. GREEN: 37 to 34.5. 2 MR. VILLAR: 37 to 34.5. 3 COMMISSIONER CLARK: Okay. So after 1998 4 you're forecast was based on a lower temperature? 5 MR. VILLAR: That is correct. 6 7 COMMISSIONER CLARK: All right. MR. BALLINGER: Can I jump in real quick? 8 This is Tom Ballinger with the Staff. Mario, is what 9 you're saying is because of the change in 10 temperatures, you'll never have an error rate as great 11 as 16.9% in the future? 12 13 MR. VILLAR: It's unlikely to have one, or at least under the conditions that you're assuming 14 here, Tom. That's all we're saying. 15 MR. BALLINGER: But that's what you're 16 trying to illustrate? 17 MR. VILLAR: That's correct. Yes. 18 COMMISSIONER JACOBS: Is the effect of 19 lowering temperature, does it broaden the peak -- the 20 observed peaks that you're looking at so that that 21 reduces the number of errors that you observed in that 22 same time? 23 24 MR. VILLAR: It doesn't broaden the peak. The peak stays the same. 25

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COMMISSIONER JACOBS: No. I understand that 1 the peak stays the same. But you're observing 2 temperatures over a period of time and because your 3 temperature now is lower, what you're saying is you're 4 going to pick up more observations here? 5 MR. VILLAR: I don't know if it's in terms 6 of observation. Maybe it would be better if Leo 7 addressed the question. 8 COMMISSIONER JACOBS: Just tell me how the 9 lowering of the temperature effects the reduced error 10 rate. 11 MR. GREEN: By assuming the lower 12 temperature, the fact is that their projected value 13 goes up. Okay. By having that value goes up, there 14 is -- it's very unlikely that we're going to miss by 15 that same amount. 16 COMMISSIONER JACOBS: Okay. Thank you. 17 MR. VILLAR: With that adjustment to the 18 forecast firm peak and applying the same 16.9% of 19 forecast error to this adjusted forecast shown in Row 20 G, we come up with an actual peak, an adjusted actual 21 peak, of 40,758 as opposed to the number that Staff 22 had, which was the 41,694. 23 When you substract from that the adjusted 24 available capacity on Row F, looking at Row J right 25

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now, you come up with a potential unserved load of 1 2 3,298 megawatts. And then when I'm making a final adjustment which is based on the amount of operational 3 measures the utility estimates is available is the 4 year 1999 of 3,844 megawatts, and it results in no 5 unserved load, in fact, there's some megawatts left 6 over to serve additional load based on these 7 8 estimations only.

9 And, again, this is just for illustrative 10 purposes. There could be a significant number of 11 corrections made. We haven't attempted to make all of 12 those at this point.

Conclusions are that we don't believe it's 13 14 realistic to assume that during instances of extreme weather there will be a repeat of the conditions that 15 existed 1989, and that the lessons learned from the 16 17 Commission and utility actions does then need to be recognized and those have significantly mitigated and 18 alleviated the potential for unserved load under 19 extreme weather conditions. And with a set of more 20 realistic conditions, we don't think that there will 21 be unserved load. 22

23 MR. BALLINGER: Mario, did I understand that 24 you just stated that given similar circumstances the 25 Peninsula would serve all load?

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1	MR. VILLAR: I'm sorry, Tom?
2	MR. BALLINGER: Did you just say that under
3	similar situations you expect the Peninsula to serve
4	all firm load?
5	MR. VILLAR: We think under similar
6	circumstances temperaturewise, and even not accounting
7	for some of the things that are here, we don't expect
8	that there will be unserved load.
9	MR. BALLINGER: Okay.
10	MR. VILLAR: Under more realistic
11	assumptions for forced outages, scheduled maintenance
12	and taking into account operational measures.
13	I'd like to discuss a little bit the second
14	remaining issue from 1998 which is the Staff's
15	probabilistic assessment.
16	MR. BALLINGER: Before we move on, I got a
17	couple of questions on the Christmas as facts have
18	been brought up. Do you know how much in '89 of
19	natural gas fired generation did not have oil backup?
20	MR. VILLAR: There were 225 megawatts from
21	what I recall, Tom. It was Cutler 5 and 6, and a
22	couple of Deerhaven GTEs from Gainesville. And at the
23	time Cutler 5 and 6 did not have firm gas supplies.
24	We do have firm gas supplies now. That was the reason
25	why Cutler 5 and 6 was interrupted, and I don't know

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whether Deerhaven has firm gas or not.

MR. BALLINGER: Do you know how much in the 2 future -- we're adding a lot of natural gas 3 generation. How much of that is planned not to have 4 5 oil backup, roughly?

MR. VILLAR: I am not aware of the number of 6 megawatts, Tom, but to the extent that it has a firm 7 8 gas supply, that should take care of the issue. Because the reason why the interruption occurred is 9 because those contracts, even though the plants were 10 gas only units, they did not have a firm gas supply at 11 the time. And if do you have a firm gas supply, it's 12 not subject to interruption. In 1989 those gas 13 supplies were subject to interruption. 14

MR. BALLINGER: So it wasn't that the wells 15 were freezing up in Louisiana; it was the fact of a 16 contractual matter is why they were interrupted? 17

MR. VILLAR: The gas was diverted to other 18 uses because it was not firm. 19

MR. BALLINGER: Okay.

MR. VILLAR: If you don't have it firmed up, 21 it has the lowest priority on the system and it gets 22 23 interrupted.

Thank you. MR. BALLINGER: MR. VILLAR: The Staff's probabilistic

1 assessment is the next issue. And there, this is just 2 another reminder of what Staff had found before. I'm 3 not going to dwell on it. But basically Staff found 4 that there was a very short exposure, I would call it. 5 This is another replicate of a Staff graph from the 6 workshop, and I think this was from the September 11th 7 Commission workshop.

And the only thing I'm going to comment on this is I'm going to use it to say that Staff assumed that for each -- if you look at the row for FPL, for example, each one of these data points has an equal probability of occurrence in order to arrive at the random number that they use here. They get the same for, I think -- I believe it was ten utilities.

The major point of disagreement that we have or one of the points of disagreement and one of the deficiencies that we believe is attended with the Staff methodology is that they do assume that the probability of occurrence is equal for each one of these data points, and it's not.

These two charts -- again, they replicate what Staff did. This is the 1998 Ten Year Site Plan figures for the summer. And the numbers that Staff found inadequate under their analysis was zero. No inadequacies.

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For the winter, Staff focused on the winters of 1999 and 2000 with a probability of nonmeeting load according to their numbers of 6 % and 8.3%. Those were the areas that they identified as having some concerns.

Specifically where we disagree with Staff 6 is, like I said, the assumption of equal 20% 7 8 probability from each data point. That fails to recognize that there has been significant change in 9 the way utilities operate their system; changes in 10 forecasting techniques, improvements in reliability, 11 et cetera, that render that assumption invalid. 12 13 That's one of the reasons why we disagree with the Staff analysis. 14

Also, they're drawing from a very small sample size. Only five years worth of data. And by drawing from that sample size, coupled with the assumption that they are assuming the probability is equal, it renders their conclusions questionable.

Also, they're not recognizing that the FRCC reserve margins are calculated on an aggregated noncoincident peak basis.

What I'd like to do is run through a couple of very brief examples of what happens, and I'd like to run through the sample size here real quick.

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1	This on the left-hand side where you see the Staff
2	1998 plan evaluation for the winters of 1999/2000,
3	those were the two winters and 2000/2001, those
4	were the two winters of concern to Staff. They found
5	that, based on their calculations, that 6% of the time
6	it would be inadequate for the winter 1999/2000 and
7	8.3% of the time for the winter of 2000/2001.
8	On the right-hand side you'll see we
9	replicated the Staff methodology, but added one year
10	of data, the 1998 data. By adding the 1998 data and
11	doing the same analysis that Staff did on a random
12	sampling basis, the numbers changed significantly.
13	Now, all a sudden, we had in 1999/2000 a 6%
14	inadequate. We dropped that down to 1.6%. For
15	2000/2001 the number drops from 8.3% to 2.9%. Again,
16	this is without any change to Staff methodology.
17	So we don't believe that the assumptions
18	that Staff used because of their major deficiency,
19	assuming that the probability of occurrence is equal,
20	that it's an appropriate one to make, particularly
21	when you have such a small sample size.
22	And, again, just having a greater number of
23	samples is not going to fix the problem because it
24	still leaves the probability issue unresolved. That
25	is, you don't know what probability each one of those

events has because of changes that have occurred since
 that event took place. And this methodology does not
 recognize any of that.

There have also been some changes in generation maintenance schedules. And by making an adjustment that FRCC did in the 1999 analysis, we make -- and running the Staff analysis with a different number of megawatts out, you reach a totally different conclusion.

I'm not going to run through all these
examples that are here because I don't want to take up
too much time.

And again, changes in forecasting 13 techniques; the one we described before that FPL 14 changed by approximately 800 megawatts. The reason 15 why you have 750 here is because it's a different 16 year. All of those affect the conclusions that Staff 17 reached and the methodology. So the assumption that 18 the probability of occurrence for each one of those 19 events is equal, it's unsupported. 20

We believe the methodology is deficient because of the sample size and the fact that it assumes an equal probability of occurrence for each one of the data points and it's mechanical. It does not consider changes and improvements of various

1	factors and you cannot draw the kind of conclusions
2	that Staff drew from it.
3	In addition to that, it fails to recognize
4	the use of operational measures or the fact that they
5	might have a probability of even if the analysis
6	were correct, that it had a probability of not meeting
7	200 or 500 megawatts of load.
8	It's incorrect also because it does not
9	recognize the availability of over 3,000 megawatts of
10	operational measures.
11	MR. HAFF: Mario, I have a question. This
12	is Michael Haff with the Commission Staff. Weren't
13	these operational measures available in 1989?
14	MR. VILLAR: They were significantly
15	different, Mike. And if you go back to
16	MR. HAFF: I mean, it's brought up over and
17	over that we're not going to have any problems because
18	of these operational measures, and it just seems to me
19	like these were available in '89 and yet we still had
20	unserved load.
21	MR. VILLAR: They were not available to the
22	same extent. The reason for that is that in 1989, one
23	of the biggest contributors to these operational
24	measures is the DSM features, and the load SCRAM
25	capability of the DSM programs. That adds significant

number of megawatts.

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In 1989 I believe there were somewhere in the order of maybe 200 megawatts of DSM measures available as opposed to the thousands of megawatts that we have now.

In addition to that, the public appeals has 6 7 changed significantly since 1989 as a result of the 8 Commission order to implement a statewide program or a statewide emergency plan that address the conservation 9 issues and public appeals process. 10 There have been changes made to building codes, et cetera. 11 So we don't believe it's the same basis. 12

13 If you look at the numbers from '89, there appear to be a difference between the unserved load 14 and the -- I think it was the forecasted peak. The 15 actual difference between the two numbers is like 16 17 6,000 megawatts, but you only showed to like 4,744 megawatts of unserved load. Part of the 6,000 18 megawatts -- I'm sorry. Part of the 4,744 difference 19 20 to the 6,000 megawatts, it's what you could call either operational measures. I believe part of it is 21 also the fact that you're doing it on a noncoincident 22 basis. But there were like -- by their own numbers 23 24 from 1989, it appeared to be that there were like 1,300 megawatts of what you could call operational 25

1	measures, if you believe the data.
2	MR. HAFF: You say 1,300 megawatts were
3	available at that time as opposed to 3,800 now?
4	MR. VILLAR: Well, let me get the number
5	here if I can find that.
6	MR. HAFF: Ballpark is close enough.
7	MR. VILLAR: You got to realize that part of
8	that is purchase nonfirm purchases from other
9	utilities like Southern Company and stuff like that.
10	So some of that did come in. I can't find that graph
11	right now.
12	If you take the difference, Mike let's
13	use this other one. I was trying to get the clean
14	one. If you take the difference between what you show
15	as actual peak in 1989, and you subtract that from a
16	total capacity available, you get a difference of
17	about 6,000 megawatts. Yet the only amount of
18	unserved load shown was 4,744 megawatts. So the
19	difference had to come from somewhere. It was either
20	purchased from somewhere else, conservation appeals,
21	et cetera.
22	MR. BALLINGER: Mario, I have a couple of
23	questions. This is Tom. Do you realize or recognize
24	Staff hasn't used the probabilistic method in the '99
25	assessment?

1	MR. VILLAR: Yes, I do. I was just bringing
2	it up because it was an unresolved issue from last
3	year. I did not know whether you were using it or not
4	because you haven't made your presentation here.
5	MR. BALLINGER: And correct me if I'm wrong,
6	but if you take something and you do a simple
7	averaging of numbers, doesn't that also assume that
8	you've got the similar same probability for each of
9	those occurrences?
10	MR. VILLAR: No, we're not because we're not
11	assuming any probability to it. All we're doing is
12	for testing purposes, Tom. We're not assigning any
13	particular probability to it. We're only using it as
14	a test.
15	MR. BALLINGER: Okay. But isn't the
16	mathematical effect the same? That you've taken the
17	same error rate for each year and given it the same
18	probability when you simply
19	MR. VILLAR: No. I think the only place
20	where we wind up being the same is the median may be
21	the same, but then you calculate a probability in your
22	analysis and you go off to the extremes and you
23	attempt to predict what the extremes are. We don't do
24	that.
25	MR. BALLINGER: Okay.

MR. VILLAR: We have -- in our analysis, and 1 you'll see that later, we do look at the extremes, but 2 3 we just look at sensitivities assuming the worst error that we had during the time period. We don't assign a 4 probability to that. 5 MR. BALLINGER: Do I also understand -- I'm 6 7 back on Page, I guess, 15 of your slide where it shows 8 the scheduled maintenance put in the 1,000 megawatts. 9 MR. VILLAR: Yes. MR. BALLINGER: That still shows an 10 inadequate, a shortfall, if you will, based on the 11 12 percent. Now, I understand the megawatts are much 13 smaller. And are you saying that that shortage would be made up by inner ties to Southern or other SCRAM 14 measures, things of that nature? 15 16 MR. VILLAR: Let me go back to slide 15 for 17 a minute here and make sure I'm on the same page you 18 are. 19 Now, we weren't conceding that there were 20 going to be 1,000 megawatts out. All we were doing is 21 making an adjustment to show some megawatts out. But again, based on your analysis, Tom, if you look at 22 23 1999/2000, what you're basically projecting there is 24 that there's a very small probability that you're not 25 going to be able to serve load based on these

assumptions. 1 In other words, 98.5% of the time under your 2 analysis, I'm okay. I think that's pretty good. And 3 in addition to that, this doesn't take into account 4 operational measures or that I have over 3,000 5 megawatts available to the system. 6 7 MR. BALLINGER: Okay. MR. VILLAR: I'd like to turn now finally to 8 the FRCC load and resource plan and the reliability 9 10 assessment. First graph is a projection of what the firm 11 12 peak demand is going to be for the state, and again, 13 the way FRCC compiles the data, this is noncoincident firm peak demand. We're, at this point, not 14 calculating any data on the basis of coincident peaks. 15 The change from 1999 to 2008 is roughly 24% 16 for the winter peak and about 21% for the summer peak 17 or 900 megawatts per year growth rate for the winter 18 peak and about 800 megawatts per year for the summer 19 20 peak. These are the net capacity additions and you 21 can see on the right-hand side -- let me see if I can 22 focus this a little better. Oops. 23 The difference from the 1998 plan to the 24 25 1999 plan is a significant number of additional

1	
1	megawatts. We have 9,728 megawatts added through 2008
2	versus 7,800 megawatts in last year's plan. Roughly
3	24% higher. Again, this number is only utility
4	capacity being added. It does not include QF
5	contracts, imports, et cetera.
6	For the winter term, we have a similar
7	picture. 8,725 megawatts shown last year versus
8	10,744 or roughly 23% higher megawatt additions than
9	last year.
10	CHAIRMAN GARCIA: Where does that increment
11	come from? I'm sure you said it. I just missed it.
12	Is it just your re-analysis of the situation you're in
13	and you're going to put more generation into the
14	ground?
15	MR. VILLAR: The plans are not the same,
16	Mr. Chairman, and also we have a different year. In
17	addition, we have one additional year, 2008 versus
18	2007, which is what we had before. I haven't broken
19	it out specifically for what it is, but the plans have
20	changed from last year. For example, in FP&L's case
21	we have additional megawatts.
22	CHAIRMAN GARCIA: Right, but, obviously,
23	this is 10 years out so clearly you always change
24	them, but that's a significant increase.
25	MR. VILLAR: Yes, it is.

	11
1	CHAIRMAN GARCIA: Okay.
2	MR. VILLAR: Again, this one dispatchable
3	DSM and it shows existing and cumulative additions at
4	time of summer peak. And for clarification purposes,
5	when we say cumulative additions, the numbers in the
6	white up here is the net additions. It is not a truly
7	a cumulative number there. Some there might be 80
8	megawatts in the year 2000 added, for example, but
9	there are some also that go away because of plans that
10	go away, et cetera. So this only shows a net
11	increase. This is for summer peak.
12	We have a similar picture for winter peak.
13	Again, the numbers above the existing amount are the
14	net additions in DSM programs. And part of the
15	reasons why there's a dip in the curve is some
16	utilities are changing the amount of DSM that they
17	have. This shows the effected DSM is not as
18	cost-effective as it used to be perhaps and other
19	different changes to the system.
20	This one basically shows the amount of firm
21	imports coming into the state and they do vary through
22	time because some of the contracts expire in the early
23	years. For example, the firm purchases, Tallahassee
24	has some purchases that are expiring in '99 or 2000.
25	So the numbers do change through the years.

	1
1	The available transfer capability into the
2	state is shown on the right-hand side and those will
3	be available for nonfirm purchases, dialing
4	assistance, et cetera.
5	CHAIRMAN GARCIA: Can I ask you, why is it
6	so low in 2000? Is that because it's already
7	committed? This shows what's available. I'm sorry.
8	MR. VILLAR: It's only the all you show
9	there is a net after the firm commitments.
10	CHAIRMAN GARCIA: Okay. But this isn't new
11	capacity; just there are no contracts that are going
12	to be there?
13	MR. VILLAR: There are no new firm contracts
14	in there. It's just a change in the existing
15	contracts.
16	CHAIRMAN GARCIA: Right.
17	MR. VILLAR: The one number that's going to
18	change, I think the owned megawatts that we have shown
19	on that graph is the shared amount, and in the 1998
20	plan the number was 867 megawatts. The number of
21	megawatts has changed since then. So it's a little
22	higher than that. But again, so have some of the
23	other contracts in terms of the actual megawatts.
24	The fuel mix, we have it shown in this
25	graph. Last year we had a significant number of
	1

1	not last year. I'm sorry. Relative to 1998, you'll
2	see natural gas goes from 17% consumption to about 37%
3	of the mix in the year 2008. That represents
4	basically the addition of significant amounts of
5	combined cycle and gas firing capacity into the state.
6	Here are the FRCC reserve margins projected
7	for the period. And you'll see they all go above the
8	FRCC standard reserve 15% reserve margin standard,
9	which is the solid line that goes cuts across the
10	middle.
11	And again, it should be understood that
12	these reserve margins are calculated on a
13	noncoincident basis. If you were to apply the load
14	diversity factors, these reserve margins would be
15	approximately 2% higher.
16	I want to turn now to the reliability
17	assessment analysis that was done by FRCC this year,
18	and we focused on two areas; loss of load probability
19	analysis and reserve margins.
20	The LOLP analysis is different from the
21	reserve margin analysis because reserve margin only
22	looks at the time of peak. Loss of load probability
23	looks at the whole year and the load curve throughout
24	the year. So we are trying to answer the question as
25	to how likely are we to have sufficient capacity to

1	
1	serve a load each day as opposed to the peak day,
2	which is what the reserve margin looks at.
3	It also takes into account what the forecast
4	load is, the load profile, the availability of units,
5	both for planned maintenance and forced outage rates,
6	and it conducts an assessment of the system for each
7	one of those days and then sums the probabilities of
8	each one of those days to arrive at a conclusion for
9	the whole year.
10	We don't consider, in this particular
11	analysis, the frequency or the duration of the outage,
12	but just the fact that it actually occurs. And we
13	measure it against the industry standard
14	one-day-in-ten-years loss of load probability.
15	The results of the LOLP analysis are
16	presented here, and I can't focus this thing very
17	well. The reference case is what the FRCC load and
18	resource plan contains, and it's based on the most
19	likely assumptions or what we believe is the
20	appropriate method of analysis. We showed no
21	violations and there is a couple of graphs behind this
22	that shows what the actual numbers are.
23	We conducted an additional set of
24	sensitivities to the LOLP analysis from the reference
25	case, and one, which is the item No. 2 there, is we

1 assume that there will be no usage whatsoever of load 2 management interruptible loads; no direct load That had absolutely no effect on -- had some 3 control. effect on the loss of load probability, but it didn't 4 raise it above the .1 per year standard. 5 We also assume that we had a three 6 7 percentage point increase in the steam unit forced outage rate from the projected forced outage rates for 8 those units. Again, we showed no violations under 9 those conditions. 10 We then assumed some changes to the load 11 forecast. In particular, we simulated some extreme 12 type winter conditions and more extreme type summer 13 conditions and we found no violations. 14 Just for clarification purposes, I think 15 16 what was assumed for the winter was two, four day 17 periods during the month of January where the load was 18 a certain percentage above where we had normally 19 forecasted. And I think for day one we were assuming 20 a 5% increase in demand. For the second day of that four day period 21 we assumed a 10% increase in demand. And the third 22 23 day I think it came down to about 7.5%, and the last 24 day of that came down to a 5% increase over the forecasted peak and we did that twice in the month of 25

1 January.

2	So we had two incidents in the month of
3	January that we looked at or fairly demanding
4	conditions. Again, we found no violations.
5	For the summer, it was a similar analysis
6	that was done. There were two, one week periods that
7	were assumed during the month of August above the
8	forecasted peaks, and again, there were no violations.
9	The FRCC reference case is we consider it
10	robust enough to all sensitivities examined so that we
11	don't believe that there is any probability of
12	concern.
13	I'd like to turn now to the reserve margin
14	standard.
15	MR. BALLINGER: Mario, before we leave that,
16	can I ask a question? This is the first time you've
17	actually presented the results, all the sensitivities
18	to Staff. I noticed in the '99 reserve margin
19	analysis it just had a statement that they were
20	similar to '98, but Staff hasn't been made aware of
21	any of these values yet until today; is that correct?
22	MR. VILLAR: As far as I know, that's
23	correct, Tom.
24	MR. BALLINGER: Okay.
25	COMMISSIONER JACOBS: I have a question.

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1	MR. VILLAR: Yes.
2	COMMISSIONER JACOBS: This year we had a
3	sustained period of high temperatures in August. I
4	think probably a week or two of above average
5	temperatures. How would that play into your analysis?
6	MR. VILLAR: Well, you're comparing forecast
7	to actuals so it doesn't actually play into it. But
8	we did do a sensitivity analysis, like I said, for
9	both the summer and the winter peaks when we
10	forecasted. And we assumed, in the case of the
11	summer, two one-week periods during the month of
12	August where we had exceeded the forecasted peaks at
13	that time and we saw no violations. But during the
14	month of August this year we didn't have any
15	interruptions as far as I know.
16	COMMISSIONER JACOBS: No, we didn't. Wasn't
17	there one week, though, where there were wasn't
18	there one week in August where we had we didn't
19	have interruptions, but we had the reserve?
20	MR. BALLINGER: In '99?
21	COMMISSIONER JACOBS: Yes.
22	MR. BALLINGER: I believe it was April we
23	got into an alert situation, if I'm remembering
24	correctly. It was right around and it was right
25	before, I think, TECO had the explosion at Gannon. It

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was the few days prior to that we were in an alert
 status for a day or two. I see Henry nodding his
 head. But I think over the summer, so far we've done
 okay.

MR. VILLAR: I think one important thing 5 here is that, the fact that we have an alert doesn't 6 7 mean anything. It's part of our plan. The reason why we declare an alert is so we pay attention to what's 8 going on so we can take the appropriate action; make 9 sure there are units that are available; that we do 10 have the availability of nonfirm power purchase from 11 12 somewhere else if it's necessary; that we have the ability of operational measures to call them into play 13 if need be. But the advisories and alerts, et cetera, 14 15 is all part of the plan.

