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A Touchstone EnergySM Partner

August 22, 2001

FPSC-COMMISSION CLERK

Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 VIA HAND DELIVERY

> RE: In Re: Territorial Dispute Between West Florida Electric Cooperative Association, Inc. and Gulf Power Company in Washington County, Florida Docket No.: 010441-EU

Dear Ms. Bayo:

I am enclosing herewith the originals and fifteen (15) copies of the Rebuttal Testimony of Jeff Parish, Joseph E. Perry, III, P.E., Mark A. Cicchetti, Michael K. Moore, P.E. and Russell L. Dunaway filed on behalf of West Florida Electric Cooperative Association, Inc.

I am also enclosing a copy of this letter as an acknowledgement copy and would appreciate it if you would file stamp it and return it to me in the enclosed self-addressed/stamped envelope as an acknowledgement of the date the above Rebuttals were filed. Please call me if you have any questions regarding this matter.

Very truly yours,

Li I Chil

PSC-BUREAU OF RECORDS

Gary F. Clark

10407-01 thru 10411-01

GFC/daj Enclosures

CC:

John H. Haswell, Esquire Attorney for West Florida Electric Cooperative Association, Inc. Frank E. Bondurant, Esquire Attorney for West Florida Electric Cooperative Association, Inc. William S. Rimes, Executive Vice President and CEO West Florida Electric Cooperative Association, Inc. Jeffrey A. Stone, Esquire Attorney for Gulf Power Company Russell A. Badders, Esquire Attorney for Gulf Power Company

The power of human connections

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Territorial Dispute Between West Florida Electric Cooperative Association, Inc. and Gulf Power Company in Washington County, Florida. Docket No.: 010441-EU

Date Filed: August ____, 2001

REBUTTAL

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OF

RUSSELL L. DUNAWAY

FOR

WEST FLORIDA ELECTRIC COOPERATIVE ASSOCIATION, INC.

;

DOCUMENT NUMBER-DATE

1		West Florida Electric Cooperative Association, Inc.				
2	Before the Florida Public Service Commission					
3	Rebuttal Testimony of					
4	Russell L. Dunaway					
5	Docket No. 010441-EU					
6		Date of Filing: August 22, 2001				
7						
8	Q.	Please state your name, business address and occupation.				
9	А.	Russell L. Dunaway, P.O. Box 127, 5282 Peanut Rd., Graceville,				
10		Florida. I am Vice President, Finance and Administration for West				
11		Florida Electric Cooperative.				
12	Q.	Are you the same Russell L. Dunaway that filed direct testimony in				
13		this docket dated July 30, 2001?				
14	A.	Yes.				
15	Q.	What is the purpose of your rebuttal testimony in this docket?				
16	Α.	My purpose is to rebut portions of the testimony of Mr. T.S.				
17		Anthony and Mr. Ted Spangenberg, Jr. testifying on behalf of Gulf				
18		Power Company.				
19	Q.	Do you agree with Mr. Anthony's statement that Gulf's efforts to				
20		successfully compete against the natural gas driven compression				
21		alternative surpassed West Florida's expectations regarding the				
22		ability to achieve a win-win agreement with this customer?				
23	A.	No. West Florida's expectation is to serve this load. Anthony				
24		forgets that between 1997 and November 2000, ECS, FGT or				
25		whatever they call themselves did not discuss service with West				

Florida. As Gulf Power clearly states, all the discussion was between Gulf Power and FGT/Enron. Clearly FGT/Enron and Gulf Power kept West Florida out of the loop. How could we possibly have any expectation of competing against natural gas driven compression when we were not asked about it. And if Anthony is suggesting that the additional load at Station 13-A is competitive, we take issue with it. This is not a competitive load.

8 Q. In the discussions with ECTR in 1996, did they indicate at what
9 rate level electricity would be competitive with natural gas drive
10 compression?

11 A. Yes. Mr. David Brown, Director, ECTR stated the price would 12 have to range between 2 to 3 cents per kilowatt-hour with ETCR 13 owning the substation. In subsequent discussions with Ms. Cheryl 14 Perchal, Vice President, Market Analysis for ETCR they also Gulf's 15 required a 3.5% annual cap on any future increases. 16 present PX rate is 3.8 cents per kilowatt-hour, assuming a 75% 17 load factor, which exceeds the price ETCR indicated would be 18 competitive with natural gas compression. ECS has also agreed to 19 pay Gulf for a stand-by transformer.

