

State of Florida



Public Service Commission

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-M-E-M-O-R-A-N-D-U-M-

DATE: November 2, 2017

TO: Hong Wang, Chief Deputy Commission Clerk, Office of Commission Clerk

FROM: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk

RE: Docket No. 20170007-EI - Environmental cost recovery clause.

Please place the attached corrected transcript page in the referenced docket file. The correction is to DN 09347-2017, hearing transcript Volume 6, page 849, and corrects prefiled testimony as detailed by witness Anderson during the hearing.

/css

Attachment

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CLERK

1 **comparison?**

2 A. Generally, yes, but not for evaluating the retraction wells in the context of the
3 overall regulatory requirements for the CCS. OPC witness Panday's
4 comparison is intended to show the net effect of the recovery wells. He does
5 this by comparing a simulation with a background condition of a hypersaline
6 CCS without recovery wells pumping to one with the same background
7 condition with recovery wells pumping. This is one way of approximating the
8 independent effect of the recovery wells. However, OPC witness Panday's
9 case is unrealistic based on the performance objectives for the freshening of
10 the CCS, which includes a requirement to reduce CCS concentrations to 34
11 4 (DRK)
12 PSU within 2 years of commencement of freshening. Another unrealistic
13 aspect of his comparison is that it does not account for the additional seepage
14 that will occur as a result of adding 14 mgd to the CCS as a part of the
15 freshening. Thus, OPC witness Panday's method of approximating the effect
16 of the recovery wells is flawed in two ways: (1) it represents a case that will
17 not occur if the elements of the CA are followed because (2) his method
18 underestimates the flow that must be handled by the recovery wells.

18 **Q. OPC witness Panday goes on to say (lines 11-15) that "[t]he simulation**
19 **results in layer 8 after 1 year for this case without pumping the retraction**
20 **wells versus the case of with pumping the retraction wells...showed that**
21 **the simulated concentrations are not materially different between the two**
22 **cases." Does this show that the recovery wells are ineffective?**

23 A. No. The ten recovery wells pumping along the interceptor ditch ("ID") are