

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

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

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**DATE:** July 13, 2018  
**TO:** Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk  
**FROM:** Samantha Cibula, Office of the General Counsel *S.M.C.*  
**RE:** Docket No. 20080503-EI

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Please file the attached materials in the docket file listed above.

Thank you.

Attachment

RECEIVED-FPSC  
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MESSER CAPARELLO & SELF, P.A.

Attorneys At Law

[www.lawfla.com](http://www.lawfla.com)

October 23, 2008

**BY HAND DELIVERY**

Cindy Miller, Esq.  
Florida Public Service Commission  
Office of General Counsel  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 080503-EI

Dear Ms. Miller:

Enclosed is a copy of the response of Florida Public Utilities Company to the Staff's Data Request dated October 16, 2008, in this docket. An electronic copy was provided to Mr. Phillip Ellis pursuant to the request in the letter.

If you have any questions, please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in cursive script that reads "Norman H. Horton, Jr.".

Norman H. Horton, Jr.

NHH/amb  
Enclosure  
cc: Mr. Phillip Ellis



Docket No 080503-EI  
Responses to Staff Data Request dated October 16, 2008

Florida Public Utilities Company (FPUC) herewith submits the following responses to the staff data request sent October 16, 2008, in this docket. Any questions regarding the information provided herein should be directed to Mr. Mark Cutshaw at (904) 277-1957 or via email at [mcutshaw@fpuc.com](mailto:mcutshaw@fpuc.com).

1. Please identify all generating units on your utility's system that would be candidates for efficiency improvements by the year 2020 and 2030. Response should indicate unit name, fuel type, size (MW), heat rate (btu/kwh), and original in-service date. Also please provide an estimate of the heat rate improvement (either % or average btu/kwh), the MW increase, if any, and an estimate of the year in which the improvements could be made for each identified unit.

**Response:**

FPUC currently purchases all energy requirements from other utilities and does not own or operate any generating resources and would therefore have no generating units on the system that would be candidates for efficiency improvements.

FPUC is contracted with JEA and Southern Company to provide all firm energy requirements through December 31, 2017. A limited amount of as-available energy (less than 1%) is also purchased from Smurfit-Stone, Inc. who operates a paper mill located in Fernandina Beach in the Northeast Florida Division. Additional purchases outside the scope of the existing contracts may cause significant contractual and cost issues related to the purchased power adjustment.

2. Please provide an annual and cumulative estimate of energy (GWH) and demand (MW) savings associated with your utility's existing and proposed demand-side management programs through the year 2030.

**Response:**

FPUC has projected the annual and cumulative estimated energy and demand savings from the Conservation related demand-side management programs. FPUC does not have any other demand-side management programs. Actual savings are included for the years 2005 through 2007 with estimated amounts shown for 2008 through 2030. The results are included below. Details associated with the estimates are included in "Exhibit A".

**Florida Public Utilities Company**  
**DSM Savings from Conservation Programs**

Year	Totals					
	GWH		Winter MW		Summer MW	
	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative
2005	578.1	578.1	0.3	0.3	0.2	0.2
2006	420.1	998.2	0.3	0.6	0.2	0.4
2007	539.8	1,538.0	0.4	1.0	0.2	0.6
2008	385.3	1,923.3	0.3	1.3	0.2	0.8
2009	387.2	2,310.5	0.3	1.6	0.2	1.0
2010	402.0	2,712.5	0.3	1.9	0.2	1.2
2011	439.0	3,151.5	0.3	2.2	0.2	1.4
2012	444.3	3,595.8	0.3	2.5	0.2	1.6
2013	457.7	4,053.5	0.3	2.8	0.2	1.8
2014	435.9	4,489.4	0.3	3.1	0.2	2.0
2015	470.4	4,959.8	0.3	3.4	0.2	2.2
2016	444.5	5,404.3	0.3	3.7	0.2	2.4
2017	454.7	5,859.0	0.3	4.0	0.2	2.6
2018	458.1	6,317.1	0.3	4.3	0.2	2.8
2019	462.0	6,779.1	0.3	4.6	0.2	3.0
2020	497.7	7,276.8	0.3	4.9	0.2	3.2
2021	499.3	7,776.1	0.3	5.2	0.2	3.4
2022	471.2	8,247.3	0.3	5.5	0.2	3.6
2023	486.1	8,733.4	0.3	5.8	0.2	3.8
2024	520.0	9,253.4	0.4	6.2	0.2	4.0
2025	521.6	9,775.0	0.4	6.6	0.2	4.2
2026	524.7	10,299.7	0.4	7.0	0.2	4.4
2027	536.2	10,835.9	0.4	7.4	0.2	4.6
2028	506.8	11,342.7	0.4	7.8	0.2	4.8
2029	508.4	11,851.1	0.4	8.2	0.2	5.0
2030	542.5	12,393.6	0.4	8.6	0.2	5.2
Total	12,393.6	12,393.6	8.6	8.6	5.2	5.2

3. Please provide an estimate of your utility's existing and planned generating units that emit zero green house gases. Response should include unit name, fuel type, size (MW), heat rate (btu/kwh), original in-service date, and annual generation (GWH). Estimates should be given through the year 2030.