Q. Mr. Anthony stated that AEC and West Florida demonstrated a
 lack of energetic interest when contacted in December 1998 by
 ECS. He implied general discussions concerning the project were
 conducted with West Florida. Do you recall any discussions
 between West Florida Electric and ECS in December 1998?

25 A. No. ECS did not make a formal request, in December 1998, for

Docket No. 010441-EU 2 Witness: Russell L. Dunaway

1 information regarding West Florida's interest in serving the 2 additional load proposed at the FGT pumping station. According to 3 ECS's answer to West Florida's informal interrogatories, "ECS 4 made a phone call to WFEC's general number in December of 5 1998. The phone call was not returned." Our business records do 6 not show any evidence of receiving the call. If the unconfirmed 7 call was ECS only attempt to request a proposal from West 8 Florida, it was ECS that demonstrated a lack of interest in West 9 Florida.

10 Q. Mr. Anthony suggests that Gulf did not provide special contractual 11 arrangements to ECS in order to encourage ECS to choose Gulf 12 as the electric service provider. Would you comment on that 13 statement?

14 Our request to review the contract between Gulf and ECS was Α. 15 denied. However, its apparent Gulf entered into a contract with 16 ECS that is completely unique to this customer and therefore is 17 considered a special contractual arrangement. It seems unusual 18 for Gulf, or any utility, to proceed with surveying a six-mile 19 transmission line right-of-way easement in November 2000, 20 several months prior to finalizing the terms of the contract in 21 February 2001.

Q. Were Gulf and ECS aware that West Florida would contest Gulf's
right to serve the additional load proposed on an existing
customer's site, which West Florida has served for over 50 years,
prior of their signing the contract on February 13, 2001?

Docket No. 010441-EU 3 Witness: Russell L. Dunaway

A. Yes. In fact, thirteen days after signing the contract, on February
 13, 2001, Gulf and ECS filed a Joint Petition for Declaratory
 Statement with the FPSC. Preparations for filing the petition were
 probably made prior to the actual signing of the contract as a
 result of several letters mailed to ECS from West Florida
 beginning in December 2000.

7 Q. Mr. Spangenberg asserts that ECS is a new customer; hence,
8 Gulf Power has the right to serve it. Is that correct?

9 Α. No, it is not. FGT, ECS, and Enron North America are all part of 10 Enron Corporation. They all have the same principal place of 11 business in Houston, Texas. In addition, FGT has represented to 12 the Federal Government that it is the owner of Station 13-A and 13 represents 13-A as an expansion of its existing facilities. See my 14 Exhibit _____ (RD - 8), which is an excerpt of several pages 15 from FGT's own filing with the FERC as late as last month (July 16 2001). It would be basically a sham to permit Florida Gas 17 Transmission and Gulf Power to claim that ECS is a new 18 customer. Even if there was any merit to that assertion, 19 nonetheless, the site is wholly within West Florida's service area, 20 the facilities to be constructed will be interconnected with the 21 current customer's facilities, and on that basis alone West Florida 22 is entitled to serve this facility.

Q. Are Mr. Spangenberg's comments concerning West Florida's lack
 of ownership in transmission lines and substations accurate?

25 A. No. As referenced in my direct-filed testimony, West Florida is a

member/owner of AEC and as such, West Florida has joint
ownership in all of AEC's assets including 230 kv and 115 kv
transmission lines, substations and generation facilities. West
Florida has owned and operated substations for over fifty years. If
the FPSC rules in favor of West Florida, we plan to own the
substation serving the additional load at FGT pumping station
13-A.

8 Q. Mr. Spangenberg states that ECS's choice of Gulf is simply a case
9 of free enterprise at work. Do you agree with his assertion?

No. Gulf Power is a public utility as defined in Chapter 366.02(1) 10 Α. 11 Florida Statues and West Florida is considered an electric utility 12 as defined in Chapter 366.02(2) Florida Statues. Both companies 13 are regulated monopolies operating under the jurisdiction of the 14 FPSC. The only free enterprise entity involved is ECS. As such, 15 it is not ECS's right, in the State of Florida, to shop electric rates and choose another electric supplier to furnish electricity to a site 16 17 that is already receiving central station electricity.

18 Q. Mr. Spangenberg also questions whether ECS could rely on any
19 contract with West Florida, suggesting that the members could
20 change the arrangements and make any deal with West Florida
21 risky. Is that correct?

