



An Equal Opportunity Employer

Southwest Florida Water Management District



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WaterMatters.org

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June 23, 2025

Mr. Greg Davis, Engineering Specialist
Florida Public Service Commission
Division of Engineering
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Subject: 2025 Electric Utility Ten-Year Site Plans

Dear Mr. Davis:

In response to your request, the Southwest Florida Water Management District (District) has completed its review of the 2025 Ten-Year Site Plans for Duke Energy Florida (DEF), Florida Municipal Power Agency (FMPA), Florida Power & Light Company (FPL), Lakeland Electric (LAK), Tampa Electric Company (TECO) and Seminole Electric Cooperative (SEC). The District conducted its review pursuant to Section 186.801(2)(e), Florida Statutes, which requires the Public Service Commission to consider "the views of the appropriate water management district as to the availability of water and its recommendation as to the use by the proposed plant of salt water or fresh water for cooling purposes." Considering solar generating facilities only require small quantities of water for occasional cleaning of solar panels, they have been excluded from this review.

Regarding the construction of prospective non-solar generating facilities within the District (i.e., those that are not already approved, undergoing approval or under construction) our findings are as follows.

- DEF is planning to add four new combustion turbine units between 2033 and 2034 at undesignated sites which may or may not be located in the District
- FMPA is not planning to construct any new generating facilities within the District
- FPL is planning upgrades at its Manatee plant in 2027 and 2032
- LAK is not planning to construct any new generating facilities within the District
- TECO is planning to add a future combustion turbine unit in 2031 at an undesignated site likely to be located within the District
- SEC is planning to add two new combustion turbine units in 2028 and 2030 and a new combined cycle unit in 2032 at undesignated sites that may or may not be located in the District

The District offers the following technical assistance comments for consideration.

- The most water conserving practices must be used in all processes and components of the power plant's water use that are environmentally, technically and economically feasible for the activity, including reducing water losses, recycling, and reuse. If a lower quality water is available and is environmentally, technically and economically feasible for all or a portion of the proposed use, this lower quality water must be used.

Mr. Greg Davis, Engineering Specialist

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- For new generating facilities proposed in the southern and much of the central portions of the District, there are additional water use constraints. These areas have been designated as Water Use Caution Areas. This designation has occurred in response to water resource impacts, such as saltwater intrusion, lowered water levels in lakes and wetlands, and reduced stream flows, which have been caused by excessive ground water withdrawals. Regional recovery strategies are being implemented to address these adverse water resource impacts. In Polk and southern Lake counties, there are also water use constraints associated with groundwater withdrawals above the 2025 demand within the Central Florida Water Initiative area. This designation has occurred in response to current and future water resource impacts which are anticipated to occur as a result of future growth and water withdrawals. The District has heightened concerns regarding potential impacts due to additional water withdrawals in these areas.
- Early coordination with the District's Water Use Permit (WUP) staff is encouraged prior to submittal of any site certification or WUP applications. For assistance or additional information concerning the District's WUP program, or to schedule a meeting, please contact Jerry Harding, WUP evaluation and compliance manager, at (813) 445-8070 or jerry.harding@swfwmd.state.fl.us.

We appreciate this opportunity to participate in the review process. If you have any questions or require further assistance, please do not hesitate to contact me at (352) 269-6937 or james.golden@watermatters.org.

Sincerely,



James J. Golden, AICP
Senior Planner

JG

c: April Breton, SWFWMD
Elizabeth Fernandez, SWFWMD
Jerry Harding, SWFWMD