16 **COMMISSIONER JACOBS:** Going back to the 17 original question. When you say you assume two weeks 18 in August, is that one day of that week or for the 19 sustained --

 20
 MR. VILLAR: It's the complete week.

 21
 COMMISSIONER JACOBS: Okay.

MR. VILLAR: I can tell you exactly what it was that we assumed. For the first day, actually we had -- for the peak day we assumed a 6% increase over the forecasted peak; three days of 4% increase; one

1	day at 2%, and two days at 1%. And we did that twice
2	during the month.
3	MR. BALLINGER: I'm sorry. Could you run
4	through that slower, and also for the winter one? I
5	missed it the first time through.
6	MR. VILLAR: Sure, Tom.
7	MR. BALLINGER: For summer first.
8	MR. VILLAR: Summer was
9	MR. BALLINGER: First day was plus 6%.
10	MR. VILLAR: Well, it was a peak day. I
11	don't remember whether it was the first day or in the
12	middle of the week. Dave Dawson here? Mike, do you
13	recall?
14	UNIDENTIFIED SPEAKER: No.
15	MR. VILLAR: Okay. For the peak day it was
16	6% increase, Tom.
17	MR. BALLINGER: Okay.
18	MR. VILLAR: Then we assumed three days at
19	4% higher in the fork, and then the forecasted firm
20	peak; one day at 2%, and two days at 1% for the
21	summer.
22	MR. BALLINGER: Two days.
23	MR. VILLAR: And the winter was, the first
24	day, a 5% increase in the demand. The second day, a
25	10% increases in demand. Third day, 7.5% increase

over forecast. And the fourth day, 5% increase in 1 2 forecast. And as you remember, the winter peaks here traditionally are maybe one, two days; not necessarily 3 four. 4 MR. BALLINGER: So if I understand right, 5 for winter you did a four day window, if you will, of 6 a gradually decreasing temperature and then slowly 7 warming back up. And for summer you did a week period 8 where it gradually heated up and at peak day it was 6% 9 over the forecast? 10 MR. VILLAR: Well, actually the winter --11 the first day for the winter was 5%. The second day 12 13 resulted in 10% because of the buildup. MR. BALLINGER: Right. And then it starts 14 warming up? 15 16 MR. VILLAR: And then it starts coming back 17 down, correct. MR. BALLINGER: All right. 18 MR. VILLAR: For the reserve margin --19 MR. BALLINGER: Mario, I'm sorry. 20 MR. VILLAR: Go ahead, Tom. 21 22 MR. BALLINGER: Did you do a similar 23 sensitivity on reserve margin using these weather 24 assumptions? 25 MR. VILLAR: I'll get to reserve margins in

1	a minute to show what we did towards the end here.
2	MR. BALLINGER: Okay.
3	MR. VILLAR: Now, reserve margin
4	calculations look at the excess of total firm
5	capability or firm load. For that they assume that
6	each of the components that go into a calculation is
7	available 100% of the time or it's there and called
8	upon at the time of peak.
9	What the FRCC did is, we looked at the five
10	components that go into reserve margins, which are the
11	ones listed there; utility-owned generating capacity,
12	firm QF capacity, et cetera, and we developed a
13	certainty factor for it.
14	For example, if you take utility-owned
15	generating capacity, and over the last six years in
16	this case, because we added one year's worth of data,
17	utility-owned generated capacity at the time of peak
18	was available, not 100%, but perhaps 94%. We assigned
19	a 94% or a .94 certainty factor to that particular
20	component.
21	We did similar analysis for firm QF
22	capacity, import capacity, et cetera. We applied a
23	certainty factor to each of those. What we're
24	actually doing is trying to measure how well we've
25	been doing over the last five, six years against what

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we projected was going to be there at the time of peak. Just for purposes of testing, how far off we were from that. And remember, reserve margins are supposed to account for these uncertainties and the availability of these factors.

6 The focus of the analysis was twofold. One 7 was to determine whether the Peninsula's reserve 8 margin met the FRCC's 15% reserve margin standard. 9 And two, to confirm whether or not that standard 10 continued to be adequate given the latest figures that 11 we have been seeing in terms of certainty factors for 12 these components, et cetera.

Basically test the utility's projected reserves against recent historical performance and contingencies, and then combined that information with engineering, economic judgment to make -- to reach conclusions from that.

Now, these get complicated because we get into what we actually did, and I'd like you to keep these in mind.

The first item there shown, which is a base case, is what FRCC believes is the most meaningful case; the most likely case that we believe will occur. It contains the 1998 actuals and projections that were added to last year's database. For last year's

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analysis we used 1993 to 1997. We added actual data 1 for 1998 to the analysis to develop these certainty 2 factors for each one of those components. 3

Then we made a couple of improvements to 4 last year's approach. We added a noncoincidence 5 adjustment factor for load forecast to recognize the 6 fact that there is load diversity in the system, and 7 it's not currently included in our analysis or was not 8 done in the 1998 analysis yet as a fact of life. 9

And two, we made an adjustment to the winter 10 1993 actual and projected data for utility installed 11 generation. And the reason for that adjustment was 12 basically that the winter peak in 1993 occurred very 13 late in the season and the certainty factor is 14 supposed to measure the unavailability of capacity at 15 the time of peak due to forced outages, basically, or 16 17 my unit is broken.

And by that time in March we had scheduled 18 maintenance of some units so we didn't feel that it 19 was appropriate to use that figure because it didn't 20 actually test the brakes for the units. It was very 21 late in the year and we had sufficient capacity to 22 take the units out for scheduled maintenance to meet 23 that peak so we had no problems whatsoever. 24 Scenario 1, it's only shown here for

25

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1 illustrative purposes. It compares the figures with 2 last year's work. It does not contain any of the changes that were made in 1999. It only adds one 3 year's data to the database that was used last year, 4 but it does not include any of the other changes. 5 Scenarios 2, 3 and 4 are basically the major 6 sensitivities that we conducted against the base case 7 and they are focused on the major contributors to 8 this -- the driving factors that affect the reserve 9 margin calculations. The biggest drivers are the need 10 for reserve margins. Basically that is the 11 availability of utility installed generation capacity. 12 Where in Scenario 2 we took the worst data point for 13 the whole six year period and we applied that to the 14 15 base case. 16 All the other assumptions remained the same in terms of the certainty factors. In other words, 17 18 for all the other certainty factors, we used the average number that we had used in the base case. 19 20 For Scenario 2, for utility installed generation capacity, we used the worst number from the 21 six years' worth of data. 22 Scenario 3 applies to, again, the other 23 24 major driver of the need for reserve margins, which is 25 the load forecast error. In Scenario 3, again, we

used the worst data point during that six year period even though that worst data point is -- I believe it was the winter of 1994, and we have made some changes to the forecasting methodology that I described before that change the possibility of that really occurring again.

7 In other words, I am not going to have as 8 high a forecast error because I have changed the 9 methodology by lowering the temperatures. Still we 10 applied that to the Scenario 3.

And then Scenario 4, it's a combination of Scenarios 2 and 3, where we take the worst case for utility installed generation and the worst case for load forecast error and apply both of them at the same time.

This table is very busy, but just basically 16 tell you what it actually shows. You have the FRCC 17 reserve margin criterion here on the left. The 18 numbers right to the right of that are the actual 19 projected reserve margins by FRCC; what we are 20 expecting to be. And these numbers, again, they are 21 shown on a noncoincident basis. So, again, if we 22 wanted to make a load diversity adjustment to these 23 numbers, it would be like two percentage points 24 higher. 25

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The base case scenario shows what the needed 1 2 reserve margin would be for each -- for the base case with the certainty factors that we have used in the 3 analysis. In other words, applying the average of the 4 six years' worth of data of each one of those reserve 5 margin components, what reserve margin would I need in б order to account for those certainties -- for those 7 uncertainties associated with those components. 8 So, for example, in 1999, given those 9 uncertainties, I could meet the load with only a 6% 10 11 reserve margin. 12 Scenario 1, I'm not going to discuss, because like I said, it was only there for 13 illustrative purposes for last year's analysis. Let 14 me go to Scenarios 2, 3 and 4. 15 Scenario 2, again, shows the adjustments 16 that were made to the base case. In this particular 17 case for Scenario 2, it was a utility installed 18 generation capacity. We changed the certainty factor 19 to put the worst case in there. When you put the 20 worst case utility certainty factor -- utility-owned 21 generating capacity certainty factor, you see the 22 numbers for the needed reserve margins change from the 23 base case. They go up. I would need a higher reserve 24 margin in order to meet my -- the certainties under 25

1 that scenario.

2	The numbers on the bottom here the
3	questions, basically, on the bottom just say, answer
4	the question of, is a needed reserve margin, for the
5	first one, to account for the uncertainties less than
6	15%, yes or no. If it's less than 15%, we're okay
7	with the 15% reserve.
8	The second question goes against the actual
9	projected reserves. And then here it shows the
10	conclusions as to what each one of those different
11	scenarios show.
12	And I'd like to take a moment for to go
13	through those because you might look at some of these
14	numbers on the bottom and you might say, well, we got
15	a problem. Not the case.
16	You not only need to look at what the
17	scenarios show, but also how it likely is to happen,
18	when is it likely to happen, and what other measures
19	do you have available to you in order to mitigate the
20	effects of this if it were to happen.
21	Let's look at Scenario 4 because it's the
22	worst combination of them all. And if you look at
23	Scenario 4, you'll see that the projected reserve
24	margins for the Peninsula, 16, 18, 20, et cetera,
25	appear. These are if you compare these numbers
1	

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1 against the projected reserve margins, we're okay 2 against what we are currently projecting. And, again, remember that these numbers 3 could be understated by two percentage points because 4 they're done on a noncoincident basis. So these year 5 shouldn't be a concern. 6 7 So now we're looking at the last years here, these figures here, which are the last four years of 8 the analysis. Well, a lot can happen between now and 9 The plans can change significantly. Again, the 10 then. reserve margins are calculated on a noncoincident 11 basis, so if I apply a coincident factor to these 12 numbers here, I am not really that far off from those 13 numbers because these numbers are higher by two 14 15 percentage points. I also have the availability of operational 16 measures, which, like I said, is over 3,000 megawatts 17 available to the utilities. 18 So in summary, Scenario 4, we're looking at 19 20 something that we might have some problems way out in the future. This doesn't take into account the use of 21 operational measures. It doesn't consider the fact 22 that these actual reserve margins on this side are 23 done on a noncoincident basis and we do have the 24 availability of a lot of other measures to us to 25

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mitigate the effects of what could happen. Plus, 1 2 we're looking at an extremely unlikely scenario because if the load forecast scenario, worst case 3 scenario, basically assumes that we have the worst 4 forecast error for each one of those years. 5 In other words, we didn't apply just one 6 7 factor and we said the worst forecast error was 10% and applied it for years 1999 to 2008. We took the 8 worst forecast error that was possible for a forecast 9 applying to 1999 and put it in that year. 10 The worst forecast error for a forecast that would apply to this 11 12 year, et cetera, for each one of those years. So the probability of occurrence of those events, it's 13 extremely unlikely in our opinion. 14 MR. FLOYD: Mario, I've got several 15 questions about that assessment in summer, but I also 16 have about winter. And I think I'll just let you go 17 through the winter. And so I won't interrupt this, 18 but I didn't want to pass that page without letting 19 20 you know I got some questions. 21 MR. VILLAR: No problem, Roland. The winter scenario presents a similar 22 picture. Again, I'm not going to take you through 23 each one of those, but let me explain before you 24 become totally confused with the fact that I have 25

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1 || negative numbers in the base case.

That basically what it does is because of 2 the certainty factors that we have been experiencing 3 or that we have been seeing applied to the load 4 forecast error in the winter, we've had very mild 5 winters. Therefore, the certainty factor applicable 6 to the winter is a number that reduces the projected 7 forecast from the one that we have. And what it does 8 is it basically says that if we applied that certainty 9 factor and we get the kind of forecast that we would 10 expect, we could meet the load with less reserves than 11 we currently have now. So if we have the amount of 12 reserves that we have now with the kind of load that 13 14 we have projected now is here, that would be zero reserves, we could have -- what the actual forecast 15 16 that we could project given the certainty factor would 17 be done here. So it would be negative relative to 18 where the zero reserve point is now. I don't know if I've totally confused you 19

with that, but that's the reason why we have negative numbers in there. Just basically means that we need less reserves than what we have now given the projected forecast that you could get under those conditions.

25

Again, in the winter, we have similar

results where, as each scenario goes, the numbers 1 2 increase and you would expect when we apply the worst forecast error for load to have the one having the 3 most effect, remember the certainty factor for the 4 winter normally here is a very low number, resulting 5 in low reserve margins. So only when you get to 6 Scenarios 3 and 4 do you actually see something 7 significant happening. That is because that's where 8 the winter -- the worst winter load forecast error was 9 applied in both Scenarios 3 and 4. 10

One of the things that needs to be 11 12 considered in looking at this is, again, Scenario 4 is 13 extremely unlikely and we have two points here where 14 there might be some concern. These, from here to 15 about here, are very close to the FRCC's current 16 projected reserve margins, and again, since this 17 reserve margins are calculated on the basis of noncoincident peak, if we were to bump those numbers 18 up by 2% they would meet or exceed these numbers. So 19 we don't see it as a concern. 20

This -- that adjustment would also reduce the difference between these two numbers. The issue with these numbers is they're so close in time, there isn't anything we can do about it from a planning perspective most likely. But, we are also not

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recognizing here the fact that we have 3,800 megawatts of available operational measures. So even though this might look like we might be a little short, we can do something about it. We can take appropriate steps to take care of the problem.

6 When we get back out in the later years, we 7 can take care of it by similar concerns like 8 operational measures, et cetera. Plus, we're way out 9 in the future, so the plans can change significantly 10 between now and then. We shouldn't worry too much 11 about this.

In addition to that, one thing that I 12 mentioned before that affects our confidence in being 13 able to meet these numbers, is that these forecasts 14 and the forecast error that was applied here is based 15 on the winter of 1994. We have changed, or at least 16 FPL changed, its methodology so that we do not expect 17 to see the same kind of forecast error that we saw in 18 the winter of 1994. I don't recall what the number 19 was that was applied. Steve? Is he around? Where's 20 Steve Sim? What was the forecast error that was 21 applied for the winter, the worst winter? 22 MR. SIM: I think it's 13%, subject to 23 24 check.

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MR. VILLAR: Somewhere in the 13% range.

But since there have been some improvement in load forecasting methodology, we do not expect to have as high a load forecast error as we had before, and yet here we're applying some very hard numbers to these scenario sensitivities that we've conducted. So we do not expect that these numbers would, in reality, pan out.

8 In other words, the likelihood of Scenario 4 9 occurring is extremely remote based on all the things 10 that have changed since then, and the fact that if it 11 did happen, we do have 3,800 megawatts of available 12 operational measures that we could put in place.

COMMISSIONER JACOBS: Are you aware if, in 13 Florida, there is the -- what's been dubbed these hot 14 spot scenarios? In the problems that have occurred in 15 other areas of the country they've indicated that 16 they've had adequate access to capacity but the 17 problem is that in the hot spots transmission and 18 distribution issues limited the ability to bring in 19 much of that capacity. Does that affect Florida, and 20 if so, has it been accounted to for in the analysis? 21

22 MR. VILLAR: I think you may be talking 23 about transmission constraints into particular areas 24 that do not allow assistance from outside that 25 particular region to come in.

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1 In this particular case, we have assumed as 2 part of the operational measures the availability of 3 assistance from the rest of the eastern interconnection to the extent that transmission 4 5 capacity was available. So if there were 1,000 6 megawatts of transmission capability available into 7 the state, we were assuming that that was available into the state. 8

9 We do not see that as a transmission 10 constraint at this point because that's nonfirm 11 transmission. However, if it were to happen, that 12 would still leave us with roughly 2,800 megawatts of 13 operational measures that we could take account of 14 within the state to mitigate the potential effects of 15 this. So I don't see that as a problem.

16 COMMISSIONER JACOBS: So as I understand it, 17 you've assumed that the constraints would exist 18 outside the region and your analysis would account for 19 that?

20 MR. VILLAR: We assume that there were about 21 900 to 1,000, depending on the year. I think it was 22 961 to 1,062 megawatts of tie-line assistance, let me 23 call it that for simplicity sake, coming in the from 24 the southern region.

If you do away with that number of

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megawatts, we still have sufficient megawatts and 1 2 operational measures in the state in terms of public appeal, voltage reduction, load control SCRAM to take 3 care of these issues here. 4 COMMISSIONER JACOBS: Okay. 5 MR. BALLINGER: Mario, can I ask a question 6 about the operational reserves within the state? 7 MR. VILLAR: Yes, Tom. 8 MR. BALLINGER: You said that voltage 9 reduction and all and conservation appeals. Does it 10 concern you that that's kind of a reduction in the 11 quality of service at that time? I understand we're 12 probably in an emergency situation; it's very cold or 13 very hot and you're asking people to conserve. But 14 does it concern you that we're pushing that envelope; 15 that we're having to ask people, our customers, to 16 either conserve on their own or reduce voltage to 17 certain appliance, that they may not run as 18 efficiently, things of this nature? 19 Doing your load management SCRAM, which is 20 out of the ordinary from when you normally do it, I 21 understand it's in the tariffs, but are we getting to 22 that level where we're starting to rely on those more 23 and more? And are the customers really aware of it? 24 MR. VILLAR: I don't know if the customers 25

are aware of it, Tom, but we don't believe that we're going to get into that kind of extreme conditions that we have here shown in these scenarios.

What we believe is the most likely to 4 happen, given the kind of assumptions that we have, 5 6 the most reasonable assumptions is the base case. In 7 the unlikely event that we were to get there, we will follow what the state emergency plan has, which is to 8 go out for public appeals, how to mitigate 9 circumstances to deal with that kind of extreme 10 temperatures, et cetera. 11

I don't think it's unreasonable to do that. You know, it's not something that we exercise on a regular basis or we don't expect to exercise on a regular basis. It might be an unusual event and to deal with unusual events in that regard, I think is prudent.

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MR. BALLINGER: Okay.

MR. VILLAR: In summary, I think the FRCC confirmed the continued suitability of its regional reserve margin standard of 15%. Will maintain better than 15% reserves for both the winter and summer through the addition of significant amounts of megawatts for both summer and winter periods, new generating capacity.

The LOLP analysis confirmed the analysis 1 that we had done in terms of the reliability of the 2 state and it looked at the probability of being able 3 to meet the load on each one of the days rather than 4 just on the peak periods. 5 And from that we conclude that the existing 6 and planned resources are sufficient to reliably meet 7 the needs of Peninsular Florida customers under 8 9 reasonably expected conditions. And we believe the FRCC's load and resource plan is suitable. 10 That concludes my presentation. I'd be glad 11 to answer questions. Roland. 12 MR. FLOYD: I'm passing out a little 13 handout. It's from this year's reliability assessment 14 study. Just a few selected pages. And I want to ask 15 you a question starting out on Page 21. 16 CHAIRMAN GARCIA: 21 of your presentation, 17 right? 18 MR. FLOYD: It's Page 21 of their 19 reliability study. 20 MR. VILLAR: Right. Of your handout. 21 MR. FLOYD: There should be a Page 21 at the 22 23 bottom. Do you have that, Mario? MR. VILLAR: I'm trying to put it up here so 24 25 the people can maybe try to see it.

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1	MR. FLOYD: Okay. We've got extra copies.
2	CHAIRMAN GARCIA: I think if you turn on the
3	lights there that are above the
4	MR. VILLAR: Where are you focusing on?
5	MR. FLOYD: This Page 21. Look at the
6	right-hand column where it says "Needed" Reserve
7	Margin.
8	MR. VILLAR: Yes.
9	MR. FLOYD: As I understand it, your
10	methodology or FRCC's methodology produced these
11	numbers as what was needed in each of the years 1999
12	through 2008. And I notice in the last three years
13	it's 13%.
14	And down below, I'm reading the writing on
15	this page, it says referring to that column, this
16	result indicates that both the FRCC's reserve margin
17	planning criterion of a 15% level and the higher than
18	15% planned reserve margin for each year are more than
19	adequate.
20	Now, I'm assuming when you say that, I'm
21	looking at this 13% and the 13 is less than 15, and
22	even less than 17, 18 and 17, so by your methodology
23	that's adequate. In fact, it's more than adequate
24	because you got a little room there between 13 and 15.
25	MR. VILLAR: From that standpoint, yes,

Roland, it's correct. The one thing that I'd like to 1 2 clarify is that our methodology does not produce what the reserve margin ought to be. This is for testing 3 purposes only. In other words, our methodology is not 4 designed to come up with what the ultimate reserve 5 margin ought to be. It's just used for testing a 6 particular reserve margin that has been arrived at all 7 ready. 8

9 MR. FLOYD: Can I believe these numbers, 10 thought, in the right-hand column that that is what 11 your methodology showed you needed or not?

MR. VILLAR: When we say needed, we're referring to, given the uncertainty factors that we have used in the analysis, we can meet the load -- the projected load with those uncertainty factors given these level of reserves in the right-hand column. That's what it means.

18 MR. FLOYD: Let's leave aside the question 19 right now that you have not determined -- you haven't 20 come up with a methodology to tell us what the reserve 21 margin should be. You've only come up with a test for 22 your 15% that you assume. I'm going to leave that 23 question aside for now.

MR. VILLAR: Okay.

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MR. FLOYD: All right. These numbers here

1 say that the 15% is adequate because it's less than 15. Now, what worries me -- it kind of scares me 2 about this methodology, from years 1999 through about 3 2004, your methodology says you can get by with 10% or 4 5 11%. That's your method. MR. VILLAR: Given the certainty factors, 6 7 But so what? You know, given what we've seen in yes. 8 terms of certainty factors over the last few years, 9 that doesn't mean we're going to operate there. 10 MR. FLOYD: Fine. But I know you've got 11 planned more and your standard is greater than that, 12 but tomorrow you could vote to have a standard of 10%, 13 FRCC could if it wanted. Based on your methodology you could say, well, let's just have 10% or 11% 14 15 because we don't need 13 until you get out to 2006. MR. VILLAR: Well, Roland, I think we could 16 17 speculate as to what could happen and anybody could 18 vote to until we're -- we stay here for the next 300 years. I don't think -- we're not going to go there. 19 20 MR. FLOYD: You're not speculating, though, about what your methodology produces. That says about 21 22 10% or 11% through 2004 would be adequate. Okay. I 23 got another handout. 24 What I'm passing out now is last years. No. I'm sorry. Stay on that same handout. I want to go 25

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ı	to winter reserve margins over on page
2	MR. VILLAR: 25?
3	MR. FLOYD: Yes, sir. Page 25. I have a
4	similar question on this. I just want to confirm it
5	and you seem to be agreeing with me about it.
6	According to this, in 1999/2000 winter,
7	that's the winter coming up, we only need 5%. By your
8	methodology we could get by with 5%. Not saying you
9	would adopt that, but your methodology produced that
10	number.
11	MR. VILLAR: Yes, our methodology produced
12	that number. But that's not what we're advocating or
13	anything like that. Just basically says that if you
14	use the certainty factors that we have, you could
15	account for all those certainty factors with a 5%
16	reserve margin. Basically because winters have been
17	so mild that the winter certainty factor is the
18	adjustment on it is high enough that it wipes out
19	anything else that might be effected by the
20	unavailability units or anything like that.
21	MR. FLOYD: Let me call your attention to
22	Page 16 and 17 that I handed out in the first handout.
23	Do you have Page 16? That was probably the first page
24	after the cover page?
25	MR. VILLAR: 16 is the one that I have here.

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MR. FLOYD: I'm reading a sentence here in the second paragraph. "The base case is the case which the FRCC believes is the most meaningful case analyzed."

5 Over on Page 17 you say something similar. 6 "The FRCC believes the base case" -- and that's the 7 case that generated those negative reserve margins. 8 "The base case is the most meaningful case because of 9 these two improvements." Well, we're talking about 10 the two improvements you made.

But anyway, "to the approach and because of the fact that is captures a truly representative set of values." So your results that were based on a truly representative set of values and what's the most meaningful case, you come up with negative reserve margin, and that's scary to me.

MR. VILLAR: Why is it scary? We are not proposing to go there. We look at sensitivity analysis, looking at the worst case, et cetera, and we're not changing anything. The numbers are what the numbers are.

MR. FLOYD: I tell you why it's scary to me. We do not control what FRCC says is a standard. And you can go down there and vote tomorrow that 10% is your standard based on your methodology. I don't like

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1	your methodology because of the numbers it produces.
2	But, I'm not saying you would do that. I'm just
3	saying you could do that. And
4	MR. VILLAR: So if I had six years' worth of
5	data that pro I use the exact same methodology, but
6	the number in there showed 25% you would be happy with
7	that?
8	MR. FLOYD: No. I don't like the mechanics
9	of your methodology, but I'm not going to go into that
10	now. We can save that for the hearing.
11	But, anyway, let's move on to the second
12	handout that I just handed out from last year's study.
13	MR. VILLAR: Well, I want to make clear, the
14	FRCC is not producing to carry negative reserves.
15	MR. FLOYD: That's right. And you even have
16	planned reserve margins much greater than your
17	standard, but I don't know what would keep anybody
18	from selling firm capacity outside of the state
19	because you have more than what your methodology shows
20	you need. I couldn't prevent somebody from doing
21	that.
22	MR. VILLAR: Well, speculation I don't think
23	is going to get us anywhere.
24	MR. FLOYD: I'm not speculating on what you
25	will do or might to. I'm just saying you could
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utilities can do that, and you could justify it based 1 2 on your methodology because it produces numbers that are so small. 3 I want to go to the second handout for the 4 1998 study. I think I passed out Pages 9, 10 and 11 5 from that study. And by the way, that's from the 6 exhibits in the study. Do you have that? 7 MR. VILLAR: You talking about Pages 9 and 8 10? 9 MR. FLOYD: Right. 9, 10 and 11. 10 MR. VILLAR: Okay. 9 and 10 is a summer 11 reserve margin, and 10, it's the winter. They show 12 similar results to the ones that you were talking 13 14 about at some point. MR. FLOYD: Exactly. That's it. What I 15 16 wanted to ask you about is -- let's look on Page 10. And in column 16 you have needed reserve margins 17 component over there. This is similar to what you've 18 done this year except you didn't put it in quotes last 19 20 year. And notice on year 2004 and 2005. You go 21 all the way over to the right, Column 16, you have 12% 22 is what your study showed your test, or however you 23 want to characterize it, when you were testing it 24 against 15 reserve margin, that came out to be less 25

1 || than 15. You follow me?

2 MR. VILLAR: Okay. I'm following what 3 you're saying, but --

MR. FLOYD: Okay. Now, what I want to do is 4 compare what you're study showed for that same year 5 under the same methodology by adding one year data. 6 What does it show? Look at this year's study and see 7 what Scenario 1 showed for year 2004 and 2005. I 8 think it shows you only need 1%. 9 MR. VILLAR: Okay. I don't have it in front 10 of me, but basically we are looking at 1998 stuff and 11 you got to remember that we did a couple of things. 12 We removed the winter 1993 data for utility 13 installed generation because we didn't think it was 14 representative or has an effect on it. 15 We have an additional year's worth of data 16 where we also had a very mild winter, so that also 17 tends to affect the numbers. 18 MR. FLOYD: That's the only difference, what 19

20 you just said. You added one year of data and you 21 told me last year --22 MR. VILLAR: No, we did not, Roland. 23 There's a number of changes that were made which we --24 MR. FLOYD: Scenario 1?