A. No, it is not, and it is basically a ridiculous suggestion. West
Florida is bound by its agreements like any other corporation.
Gulf Power shareholders can't overrule a binding contract
between Gulf Power and another party and neither can West

1 Florida's members. What Gulf Power shareholders and West 2 Florida's members can do, in both cases, is to vote on directors 3 and trustees, either keeping them in office or throwing them out, 4 and ECS will have a direct voice and vote in West Florida's annual 5 meetings and elections. Unless ECS is a stockholder of Gulf 6 Power Company, ECS will have no voice at Gulf Power's 7 stockholder meetings and elections. If what Spangenberg says 8 were true, then he is saying that no agreement with anybody and 9 a member owned utility is binding. I think the Commission would 10 take issue with that regarding all of the territorial agreements it 11 has approved between electric cooperatives, municipalities, and 12 investor owned utilities.

13 Q. How would you characterize Mr. Spangenberg's testimony
14 regarding the FPSC's lack of regulation over the level of West
15 Florida rates?

16 A. He is absolutely wrong. Chapter 366.04 (2) (B) Florida Statues
17 requires the FPSC to prescribe a rate structure for all electric
18 utilities.

Florida Administrative Code Chapter 25-9.051 (7) states "Rate Structure refers to the classification system used in justifying different rates and more specifically; to the rate relationship between various customers classes, as well as the rate relationship between members of a customer class."

Mr. Spangenberg has totally misrepresented the facts to misleadthe Commission.

Docket No. 010441-EU 6 Witness: Russell L. Dunaway

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1 At the appropriate time, West Florida will develop a rate tariff for 2 this customer class, based on cost of service, and will file the tariff with the FPSC for their approval. ECS will have the right to 3 4 intervene in the rate approval process and have their concerns voiced to the FPSC. The FPSC will not allow West Florida to 5 subsidize other customer classes by excessively charging this 6 7 customer. Therefore, the FPSC approval process certainly does 8 control the rate level West Florida will set for this customer. 9 Exhibit (RD-9) shows an example of a Large Power rate tariff with the approval by the FPSC stamped on the back of the 10 11 tariff. However, West Florida cannot design a rate to submit to the 12 FPSC for approval based on the limited and inconsistent 13 information that has been provided to West Florida from ECS.

14 Q. Is Station 13 merely a maintenance facility as Spangenberg15 Claims?

16 Α. No, it is not. Station 13 is a compression station. West Florida is 17 providing electric service to FGT's facilities, which include gas 18 compression. FGT is expanding that gas compression capability 19 by adding new equipment. Spangenberg is attempting to further 20 confuse the Commission by asserting that this "new " customer 21 called ECS will be providing compression services, which are 22 totally different from what FGT is currently doing on the site and 23 thereby attempting to add credence to this "new customer" theory. 24 Q. Mr. Spangenberg states in his testimony that this area is largely

25 undeveloped. Do you agree with this statement?

1 Α. No. Spangenberg is again trying to confuse the Commission by 2 avoiding the word "rural." Interestingly he is somewhat in a box 3 because he claims that the "disputed area: is only the footprint of 4 the equipment. I believe about the only thing under that footprint 5 would be some grass and some trees. But, if you go into what is 6 really the disputed area, a radius of four miles from the site, it is 7 definitely rural and has rural developments in it. It certainly is not 8 developed as an urban area, but the disputed area has fair to 9 moderate density with nearly 400 customers being served by 10 West Florida. This is not miles and miles of uninhabited terrain.

11 Q. Mr. Spangenberg identifies the property as "industrial." What are12 your comments?

13 Again, Mr. Spangenberg is confusing the use that a land owner Α. 14 may want to use his property for, and what is actually out there 15 right now. Again, this is a rural area and on the site itself is a 16 compression station operated by Florida Gas Transmission and 17 served by West Florida. Interestingly, Station 13 is what could be 18 characterized as an industrial use of the property and for the last 19 40 years Gulf Power has not objected to that. He claims that the 20 disputed area is "industrial" when in fact that is just the use that 21 the customer wants to use it for.

