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December 29, 2011

Ms. Ann Cole, Director
 Division of the Commission Clerk and Administrative Services
 Florida Public Service Commission
 2540 Shumard Oak Blvd.
 Tallahassee, FL 32399-0850

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 12 JAN 10 AM 9:22
 COMMISSION
 CLERK

110316-EM

Dear Ms. Cole,

Please find attached, FKEC's Emergency Operation's Plan (EOP-001-0_FKE_Emerg Ops Planning_r9_111005.docx), and as required by Rule 25-6.0185 of the Florida Administrative Code. FKEC respectfully requests the Commission Clerk to place the above referenced document in Docket No. 110316-EM. This document is very similar to what was previously filed in Docket No. 090047-EM, and contains only minor cosmetic enhancements.

Please also find attached, as required by Rule 25-6.0185 of the Florida Administrative Code, FKEC's submission of this Emergency Operations Plan to the Florida Reliability Coordinating Council (FRCC) via a screen print as posted to the FRCC secure web site.

Regards,

Dennis Minton,
 Dir of Power Supply
 & Delivery, and NERC
 Compliance, FKEC
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 Dennis.minton@fkec.com

Attachments: EOP-001-0_FKE_Emerg Ops Planning_r9_111005.docx
 EOP-001-0_111229_Emerg Ops Planning_Screen print_Screen of FRCC BA TOP posting for PSC filing.pdf

Cc: Scott Newberry, FKEC CEO
 Dennis Minton
 file

DOCUMENT NUMBER-DATE
 00182 JAN 10 2011
 FPSC-COMMISSION CLERK

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Title	Emergency Operations Planning			
Purpose	Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.			
NERC Standard EOP-001-0	Dept Assigned 56	Dept(s) Affected 56	Effective Date October 05, 2011 – rev 9	Review Period Annual or As required

1.0 Definitions:

- 1.1 Operating Emergency or Bulk Electric System (BES) Emergency - Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System.
- 1.2 Energy Emergency - A condition when a Load-Serving Entity has exhausted all other options and can no longer provide its customers' expected energy requirements. This includes insufficient generating capacity.
- 1.3 Interconnection Reliability Operating Limit (IROL) - The value (such as MW, MVar, Amperes, Frequency or Volts) derived from, or a subset of the System Operating Limits, which if exceeded, could expose a widespread area of the Bulk Electric System to instability, uncontrolled separation(s) or cascading outages.
- 1.4 System Operating Limit (SOL) - The value (such as MW, MVar, Amperes, Frequency or Volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria. These include, but are not limited to:
 - a) Facility Ratings (Applicable pre and post contingency equipment or facility ratings)
 - b) Transient Stability Ratings (Applicable pre and post contingency Stability Limits)
 - c) Voltage Stability Ratings (Applicable pre and post contingency Voltage Stability)
 - d) System Voltage Limits (Applicable pre and post contingency Voltage Limits)

2.0 Procedures:

These procedures exist to help FKEC's System Operators (SO) recognize, communicate and respond to imminent or occurring system events that, if not mitigated, could adversely affect the continued reliable operation of its transmission system. FKEC staffs, at all times, a qualified, Certified NERC System Operator. The methods identified in Sect 2.1 below are all effective mitigation measures for Energy Emergencies and other Operating Emergencies.

FKEC shall annually review and update this capacity and emergency plan.

2.1 Methods of mitigation:

- a) Auto Voltage Control (AVC) – Has an immediate negative net effect on load;
- b) Load Management (LMS) – Has a negative net effect on load, yet may take up to 30 minutes to realize full benefit; Used only with RC or FPL approval.
- c) Interruptable Loads (IL) – Has a negative net effect on load, yet may take up to 30 minutes to realize full benefit;
- d) Dispersed Generation (DG) – Has an immediate negative net effect on load – future option for FKEC;

- e) Charles A Russell Generating Facility (CARGF) – Has an immediate negative net effect on load, yet may take up to 30 minutes to realize full benefit; Used only when FPL cannot serve FKEC capacity or for operating emergency, such as voltage support, etc...
- f) Curtailment of Line 7 load (KEYS);
- g) Shedding of FKEC native load (see EOP-003-0).

2.2 Load Reduction due to Reliability Coordinator (RC) request:

As the RC is charged with maintaining the integrity of the BES, and as events take place that would jeopardize that integrity, such as loss of generation, import capacity or facilities, the RC may call on FKEC to help mitigate the event. The FKEC System Operator actions shall include:

- a) If time permits, try to ascertain from the RC the nature of the request (ie..loss of: generation, transmission line or facility, import capacity (Interconnection Tie-Line) or suspect sabotage);
- b) The amount of reduction and time required to make reduction. Is this a FKEC load reduction or incoming transmission capacity reduction?;
- c) Quickly assess if native load shedding will be required to achieve said reductions – If so, report to the RC that native load shedding may be required even after implementing the other mitigation methods described above. The RC may waive or require the native load reduction;
- d) Implement said methods of load reductions as identified above, up to and including shedding of native firm load, if RC so requires. Refer to EOP-003 for load shed schedules.