**Response:**

See response to Question #1.

4. Please fill in the attached spreadsheets electronically.

**Response:**

The information requested included in "Exhibit B" and is completed as much as possible. The information included on the spreadsheets is limited since some of the data is not applicable to FPUC. A description of the information included on each tab is shown below:

Energy Demand and Capacity Forecast – Forecast Load information is included.

Capacity Additions and Changes – Not Applicable.

Energy Sources (GWh) – Not Applicable.

Energy Sources (%) – Not Applicable.

As previously mentioned, FPUC is a non-generating utility and does not file ten year site plans. For additional information see the response to Question #1.

Florida Public Utilities Company  
DSM Savings from Conservation Programs

Year	Totals					
	GWH		Winter MW		Summer MW	
	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative
2005	578.1	578.1	0.3	0.3	0.2	0.2
2006	420.1	998.2	0.3	0.6	0.2	0.4
2007	539.8	1,538.0	0.4	1.0	0.2	0.6
2008	385.3	1,923.3	0.3	1.3	0.2	0.8
2009	387.2	2,310.5	0.3	1.6	0.2	1.0
2010	402.0	2,712.5	0.3	1.9	0.2	1.2
2011	439.0	3,151.5	0.3	2.2	0.2	1.4
2012	444.3	3,595.8	0.3	2.5	0.2	1.6
2013	457.7	4,053.5	0.3	2.8	0.2	1.8
2014	435.9	4,489.4	0.3	3.1	0.2	2.0
2015	470.4	4,959.8	0.3	3.4	0.2	2.2
2016	444.5	5,404.3	0.3	3.7	0.2	2.4
2017	454.7	5,859.0	0.3	4.0	0.2	2.6
2018	458.1	6,317.1	0.3	4.3	0.2	2.8
2019	462.0	6,779.1	0.3	4.6	0.2	3.0
2020	497.7	7,276.8	0.3	4.9	0.2	3.2
2021	499.3	7,776.1	0.3	5.2	0.2	3.4
2022	471.2	8,247.3	0.3	5.5	0.2	3.6
2023	486.1	8,733.4	0.3	5.8	0.2	3.8
2024	520.0	9,253.4	0.4	6.2	0.2	4.0
2025	521.6	9,775.0	0.4	6.6	0.2	4.2
2026	524.7	10,299.7	0.4	7.0	0.2	4.4
2027	536.2	10,835.9	0.4	7.4	0.2	4.6
2028	506.8	11,342.7	0.4	7.8	0.2	4.8
2029	508.4	11,851.1	0.4	8.2	0.2	5.0
2030	542.5	12,393.6	0.4	8.6	0.2	5.2
Total	12,393.6	12,393.6	8.6	8.6	5.2	5.2

Florida Public Utilities Company Estimated Demand Side Management Savings Projections from Existing and Purposed DSM Programs\*