22 Q. Do you have any concluding remarks?

A. Yes. Gulf Power's basic position in this case is that ECS is
entirely a new customer, and has gone to great lengths to make it
appear so. But, that position, however, makes about as much

1		sense as an attempt by West Florida and AEC to serve a vacant
2		lot in downtown Pensacola right under Gulf Power's nose. All we
3		would have to do is arrange to have the landowner be someone
4		who has never received service from Gulf Power before, and get
5		him to locate equipment that requires 230 kV service. Then, as
6		GPC claims, we could build a transmission line right to the vacant
7		lot.
8	Q.	Does this conclude your rebuttal testimony?
9	Α.	Yes it does.
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Florida Public Service Commission Docket No. 010441-EU

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF JACKSON

BEFORE ME, the undersigned authority personally appeared RUSSELL L. DUNAWAY, who being by me first duly sworn and who is personally known to me, deposed and says that the foregoing Rebuttal Testimony and Exhibits, if any, are true and correct to the best of his information, knowledge and belief.

. Canana

Russell L. Dunaway

Sworn to and subscribed before me this $\frac{21^{54}}{24}$ day of August, 2001.

Notary Public, State of londo Print Name: Commission Number: CC829709 Commission Expiration Date: 4-25-03

Beverly E Anderson My Commission CC829709 Expires April 25, 2003

Exhibit ____ (RD-8)

(A composite of 12 pages)

Federal Energy Regulatory Commission Office of Energy Projects

FLORIDA GAB TRANSMISSION COMPANY PHASE V EXPANSION PROJECT

Final Environmental Impact Statement



July 2001

In Reply Refer To: OEP/DEER/Gas Group 1 Florida Gas Transmission Company Docket Nos. CP00-40-000, -001, and -002

TO THE PARTY ADDRESSED:

The staff of the Federal Energy Regulatory Commission (FERC or Commission) has prepared a final environmental impact statement (EIS) to assess the environmental impact associated with the construction of facilities proposed by Florida Gas Transmission Company (FGT) and referred to in this final EIS as the FGT Phase V Expansion Project in the above-referenced docket.

The final EIS was prepared to satisfy the requirements of the National Environmental Policy Act (NEPA). The staff concludes that approval of the FGT Phase V Expansion Project, with appropriate mitigating measures as recommended, would have limited adverse environmental impact. The final EIS evaluates alternatives to the proposal, including system alternatives, route alternatives, and route variations.

The final EIS assesses the potential environmental effects of the construction and operation of the proposed facilities in Mississippi, Alabama, and Florida.

The purpose of the FGT Phase V Expansion Project is to transport up to 112,487 million cubic feet (MMcf) per day of natural gas on an annual basis to seven electric generation customers and others in Florida. Three of these customers, representing 94 percent of proposed transportation capacity, are in the process of developing and constructing additional gas-fired electric generating capacity to serve the growing market for electricity in Florida. FGT estimates the total cost of its Phase V Expansion Project at \$452 million.

FGT proposes to construct and operate an interstate natural gas pipeline and associated aboveground facilities under Section 7(c) of the Natural Gas Act (NGA) and Title 18, CFR, Part 157. FGT proposes to expand its existing 5,225-mile-long natural gas pipeline transmission system by the construction of approximately 165.8 miles of pipeline loops and laterals, 132,615 horsepower (hp) of additional compression at nine existing and three new compressor stations, and other associated auxiliary facilities in various locations in Mississippi, Alabama, and Florida.

In addition, FGT proposes to acquire from Koch Gateway Pipeline Company (KGPC) an interest in KGPC's Mobile Bay Lateral that would give FGT the rights to about 50 percent of the available capacity on that system. Concurrent with FGT's filing, KGPC filed an application in Docket No. CP00-39-000 for approval to abandon by sale to FGT the interest in its Mobile Bay Lateral. However, the environmental analysis of this action qualifies as a categorical exclusion and is not included in the EIS.

The final EIS has been placed in the public files of the FERC and is available for public inspection at:

Federal Energy Regulatory Commission Public Reference and Files Maintenance Branch 888 First Street, N.E., Room 2A Washington, DC 20426 (202) 208-1371

Copies of the final EIS have been mailed to Federal, state and local agencies, public interest groups, individuals who have requested the final EIS, newspapers, and parties to this proceeding.

In accordance with the Council on Environmental Quality's (CEQ) regulations implementing the National Environmental Policy Act, no agency decision on a proposed action may be made until 30 days after the U.S. Environmental Protection Agency publishes a notice of availability of an final EIS. However, the CEQ regulations provide an exception to this rule when an agency decision is subject to a formal internal appeal process which allows other agencies or the public to make their views known. In such cases, the agency decision may be made at the same time the notice of the final EIS is published, allowing both periods to run concurrently. The Commission decision for this proposed action is subject to a 30-day rehearing period.