2.3 Load Reduction due to loss of FKEC transmission element:

When a transmission element becomes unavailable that requires de-rating of FKEC's import capacity, The FKEC System Operator actions shall include:

- a) Calculating the new import capacity of the transmission system, notifying KEYS of their contractual pro-rated share of the new import capacity;
- b) Utilize all load reduction methods indicated above, maintaining voltage and import schedules;
- c) As all resources are exhausted, manual load shedding may be required. Refer to EOP-003 for load shed schedules.

3.0 Communication:

The FKEC System Operator will closely monitor the transmission system operating limits and initiate actions, as outlined above, and when conditions dictate. When all resources have been exhausted, the FKEC System Operator shall apprise the FRCC SC and KEYS Coordinator of said condition, alerting those to possible assistance. See also EOP-002, "Capacity and Energy Emergencies".

4.0 Staffing:

FKEC has one NERC Certified System Operator on shift, at all times. Each SO shall be current with FKEC operating policies as well as all applicable NERC and FRCC operating policies. As events develop, each SO is authorized to call for help or utilize any resource available deemed necessary to mitigate the event. Typically, as storm threats develop, two SO's are scheduled for the anticipated workload.

5.0 Reporting:

5.1 See FKEC Phone Listing – FKE-008-0

Revision	Date	Action	By
0	06/01/06	New	DMinton
1	09/27/06	KEYS Coordinator Phone Change	DMinton
2	11/08/06	Add Staffing Levels to mitigate emergency	DMinton
3	10/10/07	Review & Update - Add references to EOP-003 for Load Shedding.	DMinton
4	08/25/08	Review & Update – Add Numbering – Update Title D Minton	DMinton
5	12/14/08	Added reference to EOP-002 in Sect 3.0	DMinton
6	04/29/09	Change 5.0 to reference FKE Phone Listing	DMinton
7	05/01/10	Mod Sect 1.1, 1.2 & 2.0. Update header & review period	DMinton
8	04/28/11	Review & Update	DMinton
9	10/05/11	Update Sect 2.1 (b) & (e)	DMinton

Document Change Control					
Name	Rev	Date	Name	Rev	Date
Dept Head/Date			Director/Date		
			10/5/2011		

Attachment 1 – EOP-001-0 - Elements for Consideration in Development of Emergency Plans

1. **Fuel Supply and Inventory** - FKEC has capacity to safely store and inventory up to 310 k gallons of diesel fuel for its 18 MW peaker generation plant (CARGF). FKEC desires to have on hand, no less than 175 k gallons. FKEC also has means to barge in fuel deliveries if roads or bridges prohibit regular tanker traffic.
2. **Fuel Switching** - FKEC's generators do not use alternate fuel sources.
3. **Environmental Restraint** - As a peaking, not base loaded plant, there are no environmental restraints.
4. **System Energy Use** - FKEC has remote/manual starting capabilities of its facilities' standby generation for use, as conditions dictate.
5. **Public Appeals** - FKEC retains a public relations firm charged with disseminating pre-scripted and authorized appeals for conservation and reductions, as system conditions warrant and are directed by the System Operator. This public relations firm also maintains our web-site where educational materials are presented.
6. **Load Management** - FKEC utilizes residential load management only upon RC or FPL consent.
7. **Optimize Fuel Supply** - FKEC has one fuel source with all units operating at a similar heat rate.
8. **Appeals to Customers to Use Alternate Fuels** - FKEC will make public appeals to its customers, when a fuel emergency exists, to reduce energy consumption of all non-essential loads and to encourage the customers' use of customer-owned generation.
9. **Interruptable and Curtailable Loads** - FKEC has rate tariffs and offers contractual agreements for this type of service. FKEC will call on its customers to interrupt and disconnect from the utility as outlined in EOP-001-0.
10. **Maximize Generator Output and Availability** - All FKEC generators, when not islanded, operate in full output base load configuration.
11. **Notifying IPP's** - There are no IPP's currently operating within FKEC's service territory.
12. **Requests of Government** - FKEC appeals to all governmental entities to comply with Item 5, above, and those that have interruptable loads to comply with Item 9, above.
13. **Load Curtailment** - See EOP-003-0.
14. **Notification of Government Agencies** - As steps in the emergency plan are implemented, FKEC documents and gives notification, as requested, to the FRCC RC of system status.
15. **Notifications of Other Operating Entities** - Notifications to neighboring entities and the FRCC RC will be made declaring status of system, as outlined in EOP-003-0.