	Geothermal HP TOTAL ANNUAL REDUCTION			Good Cents Home TOTAL ANNUAL REDUCTION			Residential Energy Survey TOTAL ANNUAL REDUCTION			Resid Heating/Cooling Upgrade TOTAL ANNUAL REDUCTION			Resid Ceiling Insulation Upgrade TOTAL ANNUAL REDUCTION			Commercial Energy Survey TOTAL ANNUAL REDUCTION			Commercial Indoor Light Rebate TOTAL ANNUAL REDUCTION		
	KWH	WINTER KW	SUMMER KW	KWH	WINTER KW	SUMMER KW	KWH	WINTER KW	SUMMER KW	KWH	WINTER KW	SUMMER KW	KWH	WINTER KW	SUMMER KW	KWH	WINTER KW	SUMMER KW	KWH	WINTER KW	SUMMER KW
2005	0	0	0	86,907	100	50	82,754	28	60	98,038	97	31	8,953	18	3	301,448	96	86	0	0	0
2006	0	0	0	79,137	80	40	32,832	11	20	123,820	126	40	24,301	48	0	159,952	51	51	0	0	0
2007	0	0	0	27,368	31	17	29,888	10	18	247,840	251	80	25,680	50	10	200,166	86	86	0	0	0
2008	0	0	0	26,517	23	13	55,178	19	34	123,820	126	40	25,680	50	10	120,192	41	41	30,962	12	16
2009	2,167	2	2	16,609	19	10	57,228	20	35	125,488	127	41	25,680	50	10	126,192	41	41	30,962	12	16
2010	2,167	2	2	23,448	26	15	80,852	20	36	125,488	127	41	25,680	50	10	135,344	43	43	30,962	12	16
2011	2,167	2	2	28,378	30	16	60,878	21	37	125,488	127	41	26,639	53	10	135,344	43	43	61,924	23	32
2012	2,167	2	2	38,287	34	19	82,244	21	38	125,488	127	41	26,639	53	10	135,344	43	43	61,924	23	32
2013	2,167	2	2	34,195	30	21	84,868	22	39	127,918	129	41	26,639	53	10	141,486	45	45	61,924	23	32
2014	4,334	4	4	39,080	44	24	68,129	23	40	127,918	129	41	26,639	53	10	141,486	45	45	30,962	12	16
2015	4,334	5	4	41,034	46	26	67,718	23	41	127,918	129	41	26,639	53	10	141,486	45	45	61,924	23	32
2016	4,334	5	4	42,011	47	26	70,224	24	43	128,967	130	42	26,639	53	10	141,486	45	45	30,962	12	16
2017	4,334	5	4	42,988	48	27	72,048	25	44	128,967	130	42	28,138	55	11	147,648	47	47	30,962	12	16
2018	4,334	5	4	42,988	48	27	73,872	25	45	130,116	132	42	28,138	56	11	147,648	47	47	30,962	12	16
2019	6,501	7	6	42,988	48	27	75,896	26	46	130,116	132	42	28,138	56	11	147,648	47	47	30,962	12	16
2020	6,501	7	6	42,988	48	27	77,520	27	47	131,685	133	43	29,417	58	11	147,648	47	47	61,924	23	32
2021	6,501	7	6	42,988	48	27	79,116	27	48	131,685	133	43	29,417	58	11	147,648	47	47	61,924	23	32
2022	6,501	7	6	42,988	48	27	80,484	28	49	133,214	135	43	29,417	58	11	147,648	47	47	30,962	12	16
2023	10,835	12	9	42,988	48	27	82,090	28	50	134,783	137	44	30,896	60	12	153,800	49	49	30,962	12	16
2024	10,835	12	9	42,988	48	27	83,478	29	51	134,783	137	44	31,976	63	12	153,800	49	49	61,924	23	32
2025	10,835	12	9	42,988	48	27	85,272	29	52	134,783	137	44	31,976	63	12	153,800	49	49	61,924	23	32
2026	16,838	12	9	42,988	48	27	86,888	30	53	136,312	138	44	31,976	63	12	153,800	49	49	61,924	23	32
2027	13,802	15	11	42,988	48	27	88,484	30	54	137,861	140	45	31,976	63	12	159,952	51	51	61,924	23	32
2028	13,802	15	11	42,988	48	27	90,080	31	55	137,861	140	45	31,976	63	12	159,952	51	51	30,962	12	16
2029	13,802	15	11	42,988	48	27	91,686	31	56	137,861	140	45	31,976	63	12	159,952	51	51	30,962	12	16
2030	13,802	15	11	42,988	48	27	93,252	32	57	139,410	141	45	31,976	63	12	159,952	51	51	61,924	23	32
<b>Total (kWh)</b>	<b>153,857</b>	<b>175</b>	<b>133</b>	<b>1,070,792</b>	<b>1,206</b>	<b>669</b>	<b>1,868,232</b>	<b>639</b>	<b>1,139</b>	<b>3,482,152</b>	<b>3,529</b>	<b>1,124</b>	<b>723,914</b>	<b>1,421</b>	<b>277</b>	<b>4,041,864</b>	<b>1,281</b>	<b>1,281</b>	<b>1,052,708</b>	<b>392</b>	<b>538</b>

\*Based on participant projections

Exhibit A  
Docket #080503-EI  
Page 3 of 3

Florida Public Utilities Company Estimated Demand Side Management Savings Projections from Existing and Proposed DSM Programs\*

	Totals					
	GWH		Winter MW		Summer MW	
	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative
2005	578.1	578.1	0.3	0.3	0.2	0.2
2006	420.1	998.2	0.3	0.6	0.2	0.4
2007	539.8	1538.0	0.4	1.0	0.2	0.6
2008	385.3	1923.3	0.3	1.3	0.2	0.8
2009	387.2	2310.5	0.3	1.6	0.2	1.0
2010	402.0	2712.5	0.3	1.9	0.2	1.2
2011	439.0	3151.5	0.3	2.2	0.2	1.4
2012	444.3	3595.8	0.3	2.5	0.2	1.6
2013	457.7	4053.5	0.3	2.8	0.2	1.8
2014	435.9	4489.4	0.3	3.1	0.2	2.0
2015	470.4	4959.8	0.3	3.4	0.2	2.2
2016	444.5	5404.3	0.3	3.7	0.2	2.4
2017	454.7	5859.0	0.3	4.0	0.2	2.6
2018	458.1	6317.1	0.3	4.3	0.2	2.8
2019	462.0	6779.1	0.3	4.6	0.2	3.0
2020	497.7	7276.8	0.3	4.9	0.2	3.2
2021	499.3	7776.1	0.3	5.2	0.2	3.4
2022	471.2	8247.3	0.3	5.5	0.2	3.6
2023	486.1	8733.4	0.3	5.8	0.2	3.8
2024	520.0	9253.4	0.4	6.2	0.2	4.0
2025	521.6	9775.0	0.4	6.6	0.2	4.2
2026	524.7	10299.7	0.4	7.0	0.2	4.4
2027	536.2	10835.9	0.4	7.4	0.2	4.6
2028	506.8	11342.7	0.4	7.8	0.2	4.8
2029	508.4	11851.1	0.4	8.2	0.2	5.0
2030	542.5	12393.6	0.4	8.6	0.2	5.2
	<b>12,393.6</b>	<b>12,393.6</b>	<b>8.6</b>	<b>8.6</b>	<b>5.2</b>	<b>5.2</b>