**MR. VILLAR:** What's that? I'm sorry.

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MR. FLOYD: Scenario 1 you told us was so we 1 could compare with last year. You just got through 2 saying that a while ago. 3 MR. VILLAR: Okay. Is this Scenario 1? I 4 don't know what this is. This is 1998. 5 MR. FLOYD: Mario, I told you to compare 6 7 that with 1999 Scenario 1. MR. VILLAR: I understand that, Roland, but 8 I don't know what went into this number. I haven't 9 seen this number in I don't know how long. 10 11 MR. FLOYD: Well, the 12% was what your method produced last year. Would you agree with that? 12 You may disavow it now --13 MR. VILLAR: It may be, but I don't know 14 what winter No. 6 is. I'm taking your word for it. Ι 15 can't compare it. I don't know what this number is at 16 this --17 MR. FLOYD: I'm going to show you how to 18 compare it. Look at -- on Page 10 you'll get a number 19 of 12%. Now, this year you gave us a study and said, 20 Scenario 1 was what we would use to compare with last 21 year's study because you didn't make your coincidence 2.2 factor changes and so forth. And so I looked at this 23 year's study under Scenario 1 and I found for that 24 25 same year you're saying we only need 1%. Now, those

1	are the numbers there. I'm not making these things
2	up.
3	MR. VILLAR: I have not compared these two
4	numbers, Roland. I would be glad to go back and look
5	at them or have somebody look them
6	MR. FLOYD: I'm not asking you to do
7	anything
8	MR. VILLAR: and give you an explanation
9	for them, but I don't what it is at this point.
10	MR. FLOYD: All I'm pointing out here is
11	and I don't want to get into a debate on is your
12	methodology last year showed, and this is methodology
13	that's scary to me, but and this is the reason.
14	Last year you say we need 12% in 2004 and 2005. For
15	the same year, this year, with one year's additional
16	data, you tell me I need 1%. What that tells me is
17	you're method is not very stable. You add one year
18	data and all of a sudden you got reduced from 12% to
19	1% is what is needed.
20	By the way, that's the problem. You have
21	the same problem that you said Staff had with only
22	using five years of data. That's all you used, too;
23	five data points.
24	MR. VILLAR: I understand that.
25	MR. FLOYD: And when you added six data

points you had a big change in there. That makes me
 nervous.

3	MR. VILLAR: I understand that that one data
4	point is going to change. But what it's going to
5	change is the median and I'm not assigning any
6	probabilities to any of these numbers, unlike what
7	Staff did last year. I'm not assuming that anything
8	is going to occur in any particular way. And we are
9	also recognizing all the assumptions and the changes
10	that have taken place. It's just that this is the
11	only data that's available.
12	MR. FLOYD: Well, it's kind of shaky data
13	when you come in here one year and say we need 12%,
14	and the next year you come in and say, well, one will
15	do. It makes me wonder.
16	MR. VILLAR: I don't think it's shaky data.
17	That's what the data shows. But, again, I haven't
18	compared these two numbers. I'd be glad to take a
19	look at it.
20	MR. FLOYD: All right. Thank you.
21	MR. BALLINGER: Commissioners, Staff still
22	has several questions. I don't know if you want to
23	take a quick break now because we're about to go
24	through the packet of information that we handed out
25	earlier.

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1 CHAIRMAN GARCIA: Yes. Let's go ahead and 2 take 15 minutes and then we'll start again with you, 3 Mark. (Brief recess.) 4 5 MR. BALLINGER: There's a sign-up sheet over 6 7 here on this thing. We need everybody to sign up so we can keep an accurate attendance list of today's 8 proceedings. And I understand Mr. Henry Southwick 9 wanted to say a little bit before we went on with 10 Staff's questioning. 11 MR. SOUTHWICK: Just a little bit. I just 12 wanted to point out that at the FRCC what we adopted 13 was a 15% reserve margin standard. We did not adopt a 14 methodology per se. We recognized that there is no 15 16 perfect methodology and that's why we didn't do it. So what we adopted, as I said, is the standard, and I 17 18 wanted to assure you that we have no intention or plan 19 that I'm aware of at all to change that standard. 20 Certainly not to lower or raise it at all. MR. BALLINGER: Thank you. I told 21 Mr. Villar he could probably go ahead and sit down for 22 this because the Staff packet is a little cumbersome 23 24 to be putting up on the overheads, but everybody should have the Staff documents packet we handed out 25

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earlier. I know we sent it to the Commissioners 1 before the workshop. If you need any extra copies, 2 let me know. And I will get started. 3 Mr. Villar, if you could turn to Page 2, 4 which kind of summarizes our 1999 concerns of the FRCC 5 6 methodology. And I'd like to say that a lot of these are similar to what we had in '98 in that we're 7 concerned about the low LOLP values. In other words, 8 they tended to produce results of reserve margin of 6% 9 to, 8%, roughly. What that means is that reserve 10 margin is now the driving factor. Is that again the 11 12 same case in '99? MR. VILLAR: Yes, it is, Tom. 13 MR. BALLINGER: Really, we have had no 14 experience at 15%. I know utilities have used it as a 15 planning criteria, but LOLP has been driving -- when 16 generation has been added, utilities haven't actually 17 operated near 15% for guite sometime; isn't that 18 19 correct? MR. VILLAR: Well, part of the reason, among 20 others, why LOLP was driving the reserve margins that 21 were needed by the utilities was the fact that we had 22 not as good unit availability as we have currently. 23 And because we have made significant improvements in 24 unit availability, the focus has changed from LOLP to 25

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reserve margin and the two methodologies complement
 one another. We're not proposing to abandon looking
 at prior methodologies.

MR. BALLINGER: I understand. But basically 4 now that we've gone to reserve margin being the key 5 factor, we really haven't had -- sustained experience 6 having reserve margin being the driving factor. 7 That's kind of what's concerned Staff, when we get 8 especially such a low level of 15%. We'll get to a 9 little later in the packet of why that's a concern. 10 What I'm trying to point out here is that a 11 lot of these concerns were also raised in '98 and we 12 still have similar concerns. 13 MR. VILLAR: I understand, Tom. I just 14 wanted to clarify the FRCC standard is a minimum 15 standard and the projected reserves are higher than 16 17 15. MR. BALLINGER: I understand. 18 I think what Roland brought up earlier, our 19 concern this year is the dramatic changes from the '98 20 analysis to the '99, basically, with just one year of 21 additional data; how the results swing significantly. 22 And I think that gives Staff some concern, much like 23 the FRCC had concern over our probabilistic method; 24

25 that the lack of data can widely influence the

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1	results. That gives Staff some concern about relying
2	on, that of saying something is adequate or not.
3	The reliability during off-peak periods,
4	this is probably a new one. We didn't have it as much
5	in the '98 assessment but in '99, it's kind of come to
6	light that maybe this is an area that needs further
7	work. And then, again, the Christmas of '89 backcast,
8	that's kind of an acid test that Staff does. We just
9	try to see should we be no worse off than we were in
10	Christmas of '89 as kind of a threshold issue. Again,
11	I think looking at this year's test, we've come up
12	with it's really hinging on maintenance, of when
13	maintenance is scheduled and when the peak would
14	occur. And, again, that kind of resolves with that
15	other one with during off-peak periods as well. Those
16	two interplay. And I think that's really what the
17	Christmas backcast is telling us, but we'll get to
18	that more as we go through the packet.
19	Page 3 and 4 basically show projected
20	reserve margins that came from the FRCC FCG aggregate
21	plans of years ago and they're indicated there on the
22	side. And this shows that projected reserve margin
23	has been declining for some time; isn't that correct?
24	MR. VILLAR: The actual reserve margins,
25	yes. One point I'd like to comment on, Tom, is if you

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look at the data you have there, a lot of the reasons 1 why those reserve margins were very high had nothing 2 to do with being driven by any reliability criteria or 3 standard. We had a lot of oil backout being put in 4 place, et cetera, which resulted in excess capacity. 5 And that's the reason why reserve margins were higher. 6 MR. BALLINGER: Wasn't part of it, too, that 7 LOLP was the driving factor back in those days? 8 MR. VILLAR: LOLP might have been the 9 driving factor at some point, but I don't believe in 10 the 50 to 40% reserve margin LOLP had anything to do 11 with that. 12 MR. BALLINGER: Would you -- let's go on to 13 14 Page 5. This shows some recent experience. Aqain, this goes to my questioning about we really haven't 15 had experience at 15%. What this does, it looks at 16 each year and it took the prior year's forecast and 17 showed what the reserve margins were. And really 18 since 1991 is the only time we had any experience of a 19 15% reserve margin; everything else has been higher, 20 18, 24, 19%. And that's what is troubling Staff, is 21 22 now that we're adopting this standard of 15%, 23 historically, though, we haven't had the experience 24 there and that's why we're a little concerned. We 25 want to be on the cautious side. And I just wanted to

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point that out that also, probably, in those earlier 1 years, as you said, that LOLP was the driving factor 2 and so units might have been added because of LOLP 3 violations and not reserve margin violations. 4 Let me go on. I think you stated earlier, 5 too, the next page that you still believe LOLP to be a 6 viable tool, don't you? 7 MR. VILLAR: Yes, we do. 8 MR. BALLINGER: Okay. But now it's no 9 longer become the driving force because of high unit 10 availabilities and things of that nature. 11 MR. VILLAR: That's correct. And we're 12 still looking at it. If for some reason unit 13 availabilities were to decline, LOLP results would 14 probably show that. 15 MR. BALLINGER: Okay. I'm on Page 6 of the 16 Staff handout, it shows a little table there. And in 17 1997 the FRCC actually did a comparison, if you will, 18 of the .1 LOLP to reserve, margin and it showed these 19 values here of about .1 would equate to about a 6 to 20 8% reserve margin. Are the results similar for '98 21 and '99? I couldn't track those numbers down 22 23 anywhere. MR. VILLAR: We didn't do a computation, 24 But given the actual LOLP results we have 25 Tom.

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experienced recently, I would expect the reserve 1 margins on a LOLP basis to meet just a .1% number to 2 be significantly lower than the ones that we're 3 projecting. So it might come in in the same range as 4 the '97. I just don't know. 5 MR. BALLINGER: I'm going to digress real 6 quick here because of something you handed out today, 7 which is the first time I saw -- back to your analysis 8 or your presentation, you didn't show this chart on 9 the overhead slides, but it's Page 31 of your 10 presentation. It shows all the results of the 11 sensitivities on LOLP. 12 13 MR. VILLAR: My pages are no longer in order. Let me try to find them here. 14 15 MR. BALLINGER: We can --16 MR. VILLAR: Yes, Tom. 17 MR. BALLINGER: And I'm looking at the Column that says "No Direct Load Control." 18 MR. VILLAR: Correct. 19 MR. BALLINGER: Okay. Now, to me what that 20 said is that basically what you did is you assumed all 21 your load to be firm load and did a LOLP analysis, 22 except for other DSM measures, such as air 23 conditioning and things like that, but basically load 24 management and interruptible load were not exercised 25

and you calculated the LOLP values. Is that correct, 1 2 that sensitivity? MR. VILLAR: I'm sorry. You said something 3 about air conditioning load? You lost me on that one. 4 MR. BALLINGER: Perhaps not. That's already 5 embedded in the load forecast. But this sensitivity 6 basically took the nonfirm load. 7 MR. VILLAR: The interruptible and the DSM 8 9 programs --MR. BALLINGER: -- part of your reserve 10 margin. 11 MR. VILLAR: -- not to be available. 12 MR. BALLINGER: -- and treated them as firm 13 14 load for LOLP calculations. So these numbers being so low tells me that the peninsula should be able to 15 16 serve all of its load management and interruptible load and never interrupt them. That they are reliable 17 enough. There's enough reserve margin out there to 18 serve those people 24 hours a day, seven days a week. 19 That's what these LOLP numbers tell me. 2.0 MR. VILLAR: No, they don't. 21 MR. BALLINGER: Then what do they say? 22 MR. VILLAR: That's just a sensitivity to 23 that. 24 LOLP just looks at a particular set of 25

conditions and produces a result based on those 1 conditions. It doesn't mean that because LOLP 2 3 analysis tells me this particular answer, I am going to be making all kinds of assumptions as on how the 4 5 system is operated and whether I'm going to be able to serve load under all conditions. 6 MR. BALLINGER: I'm not. But from a 7 reliability standpoint, if LOLP is still a viable 8 alternative, these numbers tell me that I could serve 9 all of my firm and nonfirm load and never interrupt 10 them because the value is less than .1. 11 12 MR. WILEY: This is Ken Wiley, Tom. We discussed this extensively last year and 13 the prior years, especially in 1997, and I think we 14 were indicating to you that back when 15 one-day-and-ten-years LOLP was the significant 16 planning tool that was driving things, we were 17 experiencing equivalent availability factors of around 18 80% in this state. And now we're between -- somewhere 19 20 between 88 and 90%; quite a significant increase in unit availability. 21 22 And we're not sure what one day -- or what day per ten years, or whatever, applies when we're up 23 24 at the 90% availability. One-day-in-ten-years and 80% availability was a good combination, and we understood 25

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that back in those days. We don't feel that 1 one-day-in-ten-years is the appropriate number with 2 these high availabilities which are approaching 90%. 3 So we don't know what it is. 4 MR. BALLINGER: And I apologize, because 5 this is the first time I've seen this data today. 6 Let me go back to the Staff handout, again, 7 8 on Page 6. If I understand correctly, Mario, it probably is okay to assume that a .1 LOLP would equate 9 to about a 6 to 8% reserve margin for '98-99. 10 MR. VILLAR: I don't know what the actual 11 number is, Tom. I wouldn't expect it to be 12 13 significantly different from there but I don't know. MR. BALLINGER: Okay. Given that FPL is 14 about half of the peninsula system, would you expect 15 there to be a similar correlation between their LOLP 16 and reserve margin numbers as compared to the 17 peninsula numbers? I mean, should they be pretty 18 close? 19 MR. VILLAR: I haven't looked at that. 20 Perhaps Steve Sim can answer that question better. 21 MR. BALLINGER: I'm just asking you from the 22 FRCC, would you expect that to happen when you 23 aggregate and look at a total system basis. 24 Tom, if I understand what your 25 MR. SIM:

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1 question is, would FPL expect to see similar LOLP 2 results? MR. BALLINGER: Yeah. 3 MR. SIM: The answer is no. 4 MR. BALLINGER: Okay. We'll get there. 5 Thank you. 6 7 Mario, I gave you another handout which you handed out earlier --8 COMMISSIONER CLARK: Well, you can't leave 9 that pending. Somebody has got to explain that to me. 10 MR. BALLINGER: We'll get there. I want to 11 first prove that they --12 COMMISSIONER CLARK: Can he explain it now, 13 Tom, while I'm still thinking of it? 14 MR. BALLINGER: Well, maybe it would be 15 helpful to show how different they are and then he can 16 17 explain. That's all I was going to do next. 18 MR. VILLAR: I'll let Steve get into it in 19 detail. 20 Part of the reason, Commissioner Clark, is 21 that there's a significant number of assumptions that are different, in particular, the number of units, the 22 availability of the different units, et cetera, which 23 are different between FRCC and FPL's, but I'll let 24 25 Steve comment on that some more.

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1 MR. SIM: Tom, this was one thing I was 2 going to touch on very briefly in the FPL 3 presentation. I would not expect the FPL system to have similar LOLP values to the Peninsular Florida 4 simply due to the size differences between the systems 5 and specifically the number of units, the much greater 6 of units in Peninsular Florida than there are in the 7 8 FPL system.

9 MR. BALLINGER: Would you expect several 10 orders of magnitude?

11 MR. SIM: What I would expect for FPL is on 12 the order of .0-something, .01, .07, something along 13 those lines for FPL's system. Given exactly similar 14 circumstances for Peninsular Florida, I would expect 15 out several more decimal points of zeros before we got 16 a significant digit.

17 MR. BALLINGER: Okay. And these concerns 18 were raised last year, and I know FPL had some 19 concerns about the FRCC analysis because their first 20 take was it should have been much closer. They were 21 concerned with the very low LOLP numbers that the FRCC 22 was coming up with and they didn't correspond with 23 their values.

I never got a clear explanation as to why the difference was. It appears that the FPL and the

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FRCC agreed on something. Staff has never been made aware of clearly why the difference is there; never seen the numbers to justify why the difference is there.

MR. SIM: Tom, I think the answer for that 5 is we didn't have an answer for that last year during 6 the FRCC presentation. One thing FPL did during its 7 1998 planning work is we did an independent assessment 8 of LOLP for different size systems keeping all 9 assumptions similar and then varying one at a time. 10 We looked at a generic utility system of about 15,000 11 megawatts, the FPL system size. We then grew that 12 system and shrunk it down to 5,000 megawatts and up to 13 14 45,000 megawatts to try to convince ourselves that we 15 could, indeed, believe the validity of the LOLP 16 results we were getting, both for FPL and for the FRCC. And we were able to convince ourselves that 17 18 those numbers were not only reasonable but should be 19 expected.

20 MR. BALLINGER: Well, perhaps you could 21 impart that knowledge to Staff and we'd like to mull 22 over that.

23 MR. SIM: We'd be happy to share that with 24 you at a convenient time.

25

MR. BALLINGER: Okay. I'm on to Page 7 now.

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1 And what this is is from the -- I guess it was an item 2 at the agenda of the FRCC basically saying what the 3 FRCC would do with this standard that's been approved 4 now or adopted by the FRCC.

And the way I understand it is that if a utility is shown to be below the 15%, that the FRCC would find out who the offending parties are, notify them, and also notify the PSC. Is that a correct summarization of this?

MR. VILLAR: If you found that a utility was below the 15%? No, that's not the case, Tom.

MR. BALLINGER: No. If the Peninsula was below the 15%, the FRCC would seek out who were the offending parties to cause the whole Peninsula to drag down and notify those party or parties and the Staff.

MR. VILLAR: We would assess the circumstances and identify how far off we are from the 15% standard; how the various parties are affected et cetera, and then we would make a report to the Commission and to the FRCC board.

21 MR. BALLINGER: But the FRCC would take no 22 independent action, if you will, or sanction of a 23 party. They'd get the parties together and see what 24 they could work out?

25

MR. VILLAR: It would be reported up to the

ı	board. I don't know what the board would do. I can't
2	answer that one at this point in time.
3	MR. BALLINGER: Okay. Do you honestly
4	expect
5	COMMISSIONER CLARK: Let me ask you a
6	question. Do you think that's likely to change
7	depending on how if the legislation that is being
8	proposed to change NERC to NAERO, might they take some
9	action under the new legislation, do you know?
10	MR. VILLAR: That might be something that
11	Ken could probably answer better than I can.
12	MR. WILEY: I don't anticipate that the
13	adequacy issue is going to be handled by the NERC
14	legislation.
15	COMMISSIONER CLARK: Okay.
16	MR. BALLINGER: In all honesty, what are the
17	chances of that happening in the out-years, of
18	somebody being below 15%, knowing now that it's a
19	standard?
20	MR. VILLAR: I guess it would be remote
21	but
22	MR. BALLINGER: It would be what?
23	MR. VILLAR: Remote.
24	MR. BALLINGER: Okay. And if it happened in
25	the earlier years, say first, second, third year I

1	think you said there's really not much we can do about
2	it from a planning perspective.
3	MR. VILLAR: In terms of adding units or
4	something like that, you're probably correct on that.
5	As to whether some other measures can be taken, that's
6	something else. Operationally there's a lot of tools
7	that are available to utilities to take care of
8	short-term problems.
9	COMMISSIONER CLARK: Tom, let me interrupt
10	just a minute.
11	I just want to make sure that in the early
12	years where there's less percentage reserve margin,
13	that's still only assuming an import of, what, 1400
14	megawatts?
15	MR. VILLAR: What, Commissioner, I'm sorry,
16	import?
17	COMMISSIONER CLARK: What is the import
18	capability figured into that margin of reserve?
19	MR. VILLAR: Import into the state? Ken has
20	it here. 1999 it's contracted firm interchange of
21	1640 megawatts.
22	COMMISSIONER CLARK: How much more could we
23	import if we needed to?
24	MR. VILLAR: Let me go back and refer to it.
25	I think we're talking about a thousand megawatts.
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1	COMMISSIONER CLARK: Okay.
2	MR. BALLINGER: But my point I was getting
3	at is in the short term, the FRCC again would notify
4	or try to find the parties and get them to work it
5	out, but it would be more operational things; it may
6	be securing a short-term contract over the interties,
7	things of this nature.
8	MR. VILLAR: If reserves were to drop blow
9	15%?
10	MR. BALLINGER: Yeah.
11	MR. VILLAR: They are not below 15%.
12	MR. BALLINGER: If they were. I'm trying to
13	get a hold on the FRCC's procedures of what they would
14	do if this standard is violated.
15	MR. VILLAR: Yeah, they would look at it.
16	And remember, the FRCC also has an Operating Committee
17	that looks at this stuff on a regular basis; not just
18	on a long-term planning basis.
19	MR. BALLINGER: I'm going to go through
20	something that's kind of an example of how I think it
21	would work and how it has worked in the past and what
22	happened.
23	Back in '97 the Staff had some concerns
24	about a couple of utilities' plans which had
25	unspecified purchases or unidentified purchases. And

1 the FRCC correctly removed those from its aggregate 2 plan and that showed reserve margins declining down to 3 about 8%, or 5% in the out-years.

There was a lot of hullabaloo going on about what to do. The FRCC then, when it did its 1997 reliability assessment, added back in another 1500 megawatts of now committed capacity from various utilities who had updated their plans.

9 Is that kind of the process that would 10 happen again, is: One, the FRCC identifies there's a 11 problem in reserves; two, they get together with the 12 affected parties; and three, they rework their plans 13 to make it fit the standard before any formal finding 14 by the Commission.

15 MR. VILLAR: Tom, I wasn't directly involved 16 in the 1997 study. I was not looking at that kind of 17 stuff at the time so maybe Ken would be better off --

18 MR. WILEY: I wouldn't characterize it as 19 reworking plans to make it fit the criteria for 20 Commission purposes, though. So I'd object to that 21 comment, Tom.

But yes, we did in 1997 go back to those unspecified units and we talked to all of the utilities that had that in there and indicated that something had to be more clear than that. And as a

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result of that, they did provide some clarification to some of those capacities as to what they were doing in anticipating without violating some of their confidential matters, and we ended up including some of that capacity back in there as a result of those bilateral conversations.

7 MR. BALLINGER: Okay. We can move a little 8 quick here. Page 8 is just a letter I sent to you 9 Mr. Wiley, and I also sent to all of the other 10 utilities last year. And Page 9 is just a summary of 11 what our concerns were in the 1998 assessment and that 12 was just to kind of show they are very similar in '99.

Up to the reserve margin driving this, that LOLP is no longer the driving force. The main reason is high generator availability, if I understand right. In the last three to five years, we've seen availabilities increase up into the 90% range; is that correct?

MR. WILEY: Yes, that's correct.

19

20 MR. BALLINGER: Okay. And on Page 10 --21 this is something -- I'd like you to look down in that 22 middle box where it has Peninsular Florida and the 23 in-service dates. And if I do the math right, it 24 looks to me that about 26% of our capacity is 30 years 25 or older. And do you still think it's reasonable to

assume a high generator availability with such an
 aging fleet going forward in the future for the next
 ten, 15 years?

MR. VILLAR: Tom, I haven't seen these numbers so I can't confirm them, but in general terms there's a significant amount of dollars that each utility spends on improving the availability of their units and performing operation and maintenance on those facilities to be able to make sure they are available when they are needed.

So to the extent that the utilities have spent those dollars and continue to maintain those facilities, yes, I would expect the availability of the units to continue to be there.

MR. BALLINGER: Even for old units that are30, 40 years old?

MR. VILLAR: There's nothing wrong as long as you are maintaining the unit with -- the 30, 40 year old unit.

20 MR. BALLINGER: Okay. I think Henry stated 21 earlier, too, that really the FRCC adopted a standard, 22 not really a methodology, because a methodology 23 changes; it's a work-in-progress. You're always 24 updating it and looking at it. Did I characterize 25 that right, Henry?

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1	MR. VILLAR: Yes. You know, like data
2	points, for example, as methods change, et cetera,
3	some of those prior years data may not be useful
4	anymore. They may not be representative of what the
5	future conditions would be like.
6	MR. BALLINGER: Right. And this year you
7	did some things like the noncoincident factor or a
8	coincidence factor, I should say, and removal of the
9	'93 data to try to improve the methodology.
10	MR. VILLAR: That's correct.
11	MR. BALLINGER: Okay. On Page 11
12	COMMISSIONER CLARK: Let me ask a question
13	on that.
14	I thought you continued to assume you
15	continued to use noncoincident in your analysis, but
16	then you said you could assume that the reserve
17	margins would be 2% higher if you used coincident.
18	MR. VILLAR: What we did, when we reported
19	both the forecasted FRCC reserve margins, we did not
20	put in a noncoincident factor adjustment. In
21	performing our analysis in terms of the scenarios that
22	we looked at, we did include a load diversity factor
23	in there, a noncoincident adjustment, because we felt
24	it was the appropriate thing to do.
25	MR. BALLINGER: Okay. On Page 11, this is a

table I got last year attending one of the FRCC 1 meetings and going through this process. And it shows 2 the generation certainty factors, the data that was 3 used to calculate this. And I raised this at the last 4 hearing in '98 and I'm wondering, are you still 5 relying on this basic data again, just adding a 1998 6 7 column -- and I understand you removed '93 -- but, basically, these would be the same numbers? 8 **MR. VILLAR:** I haven't seen these numbers 9 before but I would assume so. Steve says there might 10 be some minor corrections, Tom, but otherwise it 11 12 should be --MR. BALLINGER: Okay. I mean we asked for 13 the certainty factors a while ago. We still have yet 14 to receive them. So this is all I've got. 15 If you'd look at the data for Orlando and 16 Seminole, and they are showing zeros as certainty 17 18 factors for their generation compared to peak, and 19 does that mean they are perfect for five years? Or 20 does this data give you some question that maybe they 21 didn't have all of the data they needed? MR. VILLAR: That's the data reported, Tom, 22 23 as being available at the time of peak. 2.4 MR. BALLINGER: But does it concern you, from the FRCC, to rely on this data when it looks a 25

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1 little suspicious? That they've had no errors in 2 their generation availability? And, again, this was brought up in '98. 3 4 MR. VILLAR: It could happen. 5 MR. BALLINGER: Okay. MR. VILLAR: I don't see any reason why. 6 7 MR. BALLINGER: Okay. Did you question OUC and Seminole about this? 8 9 MR. VILLAR: I didn't personally, no. MR. BALLINGER: Did anyone at the FRCC? 10 MR. VILLAR: Steve says that, yes, that 11 Seminole was questioned on it. 12 MR. WILEY: Tom, this is Ken. 13 You know, you indicated that you haven't 14 seen this data. And I would just like to, for the 15 16 record here, indicate that some of the reasons you're not seeing a lot of data this year is because the 17 18 Commission decided to take these particular matters of 19 reserve margin, and all these other things surrounding them, and put them in a docket. And as you know, we 20 were hoping that you were going to be very involved in 21 our study this year, but the Staff was not able to 22 23 because of a lot of complications surrounding the fact that we were in a docket. So I just wanted to say 24 that for the record. 25

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1	MR. BALLINGER: Let me move on. Let's look
2	at this table here.
3	If I recall from what you did, is you
4	removed the '93 generator availability data because
5	that peak occurred in March, you had a lot of units
6	down for maintenance.
7	MR. VILLAR: I'm sorry, Tom. What are you
8	looking at?
9	MR. BALLINGER: I'm still on Page 11.
10	MR. VILLAR: Page 11 still?
11	MR. BALLINGER: Yeah.
12	In the '99 study you removed the 1993 data
13	because the peak happened in March; you had a lot of
14	units out for scheduled maintenance.
15	MR. VILLAR: The winter data, that's
16	correct.
17	MR. BALLINGER: Looking at the bottom
18	totals, that had the largest impact on generator
19	uncertainty, if you will, with 1993's, right?
20	MR. VILLAR: Yes.
21	MR. BALLINGER: Okay. And then you also in
22	'99 included a coincidence factor on the peak load for
23	all of your scenarios.
24	MR. VILLAR: Except for scenario two.
25	MR. BALLINGER: Right.