Additional information about the proposed project is available from the Commission's Office of External Affairs, at (202) 208-1088 or on the FERC Internet website (www.ferc.gov) using the "RIMS" link to information in this docket number. Click on the "RIMS" link, select "Docket #" from the RIMS Menu, and follow the instructions. For assistance with access to RIMS, the RIMS helpline can be reached at (202) 208-2222.

Similarly, the "CIPS" link on the FERC Internet website provides access to the texts of formal documents issued by the Commission, such as orders, notices, and rulemakings. From the FERC Internet website, click on the "CIPS" link, select "Docket #" from the CIPS menu, and follow the instructions. For assistance with access to CIPS, the CIPS helpline can be reached at (202) 208-2474.

David P. Boergers Secretary

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EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) for the Florida Gas Transmission Company (FGT) Phase V Expansion Project has been prepared by the staff of the Federal Energy Regulatory Commission (FERC or Commission) to fulfill the requirements of the National Environmental Policy Act and the Commission's implementing regulations under Title 18, Code of Federal Regulations (CFR), Part 380.

FGT proposes to construct and operate an interstate natural gas pipeline and associated aboveground facilities under Section 7(c) of the Natural Gas Act (NGA) and Title 18, CFR, Part 157. FGT proposes to expand its existing 5,225-mile-long natural gas pipeline transmission system by the construction of approximately 165.8 miles of pipeline loops and laterals, 132,615 horsepower (hp) of additional compression at nine existing and three new compressor stations, and other associated auxiliary facilities in various locations in Mississippi, Alabama, and Florida.

FGT would also acquire from Koch Gateway Pipeline Company (KGPC) an interest in KGPC's Mobile Bay Lateral that would give FGT the rights to about 50 percent of the available capacity on that system. Concurrent with FGT's filing, KGPC filed an application in Docket No. CP00-39-000 for approval to abandon by sale to FGT the interest in its Mobile Bay Lateral. The environmental analysis of this action qualifies as a categorical exclusion and is not included in the EIS

The FGT Phase V Expansion Project is designed to transport up to 112,487 million cubic feet (MMcf) per day of natural gas on an annual basis to seven electric generation customers and others in Florida. Three of these customers, representing 94 percent of proposed transportation capacity, are in the process of developing and constructing additional gas-fired electric generating capacity to serve the growing market for electricity in Florida. FGT estimates the total cost of its Phase V Expansion Project at \$452 million

PROJECT IMPACTS

The construction of the FGT Phase V Expansion Project would affect a total of 2,069 acres of land. 1 The total acreage affected by construction comprises 1,815 acres for pipeline construction right-of-way, 81 acres of extra work space, 53 acres for the compressor stations and meter station, 0.2 acre for the regulator station, and 120 acres for the pipe and contractor yards. A total of 585 acres would be required for operation of the facilities.

FGT estimates that 66 residences would be within 50 feet of the construction work areas (e.g., construction rights-of-way and extra work areas). No planned residential, commercial, or industrial developments would be crossed. Construction near residential areas would be conducted so as to minimize adverse impacts on residences and ensure that cleanup is quick and thorough. For residences within 25 fect of the construction work areas, FGT would comply with the workspace limitations and the construction techniques detailed on the Residential Implementation Plan site-specific drawings.

Construction and operation of the FGT Phase V Expansion Project would result in temporary and permanent alteration of wildlife habitat, as well as direct impact on wildlife such as disturbance, displacement, or mortality. The clearing of forest for construction and operation of the pipeline would result in a change of forested wildlife habitats to herbaceous and shrub cover habitat types. After construction, the temporary construction right-of-way and extra work areas in previously forested areas would be allowed to revegetate naturally and would eventually return to preconstruction conditions. In upland areas, the



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1.0 INTRODUCTION

The staff of the Federal Energy Regulatory Commission (FERC or Commission) has prepared this environmental impact statement (EIS) to assess the environmental impact associated with the construction of facilities proposed by Florida Gas Transmission Company (FGT) and referred to in this final EIS as the FGT Phase V Expansion Project.

On December 1, 1999, FGT filed an application with the Commission in Docket No. CP00-40-000, under Section 7(c) of the Natural Gas Act (NGA) and Part 157 of the Commission's regulations for a Certificate of Public Convenience and Necessity (Certificate) to construct, acquire, and operate various pipeline and compression facilities in Mississippi, Alabama, and Florida. Subsequently, FGT filed modifications to the proposed project for several of the pipeline components and compressor stations.⁴ The project, as currently proposed, herein consists of the construction and operation of about 165.8 miles of natural gas pipeline and compression totaling 132,615 horsepower (hp).