**2008 TEN YEAR SITE PLAN DATA  
Energy Demand and Capacity Forecast**

Utility Florida Public Utilities Co.											
Year	Net Energy for Load (GWh)	Retail Energy Sales (GWh)	Year	System Firm Peak Demand		Total Capacity Available		Reserve Margin After Maintenance		Reserve Margin After Maintenance	
				Sum (MW)	Win (MW)	Sum (MW)	Win (MW)	Sum (MW)	Win (MW)	Sum (%)	Win (%)
2008	N/A	N/A	2008	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2009	N/A	N/A	2009	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2010	N/A	N/A	2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2011	N/A	N/A	2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2012	N/A	N/A	2012	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2013	N/A	N/A	2013	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2014	N/A	N/A	2014	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2015	N/A	N/A	2015	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2016	N/A	N/A	2016	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2017	N/A	N/A	2017	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Source	3.3 (8)	3.3 (5)		7.1 (7)	7.2 (7)	7.1 (6)	7.2 (6)	7.1 (11)	7.2 (11)	7.1 (12)	7.2 (12)
FPL	3.3 (5)	3.3 (8)		7.1 (9)	7.2 (9)	7.1 (6)	7.2 (6)	7.1 (13)	7.2 (13)	7.1 (14)	7.2 (14)

**CURRENT PLANNING DATA (as of 10/2008)  
Energy Demand and Capacity Forecast**

Utility Florida Public Utilities Co.												
Year	Net Energy for Load (GWh)	Retail Energy Sales (GWh)	Year	System Firm Peak Demand		Total Capacity Available		Reserve Margin After Maintenance		Reserve Margin After Maintenance		As-Available Energy Rate (\$/MWh)
				Sum (MW)	Win (MW)	Sum (MW)	Win (MW)	Sum (MW)	Win (MW)	Sum (%)	Win (%)	
2008	800.8	771.2	2008	173.7	158.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2009	823.7	793.3	2009	178.7	163.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2010	843.8	812.6	2010	183.0	167.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2011	870.7	838.4	2011	188.8	172.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2012	889.6	856.6	2012	192.9	176.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2013	906.9	875.2	2013	197.1	180.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2014	928.7	894.2	2014	201.4	183.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2015	948.9	913.6	2015	205.7	187.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2016	969.5	933.5	2016	210.2	192.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2017	990.6	953.8	2017	214.8	196.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2018	1,012.2	974.5	2018	219.5	200.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2019	1,034.3	995.7	2019	224.2	204.8	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2020	1,056.8	1,017.4	2020	229.1	209.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2021	1,079.4	1,039.2	2021	234.0	213.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2022	1,102.5	1,061.4	2022	239.0	218.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2023	1,126.2	1,084.1	2023	244.1	223.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2024	1,150.3	1,107.3	2024	249.4	227.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2025	1,175.0	1,131.1	2025	254.7	232.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2026	1,200.2	1,155.3	2026	260.2	237.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2027	1,225.9	1,180.1	2027	265.8	242.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2028	1,252.2	1,205.4	2028	271.5	247.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2029	1,276.0	1,228.3	2029	276.6	252.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2030	1,300.2	1,251.6	2030	281.8	257.4	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**2008 TEN YEAR SITE PLAN DATA  
Capacity Additions and Changes**

Utility		Florida Public Utilities Co.									
Year	Plant name	Unit #	Location	Unit Type	Primary Fuel	In-Service Date	Net Capability		Status	Planned or Committed?	
							Sum	Win			
2008	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2009	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2012	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2013	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2014	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2015	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2016	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2017	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

Source: Schedule 8

**Note - Committed Units are defined as those units which have already begun construction, received a determination of need, or entered into the permitting process.**

**CURRENT PLANNING DATA (as of 10/2008)  
Capacity Additions and Changes**

Utility		Florida Public Utilities Co.									
Year	Plant name	Unit #	Location	Unit Type	Primary Fuel	In-Service Date	Net Capability		Status	Planned or Committed?	
							Sum	Win			
2008	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2009	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2010	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2012	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2013	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2014	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2015	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2016	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2017	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2018	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2019	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2021	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2022	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2023	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2024	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2025	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2026	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2027	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2028	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2029	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
2030	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