The combination of these two adjustments, 1 doesn't that serve to raise the reserve margin? Or 2 conversely lower your needed reserve margin? 3 MR. VILLAR: It will lower the needed 4 reserve margin because you're taking into account that 5 load diversity does exist. So you do need less 6 reserves to meet a low diversified load than you do a 7 nondiversified load, yeah. 8 MR. BALLINGER: And you kept the same 9 standard of 15% both in '98 and '99 as far as the bar 10 that your measured --11 MR. VILLAR: The FRCC standard is a 15% 12 minimum reserve standard. 13 MR. BALLINGER: Okay. If you get an extreme 14 winter like we had in Christmas of '89, or severe 15 cold, wouldn't you agree that diversity kind of drys 16 up; that basically all of the utilities are peaking at 17 18 the same time? MR. VILLAR: Not necessarily, Tom. I looked 19 at the data you guys had in the '89 report, in the 20 back of the report, and the only way the data was 21 reported was by morning and afternoon. You could have 22 diversity. One utility might have peaked -- for 23 example, let's take just the afternoon peak. One 24 utility might have peaked at 3:00 in the afternoon, 25

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another one at 5:00. You still have diversity among 1 utilities in terms of when they actually peaked within 2 3 the same day. (Comment from audience.) 4 MR. BALLINGER: Well, that's not my 5 recollection from the '98 data. 6 COMMISSIONER CLARK: You know, I think 7 8 just --MR. VILLAR: '89 data, you mean. 9 MR. BALLINGER: '98 data. I'm sorry, go 10 ahead, Commissioner. 11 COMMISSIONER CLARK: In preparation for the 12 docket, I think it would be useful to understand what 13 diversity of peak did occur during 1989. 14 MR. VILLAR: There's no way of knowing, 15 Commissioner. Because the data is not reported that 16 17 way. COMMISSIONER CLARK: I just heard somebody 18 say that Corp peaked on the 3:00 in the morning. 19 (Simultaneous conversation.) 20 MR. VILLAR: Some people might know at what 21 hour they peaked. 22 COMMISSIONER CLARK: I think it would be 23 helpful to know because --24 MR. VILLAR: All right. We'll try to see if 25

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we can come up with that. But all we had was the actual Staff report from '89, and from that Staff report it was impossible to come up with what the coincident peak was.

MR. BALLINGER: What I recall from the 1998 5 б study, when the FRCC provided Staff all of the data, is there was very little diversity on winter peak for 7 these five years that you did for a historic database. 8 That virtually every utility was peaking on the same 9 day at the same hour in the winter, and these were 10 mild winters that we had in historic. I have it back 11 here in would of my folders. I'll probably have to 12 dig it out and have it for the hearing that we go for. 13

But it brought to me that when we get a cold, a severe cold front that gets all the way down to Miami, everybody's peaking at about the same time. People still get up about 6 o'clock in the morning and take shower and turn their heat on and go to work.

19 MR. VILLAR: I'll try to look at the data 20 the Commissioner has requested and see if we can come 21 up with that, Tom. But we did have a independent 22 consultant look at the load diversity in the system, 23 and the numbers we applied were the numbers that the 24 consultant arrived at based on the data we had, which 25 was the data from the last six years.

1 COMMISSIONER CLARK: I would only comment, 2 to the extent you want us to take comfort that you can take account of load diversity in determining an 3 4 appropriate margin of reserve, there should be some basis for us to conclude that that is appropriate when 5 you have an extreme weather condition. 6 7 MR. VILLAR: I understand. We'll see what 8 we can do there, Commissioner. MR. BALLINGER: Back to the coincidence 9 factor, my reading is not all of the utilities within 10 the FRCC agree with using a coincidence number when 11 12 aggregating peak demands or testing a reserve margin analysis. Is that your understanding, too, that there 13 may be some dissension in the utilities? 14 MR. VILLAR: The RWG looked at the issue and 15 there was no dissension at the RWG in terms of 16 17 conducting the analysis. 18 MR. BALLINGER: Okay. If we go with a coincidence factor that's applied, how do you suggest 19 20 that the Commission compare past FRCC aggregate plans? That we apply the same coincidence factor to all of 21 22 them? Do we ask the FRCC to go back and develop a coincidence factor for the 1994 plan, '93? How should 23 we go forward? 24 25 MR. VILLAR: I don't see any reason why you

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need to compare to what happened in the past in terms 1 of comparing loads now. Things change and you 2 constantly need to adjust. You don't need to be 3 adjusting prior practices or methods, Tom, I don't 4 think. You just basically need to recognize what the 5 future will hold and the basic changes that have been 6 7 made and methodologies, et cetera, from here on out. I don't know what it serves. 8

9 MR. BALLINGER: Okay. On Page 12 now of the 10 handout, this was basically a compilation of data from 11 a letter we sent back on Page 8 of all of the 12 utilities. If you read Page 8 it says, "There's 13 attached tables. Please fill them out." This is the 14 compilation of those results.

And I'd like to, if you can, from the FRCC perspective, and all of this load diversity and everything else, does it give you some concern that -let's see Seminole, Tallahassee, JEA and TECO have different temperatures for the same city?

In other words -- let me see here. Like for Seminole and Tallahassee, they forecasted 19 degrees for their peak in the winter. But the City of Tallahassee uses 22 degrees for their peak load. For Seminole, they use 24 degrees in Jacksonville, yet JEA uses 23 degrees. Seminole uses 32 degrees for Tampa

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1	yet TECO uses 31. Does that give you any concern when
2	trying to do a compilation of data, that the
3	individual utility forecasts, they are not doing the
4	same temperature profile for the similar cities?
5	MR. VILLAR: I'm not a forecaster. You
6	need perhaps Leo Green can help with that one.
7	But, for example, in the Miami area,
8	whenever you see the television stations, they report
9	the temperatures in Miami at five different places in
10	the Greater Miami area five different temperatures, so
11	where you measure the temperature might have something
12	to do with it. I don't know, Tom.
13	MR. BALLINGER: But if you're applying a
14	coincidence factor, I'd assume you'd want to know that
15	the individual forecasts were accurate to begin with
16	before you apply a coincidence factor.
17	MR. VILLAR: Leo.
18	MR. GREEN: It is possible that utilities
19	might have different temperatures. If Seminole goes
20	back 30 years and Tampa goes back 20 years, you could
21	have a different average temperature. And there's
22	nothing wrong in that because it's a statistical
23	answer. You want to correlate data with temperatures.
24	If Seminole is using 30 years and they want to
25	correlate 30 years of temperature with load data, it's

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l	okay. So you can have different temperatures.
2	And I'd like to jump back to the diversity
3	you mentioned. In Christmas of '89 North Florida was
4	coldest on the 23rd of December, South Florida was
5	coldest on the 24th. We do not know when the state
6	peaked because a lot of load was not served. But if I
7	look just at temperatures, it would suggest that even
8	in Christmas of '89 there is some diversity on the
9	system.
10	COMMISSIONER CLARK: Just so I'm clear, it
11	doesn't matter that each one uses a different
12	temperature as long as they have correlated it to what
13	their peaks are.
14	MR. GREEN: That's exactly correct,
15	Commissioner.
16	MR. BALLINGER: Again, on this Page 12, I'm
17	looking over at the column of percent of reserve
18	margin of nonfirm load. And the data we got in '98
19	showed that for winter, Florida Power Corporation was
20	relying on 94%, basically, of their reserve margin was
21	made up of nonfirm load; that being load management
22	interruptible load. Tampa Electric Company was 66.8%
23	of all their reserves was nonfirm load.
24	To me that tells me that they are planning
25	to interrupt their interruptible customers, they're
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1 planning to exercise load management at time of winter 2 peak. Because virtually everything is in the DSM side of it. Yet your LOLP numbers for '99, to me, say they 3 could probably serve everything in the state. 4 5 Does it concern you having that much nonfirm load making up reserves for Peninsular? 6 7 MR. VILLAR: I think the nonfirm load has been something that has been addressed by the 8 Commission. All of these nonfirm load issues and the 9 amount of nonfirm load that each utility has on its 10 own system has been done on the basis of what is 11 cost-effective to that utility and approved by the 12 Commission in accordance with the goals. From there 13 14 on out, I can't comment anymore because each utility has its own individual needs and particular 15 characteristics that I'm not aware of. 16 17 MR. BALLINGER: So from a reliability 18 standpoint, though, for the Peninsular, it wouldn't

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19 bother you if all of our reserve margins were nonfirm 20 load if that was proven cost-effective?

21 MR. VILLAR: Generally there's a point in 22 which nonfirm load becomes non-cost-effective before 23 you reach 100% of reserves. If you do have a certain 24 amount of reserves in nonfirm load, you ought to use 25 them.

1	MR. BALLINGER: Do you know if the '99 plan
2	shows similar numbers as far as percentagewise?
3	MR. VILLAR: I haven't look at it on an
4	individual basis. I don't know what the numbers show.
5	MR. BALLINGER: Okay. Page 13. I'm really
6	only going to ask you generally here. This is we
7	had some concerns in 1998 of a heat wave, and power
8	being sold and bought, people alleging being gouged by
9	price marketers.
10	Do you know in 1999 did we have a similar
11	experience as far as were there any like in I guess
12	it was April of this year, we were under an alert
13	was the purchase price of power fairly high?
14	MR. VILLAR: I don't know, Tom.
15	MR. BALLINGER: Okay. On Page 14 through
16	16, a letter from Mr. Jenkins to Mr. Adjemian who was
17	your predecessor, I think, last year with the RWG.
18	And the two attachments show a historic thing of
19	temperatures at various cities. And the highlighted
20	days are when there were two or three consecutive days
21	below the trigger temperature shown up at the top.
22	And those trigger temperatures are temperatures in
23	which a utility would issue an advisory, if you will,
24	per that emergency plan.
25	A couple of things I get from this letter

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1	and exhibits, is that one, it shows that from 1990 to
2	date we have had pretty mild winters. And I think you
3	said that earlier. You could see, like, for Miami,
4	there's been no advisories up through '94, and then we
5	had a couple, '95, '96 and '97, but they have been
6	real close to the trigger temperature of 40 degrees.
7	MR. VILLAR: That's correct.
8	MR. BALLINGER: And the same has been pretty
9	much true throughout the state.
10	I think it also shows that there's been
11	1, 2, 3, 4, 5, 6, 7, 8 9 coincidences where we have
12	had two or three cold days in a row. In other words,
13	that it's just one day that it gets cold and then it
14	warms back up. It will be a semi-sustained cold
15	period, at least going back to 1970.
16	MR. VILLAR: Yes.
17	MR. BALLINGER: And then on Page 17 just
18	kind of graphically shows that. And basically that
19	data was taken from this chart and just put it in
20	graphical form to show the typical trend. It will be
21	cold one day, it may be cold the second day and start
22	warming up the third day, much like the sensitivity
23	you did for LOLP.
24	MR. VILLAR: Okay.
25	MR. BALLINGER: I'll ask this, I asked

1	earlier: You didn't do a similar sensitivity on a
2	three-day cold period for reserve margin. What you
3	did is take the worst uncertainty factor and applied
4	it to the load forecast and saw what the reserve
5	margins came out; is that correct?
6	MR. VILLAR: We looked at the time of peak.
7	Reserve margin only looks at the peak.
8	MR. BALLINGER: So you don't know what a
9	three-day sustained cold front would have on reserve
10	margins?
11	MR. VILLAR: A three-day sustained cold
12	front? I would expect it to be similar to the
13	analysis that we did in Christmas of '89 where we
14	showed we could probably meet the load.
15	MR. BALLINGER: Okay. Now, we get to
16	Page 18. This was similar to what you had in your
17	presentation, which was a Staff chart that we did back
18	in 1998. This has been updated a little bit more.
19	Let me walk through and explain what the changes are
20	before we go.
21	First off, it assumed in the plan side
22	let me back up again. The Christmas of '89 column is
23	data taken from the Staff Report that gathered data
24	from utilities to present actual forced and planned
25	outages and expected load that was unserved. So all

of those numbers came right from that report and they
 are actually what occurred.

The second column is from the FRCC 1999 Load and Resource Plan. Those numbers came directly out of that.

And the third column is what if that plant had been at a 15% reserve margin? In other words, it just adjusted utility generation down to a level to get 15% reserves, and then did the rest of the calculations.

I'll point out up at the top in the small 11 print -- it may be a little small to read -- that the 12 availability of utility generation was not the 77% 13 that was assumed back in '98, but rather was 92.4% and 14 that came from the certainty factors of generators in 15 the 1998 study. So basically it assumed that all 16 utility generation had an availability of 92.4% at 17 time of peak, which matched up with the FRCC's 18 certainty factor. That was taken separate after 19 maintenance was pulled out, as you see in Row B. 20 And, really, all I want to do is a 21 comparison between 18 and 19, is just to look at the 22 only difference between the two sheets are that 23 24 maintenance is included on Row B. Then the rest of 25 the calculations follow out in the same methodology.

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1	Then what it tells me is if you look at Row
2	L, I guess it is, that without maintenance in other
3	words, the FRCC did not have any scheduled maintenance
4	and we had a similar event as in Christmas, and,
5	again, I know we can argue about the 16.9% load
6	forecast error, but let's assume that to happen
7	that if there was no maintenance plan, that even a 15%
8	reserve margin should result in less megawatts not
9	served than Christmas of '89. But, however, if you
10	had maintenance scheduled during that time much like
11	you had in Christmas of '89, that there was scheduled
12	maintenance going on, and we got hit with a cold
13	front, the number would jump up above what happened in
14	1989.
15	I guess what I want you to think about of
16	what I get out of these two is that maintenance is
17	really critical, especially in a off-peak time when
18	peak can happen. Do you agree with that statement?
19	MR. VILLAR: Maintenance is critical all the
20	time, yes.
21	MR. BALLINGER: And isn't it true that
22	you know, you do maintenance in off-peak periods but
23	you can't tell when a cold front is going to come or
24	when we're going to get a heat wave like in April. So
25	those periods are really where utilities are most

1 exposed?

2	MR. VILLAR: I wouldn't necessarily agree
3	with that. Generally, if you are in one of these
4	valley periods, let's call it, or off-peak periods,
5	even though you might get a peak during that period,
6	the peak is generally lower than the peak you would
7	experience in the peak period. Even though you might
8	have some units out for maintenance, you probably are
9	still able to meet the load.
10	MR. BALLINGER: Like you said earlier, that
11	this past five years the utilities peaked in '93,
12	anyway, they peaked in March, not January or February.
13	MR. VILLAR: Yes.
14	MR. BALLINGER: And Christmas of '89, that
15	happened over a weekend, which typically has lower
16	loads than a week day; is that correct?
17	MR. VILLAR: For residential load, not
18	necessarily. Because generally the residential load
19	tends to drive the winter peak. This is a big
20	contributor to it.
21	MR. BALLINGER: But from a system load,
22	everything I have seen is that weekdays are your peak
23	days and weekends tend to drop off.
24	MR. VILLAR: Generally, they are. But if
25	you are in a holiday weekend and everybody is at home,

and you have an extreme winter temperature, everybody is cold; they have their heaters on and the peak may be more pronounced than it would be when people are sitting at the office where they have more efficient systems going on, et cetera, and strip heating at home is turned off because they happen to be in the office or at work.

MR. BALLINGER: Page 20, just to kind of 8 show you where that number came from the maintenance. 9 10 This is a sheet I got from the FRCC that we get periodically -- kind of sporadically, actually -- that 11 shows plans for maintenance of utilities. And you can 12 see there, in December, the third week of December, of 13 2955 the utilities actually were planning to do some 14 maintenance in the third week of December. Again they 15 had zero in the fourth week, and then very little in 16 January and February, as you would expect. But then 17 again back in March, the first week in March, they 18 have almost 2000 megawatts scheduled for maintenance. 19

I guess that's what is concerning me is these valley periods of scheduling maintenance. Has the FRCC done anything to look at those periods from a reliability perspective?

24 MR. VILLAR: Tom, one thing that's not 25 evident from here is you have an August 20th FRCC

projection of what reserve margins were going to be 1 and what units were going to be out for maintenance. 2 I know in this particular year, by the beginning of 3 December, there was significantly less number of 4 megawatts out for -- scheduled for maintenance in the 5 period in question. And that is based on a shorter 6 term forecast where you get closer to it and you see 7 8 what the projected loads are, et cetera.

The FRCC from an Operating Committee and 9 individual utilities look at what unit maintenance 10 they need to do on a regular basis and they are 11 constantly updating the numbers given the projected 12 conditions at the time, whether the units are out for 13 maintenance or they have a forced outage, et cetera. 14 All of that gets taken into account. So no one number 15 at any particular time is actually representative. 16

MR. BALLINGER: I know. This is just the latest one I had. We don't get them all every week or every month or anything like that.

MR. VILLAR: Sure.

20

21 MR. BALLINGER: Okay. Page 21. This goes 22 back to again what Roland was saying --

23 MR. VILLAR: Before we leave this, Tom, I'd 24 like to make a couple of points on your graphs, on 25 your charts on 18 and 19.

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1 If you just make a couple of minor 2 adjustments to your numbers here, taking into account the changes that FPL, for example, made, the 800 3 megawatt change in the forecast, and still applying 4 your 16.9% load forecast error to these numbers, and 5 take into account operational measures, there will be 6 7 no unserved load in here. And I would expect similar conditions to occur on Page 19. 8

9 MR. BALLINGER: So that again goes to your 10 statement earlier that you would expect if we had 11 another Christmas freeze of '89, the Peninsula should 12 be able to serve all firm load.

13 MR. VILLAR: Under more reasonable 14 conditions. I'm not telling you that at any 15 particular point we're going to be able to serve all 16 the load all the time. There might be some instances 17 in which we might be able to. But under more 18 reasonable assumptions and conditions, we would expect 19 to be able to serve the load.

20 MR. BALLINGER: What more reasonable? I'm 21 assuming it gets down to, what was it? 23 degrees. 22 How cold did it get in Miami on Christmas? If we have 23 temperature like that, you're saying you expect to 24 serve all firm load.

25

MR. VILLAR: Based on the conditions that we

1 || have in our analysis, yes.

2	MR. BALLINGER: Can I go to 21? This goes
3	back, again, to what Roland was pointing out, the
4	difference between the '98 and '99 study and how they
5	jumped with the addition of one year.

6 Now, these numbers are both the base cases 7 for both studies. It's not the Scenario One. So in 8 other words, the 1999 study includes the impact of the 9 coincident factor and the removal of '93 data, but 10 it's one the FRCC believes is the most reasonable 11 case. Okay?

All this table really shows is that summer looks pretty close from what we got last year, at least the data looks somewhat consistent. I know It gives Roland some concern in the early years that we could get by with 8% reserves, but it's close to what we had last year.

What's concerning is in the 1998 study, in the winter, where you go from the 13% in the out-years to zero and minus 1%, that's a significant change with basically adding one year of data and doing these other improvements that you said.

Does that bother you with the methodology that it's that erratic?

25

MR. VILLAR: No, it doesn't. This is what

the results show, Tom, and we incorporated some 1 improvements to the methodology; this is what the data 2 shows. And, again, we're not saying that because this 3 is the results that we're changing our reserve margin 4 standard. Our reserve margin is the minimum 15% 5 6 reserve margin. MR. BALLINGER: So you think that --7 MR. VILLAR: And we not only look at these 8 numbers, but we look at sensitivities associated with 9 those numbers, we look at extremes in the other 10 direction and we also rely on a LOLP analysis. So we 11 look at all of the factors in order to arrive at a 12 conclusion as to whether or not our reserves are 13 adequate. We think that based on all the factors and 14 all the circumstances the reserves are adequate. 15 16 MR. BALLINGER: Okay. So it gives you no heartache at all that a methodology to test a reserve 17 margin gives you such drastic results from one year to 18 the next? 19 MR. VILLAR: No, it does not. 20 MR. BALLINGER: Okay. In general, would you 21 agree that planned reserves have an impact on 22 23 operating reserves? MR. VILLAR: Operating reserves are the use 24 the plan reserves. You plan for something. Once you 25

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1	
1	have it in place, then you operate the reserves you
2	have planned once you built them.
3	MR. BALLINGER: And generally, the more
4	planned reserves you have probably the more operating
5	reserves you'd have and vice versa?
6	MR. VILLAR: Well, I mean, It depends on
7	what you do with them, yes.
8	MR. BALLINGER: They are at your disposal.
9	Obviously they are in the ground. They are there.
10	COMMISSIONER CLARK: I don't understand
11	that.
12	MR. BALLINGER: If you plan to have 2000
13	megawatts three years from now versus planning to have
14	1500 megawatts two years from now, you're going to
15	have less operating reserves obviously.
16	COMMISSIONER CLARK: When?
17	MR. BALLINGER: going with the lower
18	amount.
19	COMMISSIONER CLARK: When?
20	MR. BALLINGER: Two years from now.
21	COMMISSIONER CLARK: It depends on what gets
22	built. I don't see the relationship at all.
23	MR. BALLINGER: Let's say this: Let's say
24	that the plan is to have 4,000 megawatts of reserves
25	two years from now. That's the plan. But now because

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1 of a standard, we're going to say, "No, I'm only going 2 to plan to have 3,000 megawatts available two years from now because of a change in a standard." That has 3 also had an equal, if you will, effect on operating 4 reserves that you will have available then. 5 COMMISSIONER CLARK: At that time. 6 MR. BALLINGER: In other words, if you go 7 from a 20% reserve margin to a 15% reserve margin, you 8 have less operating reserves as well. Is that a 9 general movement or principle that you see? 10 MR. VILLAR: I would say so. But the 11 question is whether you need those operating reserves 12 or those plan reserves. If up don't need them, then 13 14 it's fine to have them. 15 MR. BALLINGER: I understand. I'm just 16 trying to get -- there is a correlation, though, between planned and operating? 17 MR. VILLAR: Only from the standpoint that 18 if I built X number of megawatts and I have it 19 available on a regular basis, and I can do -- we can 20 have maintenance on them or to account for forced 21 outages, et cetera, yes, to some degree there is, but 22 not very direct. 23 MR. BALLINGER: Maybe this would help. 24 Ιf for the past ten years utilities were planning at 20% 25

reserve margins and were always right about 20%, that 1 gives you X amount of operating reserves. And now 2 they decide we don't need to plan for 20%; we can plan 3 for 15. That would give you X minus some number of 4 operating reserves on a going-forward basis, would it 5 6 not? MR. VILLAR: Yes. 7 MR. BALLINGER: Okay. That's all -- I mean, 8 I thought this was pretty simple. I didn't mean to 9 make it complicated. 10 MR. VILLAR: Okay. 11 MR. BALLINGER: I'm on Page 22. And what 12 Staff has done is tried to show this relationship of 13 planned and operating reserves to try to get some 14 actual feel. And let me explain a little bit about 15 what these columns are and what they mean. 16 Is it your understanding when there's a 17 Peninsular Advisory, does that mean that we've reached 18 some temperature thresholds per an emergency plan? 19 (Pause) 20 21 MR. VILLAR: I'm sorry, Tom. I was talking 22 to Ken Wiley here. 23 MR. BALLINGER: Okay. When we reach an Advisory for the Peninsula, does that mean that there 24 has been certain temperature thresholds reached within 25

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the Peninsula? 1 MR. VILLAR: I don't recall how the 2 3 emergency plan is set up. MR. WILEY: Yes. Yes. You can reach either 4 a temperature threshold or a specific utility might be 5 calling for conservation measures. Those are two 6 7 things that could occasion an Advisory. MR. BALLINGER: But generally they are 8 9 caused by temperatures. 10 MR. WILEY: Yes. MR. BALLINGER: What we did, is we got some 11 actual Capacity Advisories from the FRCC over the last 12 couple of years on these specific dates and it showed 13 the operating margin we had. So like in June 16th of 14 '98, there was an Advisory, which meant it was hot 15 probably that day, but we had 2600 megawatts of 16 operating reserves so we were fine. We weren't in 17 18 danger of losing any load but we were still kind of 19 keeping everybody aware of what was going on. Is that a fair assessment of how it works? 20 21 MR. WILEY: Yes. 22 MR. BALLINGER: And you could see that through 1998 we had several Advisories through the 23 summer, but we had plenty of operating reserves so 24 there was no problem of getting into a problem. 25

1 Now, if we get down to where our operating 2 reserves are less than the largest unit in Florida, which is 910 megawatts, that throws us into an alert 3 state. Is that correct? A little bit more 4 5 significant event. MR. WILEY: Yes. 6 7 MR. VILLAR: Yes. MR. BALLINGER: And that's because when 8 you're at that level of operating reserves of your 9 largest unit, that if that largest unit were to trip 10 off line suddenly, there would be a lot of chaos going 11 There would have to be interchanges going over 12 on. the ties, hopefully. Hopefully, Southern would be 13 there. And if they weren't there, we might have a 14 disconnect from the southeast interconnect. 15 16 I mean, I'm trying to get -- is that why an alert is a critical situation; that you really sit up 17 18 and pay attention when you get to an alert status? MR. WILEY: An alert level is one that we 19 take very seriously and it basically just puts red 20 lights in every control room. 21 MR. BALLINGER: And basically what that is 22 telling you is from a system standpoint, we're 23 operating pretty close -- you know, if nothing happens 24 we'll be okay, but if we lose a large unit we might 25

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1	have to be scrambling around. Is that correct?
2	MR. WILEY: If we lost the largest unit, we
3	would be interrupting some firm load, yes.
4	MR. BALLINGER: Okay. In 1998 we didn't see
5	any alerts because we had plenty of operating
6	reserves. But in '99 we had one alert situation in
7	April of '99. I think we referred to that earlier
8	today. That we had some unusually hot weather in
9	April. There was probably some scheduled maintenance
10	going on as well, and we got to this level of
11	operating reserves. Now, we didn't lose any firm load
12	that I can recall in April of '99. Is that your
13	recollect as well?
14	MR. WILEY: We did not.
14	MR. WILEY: We did not.
14 15	MR. WILEY: We did not. MR. BALLINGER: Okay. Now, what this chart
14 15 16	MR. WILEY: We did not. MR. BALLINGER: Okay. Now, what this chart tries to do is say, all right, look over on the far
14 15 16 17	<pre>MR. WILEY: We did not. MR. BALLINGER: Okay. Now, what this chart tries to do is say, all right, look over on the far left where it shows what the reserve margins were for</pre>
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margins shown in the middle column. And what that 1 2 does, is it tells me that if we had been at 15%, we wouldn't have had the operating margins, first off, 3 that we actually had, and actually we would have been 4 into alert status quite a few more times than we were. 5 And, again, I think this just goes to exhibit the 6 interplay between planned reserves and operating 7 reserves. 8

9 MR. WILEY: What your analysis shows me, 10 Tom, is that our 15% planned reserve margin would have 11 been adequate to get us to this. We would have had an 12 alert two times during the summer of 1998 and we would 13 not have lost load.