FGT would also acquire from Koch Gateway Pipeline Company (KGPC) an interest in KGPC's Mobile Bay Lateral that would give FGT the rights to about 50 percent of the available capacity on that system. Concurrent with FGT's filing, KGPC filed an application in Docket No. CP00-39-000 for approval to abandon by sale to FGT the interest in its Mobile Bay Lateral. This action qualifies as a categorical exclusion with no environmental analysis required under the Commission's regulations (Title 18, Code of Federal Regulations, Part 380) and is not included in this EIS.

1.1 PROJECT PURPOSE AND NEED

The purpose of the proposed FGT Phase V Expansion Project is to deliver natural gas to satisfy growing fuel requirements of electric generation customers and others in the state of Florida. The largest users, for which most of the proposed facilities would be constructed, would be Tampa Electric Company (TECO), Florida Power and Light Company (FPL), and Gulf Power Company (an affiliate of Southern Company Services, Inc.). Each of these companies is in the process of developing and constructing additional gas fired electric generating capacity to serve the growing market for electricity in Florida.

In addition, Peoples Gas System (Peoples) and the City of Tallahassee would be served with smaller quantities of natural gas for local distribution. Table 1.1-1 lists the FGT Phase V Expansion Project customers and natural gas volumes in million cubic feet (MMcf). FGT estimates that the Phase V Expansion Project would cost approximately \$452 million.

FGT states that the proposed project would enhance the environment by using natural gas to repower the FPL Sanford Plant and the four generating units at the City of Tallahassee's Purdom Station, which are currently fueled by oil, and TECO's Bayside Plant, which is currently fueled by coal. In addition, constructing two new gas-fired electric generation stations (Gulf Power Company's Lansing Smith Unit 3 and Jacksonville Electric Authority's [JEA's] Brandy Branch Plant) would reduce emissions compared to the use of other fuels.

<u>1</u>/

FGT amended its original application (filed December 1, 1999) on August 1, 2000, and again on September 29, 2000, to reflect route changes and redistribution of compression for the proposed FGT Phase V Expansion Project. Originally, the proposal consisted of 215.4 miles of pipeline and 89,765 horsepower of compression

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2.0 PROPOSED ACTION

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2.1 PROPOSED FACILITIES

FGT proposes to expand its existing 5,225-mile-long natural gas pipeline transmission system by the construction of approximately 165.8 miles of pipeline, 132,615 hp of additional compression, and other associated auxiliary facilities in various locations in Mississippi, Alabama, and Florida. Specifically, FGT proposes to:

- construct about 165.8 miles of pipeline including:
 - 65.1 miles of mainline loops $\frac{4}{}$ and lateral loops in Mississippi, Alabama, and Florida;
 - 71.9 miles of various new laterals; and
 - 28.8 miles of new supply pipeline;
 - install a total of about 132,615 hp of compression at nine existing and three new compressor stations in Alabama and Florida;
- construct two regulator stations in Florida;
- construct three delivery point meter stations in Florida;^{5/}
- construct one receipt point meter station in Alabama; and
- construct nine mainline valves.

The location of FGT's proposed facilities is shown on figure 2.1-1 (maps 1 and 2). Table 2.1-1 identifies the proposed pipelines. Table 2.1-2 identifies the proposed aboveground facilities. Detailed maps of the pipelines and aboveground facilities are presented in appendix B.

2.2 LAND REQUIREMENTS

FGT proposes to use construction right-of-way widths varying from 30 to 245 feet (see table 2.2-1). These widths vary depending on the diameter of the pipe and the availability of an immediately adjacent existing corridor that could be used by FGT for temporary work space. FGT has attempted to reduce impacts by locating approximately 123.3 miles (74 percent) of the pipeline adjacent to existing rights-of-way. Approximately 42.5 miles (26 percent) of the pipeline would be constructed on new right-of-way that does not parallel existing rights-of-way. Figures C-1 through C-50 in appendix C show typical cross-sectional drawings indicating temporary construction right-of-way requirements, new permanent rights-of-way.

