

Electric & Gas Utility | 2602 Jackson Bluff Road | Tallahassee | FL | 32304 | 850-891-4968

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FPSC - COMMISSION CLERK

July 19, 2019

Clerk's Office
State of Florida Public Service Commission

Dear Sir/Madam:

The following pages are the City of Tallahassee Utilities' responses to the "Ten-Year Site Plans for Florida's Electric Utilities Supplemental Data Request #2" pursuant to the request received from Florida Public Service Commission Staff member Mr. Doug Wright. Please note that a copy has been separately provided to Mr. Wright via e-mail per his request. If you should have any questions regarding this report, please feel free to contact me at (850) 891-3130 or paul.clark@talgov.com. Thank you.

Sincerely,



Paul D. Clark, II
Principal Engineer

Attachment

Forecasting

1. With respect to the forecasting methodology, procedure, and accuracy associated with City of Tallahassee Utilities' forecast of "Total Sales to Ultimate Customers," please specify all the differences/ modifications/ improvements, if any, between City of Tallahassee Utilities' 2018 TYSP and 2019 TYSP.

The only substantive differences/modifications/improvements made with respect to the City of Tallahassee, Electric & Gas Utility's ("TAL") forecasting methodology, procedures or accuracy between the issuances of its 2018 and 2019 TYSPs was related to the weighted blending of the economic data. For the 2018 forecast, the economic data from Woods & Poole and the Bureau of Economic and Business Research (BEBR) was weighted 20% and 80%, respectively. For the 2019 Forecast, the Woods & Poole/BEBR blend was 50/50. TAL and its consultant, nFront Consulting LLC, determined that this change was needed to temper fluctuations observed in the BEBR economic data forecast available at the time the 2019 forecast was produced versus BEBR's previous projections. TAL's forecasting methodology, procedure, and accuracy is discussed further in its 2019 TYSP report (Chapter II) and in its responses to related questions in FPSC Staff's "Review of the 2019 Ten-Year Site Plans for Florida's Electric Utilities, Supplemental Data Request #1" (Questions #3 through #23).

Generating Units

2. Please identify the status of the Application for Surrender of License for the Jackson Bluff Hydroelectric Project, filed with the Federal Energy Regulatory Commission on June 5, 2017.
 - a. Please explain the motivation for filing an application for surrender for the project.

TAL's primary motivation for surrendering its license to operate the "Jackson Bluff Hydroelectric Project" (referred to in its 2019 TYSP filing as the "C. H. Corn Hydroelectric Station") was to reduce cost and risk. As reported in its prior TYSPs, because the hydroelectric generating units were run-of-river (dependent upon rainfall, reservoir and downstream conditions), TAL considered these units as "energy only" and not as dependable capacity for planning purposes. Further, the energy contribution from

the facility was minimal, about 17 GWh annually on average, which is less than 1% of TAL's annual net energy for load requirement. Yet the cost of staffing, operating and maintaining the facility and the transmission service required to deliver the energy to the TAL electric system was considerable. After reviewing its options, TAL ultimately determined that the value provided by the facility did not justify its cost.

- b. Please identify when the project is expected to be fully surrendered.

As reported in TAL's 2019 TYSP (Chapter III, Section 3.2.3), "All decommissioning activities have been completed and FERC issued a letter accepting the City's surrender of the operating license on March 13, 2019."

Flood Mitigation

3. Please explain the Utility's planning process for flood mitigation for current and proposed power plant sites and transmission/distribution substations.

TAL is required to follow the U.S. Environmental Protection Agency's (EPA) stormwater permit process as part of the National Pollutant Discharge Elimination System (NPDES) program. This is also as a part of the Site Certification application process for proposed power plant sites. During the permitting process, TAL has an engineering firm design the site to address potential flooding conditions. After the permit is issued, TAL's flood mitigation plan is simply to build according to the engineering firm's final site design. Any subsequent change needed on the plant site that may require modification of the site's storm water system triggers a new design review.

The potential for flooding is also a consideration in the siting of new transmission and distribution substations. All TAL's new and most of its older transmission/distribution substations are constructed outside flood plains. TAL does have a few older stations within flood plains, but the equipment in the stations are constructed high enough that flood water cannot reach them.