14 MR. BALLINGER: Well, you don't know because 15 nothing tripped. We don't know actually what 16 happened, is my understanding. The FRCC doesn't keep 17 actual results when we go through Advisories of what 18 happened.

We would have been on alert status two times in '98 and three times in '99. And had we lost a unit, we would have been in deep trouble. In other words, what I'm saying is it's pushing it closer to your operating reserve margin envelope.

24 MR. WILEY: I think there's a lot of "we 25 don't knows" in your analysis, not just these three

1 specific ones.

2	MR. BALLINGER: And I would agree. Do
3	you like say, for example, let's take April of '99,
4	we were in an alert status. We lost no firm load.
5	Now, had we been at 15% we would have really been in
6	alert status, and if we had lost a unit of 150
7	megawatts, we would have blacked out, or some
8	utilities would have blacked out some customers. So
9	we were operating if we had been at 15%, we would
10	have been operating at a margin of only 150 megawatts
11	before firm load was lost. That's what that tells me.
12	MR. WILEY: Well, that's what your numbers
13	point out. I think that, first of all, you're
14	looking our 15% planning criteria is a peak load
15	criteria for summer and winter. It doesn't
16	necessarily apply to the summer months. However, as
17	you know, as part of our analysis we do look at all of
18	the months. You just referred to that a few pages
19	ago. And we used 15% when we look at things.
20	So we certainly did look at whether or not
21	we had 15% or greater reserves during April. And as
22	you know, that particular April was a very hot April.
23	It was above our forecast expectations; very much so
24	above it.
25	MR. BALLINGER: Okay. I'm going to move on

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1 now to the last bit of pages.

2	This is more for clarification for
3	everything. There's been some confusion about the
4	Commission's reserve margin rule or the adequacy of
5	resources, and some utilities seem to rely on it, that
6	the Commission has adopted a minimum planning reserve
7	standard, if you will. And what I'd really like you
8	to do is turn to Page 24, which was a Staff
9	recommendation, that addressed a clarification that
10	Tampa Electric brought forward after this rule was
11	adopted. And, basically, Tampa Electric asked to
12	clarify this rule was for pricing purposes only, and
13	not for prudency or planning reserves. And the
14	Commission agreed with that clarification.
15	Unfortunately, that did not show up in the Order
16	adopting the rule. The Order adopting the rule just
17	said here's the rule. Is that your understanding of
18	how this rule became into existence?
19	MR. VILLAR: I understand that some
20	utilities are interpreting it the way you said it,
21	Tom. This is what I recall from the discussions that
22	took place at the time. That it was for pricing
23	purposes, but the language of the rule it's
24	definitely you can read it absolutely the other
25	way, that it's not for pricing purposes.

1 MR. BALLINGER: Well, how would the FRCC 2 interpret this rule? Would they see it as a pricing rule? 3 4 MR. SOUTHWICK: It's my understanding it's a 5 pricing rule. I don't know that the FRCC has officially interpreted it at all. 6 MR. VILLAR: Yeah. I don't think we have. 7 8 MR. BALLINGER: Well, Henry, are you 9 speaking on behalf of FRCC or Florida Power Corporation. 10 MR. SOUTHWICK: Actually, I was speaking on 11 behalf of myself. (Laughter) 12 MR. VILLAR: I don't think the FRCC has 13 addressed the issue, Tom. 14 MR. BALLINGER: Okay. That's all the 15 16 questions I have, Commissioners. COMMISSIONER JACOBS: I have a brief 17 18 question. 19 MR. TRAPP: Well, Commissioners, before we 20 moved away from the FRCC presentation, there were just a very few questions I wanted to ask with respect to 21 continuing studies and further activity that the FRCC 22 may or may not be pursuing. And I'm not sure who to 23 address these so I'll address them to Mario or to Ken, 24 25 whoever can best address them.

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I think Ken mentioned earlier that there is 1 2 a lot of uncertainty associated with the LOLP methodology of calculating reserve adequacy. And he 3 mentioned we just don't know what we've got anymore 4 5 with respect to LOLP. The question I had for FRCC was -- Ken, have 6 7 you made any plans or do you intend to take any steps to further analyze what level of LOLP in Florida is 8 meaningful? 9 MR. WILEY: Our study group has addressed 10 that question for the last two years, Bob, and I quess 11 we don't have a precise answer at this stage. We're 12 thinking about getting involved in something that I 13 believe the General Electric group is looking at to 14 see if that could help us answer it. But 15 16 specifically, no, we don't have anything on the drawing board. 17 18 MR. TRAPP: So your plans are not to abandon the study of LOLP, but to try to see if we can 19 20 recalibrate the model? MR. WILEY: We're definitely not abandoning 21 22 it. 23 MR. VILLAR: Bob, I don't know that there's any need to recalibrate the model at this stage. 24 We 25 had some discussions on that issue this year, and

1 there was some questions lingering from the 1998 time And based on the discussions of the members at 2 frame. that stage, they felt fairly comfortable that the 3 model at this stage was representative of current 4 conditions, but it may be something we might want to 5 look at some more again. I don't know. 6 7 MR. TRAPP: When was the last time the one-day-and-ten-years was looked at with respect to 8 its validity? How did you pick one-day-in-ten-years? 9 MR. VILLAR: The one-day-in-ten-years has 10 been around longer than I have been in the utility 11 12 industry, I think. MR. TRAPP: 1970 arena? 13 MR. WILEY: Yes. It was in the '60s and 14 15 '70s that we migrated into that. And it was for two 16 things. It was -- the industry was pretty homogenized at that time, and I think that was the case of one 17 size kind of fit all. And actually in the '60s, 18 and -- I even hesitate on saying this because I 19 remember this -- is that we actually went back with 20 some historical data for the peninsula during those 21 days, and kind of played a "what if" and ran loss of 22 load probabilities. And sure enough, our actual 23 experience indicated that one-day-in-ten-years was 24 about what we were. And we sat there and reflected on 25

1	those historical years, and said those were pretty
2	reliable years. Yeah, we liked them. So we kind of
3	had an anecdotal acceptance of the
4	one-day-in-ten-years back in the '60s and '70s.
5	MR. TRAPP: So it made us feel good and we
6	adopted it and they've stuck with it for 30 years.
7	MR. WILEY: Yes, sir, until these
8	availability rates climbed up to where they are.
9	MR. TRAPP: And I would also remind you that
10	unit costs have fallen from the 12 to \$2,000 a
11	kilowatt that were looked at when we calibrated it
12	back in the 1970s. I would suggest that \$350 a kW or
13	\$400 a kW is a lot of difference in terms of cost that
14	one can afford reliability.
15	Anyway, I'd appreciate it if you'd keep us
16	abreast with respect to your plans to further pursue
17	the LOLP question.
18	The next question I had, had to do with
19	we have had some discussion here today about tightness
20	of reserves during off-peak and shoulder hours. I'd
21	like to know what the FRCC has discussed with respect
22	to the further study of this issue.
23	MR. WILEY: When you say "tightness of
24	peak," exactly what do you mean there, Bob?
25	MR. TRAPP: It seems like we have these

1	
1	alerts and these capacity shortfall crises mostly
2	around off-peak periods, not peak periods. Yet the
3	reserve margin criterion that we seem to be driving
4	the system off of is based on a single peak-type
5	analysis. Has the FRCC studied the shoulder months,
6	the relationship of maintenance that's taking place in
7	that period of time and the probabilities of abnormal
8	weather or circumstances arising that time that seems
9	to be the reality of what's happening out there? Or
10	do you plan to study it?
11	MR. WILEY: Well, I think our study is once
12	a month we update our maintenance program for the next
13	rolling 12-month period of time. And we go through
14	there and we analyze what the reserve margins the
15	resulting reserve margins are after we maintain them
16	on a week-by-week basis. Our maintenance schedules
17	are actually scheduled on a, you know, specific day
18	that a unit would be taken out, and it would be
19	brought back in on another specific day, and that's
20	how detailed we have broken that up.
21	MR. TRAPP: I thought I read in some of the
22	minutes that Roland and Connie had brought back from

23 the Operating and Engineering Committees that that had 24 been addressed in one of the committees and it was 25 going to be looked at further. I guess that's really

1	where I'm going. Is there a more formal study of this
2	going on or just business as usual?
3	MR. WILEY: I was going to get to that.
4	One of the "look sees" that we do is to make
5	sure that any resulting week that falls below 15%
6	reserve margin is looked at in detail by the proper
7	people in our Operating Committee and they are
8	flagged. And we have been discussing in this
9	particular group whether or not we want to codify that
10	15%, because at this stage it was kind of a reference;
11	it wasn't an absolute. So we are talking about
12	codifying that.
13	MR. TRAPP: I'm sorry, I missed perhaps some
14	of that. You're looking at making a monthly 15%
15	reserve margin criteria?
16	MR. WILEY: When we go over our operating
17	reserves after maintenance of putting in there that
18	anything that is less than 15% will be reviewed in
19	detail, and I mean very much detail, by our Operating
20	Reliability Subcommittee. And this is a monthly type
21	of an analysis.
22	MR. TRAPP: Let me move on to my last
23	question. It has to do with the treatment of
24	noncommitted capacities.
25	We've heard testimony here today that you're

1 taking into account -- at least in your LOLP 2 calculations -- noncommitted transmission capabilities 3 with the Southern Company. And we're witnessing the 4 growth as a result of Congress acting in 1992 of the 5 EWG industry. I think the Commission is aware of at 6 least 3100 megawatts of announced noncommitted 7 capacity that might be coming into the state.

8 My question to the FRCC is what steps is the 9 group taking with respect to the identification of 10 that capacity, the verification of that capacity, and 11 the assessment of that capacity with respect to 12 adequacy of the Florida grid?

13 MR. VILLAR: I think one of the things that 14 we talked about this year, Bob, at the RWG was whether 15 or not to include some nonfirm uncommitted capacity in 16 our analysis. And the consensus of the group was that 17 at this time it was unnecessary to do so. We did talk 18 about including noncommitted capacity in the LOLP calculation, just like we could include the assistance 19 20 from the SERC region. But given the levels of LOLP that we were experiencing, it was unnecessary to 21 include them in the calculation at this time. We 22 could have, but we decided not to. And that could 23 include --24

25

MR. TRAPP: Why would you discriminate with

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1	respect to the noncommitted capacity in the state?
2	MR. VILLAR: I'm sorry?
3	MR. TRAPP: Why would you discriminate with
4	respect to the noncommitted capacity in the state and
5	its impact on the grid?
6	MR. VILLAR: We're not discriminating
7	against the noncommitted capacity. It was just
8	unnecessary. The levels of LOLP are so low that all
9	it was going to do was drive the number even lower.
10	MR. TRAPP: Why was it necessary to include
11	uncommitted transmission capacity?
12	MR. VILLAR: It's not that it was necessary.
13	That's one of the sensitivities that we performed to
14	exclude that. It has traditionally been included. We
15	could have included a lot of other stuff in the LOLP
16	analysis. We could have included nonfirm QF capacity.
17	We could have included a lot of other things.
18	Operational measures. There were a lot of other
19	things that could have been included. It just did not
20	matter in the LOLP calculation, so we did not include
21	them at this stage.
22	MR. TRAPP: Would you
23	MR. VILLAR: We could include them in the
24	future, but it's just going to drive the LOLP number
25	even lower.

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1 MR. TRAPP: Again, my question has more to 2 do with reporting requirements. With respect to 3 reporting and identification, what are the plans of 4 the FRCC to identify the capacity that's coming into 5 the state?

6 MR. WILEY: Our specific plan is we have put 7 a group together to discuss this particular issue and 8 to identify what our going-forward policy should be in 9 this area.

Currently our policy is that when it comes 10 to the QFs, any QF that has firm contracts, they are 11 included as part of our firm capacity and it goes into 12 our reserve margin and calculation. When it comes to 13 merchant plants, any load serving entity, such as New 14 Smyrna Beach, that has a contract with a merchant 15 16 plant to purchase power, that contracted capacity is included in the reserve margin calculation and it 17 18 is -- that's the case this year. And we know this is 19 a growing issue and we will be addressing it prior to 20 putting this report together next year.

MR. TRAPP: So you anticipate having some mention of it or addressing it somehow in next year's Ten Year Site Plan? Is that what I'm hearing? MR. WILEY: It will be. Yes. MR. TRAPP: Thank you. That's all the

1 questions I have, Commissioners.

2	COMMISSIONER JACOBS: I guess it would be
3	simple to say that well, not simple because what
4	you've done is explained a very complex process. But
5	to kind of boil it down, you've with your certain
6	analysis and such, you kind of say we looked at
7	historical data and we determined with a 15% margin it
8	would be okay, based on what history has taught us.
9	Is that okay?
10	What I'd like to ask you to do, look at
11	three trends I have seen, and see if you agree with
12	those trends as being legitimate, first of all.
13	Second of all, if you would speculate the impact that
14	they might have on your analysis.
15	One, I think we've gone through a lot but
16	just let me say that we've looked at the weather issue
17	and we've looked at the atypical weather patterns.
18	But the thing that jumps out at me when I look at
19	those patterns is that there's a recurrent trend of
20	extremities over the course of several years. I mean,
21	if we'd have one year where we have one
22	out-of-the-norm weather condition I could say see it.
23	But it seems like we have several years where we have
24	had weather extremities. And in one or more of those
25	instances they occurred outside of what you would

1 expect to be a normal peak time.

The other thing is low growth patterns. 2 Ι don't know if it's going to continue, but I just 3 happen to notice in your data the total peak demand 4 5 from -- I believe it was '97-98 to '98-99, was on the 6 order of 5,000, close to 6,000 megawatts in one year. 7 That's probably an unusual event. But my concern is do we know that that's an unusual event? Do we have 8 any idea or data that suggests that it would not occur 9 10 or reoccur with any frequency in your -- in the time frame of your analysis? 11

And then the third point that I would be 12 interested in is, we've heard on many occasions our --13 with not much verification -- I take that back. 14 We have had dockets where companies who have large load, 15 who are on interruptible or -- I'm sorry, they are on 16 DSM, who have come in and expressed a very real 17 hesitance about remaining on those now that they are 18 seeing increasing patterns of interruptions. 19

For the moment if you accept Staff's analysis, what you would expect is that those interruptions would continue at present levels, perhaps even increase? Therefore, I would sense that those companies would even have greater concerns. And perhaps you might lose a few large load customers off

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of interruptible. And I notice that in your analysis, 1 there is some decrease -- in your calculation of 2 reserve margins, there's some decrease for that 3 component but it's not a large decrease. You 4 basically stay stable over the ten years. 5 So those three factors, in my mind, are of 6 interest in this particular plan. I'll be interested 7 in how you dealt with those. 8 MR. VILLAR: Let me comment on at least a 9 couple of those, and then maybe I can turn one over to 10 someone else. 11 With respect to the weather extremes, if you 12 recall, Commissioner, we had an extreme weather 13 scenario included in there. And I think within the 14 extreme weather scenario, we capture whatever might be 15 included within those variations that you were 16 concerned about. So we have looked at those weather 17 In addition to that, the analysis that we 18 extremes. 19 performed with respect to some corrections to the Staff 1989 Christmas projections for 1999 gives us 2.0 comfort that within the existing parameters we can 21 serve a load under the kind of conditions that might 22 be expected if the type of temperatures we experienced 23 in 1989 were to be experienced again. 24 You have to remember, there were a 25

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significant number of improvements that have been made 1 to utility forecasting techniques, to methods of 2 dealing with the public. Corrections made to reduce 3 the number of forced outages were experienced. 4 5 Changes in schedule, maintenance practices, et cetera. 6 So all of those give us sufficient comfort, and we think we'll be able to handle the weather extremes. 7 8 Let me address the DSM customer issue. We 9 looked in the 1999 assessment at the certainty factor we had developed in 1998 for the availability of DSM. 10 And we asked each utility, given the experience in the 11 last year or so where some customers had expressed 12 dissatisfaction with the DSM programs, and there was 13 some drop-off rates, to give us their expectations for 14 what they thought they would be able to get in terms 15 of DSM certainties; to take into account the fact that 16 some customers were dissatisfied, and whether or not 17 they had a pool of customers from which to replenish 18 that DSM supply. 19 Given those instructions, we got back some 20 data from the utilities that basically allowed us to 21 22 reach what we used 1999 as a certainty factor, where 23 each utility was taking into account if I lose a

24 certain amount of load based on customer

25 dissatisfaction with the number of interruptions, I

have these many customers that are eligible for the 1 rate and that I can replenish that DSM load. To the 2 extent that at some point in the future we might not 3 be able to get to replenish that DSM capacity, then 4 there will have to be changes made in the individual 5 6 utility plans. But all the utilities are cognizant of 7 that fact and they will take it into account in their planning practices. 8 9 Your middle question had to do with load growth and I think it may be better if Leo gets into 10 that one. 11 MR. GREEN: Could you please repeat the 12 question, Commissioner? 13 COMMISSIONER JACOBS: Yeah. On that one, 14 I've tried to find the year here -- there was a year 15 in your tables where the total peak increased on the 16 order of close to 6,000. 17 MR. GREEN: Last year, summer, right? 18 COMMISSIONER JACOBS: Yeah. One year. 19 My concern would be in your data, your 20 projected data doesn't anticipate that kind of an 21 22 increase again in any of the out-years. So I'm 23 wanting to understand, how did you rule out the fact 24 that that might not occur again? If there's data that supports that? If so, how you adjust for that. 25

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1MR. GREEN: Yes. It could happen again. We2do not consider it as a normal situation. We look at3it in the sensitivity analysis. But to give an4example, 1998 was an extremely hot year. And I hate5to bring in FPL data here, but I'm more familiar with6FPL.

7 This year our peak is like 400 or 500 8 megawatts lower than what it was last year. Our total 9 sales this year, at the end of the summer, is at 1%, this year over last year, lower; negative growth in 10 sales to give an idea how hot it was in 1998. It 11 could happen again. And that's why we have reserve 12 margins to take care of those uncertainties that could 13 And we address them in -- by looking at the happen. 14 15 sensitivity analysis that Mario referred to. 16 COMMISSIONER JACOBS: Thank you. COMMISSIONER CLARK: I think I have a 17 question he may need to answer. 18 Do you see -- is the gap between, say, your 19 20 average demand and your peak demand narrowing or getting larger? 21 22 MR. GREEN: The gap is getting smaller. 23 Meaning to say that the nonpeak load is growing faster 24 than the peak load. 25 COMMISSIONER CLARK: Okay. Do you have any

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percentages you can tell us, or, I guess, I'd be happy 1 if I saw that in the margin of reserve docket, if I 2 saw some document that gave average demand and peak 3 demand and how -- the trend. 4 MR. GREEN: I don't have that right now but 5 I could provide you with that data. 6 COMMISSIONER CLARK: All right. 7 CHAIRMAN GARCIA: All right. Do any of the 8 parties have any questions? (No response.) 9 We're going to take a 40-minute break and 10 reconvene promptly at 40 after. (Lunch break.) 11 (Thereupon, lunch recess was taken at 12 1:00 p.m. and reconvened at 1:45 p.m.) 13 14 CHAIRMAN GARCIA: I think the next presenter 15 is FP&L. Whenever you are ready. 16 MR. SIM: My name is Steve Sim. I'm 17 representing Florida Power & Light and our Ten Year 18 Site Plan review. I've got about a dozen pages and 19 it's broken down into four areas. We are going to 20 talk about the resource additions that FP&L plans; a 21 little bit about our LOLP reserve margin projections. 22 And then we're going to go into two items that Staff 23 had listed that they'd like to discuss; projections 24 for winter 2000, winter 2001 and then a brief 25

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1 discussion of nonfirm load.

I

2	First of all, in regard to our resource
3	additions for the next ten years. Our current plan is
4	showing approximately 3,300 megawatts and the numbers
5	I'm going to give you primarily are going to be summer
6	megawatt ratings. 3,300 megawatts of supply side
7	resources over the next ten years. And for
8	comparison, looking at the last two site plans before
9	the 1999 site plan, we previously showed 1,600
10	megawatts back in the '97 filing and 2,600 megawatts
11	in the 1998 filing.
12	And breaking down the 3,300 megawatts we've
13	got some changes to existing plants of a little over
14	300 megawatts. Some of our existing purchases are
15	going to decline by about 150 megawatts. We'll be
16	repowering our Fort Myers and Sanford units and the
17	plan shows that total a little over 1,800 megawatts.
18	And then we're showing three new combined cycles
19	coming in totalling a little over 1,250 megawatts.
20	This slide gives a little bit better, I
21	guess, time view of when these capacity additions are
22	coming in. We've got some changes to some of our
23	existing units happening over the next couple of
24	years, and then in 2001 the Fort Myers repowering
25	begins.

1 We have about 200 megawatts net capacity 2 coming in at Fort Myers due to the combustion turbine 3 additions, while we're working on the steam units. 4 That becomes compete, the repowering project in 2002, 5 for a net of a little over what we're showing here, 201 plus 725, so a little over 925 megawatts of net 6 7 increase at Fort Myers due to the repowering. A similar situation at Sanford. A phased in 8 9 operation with the CTs coming in first followed by the 10 full repowering. We then show that, primarily on this 11 page, that the market combined cycle unit addition 12 No. 5 and No. 6 happening towards the later end of the time period, and then one additional combined cycle 13 coming at the tail end of this period for a total of 14 almost 3,300 megawatts. And these projections assume 15 that FPL's new DSM goals are achieved. 16 And the recently approved DSM goals amounts 17 18 are shown on this page. These are the year-end summer megawatt reductions. And the note at the bottom is 19 20 just kind of a remainder to me that in regard to the 21 original DSM goals that were set in 1994, to date we're approximately 250 megawatts ahead of schedule in 22 23 meeting those goals. 24 We're not representing that we'll be able to

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maintain that pace of achieving more DSM than what we

25

1 have in our goals, but I think it's a pretty safe 2 assumption that we'll be able to at least meet the DSM 3 goals amounts that we're showing here on the top of 4 the page.

5 Switching gears a bit to our reliability 6 studies that were a part of the work that went on to 7 come up with a Ten Year Site Plan, we utilized two 8 methodologies; the loss of load probability and 9 reserve margin. And we treat them equally important.

The criteria we use are the industry standard of a maximum of .1 day per year for LOLP, and we use a minimum reserve margin standard for both summer and winter of 15%.

Using those criteria, this is what we are projected to have in regard to LOLP in the second column where we easily meet the .1 day per year LOLP standard.

And the remaining columns show the summer and winter projected reserve margins which meet, and all years but one where we meet the 15% reserve margin we easily exceed the reserve margin standard of 15%.

22 So based on our reliability studies for the 23 FPL system, we project it to be very reliable. And, 24 Tom Ballinger, this is the point we were discussing a 25 little bit earlier.

As part of our planning work last year which 1 led to the resource plan that we show in the 1999 Site 2 Plan, we undertook on our own an independent analysis 3 of LOLP for different types of utility systems. 4 And 5 the objective was to try to evaluate how reasonable the recent LOLP projections for both FPL and for 6 Peninsular Florida were because there were a lot of 7 questions about particularly Peninsular Florida when 8 we first saw them. 9

We were able to closely approximate both the FPL projections and the FRCC projections. And we concluded from this that the current projections are reasonable and, in fact, should be expected for systems of those types. And that they should reflect a higher level of reliability for both types of systems in regard to LOLP.