**Note - Committed Units are defined as those units which have already begun construction, received a determination of need, or entered into the permitting process.**

2008 TEN YEAR SITE PLAN DATA

Energy Sources (GWh)

Utility	Florida Public Utilities Co.										
	Energy Source	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Nuclear	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Coal	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Residual Fuel Oil	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Distillate Fuel Oil	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Firm Interchange	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Renewables	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Net Energy for Load	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Source: Schedule 6.1

CURRENT PLANNING DATA (as of 10/2008)

Energy Sources (GWh)

Utility	Florida Public Utilities Co.																								
	Energy Source	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	
Nuclear	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Coal	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Residual Fuel Oil	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Distillate Fuel Oil	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Firm Interchange	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Renewables	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Net Energy for Load	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

2008 TEN YEAR SITE PLAN DATA

Energy Sources (%)

Utility		Florida Public Utilities Co.									
Energy Source		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Nuclear		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Coal		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Residual Fuel Oil		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Distillate Fuel Oil		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Firm Interchange		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Renewables		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Net Energy for Load		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Source: Schedule 6.2

CURRENT PLANNING DATA (as of 10/2008)

Energy Sources (%)

Utility		Florida Public Utilities Co.																						
Energy Source		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Nuclear		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Coal		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Residual Fuel Oil		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Distillate Fuel Oil		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	CT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Firm Interchange		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Renewables		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Net Energy for Load		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

COMMISSIONERS:  
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NATHAN A. SKOP

STATE OF FLORIDA



OFFICE OF THE GENERAL COUNSEL  
MICHAEL G. COOKE  
GENERAL COUNSEL  
(850) 413-6199

## Public Service Commission

October 16, 2008

John T. Burnett and R. Alexander Glenn, Esquires  
Progress Energy Service Company, LLC  
Post Office Box 14042  
St. Petersburg, Florida 33733-4042

### STAFF'S DATA REQUEST

R. Wade Litchfield and John T. Butler, Esquires  
Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, Florida 33408

James Beasley and Lee Willis, Esquires  
Ausley & McMullen Law Firm  
P.O. Box 391  
Tallahassee, Florida 32302

Steven R. Griffin, Esquire  
Beggs & Lane  
501 Commendencia Street  
Pensacola, Florida 32591-2950

Norman H. Horton, Jr., Esquire  
Messer, Caparello & Self, P.A.  
Post Office Box 15579  
Tallahassee, Florida 32317

**Re: Docket No. 080503-EI - Establishment of rule on renewable portfolio standard.**

Dear Mr. Burnett, Glenn, Litchfield, Butler, Beasley, Willis, Griffin and Horton:

By this letter, the Commission staff requests that Progress Energy Florida (PEF), Florida Power & Light (FPL), Tampa Electric Company (TECO), Gulf Power Company (Gulf), and Florida Public Utilities Company (FPUC) provide responses to the following data requests:

1. Please identify all generating units on your utility's system that would be candidates for efficiency improvements by the year 2020 and 2030. Response should indicate unit name, fuel type, size (MW), heat rate (btu/kwh), and original in-service date. Also please provide an estimate of the heat rate improvement (either % or average btu/kwh), the MW

John T. Burnett and R. Alexander Glenn, Esquires  
R. Wade Litchfield and John T. Butler, Esquires  
James Beasley and Lee Willis, Esquires  
Steven R. Griffin, Esquire  
Norman H. Horton, Jr., Esquire

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increase, if any, and an estimate of the year in which the improvements could be made for each identified unit.

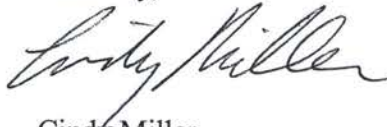
2. Please provide an annual and cumulative estimate of energy (GWH) and demand (MW) savings associated with your utility's existing and proposed demand-side management programs through the year 2030.

3. Please provide an estimate of your utility's existing and planned generating units that emit zero green house gases. Response should include unit name, fuel type, size (MW), heat rate (btu/kwh), original in-service date, and annual generation (GWH). Estimates should be given through the year 2030.

4. Please fill in the attached spreadsheets electronically.

Please provide responses electronically to Phillip Ellis at [pellis@psc.state.fl.us](mailto:pellis@psc.state.fl.us) by Thursday, October 23, 2008. If you have any questions, please do not hesitate to contact me at (850) 413-6082.

Sincerely,



Cindy Miller  
Senior Attorney

Attachment: Excel Spreadsheets

cc: Office of Commission Clerk  
Office of Strategic Analysis & Governmental Affairs (Ballinger, Ellis)  
Docket 080503-EI - Parties



**2008 TEN YEAR SITE PLAN DATA**  
Capacity Additions and Changes

Utility										
Year	Plant name	Unit #	Location	Unit Type	Primary Fuel	In-Service Date	Net Capability		Status	Planned or Committed?
							Sum	Win		
2008										
2009										
2010										
2011										
2012										
2013										
2014										
2015										
2016										
2017										

Source: Schedule 8

Note - Committed Units are defined as those units which have already begun construction, received a determination of need, or entered into the permitting process.