A loop is a segment of pipeline that is usually adjacent to an existing pipeline and connected to it at both ends

The three delivery points would be constructed under FGT's existing blanket Certificate issued in Docket No. CP82-553. However, an environmental analysis of these facilities is included in this EIS



Facility	New Compressor Horsepower	Upgrade Horsepower	Total Proposed Horsepower	MP	County	State
COMPRESSOR STATIONS						
Mainline						
Station No. 11A	15,700	_	15,700	190.8	Mobile	AL
Station No. 12A	15,700	2,650	18,350	260 2	Santa Rosa	FL
Station No 13A	24,000	-	24,000	324.5	Washington	FL
Station No. 14A	15,700	2,650	18,350	394.7	Gadsden	FL
Station No. 15A	7,200	400	7,600	468.7	Taylor	FL
Station No. 16	7,200		7,200	548.0	Bradford	FL
Station No. 17	15,700	_	15,700	608.0	Marion	FL
West Leg			·			
Station No 24	_	4,650	4,650	25 4	Gilchrist	FL
Station No 26		830	830	90.6	Citrus	FL
Station No. 27 a/	14,400	-	14,400	160.0	Hillsborough	FL
Mobile Bay Lateral						
Station No. 44 <u>a</u> /	3,335		3,335	28 8	Mobile	AL
St. Petersburg Lateral						
Station No. 31 a/	2,500	-	2,500	2.0	Osceola	FL
TOTAL	121,435	11,180	132,615			
REGULATOR STATIONS						
DeBary Regulator	_		_	14 6	Volusia	FL
Citronelle Regulator	_	-	-	170.4	Mobile	AL
METER STATIONS						
Delivery Points:						
FPL - Sanford		-		0.6	Volusia	FL
Gulf Power	~		-	27.7	Bay	FL
TECO Bayside	-	-	-	13 4	Hillsborough	FL
Receipt Point						
KGPC Meter Station	-	-	_	29.8	Mobile	AL
MAIN LINE BLOCK VALVES						
Mobile Bay Lateral	-		-	0 0	Mobile	AL
, ,		_	_	14.8	Mobile	AL
Gulf Power Lateral	-	_	-	14.2	Washington	FL
	-	-	-	21.2	Bay	FL
Sanford Lateral	-	-	-	69	Lake	FL
Loop J	_	-	-	25 4	Gilchrist	FL
Loop K	-	-	_	38.6	Levy	FL
Bayside Lateral	_	_		68	Hillsborough	FL
Loop G	_	_	-	97.5	Citrus	FI

TABLE 2.1-2 FGT's Proposed Aboveground Facilities

Wew compressor station.

2.2 LAND REQUIREMENTS

2.3.3 Aboveground Facility Construction Procedures

Construction of the two regulator stations and three new compressor stations would involve clearing and grading, where necessary, for placement of the facilities, piping, and structures. The sites would be cleared of trees, brush, and debris; and graded and compacted to surveyed elevations.

Concrete foundations would be poured and the compressor unit(s) and other large equipment would be mounted on their respective foundations. The compressor building and other ancillary buildings would then be erected around them. The natural gas piping, both above ground and below ground, would be installed and pressure-tested using a method similar to that used for the main pipeline. The piping would then be tied in to the main pipeline. The electrical wiring would be pulled through pre-installed conduits, and the instrument panels and control systems would be installed and circuit-checked.

The initial start-up of the station would be carried out in a carefully planned sequence to verify proper interconnections and equipment operation. The site would be cleaned and graded, permanent fencing installed or repaired, access roads and parking areas paved, and landscaping completed as necessary for visual and sound buffers following completion of construction activities.

Meter and regulator stations would be constructed with methods similar to those used for the construction of compressor stations, except that the sites would be smaller and the aboveground piping would be limited to meter tubes; sensor instrumentation necessary for accurate flow, pressure, and temperature measurement; and other related valves and equipment. Instrument panels and electronic data collection equipment would be located within a small on-site building.

Construction of additions to existing compressor stations would use procedures similar to those used for the construction of new facilities. The principal difference is that construction would be carried out adjacent to an existing operating facility.

Mainline block valve assemblies would be installed along the pipeline at intervals specified in the DOT regulations. They would be fenced as necessary to protect them from damage and vandalism.

2.3.4 Corrosion Protection and Detection Systems

The corrosion prevention and detection system prescribes the minimum requirements for the protection of metallic facilities from external, internal, and atmospheric corrosion. FGT would install cathodic test stations at one-mile intervals. FGT's cathodic protection system would consist of both internal and external corrosion analyses. For internal analysis, the gas would be checked at the upstream end of the system for low water content and percentage of contaminants within the gas stream. If gas is found to be corrosive, the appropriate action would be taken. FGT anticipates that the gas transported at these locations would be dry and free of corrosive matter and within the limits of FGT's quality specifications. Therefore, no further action would be needed.