Moving to the third item of the four, this 17 was one of the two items that Staff asked us to 18 present which is not traditionally shown in a Ten Year 19 Site Plan filing. It was for a projection of unserved 20 demand for the winter of 2000 and the winter of 2001 21 22 based on winter temperatures experienced on nine dates 23 that Staff selected for the period 1970 through 1989. 24 Our approach to this was, rather than go

through each one of those nine dates, we'd look at the

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worst situation and see what that showed. So in 1 Step 1 we selected the worst winter condition 2 experienced by FPL from these range of dates. 3 And we developed a new winter load forecast based on the 4 5 temperature which was derived on that date, and we 6 plugged this into our current reserve margin 7 projection to develop a revised winter reserve margin projection. And this would tell us whether or not, 8 based on the temperature alone, we had unserved load. 9 10 In Step 2, we took it one more step out 11 where we went back and we looked at recent historical 12 unavailability at peak values for generation for 13 purchases, et cetera, to determine if we applied these 14 reasonable outage factors, would we then have unserved 15 load. And then finally, we threw in the 16 operational measures that are traditionally not 1.7counted in reserve margin analysis to see how that 18 would affect the picture of unserved load. 19 20 Now, the range of dates or range of years that Staff had requested that we look at, we 21 experienced our coldest winter conditions on 22 December 24, 1989. So we used the temperature 23 experienced on that date and we developed a new load 24 forecast for the winter of 2001. 25

1	Now, Staff had asked us to look at winter of
2	2000 and 2001, but I elected to use just the winter of
3	2000 because our reserve margin is projected to be
4	lower excuse me for 2001 than it is for the year
5	2000. So, again, I'm looking at the worst case.
6	Now, this new load forecast we plugged in
7	and got a new current reserve projection for the
8	winter of 2001, and it showed that our reserves at
9	that point, based on the new load forecast, would be
10	about 640 megawatts. So based on that change alone,
11	no unserved demand was projected.
12	And, naturally, the projection would be
13	significantly better for the other eight dates that
14	Staff selected because the winter temperatures were
15	not as cold as they were for this selected date.
16	Now, in this step we started with 640
17	megawatts of capacity that was still available and we
18	then went back since the '93 time frame and we tried
19	to select what we thought were representative values
20	for unavailable at the peak hour for FPL generation,
21	for QFs and for net imports. And we also used the
22	most recent value for the confidence level in load
23	management that our folks had, based on their
24	experience with it.
25	And we then subtracted those appropriate

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1	amount of megawatts from our generation, from QFs,
2	from net imports, and we lowered the load management
3	capability that we were projecting in the reserve
4	margin calculation. And where we were on the plus
5	side of 640 megawatts of capacity still left to serve,
6	we now dipped into a theoretical unserved load of 70
7	megawatts, so we'd be 70 megawatts below what we
8	thought we would be able to serve at this point.
9	However, these 70 megawatts represent where
10	FPL would be if they applied none of the operational
11	measures that we have which are not traditionally
12	calculated included in reserve margin calculations.
13	And I'll show you that one next.
14	MR. HAFF: I got a question before you leave
15	that slide. This is Michael Haff. Are the
16	uncertainty factors I guess you used uncertainty
17	factors to come up with these reductions due to
18	unavailability of FPL generation QFs, et cetera. Are
19	those uncertainty factors the same ones used by the
20	same number that FRCC used or is that an FPL specific?
21	MR. SIM: These are the same FPL values that
22	fed into the FRCC analysis.
23	MR. HAFF: But they're not the same exact
24	FRCC you haven't taken FRCC's value and applied it
25	to FPL?

MR. SIM: No, because it wouldn't be 1 appropriate. We took the FPL values that -- on which 2 the FRCC total was built and we extracted the FPL 3 4 values and applied them here. MR. HAFF: All right. Okay. 5 MR. SIM: Now, looking at this, the Rows 1, 6 2 and 3 are what I showed you on the previous page, 7 where if we applied none of FPL's operational 8 measures, in theory we'd have unserved load of 70 9 10 megawatts. However, FPL's projecting, in its 11 operational measures, appeals to conserve about 400 12 13 megawatts which we actually think is a bit conservative. Let's get the footnote in here. 14 Residential load control SCRAM in the 15 winter, about 1,600 megawatts. And voltage reduction, 16 another 400 megawatts. So we have approximately 2,400 17 megawatts of operational measures that are not 18 accounted for in reserve margin projections. 19 When you apply that, on Line 5 we're showing 20 that we are projecting no unserved load based on those 21 conditions. And, in fact, we'd have over 2,000 22 megawatts of capacity or resources available to serve 23 additional load. 24 Now, the last of the four items that Staff 25

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1	asked us to take a look at was the nonfirm load. And
2	for FPL's system, our current capability for
3	residential load control is about 700 megawatts
4	summer, and almost 1,300 megawatts winter, while our
5	commercial industrial load control is a little over
6	400 megawatts, summer and winter rating.
7	The notice provision, pretty typical I would
8	say for these two types of nonfirm load. One week for
9	residential and five years for commercial industrial.
10	Exit fees, none for residential. And yes,
11	there is an exit fee for commercial industrial load
12	control if a customer desires to leave earlier than
13	the five year exit period unless certain conditions
14	are met.
15	There was a question Staff asked about, are
16	these counted in spending or supplemental reserves.
17	They're both counted in our supplemental reserves.
18	And regarding the annual times we've
19	exercised load control either in full or in part, what
20	this shows is for residential load control, since 1992
21	it's ranged from zero to nine times; commercial
22	industrial load control from zero to three times.
23	In regard to nonfirm load, we view it as a
24	very reliable resource. It's operated very well every
25	time we've pushed the button. We are not concerned

overly regarding dropout rates. Even with residential 1 load control with customers able to leave after one 2 week, we estimate that we have at least as many 3 eligible residential load control potential customers 4 as we have currently signed up. We also have a number 5 of customers on the waiting list for commercial 6 industrial load control. 7 CHAIRMAN GARCIA: What do you mean by 8 residential customers signed up as those waiting to 9 sign up? You're not allowing anymore to sign up? 10 MR. SIM: I wouldn't term it, Mr. Chairman, 11 as not allowing them to sign up. It's simply 12 allocating the resources to the contractors that do 13 the installations. 14 CHAIRMAN GARCIA: Got you. 15 MR. SIM: So it's more like turning a spigot 16 on and off. In regard to the actual --17 COMMISSIONER JACOBS: One brief question. 18 In the -- I'm sorry, but this is FRCC's load 19 management and interruptible dispatchable table. In 20 2000/2001 they show not only maintaining the existing 21 level, but increases. I guess it's 78 megawatts in 22 one and 73 in the other. 23 What that says is -- and what I'm trying to 24 do is put it in context of what you're saying. Even 25

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1	if they were to lose some customer that would take
2	them below that threshold, that 2,750 line, you
3	there was collective interest in DSM that would not
4	only take them back up to that level but even increase
5	it above to the extra megawatts that's indicated
6	there?
7	MR. SIM: Yes, Commissioner, I believe
8	that's true.
9	COMMISSIONER JACOBS: Okay.
10	MR. SIM: I think all utilities, certainly
11	FPL, attempt to only sign up for load control that
12	level of customers that is cost-effective.
13	COMMISSIONER JACOBS: Okay.
14	MR. SIM: But there are additional customers
15	that are at least at FPL, there are in the wings
16	that would like to get on the program.
17	COMMISSIONER JACOBS: Do you anticipate
18	there would be any impact I think I heard today, I
19	know I've heard it in other instances, that the
20	cost-effectiveness is being impacted by the cost curve
21	of building new generation? Would that mean that, to
22	the extent that more gas capacity comes on line, the
23	rebate amounts are going to be impacted downwards?
24	And do you think that would have an impact on your
25	enrollment?
	1

MR. SIM: I think the answer to that is yes for two reasons. No. 1 is the cost of generation drops. That's what load control is competing with; the avoided cost of new units. So certainly you're able to pay less in terms of incentives which shrinks your potential market.

7 **COMMISSIONER JACOBS:** So if that happens 8 midstream here, what we'd expect to see would be 9 additional capacity build as opposed to reliance on 10 the DSM?

MR. SIM: And I would say yes, and I believe you're seeing that in some of the new DSM goals numbers. I think you're seeing less DSM. Certainly less load control being signed up by FPL in the coming ten years than what we projected the last time we sat down and came up with new goals, in large part due to the reduced costs of competing generation options.

COMMISSIONER JACOBS: Thank you.

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MR. SIM: I think the last point I wanted to make sure was in regard to the actual dropout rates FPL is seeing. We traditionally have seen about 1% or less per year for all of the years up there. For example, if you look for residential load control in 1997, we never exercised it during the year and we saw roughly 1% dropout rate that year.

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The next year, 1998 the frequency of use 1 jumped to eight times per year, and I think the 2 dropout rate only rose to about 1.5% per year. So we 3 are not seeing any threat of any significant dropout 4 5 from residential load control. And again, in 6 concluding this slide, we view it as a very reliable 7 resource. 8 MR. FLOYD: Steve, this is Roland Floyd with

9 Staff. You say here that your load control, 10 residential and commercial, are not used -- are not 11 counted towards spinning reserves. I'm just curious 12 whether, according to FRCC guidelines, could they 13 qualify for spinning reserve? Are they wired in such 14 that they can respond quick enough to be called 15 spinning reserves or do you know?

16 MR. SIM: My understanding of spinning 17 reserve means it has to be on line now, which means 18 you'd have to have your finger on the load control 19 button and be reducing load now. So, therefore, I 20 don't think it would qualify as spinning reserve.

MR. FLOYD: Okay.

21

22 MR. SIM: And the last slide I've got is a 23 summary slide. We project our system to be very 24 reliable, again, from both an LOLP and a reserve 25 margin perspective. Our projections are significantly

better than both respective standards for LOLP and for
 reserve margin.

3	And contributing to this projection of a
4	reliable system are two fairly recent, back in 1997,
5	changes that we've made to our planning process where
6	we introduced a 15% winter reserve margin standard,
7	and we've also, based on the winter of 1996, we've
8	lowered our load forecast temperature, as Leo Green
9	mentioned earlier, from about 37.5 degrees to about
10	34.5 degrees; both of which have contributed a bit to
11	the increase in capacity additions that I showed you
12	on the first slide over those that we were projecting
13	back, say, in 1996. And that concludes my
14	presentation.
15	MR. HAFF: Questions for Florida Power &
16	Light? Mr. Wright.
17	MR. WRIGHT: Steve, right behind you. Schef
18	Wright. I'm representing Duke/New Smyrna. I have two
19	questions. Does the 2,400 megawatts of operational
20	measures shown on your Page 11 correspond to the 3,800
21	megawatts that Mr. Villar mentioned for the FRCC total
22	operational measures?
23	MR. SIM: Yes. That's the FPL contribution
24	to the 3,800 that Mario mentioned earlier.
	to the 5,000 that Mario Mentioned Carrier.
25	MR. WRIGHT: Thanks. And the other question

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1	is, did FPL implement operational measures during the
2	June '98 hot spell?
3	MR. SIM: Not to my knowledge, but I'm not
4	100% sure if we did.
5	MR. WRIGHT: Thanks.
6	MR. MOYLE: I had two quick questions. Jon
7	Moyle. This is with respect to Sanford and Fort
8	Myers, I guess, that are coming on in O2 and O3. Do
9	you anticipate putting the capacity represented by
10	those out for bid?
11	MR. DENIS: Jon, my name is Roberto Denis,
12	and the answer is no.
13	MR. MOYLE: As to the cost-effectiveness of
14	that, is that going to come through to the Commission
15	under a need determination petition?
16	MR. DENIS: It is not required to come to
17	the Commission for that purpose, but the management is
18	quite confident that the cost of those units plus all
19	of the associated benefits of reducing and doing away
20	with existing sources of pollution within the state,
21	air pollution primarily, more than outweigh any
22	benefits when put together more than outweigh
23	any are much better than a new combined cycle
24	facility.
25	MR. MOYLE: And that's because you're

1	displacing older, inefficient plants with newer
2	combined cycle units; is that right?
3	MR. DENIS: That's correct. Using existing
4	infrastructure, existing disturbed environmental land,
5	et cetera.
6	MR. MOYLE: Thank you.
7	MR. HAFF: Any more questions? Seeing none,
8	let's continue with the presentation by Florida Power
9	Corporation.
10	MR. CRISP: Good afternoon. My name is Ben
11	Crisp. I'm with Florida Power Corporation. On behalf
12	of Florida Power Corp. I will be presenting our Ten
13	Year Site Plan summary and addressing the questions
14	that were listed on the agenda for the Commission
15	workshop.
16	We'll be addressing, first of all, the
17	overview of the Ten Year Site Plan. And second, we'll
18	be talking about the historical and projected
19	reserves.
20	Third, we'll talk about the question on
21	estimate for unserved demand based on specific winter
22	conditions.
23	And fourth of all, we'll discuss FPC's
24	nonfirm load capability.
25	Step off first with the planned summary and

the overall historical and projected reserves. FPC 1 utilizes a minimum reserve margin criteria of 15% firm 2 peak load. In addition, we utilize a loss of load 3 probability for less than .1 days per year. 4 Next, we'll take a look at our peak demand. 5 Right here you notice that's actual; actual demand 6 served and that's for the history. That's this line. 7 And you see, as you start off on the projection --8 CHAIRMAN GARCIA: You know what? If you 9 turn off the lights there, the little florescent 10 lights, we'll be able to see it a little better. 11 MR. CRISP: How about that? Okay. This 12 line depicts actuals, peak demand, and this line 13 depicts the total demand that's from the Ten Year Site 14 15 Plan. The downward trend in between 2001 and 2003 16 reflects wholesale contracts with Seminole Electric 17 Coop that are going away. And then as you see the 18 trend continues along a fairly straight slope. 19 20 Summer peak demand, same format. Actual demand served on the left; Ten Year Site Plan total 21 demand on the right. There's a slight dip in between 22 19 or -- let's see -- 1999 and 2000 where MEAG 23 contracts and Southern Company contracts for the 24 summertime go away. There's an increase, and then the 25

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1	wholesale contracts from Seminole go away.
2	Reserve margin summary. Make a few
3	highlights. As the 15% reserve margin was established
4	as a planning criteria it took us about two to three
5	years before we were up to a point to where we had
6	passed the 15% criteria. At the 33%, that was the
7	addition of the Debary and Intercession City units.
8	You see a trend right in here from 2000 to 2003. That
9	is the Seminole peaking contracts as they phase out.
10	You see a drop from 25% to 21%. That is drop due to
11	retirements. And then an increase to 23%, the
12	addition of Hines Unit 2. And from 19% to 22% is the
13	addition of Hines Unit 3.
14	Addressing demand side management resources.
15	FPC has exceeded the 1994 Commission approved DSM
16	goals in 1998. We have included the newly establish
17	DSM goals for future years 2000 through 2009 in the
18	plan. We recognize a reduction in nonfirm load as a
19	part of our plan.
20	Generation additions. As I described for
21	you in the 15% trend, Hines Energy Complex Combined
22	Cycle Unit 1 became operational in April of 1999.
23	Intercession City, we're adding three units
24	to 297 megawatts in December of 2000.
25	Capacity upgrades at Crystal River, our coal

units, we'll increase our capacity by 75 megawatts in 1 December of 2001, and Hines Unit 2, November of 2004; 2 Unit 3 in November of 2006. 3 CHAIRMAN GARCIA: Is that the only addition 4 from your last submission? 5 MR. CRISP: That is correct. 6 This slide depicts the net energy 7 8 requirements for the system and how its broken out by a fuel driver. As you see, natural gas, we're 9 focusing on dual fuel contracts; dual fuel development 10 within our fleet. Coal, natural gas, make up the bulk 11 of our fleet. 12 The QFs are at 14% of energy service. 13 Nuclear is at 13%, purchases at 7% and oil at 8%. 14 15 Once again, this is energy, not capacity. Now, I'm going to address Agenda Item No. 3, 16 which is the estimated unserved firm demand based on 17 historical weather. 18 We took a look at two scenarios. The first 19 was a good operating condition scenario, and that 20 includes 100% unit availability; normal wholesale 21 demand and no operational resources. Under those 22 23 conditions FPC would not expect any loss of firm load. 24 We looked at a bad operating condition 25 scenario in which we had average unit availability and

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we saw or we included a significant increase in 1 wholesale demand, and we included no operational 2 resources. And in that instance FPC would expect the 3 loss of firm load between zero and 10%. I want to 4 point out, significantly less then the 20% experienced 5 in the December '89 freeze. 6 Well, one further point there. From the 7 basis on the FRCC, that would not be an inconsistent 8 9 finding. FRCC, looking at the total system, could very well wind up with a 0% loss of firm load. Us 10 being in the stand alone analysis, that could wind up 11 with zero to 10% and that makes perfect sense. 12 Nonfirm load will be the next issue we'll 13 This graph shows an overall history for address. 14 years 1990 through 1998 and then a projection from the 15 Ten Year Site Plan for 1999 through 2007. 16 As you see we do have a reduction in the 17 program in the Ten Year Site Plan. Most of that is 18 coming out of our load management area. We went --19 started off at 911 megawatts and went up to 1,300 20 megawatts of total nonfirm load, and in the Ten Year 21 22 Site Plan we're dropping it down about anywhere from 12 to 30 megawatts a year. 23 The overall nonfirm load scenario has been 24 very, very useful product for Florida Power 25

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1	Corporation and
2	MR. BALLINGER: Excuse me. Would you go
3	back to your previous slide?
4	MR. CRISP: Yes. Sure.
5	MR. BALLINGER: I've got one question on
6	this slide. How do you propose to reduce the load
7	management amount? Are you going to start closing
8	your residential load management tariff?
9	MR. CRISP: We will not close the tariff
10	itself. We just will not advertise the tariff. We
11	have had some cancellations. We are learning more
12	about the system as we go on. We have had some
13	cancellations based on our utilization of the load
14	management program.
15	We've utilized the load management program
16	as has been needed and has been required and to the
17	best service of our native load customers.
18	MR. BALLINGER: Do you know if in your
19	you'll be filing new programs soon to meet your new
20	goals. Do you know if you'll be revising the credit
21	in the residential load management program to lower
22	it?
23	MR. CRISP: I'm not sure on that, but I can
24	find that out.
25	MR. BALLINGER: Okay.

MR. FLOYD: This is Roland Floyd with Staff. 1 Just to be sure on this voltage reduction, and maybe I 2 should have asked FRCC the same name. Just to be 3 clear, the Commission has standards on voltage 4 quality. There's a nominal voltage and you cannot 5 exceed that by plus or minus 5%, I think. I may be 6 wrong on the percentages. 7 But when you say voltage reduction, you will 8 still stay within the Commission rules on -- in other 9 words, you bring the voltage down but no lower than 10 what's required by our rules? I'm assuming that. 11 MR. CRISP: And I am assuming that that is 12 correct, Roland. 13 Okay. It just will go maybe 14 MR. FLOYD: from 110 volts to 107 or 106 or whatever; still within 15 our criteria? 16 MR. CRISP: I believe that's correct. 17 MR. FLOYD: Okay. 18 MR. CRISP: Consistent with the voltage 19 reduction program, you see that we have taken it out 20 of our summer months. The reason for that being that 21 the summer months you see a peak that's much broader 22 than the winter months. The voltage reduction program 23 is not considered as effective from the summer months 24 standpoint so we've taken it out. You see the 25

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1	continued reductions in the total nonfirm load
2	program.
3	In summary, we believe the FPC plan is
4	suitable based upon exceeding the 15% minimum reserve
5	margin criteria and the loss of load probability of
6	less than .1 days per year.
7	Any additional questions?
8	MR. BALLINGER: I've got a couple questions
9	for you, and I will probably pose them to the other
10	utilities as they come up as well.
11	We saw an FPL presentation that showed the
12	number of times they utilized load management and
13	interruptible load. Are you aware of any time during
14	those instances that Florida Power Corporation was
15	selling power outside of the state?
16	MR. CRISP: If power was Florida Power
17	Corp. was selling outside of the state, it was a
18	function of a long-term contract or a term contract
19	that was made on the basis of 15% reserve margin
20	criteria or above.
21	Now, the contract could very well have been
22	made to bring down or create the best possible
23	economics by bringing down reserve margins to 15% and
24	then something happened during that period of time
25	where the sale was actually being executed on a

day-to-day basis. And then you could have gone back 1 in and used load management to satisfy a criteria 2 3 where you lost a plant, but you continued your wholesale contract outside of the state. 4 5 MR. BALLINGER: Okay. And the converse of that, are you aware of any instances where Florida 6 7 Power was interrupting its interruptible customers or load management, sought to buy from other utilities 8 within the state and they were selling outside the 9 10 state? In other words, it was unavailable and that forced you to interrupt your interruptible customers? 11 MR. CRISP: Come again. 12 MR. BALLINGER: Are you aware of any 13 instances where Florida Power was in a situation where 14 they were getting ready to interrupt their 15 interruptible customers, looked around within Florida 16 for power, and it was unavailable because other 17 utilities were selling outside the state? 18 MR. CRISP: I'm not aware of that situation. 19 MR. BALLINGER: Okay. Thank you. 20 MR. CRISP: Any additional questions? 21 22 MR. HAFF: Mr. Wright. Behind you. 23 MR. WRIGHT: I have a similar question to the one I asked Mr. Sim. 24 25 MR. HAFF: Turn your microphone on, please.

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1	MR. WRIGHT: This is Schef Wright
2	representing Duke/New Smyrna. I have a similar
3	question to the one I asked Dr. Sim. That is, do you
4	have a number of megawatts of operational measures
5	that FPC uses in its planning that would be comparable
6	to the 3,800 that FRCC uses, or as Dr. Sim put it,
7	FPC's contribution to that 3,800 megawatts?
8	MR. CRISP: Those under items are under
9	consideration right now by FPC. I'll have to get back
10	with you on that one.
11	MR. WRIGHT: You don't have a number today?
12	MR. CRISP: No, I don't.
13	MR. WRIGHT: Okay. Thank you.
14	MR. CRISP: Any additional questions? Thank
15	you.
16	MR. HAFF: Okay. Next we're going to hear
17	from a presentation by Gulf Power Company.
18	MR. MARLAR: My name is Mike Marlar. I'm
19	the chief forecaster for Gulf Power Company. I'll be
20	addressing the forecast related questions, and my
21	colleague, Mr. Pope, will address the resource plan.
22	This is our '99 Ten Year Site Plan of our
23	summer peak demand projections. Historically over the
24	last ten years we have experienced a 2.7% compound
25	average annual growth rate of summer peak demand and

our projected demand growth with the impact of 1 conservation programs is at 1.4%. Historically it 2 would have been 3% absent such programs, and our 3 projected growth would be 2% absent such programs. 4 The winter peak demand forecast is a little 5 more volatile. Historically, and this is an 6 end-point-to-end-point calculation of 0.9% compound 7 average annual growth rate. That's 9 more than 8 normalized. The projected growth rate is 2.9% under 9 normal weather conditions. Historically absent are 10 our conservation programs and we would have 11 experienced 1.3% and a 3.7% projected growth rate. 12 Our annual net energy for load projections 13 indicate historical growth rate of 2.4% without 14 2% projected -- excuse me -conservation programs. 15 with our conservation programs. And without those 16 programs we would have seen a 2.5 historical growth 17 and a 2.1% projected growth rate. 18 This concludes my forecast presentation. Ιf 19 there is any questions I'd be happy to address them. 20 COMMISSIONER DEASON: One quick question. 21 MR. MARLAR: Yes, sir. 22 COMMISSIONER DEASON: Why the decline in the 23 growth rate of summer peak demand? 24 MR. MARLAR: You talking about the '99 Ten 25

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1	Year Site Plan projection, the 1.4%
2	COMMISSIONER DEASON: Yes.
3	MR. MARLAR: versus 2.7 historical?
4	COMMISSIONER DEASON: Yes.
5	MR. MARLAR: Well, that's primarily due to
6	impacts of our conservation programs in the
7	residential sector. We're coming out with a new
8	program that will significantly impact a lot of the
9	energy consumption and the demand as well, and we also
10	have a significant demand reductions that we were able
11	to achieve under a realtime pricing program.
12	COMMISSIONER DEASON: Is your realtime
13	pricing part of DSM?
14	MR. MARLAR: Yes, sir. It's part of our
15	demand reduction programs.
16	COMMISSIONER DEASON: Well, then even if
17	you're comparing if you compare your projections
18	then without DSM you're still going from a 3% to a 2%.
19	MR. MARLAR: Yes, sir, and those projections
20	without DSM reflect some of the national standards and
21	improvements and supply sufficiencies and things of
22	that nature, and increases saturation of higher
23	efficient heat pumps. Those percentages, the 3% and
24	2%, reflects things that are absent our efforts that
25	would occur. Any further questions?

1	MR. POPE: I'd like to briefly go over
2	I'm Bill Pope with Gulf Power Company. Briefly go
3	over our basic key assumptions. Mike's already
4	covered the 1999 load forecast and we used as candid a
5	technology for our plan, the combined cycles and the
6	combustion turbines for the F class which is your
7	nominal 180 megawatt combustion turbines, and we
8	continued to put in a conventional pulverized coal
9	unit which is important when you consider fuel price
10	sensitivities in our plan.
11	Our fuel came from our 1999 budget year fuel
12	panel. That fuel panel convenes in June of every
13	year, so they actually met over a year ago.
14	Reserve margin for the Southern Electric
15	System is 13.5% planning reserve margin, which is
16	three years out and beyond. Our mixed technology that
17	we use is PROVIEW. We used to use another mixed
18	program, but it has long since been replaced by
19	PROVIEW, a better model.
20	Each go around of the mix process identifies
21	megawatts of needs in 300 megawatt blocks for all of
22	the Southern Electric System. As a Southern System as
23	a whole, these are allocated back to the operating
24	companies of which Gulf is one, and then the
25	individual operating company makes a selection based

on what best suits their needs from an economic
 standpoint. So there's another process that goes into
 the Southern Electric System resource plan where we
 get to select what is best for us.

5 We also go through a market test for our 6 selection, our resource selection, which we've done 7 recently and have been approved on our need 8 determination back in June.