**CURRENT PLANNING DATA (as of 10/2008)**  
Capacity Additions and Changes

Utility										
Year	Plant name	Unit #	Location	Unit Type	Primary Fuel	In-Service Date	Net Capability		Status	Planned or Committed?
							Sum	Win		
2008										
2009										
2010										
2011										
2012										
2013										
2014										
2015										
2016										
2017										
2018										
2019										
2020										
2021										
2022										
2023										
2024										
2025										
2026										
2027										
2028										
2029										
2030										

Note - Committed Units are defined as those units which have already begun construction, received a determination of need, or entered into the permitting process.



2008 TEN YEAR SITE PLAN DATA

Energy Sources (GWh)

Utility										
Energy Source	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Nuclear										
Coal										
Natural Gas										
ST										
CC										
CT										
Residual Fuel Oil										
ST										
CC										
CT										
Distillate Fuel Oil										
ST										
CC										
CT										
Firm Interchange										
Other										
Renewables										
Net Energy for Load										

Source: Schedule 6.1



2008 TEN YEAR SITE PLAN DATA

Energy Sources (%)

Utility											
Energy Source	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	
Nuclear											
Coal											
Natural Gas											
ST											
CC											
CT											
Residual Fuel Oil											
ST											
CC											
CT											
Distillate Fuel Oil											
ST											
CC											
CT											
Firm Interchange											
Other											
Renewables											
Net Energy for Load											

Source: Schedule 6.2



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### **Support for Com. Skop proposal**

Florida Industrial Power Users Group – supports the Skop concept of “environmental mercantilism plan that calls for operating within the existing framework and requesting bids to identify the least cost viable renewable energy resource.”

Florida Solar Coalition – highly supportive of the concept of expanding standard offer contracts to include a REC component. Agrees that contracts must be tailored to each renewable technology. Does have concern about “double counting” when an IOU used the MWH produced from its own renewable facility to satisfy its RPS goals and then sold the RECs to other states. The devil is in the details – the actual details would need to be the subject of a Chapter 120 rulemaking proceeding.

Gulf is generally supportive of a Standard Offer Contract approach. However, without more info, Gulf cannot evaluate the proposal. The simplicity, low overhead cost, use of existing legal and regulatory structures and emphasis on keeping renewable energy attribute revenues in Florida are positive. Would likely support a SOC if it incorporates a reasonable cost cap in the 1-2% range, reasonable cost recovery provisions (including cost recovery for self-build), no carve outs, a modest 1% to 5% allocation to solar rebates, and utility ownership of RECs for resale.

Office of Public Counsel – the proposal to allocate 5% of the monies otherwise earmarked for RECs to the solar rebate programs is a reasonable compromise. If a standard offer is used, the price of the contract should be a maximum price and the utility should be directed by rule to conduct competitive processes to solicit more economical proposals.

Southern Alliance for Clean Energy (SACE) - applauds the Com. Skop proposal for recognizing that renewable energy developers require financial certainty.

Sunshine State Solar Power (SSSP) – supports a program that uses a contract path mechanism. SSSP also suggests the FPSC use as much of the structure and concepts of the current PSC staff draft rules as possible. Supports allocating funds to both Standard Offer Contracts and Solar Rebates. The initial allocation should be at least \$10 million and should be revised periodically. The PSC should engage a third party consultant to determine the appropriate Standard Offer Contract pricing.

### **Opposition or Concerns with Com. Skop proposal**

Florida Industrial Cogeneration Assn., the City of Tampa and the Solid Waste Authority – two issues. A significant flaw in the standard offer contracts – only one fruitful standard offer has been executed since the early 1990s and that was for a small amount of capacity of 10 MW. Also, from a legal standpoint, the FPSC may not be able to require a utility to pay a price that exceeds the utility's avoided cost. But the FPSC could encourage it.

Wheelabrator – needs more information before it could say whether it supports the plan. Without clear compliance and enforcement measures, there is little to no incentive for an IOU to participate. The SOC would apparently do nothing to protect the economic viability of Florida's existing renewable energy facilities, as Sec. 366.92(1) requires. If there is no ability for existing renewable energy generators to sell the attributes of their renewable energy separately in the market, they will be at a competitive disadvantage compared to new developers.”

Short Version of RPS Post-Workshop Comments (filed Dec. 8, 2008)

**Alachua County**

Supports 10% by 2015 and 20% by 2020.

Opposes nuclear being considered for RPS

“Green collar” jobs will be created with rapid RPS deployment.

**Audubon of Florida**

Supports a 20% by 2020 RPS goal.

Supports 5% utility annual revenue to be used to underwrite the additional costs of renewable energy, with preference for solar and wind.

External costs of climate change impacts should be considered.

The Navigant study clearly demonstrates the 20% target could be met.

A 1% cost cap is unfair because it does not apply to other forms of generation, such as nuclear or fossil-fueled generation, and could cu renewable development off at the knees.

**Florida Alliance for Renewable Energy (late-filed)**

Renewables create energy security, jobs and environmental benefits.

Feed-In Tariffs (Renewable Energy Payments) provide priority access to the grid for all renewable producers, and long term standard offer contracts with a fixed price guaranteed for 20 years,.

Recommends a Florida Renewable Energy Freedom Act. There should be long-term fixed pricing, the same as utilities. There should be simple siting and permitting processes.

FPSC is heading down the wrong path. Tradable RECs encourage monopolies and are more expensive. There is no liquidity.

**Florida Industrial Power Users Group (FIPUG)**

Opposes solar and wind carve-out

Supports Skop concept for operating within existing framework and requesting bids for least cost viable renewable.

A mandatory RPS surcharge could be unconstitutional in that it takes property for public use without just compensation.

Navigant should revise its model to include other than the solar/wind carve-out.

### **Florida Pulp and Paper**

The more aggressive the RPS goal, the greater the costs imposed on all electric users.

Supports staff's October draft RPS rule, but requests the revenue cap be lowered to 1%.

Urges a cautious approach. There could be unrestrained harvesting of existing forest to develop the biomass resource.

### **Florida Solar Coalition**

Urges 20% by 2020.

Opposes nuclear power being treated as a renewable.

The regulatory treatment for the IOUs' cost recovery is skewed better than for the others.

Highly supportive of Com. Skop's concept of expanding standard offers.

Recommends a 4% cap on amount of retail revenues.

The REC component should be totally separate from the avoided cost or energy components in the standard offer.

Concern about "double counting" of RECs in Com. Skop's proposal.

Actual details on standard offer should be subject to Chapter 120 rulemaking.

### **Gulf Power**

Generally supports staff's draft rule. However, the definition of "Florida renewable energy resource" should be changed so it does not require that the fuels or energy sources derive from Florida. (Just insert "in Florida" after energy produced....)



Reward/Penalty – should be up to 25 basis points for both a reward and penalty.

Supports the approach taken in the Environmental Cost Recovery Clause and set the ROE for all self-built projects at the utility's last authorized rate of return.

Opposes the carve-out for solar and wind.

Rule should contain a cost cap. Concerns about allocating the cost cap between Class I and Class II renewables. This presents impediment to obtaining a cost-effective mix of renewables.

Generally supports a Standard Offer Contract approach. However, without more info, Gulf cannot adequately evaluate the proposal.

Gulf could likely support an appropriately priced Standard Offer Contract approach if it includes a 1-2% cost cap, reasonable cost recovery provisions (including cost recovery for self-build projects), no carve outs, a modest 1%-5% allocation to solar rebates, and utility ownership of RECs for resale.

### **Investor-Owned Utilities**

The IOUs make suggestions to Navigant and express concerns about the study. They ask that a section be added to the report outlining what is not included within the scope.

Navigant's assessment for certain technology choices (most notably the use of biomass crops) does not appear to take into account that 90% of Floridians depend on groundwater for drinking and potable purposes, which would be competing uses for the amount of water required for the renewable technology choices.

The IOUs are concerned with Navigant's cost analysis. It appears to be based only on the "installed cost," not the entire cost over the life of the project.

Florida's ability to achieve 20% by 2020 will likely be negatively affected (by the recent economic downturn, with a resulting downward adjustment in load growth).

A list of questions and concerns for Navigant is attached.

### **Office of Public Counsel**

OPC expresses strong concern about the costs of the RPS. Favors a rule that: (1) has no carve outs; (2) calls for competitive Requests for Proposals; (3) limits the revenue cap to 1% of annual revenues; (4) places a ceiling on the price of a REC.

Comments on Com. Skop's proposal: OPC regards the 5% allocation to the solar rebate program as a reasonable compromise. Barring legal issues, OPC favors the proposal enabling utilities to market the RECs to out-of-state entities.

OPC would prefer to see the four separate "buckets" of dollars converted into a single category.

If a standard offer contract is used, the price of the contract should be a maximum price and the utility should be directed by rule to conduct competitive processes designed to solicit more economical proposals.

Relating the cost of one technology to another on a "stand-alone" basis provides useful information.

OPC firmly opposes a new cost recovery mechanism for renewables.

### **Progress Energy Florida**

Supports the FPSC staff 10/20/08 RPS draft rule and PEF's submitted changes. It offers a balanced approach on encouraging renewables while providing consumer protection.

Recommends addition of provisions about "giving way" to Federal laws, for example on greenhouse gas limitations.

IOU penalty provisions are unnecessary.