9 And what that plan revealed in our Ten Year Site Plan for 1999 through the planning horizon, the 10 first column being the year, of course, and then the 11 summer peak demand which is what we planned to. Where 12 our starting capacity resources are is the next 13 column. Then we have power purchases. Next column, 14 capacity additions, which is actually machines on the 15 ground. And ending capacity, which we can calculate 16 17 our percent reserve margin.

And this particular reserve margin is Gulf Power Company's individual reserve margin, which contributes to the Southern Electric System reserve margin of 13.5% target.

You'll see that Gulf falls below the 13.5% percent reserve margin until 2002 where our contracts -- our firm contracts expire and we add a 574 megawatt combined cycle unit. That brings our

1	reserves to 19%, 19.1% above the 13% on until we get
2	to the year 2006.
3	In 2007 we've got a repowering of one
4	three of our plants in Pensacola. Brings our reserve
5	margin above 13.5% again.
6	MR. FLOYD: Bill, this is Roland Floyd of
7	the Staff. Just to put it on a table so to speak, I
8	know Southern Company has lowered their standard, I
9	guess you'd say, as far as reserve margin goes from 15
10	to 13.5. You know we've been going over that same
11	type question with Peninsular Florida and we'll also
12	be looking at it, you know, from Gulf's standpoint,
13	its relationship with Southern Company, too. So
14	it's I mean, I didn't want that to slip by.
15	Also, we have forecasting people who will be
16	looking at this. The point that Commissioner Deason
17	pointed out about the change in the load forecast
18	where the future looks like has declined for other
19	reasons, whether it's national standards or whatever
20	is out there and we haven't completed the analysis of
21	the plans yet and don't have a specific question to
22	ask you right now. I just wanted to kind of put that
23	out there that we are looking at Gulf as well as the
24	Peninsular Florida.
25	If you want to say anything about how the

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1	why you went from 15% to 13.5%, that would be you
2	can you might want to tell us why you did that.
3	MR. POPE: Roland, without getting into a
4	whole lot of detail, and to summarize that, we have
5	performed reliability studies from time to time and we
6	did an update back in March of 1977. And considering
7	factors at that time which drive our need to or our
8	selection of reserve margin, it was appropriate at
9	that time to select 13.5% from an economic standpoint
10	as a minimum target. That's not to say that we can't
11	have more than that as reserves, but our planning
12	reserve target is 13.5%.
13	And as mentioned earlier this year, we're
14	continuing to evaluate that in looking at current
15	trends and market price which will drive that curve
16	one way or another. So we're still looking at that.
17	Indications are with what happened in the summer of
18	1998, the 13.5% from an economic and reliability
19	standpoint, may not be appropriate, but we have not
20	reached a conclusion at this time. So that in a
21	nutshell.
22	One of the other differences, I believe,
23	between Peninsular Florida and we're not a party a
24	direct interested party in that, but we are monitoring
25	that. One of the differences, we have more tie-line

assistance to rely on than Peninsular Florida and 1 that's one of the things. We can kind of look at our 2 reliability a little differently. And you're going to 3 continue to study it, right? 4 MR. FLOYD: Yep. 5 COMMISSIONER JACOBS: Can I ask a question? 6 Looking at the year 2001, that looks like you have 7 about 22 megawatts. I suspect that -- you could lose 8 pretty much any one -- any plant in that fleet and 9 that would cause you to have problems there? 1.0 MR. POPE: It would make our reserves --11 actual operating reserves at the time drop to a 12 negative number; I believe a negative number. But, as 13 14 part of the operating -- the Southern operating system, Southern Electric System, a lot of our year to 15 year operating dependence is on the Southern Electric 16 pool, and dropping one of our units is in our planning 17 criteria and we're still solvent. We're not going to 18 lose firm load because of that. 19 COMMISSIONER JACOBS: Okay. 20 COMMISSIONER DEASON: Your column entitled 21 Power Purchases, is that the Southern System pool? 22 MR. POPE: No, sir. Those are outside the 23 Southern Electric System pool. Those are firm 24 contracts outside Southern. 25

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1	COMMISSIONER DEASON: So those are your
2	wholesale contracts?
3	MR. POPE: These are yes. Firm purchases
4	from outside utilities. These are the ones that we
5	know at this time to be firm. We are looking at now
6	next year, just for next summer, to see if there's
7	anything we need to supplement that with, but these
8	are the firm ones that we have in place long-term,
9	more than a year out.
10	COMMISSIONER DEASON: How do you factor in
11	your wholesale contract with Florida Public Utilities?
12	Do you get a demand forecast from them and factor that
13	into your wholesale requirements or how is that done?
14	MR. POPE: Yes, we do. That's what we do,
15	as well as delivery points for Alabama Electric Corp.
16	Okay. I've got one other slide. We were
17	asked to put up a history of reserves and I guess of
18	note here is the year 1995 and 1997 where our actual
19	operating reserves at the time of summer peak were
20	negative. This just highlights once again our
21	reliance, our ability to rely on the Southern Electric
22	System for meeting firm demand.
23	CHAIRMAN GARCIA: Let me ask you. Are just
24	the realities of the Southern System so much
25	different? I mean, do you have larger margins than

1	the rest of the Southern System? Is that why you
2	don't need to worry about them in your
3	MR. POPE: Besides the Southern, this is one
4	of the benefits that Gulf derives from being a member
5	of a large system is that a lot of things can happen
6	to Gulf or other units on the Southern Electric System
7	and because of size and resources we can pretty well
8	just
9	CHAIRMAN GARCIA: Find it.
10	MR. POPE: Yes. It's a benefit for being in
11	the pool.
12	And other than that, as you can see, our
13	reserves and our reliance on Southern make our plan
14	suitable and economical as we've demonstrated in the
15	recent need determination. And I'll answer any
16	questions if anybody's got any.
17	MR. HAFF: I'd just like to request that if
18	we can get a copy of these slides, a copy of those.
19	MR. POPE: I apologize, Michael. And I will
20	send a copy. As you know, I was out of town last
21	week.
22	MR. HAFF: That's right. Any questions for
23	Gulf Power? Like to thank you we're going to
24	continue on with TECO, but I'd like to take this point
25	to announce, I guess we're going to be

Mr. Chairman, we'll be finishing up today about 4:00. 1 I'd appreciate everyone's brevity in their 2 presentations and I'd like to get everyone in today, 3 but just keep that 4:00 time in mind when you're 4 presenting. 5 MR. WARD: Good afternoon. My name is Mark 6 I'm representing Tampa Electric and I'll be 7 Ward. reviewing our '99 Ten Year Site Plan, as well as a 8 brief overview of our 2000 plan that we're currently 9 10 wrapping up. Real quickly, this is the outline that I'll 11 be addressing today and I'll hit each one of these 12 points as I go through my presentation. 13 I'd first like to talk about our projected 14 demand forecast. This is our '99 Ten Year Site Plan 15 16 forecast. We are looking at about a 2.8% average annual growth rate for the summer. Roughly 2.9 for --17 2.9 for the summer and 2.8 for the winter. 18 excuse me. 19 And it equals about 100 megawatts per season in firm demand growth. Our projected 2000 plan also has a 20 forecast very similar to this. 21 Next slide is a comparison and overview of 22 our '99 Ten Year Resource Plan, as well as our 2000 23 Ten Year Resource Plan. We've added a unit and a 24 purchase in our 2000 plan and this is due to the 25

additional reserve margin criteria that we're adopting 1 2 as part of our planning next year. It's a 7% minimum supply side reserve margin for the summer and that 3 4 requires us to add an additional CT as well as a 90 5 megawatt purchase. Also like to point out that 2005 we're going 6 7 to be building out our Polk site. The site is currently permitted for 1,150 megawatts. 8 9 MR. BALLINGER: Mark, I'm sorry. MR. WARD: Yes. 10 MR. BALLINGER: Go ahead. 11 MR. WARD: The CTs that we're proposing to 12 build are also dual fuel, gas and oil. 13 MR. BALLINGER: You mentioned that you gave 14 us a preview to the 2000 plan. Does this reflect the 15 recent option that TECO exercised with the Hardee 16 Power Station? 17 MR. WARD: Yes, it does. 18 MR. BALLINGER: I have that build out. 19 And 20 that's from -- I understand from the letter I saw from Mr. Hernandez, that's due in service year 2000? 21 MR. WARD: Yes, it is. Summer of 2000. 22 MR. BALLINGER: And have they started 23 construction on that? 24 MR. WARD: Yes, they have. 25

MR. BALLINGER: Okay. If I understand it 1 that's going to be -- you have a -- it will be owned 2 by Hardee Power Partners. I think that's their name. 3 MR. WARD: Yes. 4 MR. BALLINGER: So they have a purchase 5 6 agreement with TECO. 7 MR. WARD: Yes. MR. BALLINGER: And that hasn't come before 8 the Commission yet for cost recovery approval? 9 MR. WARD: That's correct. 10 MR. BALLINGER: Okay. 11 MR. WARD: Real quickly, I'd like to just 12 compare our criteria. '99 we had a 15% minimum firm 13 reserve margin criteria, as well as a 1% EUE per net 14 energy for load. We've gone to a year round 15% firm 15 reserve margin criteria for summer and winter, as well 16 as the 7% minimum supply side reserve margin for the 17 18 summer. MR. FLOYD: Let me ask you one question 19 about this. I don't know if I ever really got a good 20 answer on this and maybe you don't know historically. 21 22 But when I first stared working here TECO had a 25% 23 reserve margin standard. A few years later they went to 20%. And now last year or year before, I don't 24 remember which, now it's down to 15%. 25

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1	MR. WARD: Yes. We went to that in the
2	summer of '96, I think. Or sorry. Fall of '96.
3	MR. FLOYD: Okay. I just wondered, without
4	getting into too much detail, if you can explain why
5	in such a short time you go from 25 to 15. I mean,
6	you got about you know, well, half almost of what
7	it used to be.
8	MR. WARD: I think we've answered that in
9	some of the interrogatories and I'd kind to like to
10	leave that to the reserve margin docket.
11	MR. FLOYD: Okay.
12	MR. WARD: Having a hard time getting this
13	slide on here. But this is a comparison of our '99
14	plan, reserve margins winter versus what we're
15	proposing in 2000. The bottom part of each bar is the
16	nonfirm load contribution to reserves. The top
17	portion is the supply side contribution. You can see
18	an increase in our supply side reserves with our
19	proposed 2000 plan.
20	MR. BALLINGER: Mark, one more question.
21	I'm sorry. Now, TECO hasn't filed a revised Ten Year
22	Site Plan.
23	MR. WARD: That's correct.
24	MR. BALLINGER: So Staff is still reviewing
25	and our comments will be focused on the '99 plan as

1	filed.
2	MR. WARD: All right.
3	MR. BALLINGER: Which would be the top graph
4	you've got there.
5	MR. WARD: Okay.
6	MR. BALLINGER: Is that
7	MR. WARD: That's fine.
8	MR. BALLINGER: Okay.
9	MR. WARD: Again, this is a comparison of
10	the '99 Ten Year Site Plan for the summer reserve
11	margins as well as our proposed 2000 resource plan.
12	Same as the previous chart, we have on the bottom part
13	of the bar the nonfirm load contribution, and the top
14	part is our supply side.
15	To address the question about demands
16	dealing with temperature extremes, Tampa Electric went
17	back and looked at 50 years of data in the Tampa
18	region; those temperatures occurring at the time of
19	our winter and summer peaks. And then we calculated a
20	reserve margin based on those loads and that's what
21	we're showing here.
22	MR. BALLINGER: So if I understand this
23	correctly, if it got to 25 degrees, I guess, in
24	Tampa
25	MR. WARD: Yes.

11	
1	MR. BALLINGER: you'd have about a 4%
2	reserve margin maybe?
3	MR. WARD: That's a 4% reserve margin
4	without operational measures.
5	MR. BALLINGER: Okay. Basically, it could
6	get down to 20%. Then you wouldn't lose any firm load
7	and wouldn't have to use voltage reduction or SCRAM or
8	anything like that?
9	MR. WARD: Ask that question again, Tom.
10	MR. BALLINGER: If it got down to
11	20 degrees, to me it looks like you still have some
12	reserve, and you're saying you could serve that and
13	not institute operational things such as
14	MR. WARD: No. We would have to do that.
15	This is assuming that we would have 100% availability
16	of our supply side resources. So I would expect we'd
17	have to institute some operational measures.
18	MR. BALLINGER: Okay.
19	MR. WARD: This is our projected our
20	historical and projected nonfirm load. It includes
21	interruptible and load management contributions.
22	These are what we count in our reserves. It's fairly
23	flat through time.
24	We wanted to try to address the correlation
25	between reserve margin and load controls. What I'm

1	using as a proxy today is EUE, which is unserved
2	energy, expected unserved energy.
3	Tampa Electric believes that it's a very
4	difficult thing to do because of the multiple
5	variables that affect the relationship that either
6	any of those variables that you see in the dark purple
7	could affect the correlation between reserve margin
8	and EUE.
9	For instance, you could have relatively low
10	reserves, very high unit availability and not
11	institute controls or vice versa. And that's just one
12	variable that would affect that. You have unit size,
13	number of units and unplanned outages as well.
14	The items in the center there in the shaded
15	box, those are the items that are in common with both
16	expected unserved energy reserve margins. Any
17	questions?
18	MR. BALLINGER: I will ask the same question
19	I asked the FPC presenter. Are you aware over the
20	last couple of years any time that TECO has been in a
21	position, they were getting ready to interrupt their
22	interruptible customers and looked for power from
23	other Florida utilities, but found it unavailable
24	because it was being sold out of state?
25	MR. WARD: Not to my knowledge.

MR. BALLINGER: Okay. I'd like to ask a 1 favor, I guess, of TECO and Florida Power and Florida 2 3 Power & Light. If you all could get together and look at instances you did this and corroborate those 4 5 responses to see if, in fact, this ever happened and get back to Staff with that. 6 7 MR. WARD: We will. Thank you. MR. HAFF: Question, Mr. Wright? 8 COMMISSIONER CLARK: Would Staff refresh my 9 10 memory on the basis on which customers get interrupted, because we changed it. At one time it 11 12 was that you could get --MR. BALLINGER: As a priority? 13 COMMISSIONER CLARK: Right. You get 14 15 interrupted if power is needed to firm customers on another utility's --16 MR. BALLINGER: Yes. That's correct. 17 COMMISSIONER CLARK: For their firm 18 19 customers. 20 MR. BALLINGER: Our rules read now, and I 21 think all the tariffs are corrected, that if a company 22 needs power to serve its firm load, another company 23 must interrupt its nonfirm load to serve that load. 24 COMMISSIONER CLARK: Okay. 25 MR. BALLINGER: In other words, to help out;

1	to use it as an actual generator. But you're correct
2	in that.
3	CHAIRMAN GARCIA: So that shouldn't be
4	happening.
5	MR. BALLINGER: Well, it depends on the
6	timing, I think, as Florida Power mentioned or other
7	people, of when that contract was signed. It may have
8	been a long-term contract signed a month or two ago
9	and then you get into the situation; well, you've got
10	a firm wholesale agreement. You've got to oblige by
11	it. But then we get a heat wave come down here,
12	you're stuck with operating reserves. But that's a
13	firm commitment you made a couple months ago maybe.
14	We're not sure if that's the situation or if it's a
15	nonfirm transaction going on.
16	MR. HAFF: Mr. Wright, did you have a
17	question?
18	MR. WRIGHT: Yes, Mr. Haff, thank you.
19	Mr. Ward, I have a couple of questions about
20	operational measures like I asked FPL and FPC's
21	representatives. Do you have a number of megawatts
22	that Tampa Electric uses as operational measures
23	analogous to those represented by Dr. Sim for FPL?
24	MR. WARD: I believe what we provided FPL in
25	that analysis was 70 megawatts and that was tied to

1 voltage control. MR. WRIGHT: Okay. And as far as you know 2 is that all then? 3 MR. WARD: That is all I'm aware of. 4 MR. WRIGHT: Okay. Did you all implement 5 voltage control either in June of 1998 during the hot 6 spell or during the constrained event you had in April 7 of this year? 8 MR. WARD: I can't answer that. I don't 9 know. 10 MR. WRIGHT: Thank you. 11 **COMMISSIONER CLARK:** I have a question. Ι 12 don't know if you can clarify it or Staff. Is there 13 an obligation on the part of a utility that has 14 capacity, to sell that capacity to another utility so 15 16 that they do not interrupt their demand side management customers? Are they obligated to sell it? 17 MR. BALLINGER: Are you asking me? 18 COMMISSIONER CLARK: I don't care who 19 answers it really. 20 MR. BALLINGER: My view of it is, if they 21 have it yes, they have to. But if they prearranged a 22 sale, let's say --23 2.4 COMMISSIONER CLARK: Why are they -- do the tariffs obligate them to do that? Do you know if you 25

1	
1	are obligated to sell power to a sister company to
2	avoid them interrupting their demand side management
3	customers?
4	MR. WARD: Only if it's a firm contract.
5	MR. BALLINGER: Right. I don't think
6	they're obligated for nonfirm for buy-through, that
7	type of thing.
8	COMMISSIONER CLARK: And it would be
9	appropriate that they would not be if it's supposed to
10	act like a generating unit, right?
11	MR. BALLINGER: Correct.
12	COMMISSIONER CLARK: Okay.
13	MR. HAFF: Are there any more questions for
14	Tampa Electric?
15	All right. Next we'll here from the munis.
16	FMPA is next and we're coming up on 3:00. We need to
17	wrap it up by 4:00, so make brief presentations or if
18	you just want to answer questions, I guess, that would
19	be fine. Yeah, Rick, that's for you too.
20	MR. CASEY: That extends to me as well?
21	MR. HAFF: Yes. Trying to move this along.
22	MR. CASEY: Rick Casey with FMPA. I will be
23	as brief as I can. Let me switch gears here. Just to
24	give you an idea, we've got currently 28 members as of
25	last Friday. City of Quincy joined FMPA as a member

1	and so we have representatives all over the state.
2	We're organized a little bit differently.
3	We're a wholesale power supplier. I apologize for the
4	slide. We've got five power supply projects. The
5	St. Lucie project has a partial ownership in the FPL.
6	We've got 15 members that participate in that project.
7	Stanton project we have 64 megawatts out of
8	the OUC Stanton 1 Unit of which six members are
9	participating in that project.
10	Tri-City, again, is in OUC Stanton 1 coal
11	power plant. Three separate members have participated
12	in that project.
13	Stanton II, 100 megawatts of that in the
14	OUC. Seven members participate there.
15	All-requirements project is where we spend
16	most of our time. Pardon me. We have ten members now
17	of that project. We supply all their power supply
18	needs and that's where I spend most of my time
19	planning.
20	We anticipate the City of Lakeworth coming
21	in in the next year or so and so we may instead have
22	11 members there in the not too distant future.
23	MR. HAFF: Rick, is the light coming through
24	the bottom of that projector or is it coming through
25	the top?

1	MR. CASEY: That's the top. I want to try
2	that one.
3	MR. HAFF: Turn the bottom on only.
4	MR. CASEY: Thank you. Just as a matter of
5	information, the ten cities had hit had a new peak
6	this summer. We were anticipating a peak of 940
7	megawatts. They instead hit 900 megawatts on August
8	2nd of this year which is over 4% higher than we
9	expected.
10	The only significant change in this year's
11	Ten Year Site Plan compared to last year is that our
12	2000 summer peak is higher than last year's projection
13	of 2.6%.
14	Let me go ahead and cut through some of the
15	other slides and just show you some of our historical
16	reserve margins.
17	This is our historical summer peak reserve
18	margins. As actually experienced, as you can see, up
19	until about two years ago we were planning for about
20	20% reserves and we were close to that in most cases
21	on an actual basis. Got a little higher in '96 and
22	'97 but that's what we experienced on an actual basis
23	in the summer.
24	Winter peaks being a little more spiky, not
25	too prolonged are a little more difficult to project

but here's what we look like historically on our winter peaks. They can get real high and they can be real low when it gets real cold, so that's what that looks like.

5 On a planning basis we now plan for a 20% 6 summer -- 18% summer reserve margin and a 15% winter 7 reserve margin and we have a little excess in next 8 year but coming down if things go as planned.

9 In terms of anticipated, what we can and 10 can't serve in the future winters, we don't have a lot 11 of history to go back and look at. The project was 12 formed in May of '86. We did experience the December 13 of '89 winter peak and we did serve all of our load 14 that particular winter. Didn't have any fuel 15 rotations or blackouts.

We don't have any formal studies to try to anticipate what we could or couldn't serve, but in view of the fact that we did serve our load in one of the most extreme winters that's been experienced we feel fairly confident that we can probably do so again should that occur.

And in terms of nonfirm load we don't have any except to speak of two of the cities, Ocala and Leesburg, do have residential load management and right now in the summer that represents about four

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1	megawatts and in the winter six, and we expect that to
2	grow a little bit by 2008 to five in the summer and
3	nine megawatts in the winter. We don't operate it
4	real frequently, only infrequently, and as needed for
5	state capacity emergencies.
6	Any questions?
7	MR. HAFF: Any questions for FMPA? I'd like
8	to thank you for your brevity in your presentation.
9	Next let's hear from Gainesville Regional
10	Utilities if they have a presentation.
11	MR. KAMHOOT: My name is Todd Kamhoot. I've
12	put together a very short handout that addresses
13	basically the questions in Staff's outline.
14	First, I'd like to show a table, and this is
15	going to be hard to see on the overhead. Your handout
16	will be easier. These are our generating resources.
17	And our current system total is 550 megawatts.
18	Next fall we are planning to repower our
19	Kelly Unit 8 from a 50 megawatt steam unit to a 110
20	megawatt combined cycle, so we'll have a new net 60
21	megawatts for a total of 610. We expect that to be in
22	service for the winter peak of 2001.
23	The table and graph on the next page show
24	our capacity and demand at time of winter peak. You
25	can probably surmise from this graph that GRU is a

summer peaking utility and we have a good bit of 1 excess capacity in the winter time. The dark line at 2 3 the top represents available capacity and the bars represent our peak demand plus 15%. 4 5 There's a similar table and graph, the fourth page of your handout, for our summer peak 6 7 demand. Try to hit some of the high points. 8 Staff has identified some historical dates in which extreme 9 10 winter weather contributed to extraordinary high winter loads. I selected what I viewed a worst case 11 12 example to discuss today, and on Page 10 of Staff's handout, if you refer to that, I selected the 13 January 21, 1985 date. 14 You can see on there for Jacksonville it was 15 16 7 degrees Fahrenheit. It was about 10 degrees in Gainesville at that time and that happened to be a 17 date that we experienced the highest winter demand per 18 customer that we ever have. On that date we had a 253 19 megawatt peak. 20 21 The following day the temperature increased a little bit and our peak increased as well. 22 So it leads that there are probably some factors beyond 23 24 temperature that are contributing to the peak. The 255 megawatt peak on January 22nd was 25

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1 31% higher than 1984's Ten Year Site Plan's forecast.
2 So what I did for this example was apply that forecast
3 error to the winter peak of 2000/2001 because we would
4 have a lower reserve margin in that year than we would
5 this coming winter. And with all available capacity,
6 GRU would still expect to have a reserve margin of 39%
7 under that scenario.

8 If our repower of Kelly Unit 8 is not 9 complete and neither the original steam unit nor the 10 new combined cycle are available, we would still have 11 a reserve margin of approximately 14% so we would 12 still be able to meet a winter demand under a scenario 13 such as one where our peak exceeded forecast by 31%.

GRU has curtailable load agreements with two customers for a total of approximately two megawatts. These are new agreements we just entered into this year. Verification testing was conducted this summer. These were discussed in the interrogatories in more detail.

And in response to Staff's question, curtailment alone in this situation is not necessarily correlated to GRUs reserve margin because there is adequate capacity without curtailment. However, curtailment of load is valuable to us for other reasons. For example, this summer it helped relieve a

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heavily loaded circuit. 1 That's pretty much all I have in the way of 2 a presentation, if anyone has any questions. 3 MR. HAFF: Any questions for Gainesville 4 Regional Utilities? Thank you. 5 Next presentation is from Jacksonville 6 Electric Authority if they're here. 7 MR. BOSWELL: I'll be brief, Michael. Randy 8 Boswell. And I'll correct you. It is no longer 9 Jacksonville Electric Authority. It is officially 10 JEA. We changed our name. 11 MR. HAFF: Okay. 12 MR. BOSWELL: I'll use about five slides out 13 of the package and you can ask questions. 14 There's our current capacity, 2,700 15 16 megawatts. We have a one firm sale and a couple of purchases that are included in that number. 17 Just quickly, our forecast demand and energy 18 growth rates are exceeding 3% for summer, winter and 19 20 energy which was fairly aggressive, but it mirrors the Jacksonville economy. 21 Our expansion plan, as listed in our Ten 22 Year Site Plan, you'll see first we do have some 23 seasonal purchases in the near term until our capacity 24 gets built for 2000, 2002, 2008. In 2000 we add our 25

1 first combustion turbine. Three more units in 2001, 2 and one unit in 2007. The first four turbines are 3 purchased. One has been delivered. The other three 4 are on order and in the pipeline.

5 As part of our plan we are shutting down 6 some oil-fired units; replacing them with the turbine 7 gas capacity.

8 Part of our plan includes repowering 9 Northside 1 and 2 which are large steam turbines 10 currently. They will be repowered with petroleum coke 11 fuel at our Northside power plant, but we will lower 12 emissions out of that plant site in that effort.