### **Sarasota County**

Supports 20% by 2020.

Solar hot water offsets should be included.

### **Southern Alliance for Clean Energy (SACE)**

Supports 20% by 2020. Navigant study shows it could be achieved.

20% can be achieved at a modest cost, of less than 2.5% or about \$3.50 per month for a typical household using 1,000 kwh.

The cumulative rate impact from a 20% RPS by 2020 is \$26.90 in 2020, whereas the rate impact from the proposed Levy County nuclear units is \$51.92 in 2020.

Applauds Commissioner Skop for recognizing in his proposal that renewable energy developers require financial certainty, and supports concept of standard offer contract.

Supports preference treatment for solar and wind.

A Clean Energy Portfolio (including nuclear) is not within the scope of the RPS statute.

### **Sunshine State Solar Power (SSSP)**

Supports RPS targets: 5% by 2010, 8% by 2012, 12% by 2014, 16% by 2016, 20% by 2020. The FPSC could waive compliance in the early years if significant change occurred to existing assets and caused IOUs to be noncompliant before adequate new generation is developed.

Suggests more frequent review of RPS program and rules, such as the first review occurring within 2 years and other reviews every 3 years.

Supports a 5% revenue cap.

Rather than adjust the 75%/25% allocation, the payments should be eliminated to any existing asset in operation longer than 5 years prior to the RPS commencement date.

On the IOU self-build option, there should be a minimum of 50% of an IOU's RPS compliance generation coming from non-affiliated sources.

A REC-based RPS program is not appropriate for the Florida market. It is unlikely a robust trading market will develop with only 5 entities mandated to participate.

Prefers a contract-path mechanism, like long-term Standard Offer Contracts, Renewable Energy Payments or Feed-In Tariffs.

Supports Commissioner Skop's contract path approach. Also suggests that we use as much of the structure and concepts of the current PSC Staff draft rules as possible.

Supports allocating funds to both Standard Offer Contracts and Solar Rebates.

Supports the Class I and Class II allocations by renewable type.

PSC would engage a third party consultant to determine the appropriate Standard Offer pricing.

Accepts use of an "avoided cost-plus model," however each technology should be compared to its most appropriate generation proxy.

### **Wheelabrator Technologies**

Navigant should run a new scenario not just using 75%-25% split. Questions Navigant's assumptions, and some of staff's discussion.

Major concern with “Clean Energy Portfolio.” Not within legislation. It would be short-sighted and disingenuous for the PSC to suggest a 20% RPS could be achieved this way.

Supports a stretch renewable energy percentage goal and a properly set alternative compliance payment (ACP). There is no legal problem or impediment to an ACP.

The PSC should put an ACP in place and ask the Legislature to consider how to spend the funds.

Regarding the Standard Offer Contract approach, there are no clear compliance and enforcement measures. There is lack of an incentive for an IOU to participate in the program. If there is no ability for existing renewable generators to sell the attributes of their renewables separately in the market, they will be at a competitive disadvantage compared to new developers.

Wheelabrator’s proposal could be amended to allow a bundled Standard Offer Contract as an alternative choice for the generator.

Wheelabrator attached a draft rule proposal, that includes the following standard: By 2010, 3% with .5% from Class I and 2.5% from Class II; 2017, 6% with 1% from Class I and 5% from Class II; 2025, 12% with 3% from Class I and 9% from Class II; 2035, 20% with 8% from Class I and 12% from Class II.

Draft rule proposal provides for Alternative Compliance Mechanism.

Supports cost recovery language through the Environmental Cost Recovery clause.

The FPSC, not the IOUs, should establish the REC market. A REC is retained by the owner of the renewable resource from which it is derived unless sold or transferred. Within 90 days, the FPSC must institute the structure, governance and procedures for administering market.

### **Consumer Correspondence**

Approximately 20 letters from customers urged 20% RPS by 2020.

### **Late-filed Comments of Marni Zollinger**

PSC presented an entirely pro-utility RPS plan.

Navigant’s study was specifically designed to remove the most economically viable options of high-efficiency and investor-funded options.

Commissioner Skop proposal “appears to be a good effort upon which the addition of a few key ideas might yield an RPS rule that actually favors the people of Florida.”

Standard Offer Contracts – these contracts to date are from the Carter era. They divide the generator world into cogeneration-style plant not base load facilities, which are larger scale.

Let the market dictate the rate of input of clean and green and actually uphold the tenants of a “free enterprise” system versus this mockery, which reveals itself as protectionist legislation.

As to funding solar rebates, it’s an excellent idea. Have the IOUs go ahead and pay out of dividends only.

As to avoided cost plus model, this is a backwards idea that the costs of making emissions have any relation at all to the cost of renewables. Protectionist legislation doesn’t get better than this contrived means to subvert a “free market.”

As to utility self-build, no objection. If they fund new sources from dividends, let them own it. If they fund from cost recovery or increased rates, let the people own it.