Going to skip a couple of pages in the 13 interest of time and go to our nonfirm load. We do 14 have some nonfirm resources. These are our 15 16 interruptible curtailment contract amounts by year. We purposefully limited the amount of interruptible on 17 18 our system. Less than 50% of the reserves we carry 19 are in interruptibles. One customer accounts for 20 about 50 megawatts of that. It's a steel mill and current practice is the rate has a two rate option. 21 When we're in a high cost day, they get price signal. 22 They typically self-interrupt. They self-interrupted 23 numerous times this summer on price, and they're 24 happy. 25

1	You had some questions on on-site generation
2	and so forth and the data is in the pack. There it
3	is. Notice provisions on the interruptible are a
4	three year notice or enter into a five year contract.
5	We do not use it as spinning or supplemental. And
6	we've only experienced one interruption to date, and
7	there was when there was an airplane crashed into 500
8	lines in Florida and reduced the total import into the
9	state. That's been our only interruption.
10	I think that covers all I intended to say
11	and I will entertain questions.
12	COMMISSIONER JACOBS: On your '98 reserve,
13	it was fairly thin, and coming into your projections,
14	what's going to be the major factor in turning that
15	around?
16	MR. BOSWELL: I'm sorry. On our '98
17	reserves?
18	COMMISSIONER JACOBS: Yes. I'm on it
19	doesn't have a page. It's the table that has all the
20	reserve margins here.
21	MR. BOSWELL: Talking about this table?
22	COMMISSIONER JACOBS: Yes.
23	MR. BOSWELL: Those are actual experience
24	numbers, not planning numbers. And that was requested
25	by Staff.
ļ	

COMMISSIONER JACOBS: Okay. And what 1 accounts for the projection for '99 going from a 2 negative 11 to 15%. 3 MR. BOSWELL: Well, it's easier to say what 4 happened in '98. We had a large unit trip at time of 5 summer peak and that gave you the negative number. 6 That's what our reserves are for, to account for that, 7 and we certainly had no problem, but our projections 8 are 15% or higher moving forward. 9 COMMISSIONER JACOBS: Okay. 10 MR. HAFF: Since you brought this rain with 11 you, would you take it home with you? 12 MR. BOSWELL: I sure will. 13 MR. HAFF: Thanks. 14 Next presentation on the list is Kissimmee 15 Utility Authority. Are they still here? 16 I'm Myron Rollins. Robert MR. ROLLINS: 17 Miller had to leave for some PROSIM training this 18 afternoon so he asked if I would make the presentation 19 for him. He left me an hour's worth of slides, I 20 think, but I can pick two or three of them out. But I 21 think I can summarize it pretty quickly. 22 Kissimmee uses a 15% reserve margin. As a 23 comment, I think we might be making too much out of a 24 strict analytical application of reserve margins. The 25

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1	important thing is the reliability of the system and
2	whatever it takes to provide accurate reliability.
3	They need capacity in 2001 which would be
4	met by Cane Island 3, and they will need some more
5	capacity by 2004.
6	I looked at the issue of what would happen
7	on the cold days in our system, and it will be nip and
8	tuck if they would be able to serve all their loads
9	and we don't really have they don't really have the
10	data to do a detail model to try to do that.
11	But a couple of things that nobody's
12	mentioned about that is, especially when it gets cold,
13	all the combustion turbine capacity in the state will
14	produce quite a few more megawatts than is in the
15	winter capacity ratings. And also load management,
16	which Kissimmee has about 12 megawatts of currently,
17	you'll get a lot more load reduction from your load
18	management than you will out of a normal winter
19	situation.
20	And I've got plenty of slides if anybody has
21	any questions, but since we're trying to run short on
22	time, I'll quit.
23	COMMISSIONER DEASON: Can you explain to me
24	what you mean by the fact that there's going to be
25	capacity for combustion turbines which are not

1	accounted for on an extremely cold day?
2	MR. ROLLINS: Right. In general, the colder
3	it gets, the more output you'll get from combustion
4	turbines.
5	COMMISSIONER DEASON: Oh, you're talking
6	about the efficiency of the plant?
7	MR. ROLLINS: Right. The plant will put out
8	more so people will rate their turbines at a standard,
9	you know, winter temperature or whatever probably, and
10	then on these very severe days it will be colder than
11	that and there will be more output come out of those
12	units than what is shown on the capacity tables.
13	Thank you.
14	MR. HAFF: Thank you, Myron.
15	Next I have the City of Lakeland with a
16	presentation.
17	MR. ELWING: Good afternoon, Commissioners.
18	Paul Elwing representing the City of Lakeland
19	Electric. I'll try and keep my presentation very
20	brief in the interest of time.
21	Just a few highlights on the load
22	forecasting process. Lakeland has been gathering
23	Lakeland specific weather data; temperature, rainfall,
24	humidity data among other things, for over 25 years.
25	Supplementing that with weather service data for the

area gives us a database that stretches in excess of
 30 years.

3	We are a winter peaking utility and forecast
4	ourselves to continue being that for quite some time.
5	Over our history our average minimum temperature has
6	been 38.6 degrees in winter with standard deviation of
7	about 6 degrees. We've only had three years in the
8	past 25 to 30 years where we've been below what would
9	be about 24 degrees. Our lowest temperature at peak
10	of all time has been 19 degrees which occurred
11	Christmas of '89, and we're currently using 15%
12	reserve margin with a 30 degree minimum temperature
13	for winter for our planning purposes.
14	Just real quickly. Lakeland continues to
15	maintain its efforts in DSM and conservation. On the
16	residential side we have our SMART load management
17	program, along with loans for thermal efficiency
18	upgrades. On the commercial side, we've got
19	commercial lighting program, thermal energy storage
20	and high pressure sodium outdoor lighting program.
21	In an effort to address some of the Staff's
22	questions regarding nonfirm load, Lakeland does have
23	five interruptible customers that have been on tariff
24	since 1996, I believe. And they make up a total of 5
25	megawatts. However, Lakeland has never had the

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occasion to need to interrupt them. Those customers
 do have a 60 month notice in order to leave that
 tariff.

We do not have any curtailable customer as 4 5 defined by curtailable rates. Load management, we've 6 got a little over 27,000 customers. Almost all of 7 those are made up as residential. In today's numbers 8 that equates to about 52 megawatts of reduction in 9 winter; about 22 megawatts in summer, and we're 10 expecting that to grow to 63 megawatts in winter, 27 in summer by the end of the planning horizon, 2008. 11

I might note that over the past two years, we have not had to implement load management at time of summer or winter peak. We've had sufficient resources to serve all of our load. We have, however, used the program in both 1998 and 1999 calendar years. I believe '98 we used it 18 times and this calendar year we've used it 19 times for other reasons.

19 Lakeland continues to remain active in other 20 renewable programs; solar street lighting program, and 21 two other pilot programs that we're looking at; 22 distributed generation via solar thermal collectors 23 and residential photovoltaic systems.

24 MR. BALLINGER: Paul, can I interrupt real 25 quick?

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MR. ELWING: Yes. 1 MR. BALLINGER: You use DSM, you said load 2 management 19 times in '99 --3 MR. ELWING: That's correct, Tom. 4 MR. BALLINGER: -- but not at peak. What 5 6 were some of the other reasons? Did you interrupt to sell to other utilities? 7 MR. ELWING: I don't know for sure on that. 8 We did have some instances other times of the year 9 where weather was warmer than what we had expected, 10 unit tripped, and so just as a precautionary measure, 11 we implemented load management, and I know it was 12 primarily in the afternoons, warm summer days, just to 13 make sure that we were whole. 14 MR. BALLINGER: Does Lakeland have the 15 ability to use load management as a dispatchable 16 resource? And in that I mean, can you us dispatch it 17 like a unit and then make an all systems sale as long 18 as you stay within your tariff? 19 MR. ELWING: I believe we could do that 20 within the confines of our tariff. I don't know as we 21 22 do that on a regular basis, Tom. I think we have made our load management available to others when others 23 have been in trouble. 24 Just real quickly, just a little synopsis of 25

where we stand on fuel mix. I got about 205 megawatts 1 that are solid fuel, coal based. We got two small 2 diesel units that are captive to a single liquid fuel 3 No. 2 oil, and then the remainder of our capacity is 4 dual fuel capability, natural gas or oil. 5 190 megawatts of that is steam. 249 megawatts of CTs or 6 7 CCs, combined cycle. 8 I'm going to skip over the next couple 9 tables. They're just summary tables of our customers; our summer and winter demand, unless someone has a 10 specific question on those. 11 Commissioners, I'm going to jump to Page 10 12 year, again, to attempt to answer a few of the 13 questions that staff had asked for today. 14 15 Forecasted reserve margin. This is looking out over the next ten-year period. The red line is 16 15% reserve margin level which is what Lakeland has 17 been using at present. As you can see our forecasted 18 reserve margin for both summer and winter is either 19 right at or above the 15%. 20 Historical reserve margin over the past ten 21 years, again the red line, there's a 15%. We have 22 23 been above the 15% in all but one year. The winter of 24 '96 we experienced some colder than expected weather. 25 I think we had temperatures in the 25, 26 degree range

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1	and so our reserves dipped down below 10%. However,
2	all of the load was served.
3	I'm going to jump ahead again here for
4	time's sake. Jump to Page 16. The other pages in
5	between are just some updates; where we are with
6	current capacity projects. I think they are fairly
7	self-explanatory.
8	Page 16, here again, attempts to answer some
9	of Staff's questions. What would our load look like
10	had we had temperatures, weather conditions based on a
11	specific set of dates. The legend is over there on
12	the right-hand side with the different dates. The red
13	line on top is where our available capacity is based
14	on our current plan. And so even if we experience
15	weather based on those historical dates, forecasted to
16	the '99/2000 winter peak, we have sufficient capacity
17	to serve all of that load.
18	Page 17 is just the extension of that,
19	looking at the 2002-2001 time frame. And, again, we
20	have sufficient capacity to meet those loads.
21	That's all I have, if anyone has any
22	questions.
23	MR. HAFF: Any questions for Lakeland?
24	(No response.)
25	Thank you, Paul.

1	
1	Orlando Utilities Commission is the next
2	presentation.
3	MR. BLANKNER: Good afternoon. My name is
4	Matt Blankner. I'm with the Orlando Utilities
5	Commission.
6	I apologize I don't have any handouts. I
7	will forward a copy of the overheads to you, though,
8	so you'll have those.
9	This is just a layout of the generation
10	facilities for Orlando Utilities Commission. I
11	highlight the ones in gray. Those are the steam units
12	at the Indian River plant. There's a pending
13	possibility of a sale of those units. That has not
14	been finalized so I really don't have any more
15	information on that. What I might add
16	CHAIRMAN GARCIA: It's a sale with a
17	contract with that, right? Sold with a contract for
18	OUC to purchase back
19	MR. BLANKNER: Right. There would be a
20	Purchase Power Agreement with that.
21	So that's the layout of our generation
22	facilities. And I might add, too, that there hasn't
23	been any change of that since last year so those are
24	the same.
25	This is just a review of our generation mix,
	1

our fuel mix. As you can see it's fairly well 1 diversified with coal, steam, oil and gas combustion 2 turbines and nuclear. 3 These are projections of our reserve margins 4 as we go out, and we don't foresee any problems with 5 meeting the 15% reserve margin which we do go by; the 6 red line at the bottom. 7 We don't have any generation planned out to 8 2008 right now. (Indicating) The indication of our 9 summer capacity reserve margin is to the far right. 10 And the winter capacity. 11 MR. HAFF: I have a question. A couple of 12 slides back the reserve margins where you had the duel 13 summer and winter. 14 MR. BLANKNER: Sure. 15 MR. HAFF: You're building no capacity but 16 the reserve margins seem to be ramping up over time. 17 Is that because you have firm contracts that are 18 backing down during that period? 19 MR. BLANKNER: Yes, we do. Yes. 20 I'm going to skip along to the list of 21 requested topics from the Staff. And I'd like to show 22 that based on temperatures experienced on or around 23 the different dates as indicated, that OUC basically 24 has a -- we ran a native load at low temperatures with 25

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1 different ranges.

2	At 22 degrees and below we reach a
3	saturation point with our load. We also have ranges
4	from 24 to 26 degrees and 27 to 30 degrees. And all
5	of those loads indicate in those different years,
6	especially in 2002-2001, that we're not going to have
7	any problem meeting those loads. In 1989, which was
8	the worst year we had as far as temperatures goes and
9	loads, we were able to meet all loads at that time.
10	We do not have any nonfirm load situations
11	except for one curtailable customer that's one
12	megawatt. And in the interrogatories for the reserve
13	margin we did list in there the times we've curtailed
14	that customer.
15	I don't have anything else if you have any
16	questions.
17	MR. HAFF: Any questions?
18	(No response.)
19	Okay. Thank you.
20	The next presentation is going to be the
21	City of Tallahassee.
22	MR. FRAZIER: Hello. My name is Edwin
23	Frazier. I'm with the City of Tallahassee, and here
24	with me is David Byrne. He will assist me during this
25	presentation. He's also with the City of Tallahassee.

1	And this is a brief Ten Year Site Plan presentation.
2	Okay. Here we have our demand forecast.
3	We're a summer peaking system. We use a linear
4	regression model and we include DSM impact. Our
5	winter 1999-2000 forecast is 485 megawatts and our
6	summer 2000 forecast is 522 megawatts.
7	Our projected reserve margins as shown here
8	are for the years 1999 through 2008. That's based on
9	current resources that are available. But we're
10	currently evaluating other supply-side plans for the
11	years 2006 through 2008 where you see the shortage
12	appears.
13	This is our projected winter reserve margins
14	for the same period,and as you see we have no problem,
15	even based on our current resources, of meeting the
16	15% reserve margin criteria.
17	Our projected resource requirements. We, at
18	the City of Tallahassee, actually target a reserve
19	margin of 17%. And in October '99 we're going to
20	retire two 23-megawatt steam units. And we plan on
21	having a combined cycle addition in the month, May
22	2000, Year 2000. And as I said before, we're
23	currently reviewing options for the years 2006
24	and through 2008 where we show shortfalls.
25	The issues that the Commission was concerned

with the extreme winter forecast. Our forecast model 1 The dates that the Commission is temperature driven. 2 Staff reference, our record load appeared for -- the 3 historical record low for Tallahassee was on January 4 21st, 1985, which is one of the dates that was 5 mentioned. And what we did was put the -- it was at 6 6 degrees Fahrenheit and we put that in our load 7 forecast model based on today, and we came up with a 8 forecast of 589 megawatts for the winter 1999-2000. 9 And if that was to occur, we would have existing 10 resources of 570 megawatts, which would, in turn, have 11 a deficit of 19 megawatts. And in the year 2000-2001 12 we put in the 6 degree Fahrenheit load temperature in 13 our forecast model and we came up with the demand of 14 609 megawatts and resources available, 730 megawatts 15 16 and no deficit. I just wanted to mention one 17 MR. BYRNE: Edwin indicated in the extreme 18 other thing.

19 temperature case that there might be a deficit for the 20 upcoming winter.

We do have one new unit coming on line subsequent to this winter, so the timing is a little bit behind there but this does represent a worst-case scenario. And we think if an indication of extreme cold weather like that was coming in, we have

sufficient operating actions that we can take that 1 would avoid us getting into a problem situation. And 2 if there was such a case, we would probably have to 3 consider a load-shed action if we couldn't call on 4 reserves from other utilities at that time. Also, 5 about 11 degrees is what we calculate would be the --6 kind of the break-even temperature; where we would 7 have about a 570 megawatt load. 8 MR. HAFF: Is your portion of the intertie 9 with Southern fully subscribed with firm capacity at 10 this point or during these two winter seasons? 11 MR. BYRNE: No, it's not by Tallahassee, and 12 we don't currently have any firm reservations for that 13 tie line in that period of time. 14 MR. HAFF: So that would be available at 15 16 those --MR. BYRNE: It could potentially be 17 available at that time. 18 MR. FRAZIER: Nonfirm load. We currently 19 have two interruptible customers: Florida State 20 University Magnetic Lab, which is 42 megawatts; 21 Hermitage Place, which is .63 megawatts, and we have 22 one current curtailable customer, which is Tallahassee 23 Memorial Hospital at .6 megawatts. 24

MR. BYRNE: I'll just mention that the large

25

1	interruptible customer is one that we don't include
2	towards our demand forecast. It's considered to be
3	operating during off-peak periods only. We generally
4	call them in advance if we feel like there's going to
5	be a need for them to curtail their operation. And to
6	this date we've never had on situation where we had to
7	actually interrupt them on a short notice. So we
8	basically don't consider them as part of our load.
9	The other two customers we do. Although they are a
10	small quantity, they can be interrupted but never have
11	been. And that concludes our presentation.
12	Are there any questions?
13	MR. HAFF: Any questions for the City of
14	Tallahassee?
15	(No response.)
16	Thank you. I've get two more. Hear from
17	Seminole Electric Cooperative, and following them will
18	be Duke Energy New Smyrna Beach who filed a plan this
19	year.
20	MR. ZIMMERMAN: Good afternoon. I'm Garl
21	Zimmerman from Seminole Electric Cooperative. I
22	thought I was going to have a full 20 minutes, but
23	since there's somebody else to go, I'll be brief.
24	MR. WRIGHT: You can have all my time. I
25	need one minute.

MR. ZIMMERMAN: This illustrates the history 1 and forecast of Seminole's demand and resources. 2 This 3 top line is Seminole's total peak demand; this bottom line with the -- (Adjust projection machine.) 4 We'll just have to make due with what we 5 have here. 6 7 This bottom line is Seminole's obligation. 8 The rest of the total peak load being handled by 9 partial requirements and full requirements contracts. 10 As you can see, the partial requirements contracts are 11 diminishing over time and are projected to be a very 12 small percent of Seminole's resource mix, with the 13 green area being additional resources that Seminole 14 will be adding. 15 A similar chart for winter. And this just shows that we had winter peak demand in the 16 3100-megawatt range and projected to increase over the 17 18 planning horizon to about 4200 or 4300 megawatts. 19 Historical and projected reserve margins. 20 Historically, we had some fairly high reserve margins because we were planning to -- a 1% EUE, which was the 21 driver in our planning criterion. As we've added new 22 resources and diversified some, expected unserved 23 24 energy is no longer the driving force. In the future 25 we'll be planning the 15% reserves. And we're showing

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1	to be well above that for and in the 20% range for
2	most of the planning horizon.
3	New facilities that are in our plan. We
4	have our Payne Creek combined cycle unit coming on in
5	January of 2002. That is well along with engineering
6	and ground will be broken very shortly on that
7	facility.
8	We had a couple of units in here which
9	caused a little concern, I think, with Staff, where we
10	had some CTs shown being in service by January of
11	2000. We have delayed those two CTs a year, with a
12	combination of a seasonal and year-around purchases,
13	and subsequent to that, have signed a contract to have
14	those two units in service in December of 2001 with an
15	independent power producer.
16	(Inaudible comment.)
17	MR. ZIMMERMAN: No. It's rely and energy.
18	The next four units that are shown on there,
19	we're currently in negotiations and we will fill those
20	needs probably with a combination of additional
21	purchases and/or self-build units. We should have
22	those next four units firmed up by the time we file
23	our next Ten Year Site Plan.
24	Load management and interruptible. We've
25	broken it out a little more than possibly we needed

to, but we have a certain amount of load management 1 and interruptible that's in the Florida Power 2 Corporation control area which only affects our 3 partial requirements purchases. The load management 4 and interruptible that's in the FPL control area or 5 the Seminole direct-serve area, it directly affects 6 Seminole's obligation and the amount of resources we 7 have to have. 8 And what we have shown here, the 9 interruptible is really not -- the interruptible, as 10 you may think about it, it's actually self-serve 11 diesel generation, and then the DSM is the residential 12 and light commercial DSM programs. 13 And finally, load that would be unserved --14 I need to go back the other way here. Load that would 15 be unserved on the various dates in the winter of 16 '99-2000 and 2000-2001. By 2001, with the additional 17 resources, we'll have adequate capacity to serve all 18 of the load on each of those dates. This coming 19 winter we had, for one of the occurrences, about a 3% 20 unserved demand; a couple other times where it was 21 almost in the noise level, one of them less than half 22 a percent. 23 One comment, we think that our load model is 24 overforecasting our winter peaks on those extreme low 25

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1	
1	temperatures. It appeared to have a linear
2	relationship rather than indicating the type of
3	saturation that we've seen in some of the other
4	presentations as the temperatures start to bottom out.
5	So that coupled with operating measures and the
6	ability to import from our interchange partners, we
7	would hope the amount of load that we serve that
8	would be unserved would be zero.
9	And that concludes my presentation.
10	MR. HAFF: Any questions for Seminole?
11	(No response.)
12	Thank you. Mr. Wright, I guess, next, and
13	last but not least is Duke Energy New Smyrna Beach.
14	MR. WRIGHT: Thank you. I'm Schef Wright
15	here on behalf of Duke Energy New Smyrna Beach Power
16	Company. I'll be very brief.
17	Duke's plan is to construct the 514 megawatt
18	ISO-rated New Smyrna Beach Power Project and to
19	operate it as efficiently as possible. We expect to
20	sell around 4 million megawatt-hours per year to other
21	utilities in Peninsular Florida. At the time of
22	winter and summer peaks we expect to be selling the
23	full available capacity of the unit to other utilities
24	in Peninsular Florida; that's estimated to be 548
25	megawatts winter and 476 summer. The only change from

our filed plan is that due to unanticipated delays in 1 the permitting process at the cabinet level, we're now 2 projecting an in-service date for the project of June 3 2002. Thanks. 4 MR. BALLINGER: Schef, I've got one 5 question. Did you file your plan with the FRCC? 6 MR. WRIGHT: I'm sure we sent it to them, 7 Tom. I don't --8 MR. BALLINGER: Do you know if and how they 9 incorporate it in the aggregate plan? 10 MR. WRIGHT: I don't think they did but I 11 don't know. 12 MR. BALLINGER: Okay. 13 MR. HAFF: Any comments? 14 (No response.) 15 Well, we'd like to thank you all for your 16 brevity and your comments and thank you for your 17 participation today. 18 Is there any final comments from the 19 Commission? Thank you all for coming. We'll see you 20 21 soon. (Thereupon, the hearing concluded at 22 3:50 p.m.) 23 24 25

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STATE OF FLORIDA) 1 CERTIFICATE OF REPORTERS 2 COUNTY OF LEON ) We, JOY KELLY, CSR, RPR, Chief, Bureau of 3 Reporting, Florida Public Service Commission, and 4 KIMBERLY K. BERENS, CSR, RPR, Official Commission Reporters 5 DO HEREBY CERTIFY that the Workshop was heard by the Florida Public Service Commission at the 6 time and place herein stated; it is further 7 CERTIFIED that we stenographically reported the said proceedings; that the same has been 8 transcribed by us; and that this transcript, consisting of 212 pages, constitutes a true 9 transcription of our notes of said proceedings 10 DATED this 4th day of October, 1999. 11 12 13 FPSC Chief, Bureau of Reporting 14 (850) 413-6732 15 16 17 18 BERENS, RPR FPSC Commission Reporter 19 20 21 22 23 24 25

\$	12-month 127/13	2.1% 164/18
	12.5% 14/15 13 60/21, 60/24, 62/15, 103/5	2.4% 164/14 2.5 164/17
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<sup>2</sup> 60s 125/14, 125/18, 126/4 <sup>2</sup> 70s 125/15, 126/4	121/14, 121/19, 121/21, 128/5, 128/10, 128/14, 128/18,	204/22, 209/11
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<sup>3</sup> 89 8/18, 10/14, 10/15, 14/2, 14/6, 20/18, 26/19, 27/13, 74/7, 74/10, 95/15, 95/20, 96/9, 97/2, 101/3,	175/15, 175/25, 186/6, 188/4, 193/3, 193/9, 193/23,	2001 138/25, 139/24, 142/21, 143/25, 144/2, 144/4,
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<sup>'97-98</sup> 133/5 <sup>'98</sup> 6/6, 38/20, 72/7, 73/12, 73/20, 74/5, 76/21, 92/5,	<b>16.9</b> 16/8, 16/9, 16/12, 16/17, 16/19 <b>16.9%</b> 10/3, 11/1, 16/21, 17/12, 18/19, 107/5, 111/5	2006         62/15, 157/3, 168/2, 204/11, 204/23           2007         32/18, 158/16, 168/3, 191/2
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11th 22/6 12 8/15, 99/9, 101/16, 126/10, 158/23, 194/16	<b>2,700</b> 190/15 <b>2,750</b> 149/2	<b>31</b> 77/10, 100/1 <b>31%</b> 189/1, 189/13
<b>12%</b> 66/22, 68/11, 68/20, 69/14, 69/18, 70/13	<b>2,730</b> 149/2 <b>2,800</b> 56/12	3100 129/6
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3100-megawatt 208/17 32 99/25	78 148/22	adopted 6/6, 11/8, 11/9, 71/13, 71/17, 84/4, 90/21, 122/6, 122/11, 126/6
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<b>34.</b> 5 17/2, 17/3, 152/10 <b>37</b> 16/25, 17/2, 17/3	8 89/8, 99/11, 99/12, 104/11, 187/19, 189/8	advertise 159/10
37% 35/2	8% 72/10, 76/21, 80/10, 88/3, 112/16, 157/14 8,226 13/11	advisories 40/14, 104/4, 117/12, 117/23, 120/17 advisory 103/23, 116/18, 116/24, 117/7, 117/15
<b>37.5</b> 152/9 <b>38.6</b> 196/6	8,725 32/7 8,749 10/18, 13/1	advocating 63/12 affect 25/17, 46/9, 55/20, 67/18, 143/19, 179/5,
<b>39%</b> 189/6 <b>3:00</b> 95/25, 96/19, 183/16	8.3% 23/3, 24/7, 24/15	179/7, 179/12 affected 84/18, 88/12
3:50 1/18, 212/23	80 33/7 80% 79/19, 79/24	affects 54/13, 210/3, 210/6
4	800 15/9, 15/14, 15/17, 16/17, 25/15, 31/19, 111/3 850 1/23, 1/25	afford 126/14 afternoon 95/22, 95/24, 95/25, 154/10, 173/6,
<b>4</b> 46/6, 47/11, 48/15, 49/21, 49/23, 50/19, 53/7, 53/10,	867 34/20 88 79/20	193/19, 195/17, 201/3, 207/20 afternoons 198/13
53/12, 55/8, 74/19, 104/11, 211/20		agenda 5/11, 84/2, 154/14, 157/16 aggregate 74/20, 80/24, 88/1, 98/20, 212/10
<b>4%</b> 40/25, 41/19, 178/1, 178/3, 185/8 <b>4,000</b> 114/24	9	aggregated 10/4, 23/21
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