Cathodic protection at the compressor stations would consist of the installation of a rectifier with a distributed ground bed throughout the station yard piping. This installation would be made after construction has been completed. The rectifier would be sized according to the current requirement test conducted with all underground piping in place. Because FGT's compressor stations are not isolated from the pipeline, FGT would be cathodically protecting the entire system as one unit.

At the nearest NSA (NSA 2), the existing L_{dn} is 53.6 dBA. The predicted L_{dn} noise level at NSA 2 for the new compressor unit and gas coolers was calculated to be about 44.4 dBA. At NSA 2, the proposed modifications would result in an increase of 0.5 dBA, and a new total compressor station L_{dn} of 54.1 dBA. Noise levels at other nearby NSAs should be lower since noise typically decreases with increasing distance. Because the noise level would be below the 55 dBA L_{dn} limit established by the FERC, no significant impact is expected.

Compressor Station 12A

FGT proposes to install one Pignone PGT10B/PCL 502 gas turbine/compressor at Compressor Station 12A, increasing the compression at the facility by 18,350 hp to a total station compression of 42,800 hp. FGT would use inlet and exhaust mufflers on the turbine and install it in an acoustically treated compressor building. FGT would also install three GEA Rainey gas coolers to the existing cooling bank.

At the nearest NSA (NSA 1), the existing noise level is 48.0 dBA. The predicted L_{dn} for the new equipment at NSA 1 is 42.0 dBA. The proposed modifications would result in an increase of 1.0 dBA, and a new total compressor station total of 49.0 dBA. Because this level would be below the 55 dBA L_{dn} limit established by the FERC, no significant impact is expected. Vibration levels at NSA 1 would be unaffected.

Compressor Station	Nearest NSA	Distance (feet)/ Direction	Existing L _{dn} (dBA)	Phase V Additional L _{an} (dBA)	Total L _{dn} (dBA)	Noise Increase (dBA)
ALABAMA						······································
11A	NSA 2	1,150/east	53.6	44.4	54.1	0.5
44 .	NSA 1	1,080/northeast	48.1	48.8	51.5	3.4
FLORIDA						
12A	NSA 1	1,600/northeast	48.0	42.0	49.0	1.0
13A	NSA 1	1,250/northeast	54.4	42.7	54.7	0.3
14A	NSA 1	2,400/southwest	47.0	45.5	49.3	2.3
15A	NSA 2	950/east	51.4	42.6	51.9	0.5
16	NSA 1	1,600/southeast	49.1	41.0	49.7	0.6
17	NSA 1	10,000/southwest	45.0	25.1	45.0	0.0
24	NSA 1	1,900/southeast	49.8 <u>a</u> /	+2.7	52.5	2.7
26 '	NSA 1	1,200/southeast	53.3 a/	+0.3	53.6	0.3
27	NSA 1	1,380/northwest	52.8	42.8	53.2	0.4
31	NSA 1	520/northeast	45.0	55.3	55.7	10.7

Compressor Station 13A

FGT proposes to add two GE-TS motor driven compressors inside of a new compressor building at Compressor Station 13A, increasing the compression at the facility by 24,000 hp to a total station compression of 36,700 hp. The compressor units would be installed in an acoustically treated building. In addition, FGT proposes to add five GEA Rainey gas coolers to the existing cooling bank.

3.11 AIR AND NOISE QUALITY

3.0 ENVIRONMENTAL ANALYSIS

At the nearest NSA (NSA 1), the existing L_{dn} noise level is 54.4 dBA. The predicted L_{dn} for the new equipment is 42.7 dBA. The proposed modifications would result in an increase of 0.3 dBA, and a new total compressor station total of 54.7 dBA. Because this is below 55 dBA L_{dn} no significant impact is expected.

Compressor Station 14A

FGT proposes to install one Pignone PGT10B/PCL 502 gas turbine/compressor at Compressor Station 14A, increasing the compression at the facility by 18,350 hp to a total station compression of 41,400 hp. FGT would use inlet and exhaust mufflers on the turbine and install the unit in an acoustically treated compressor building. FGT also would add three GEA Rainey gas coolers to the existing cooling bank.

At the nearest NSA (NSA 1), the existing L_{dn} noise level is 47.0 dBA. The predicted L_{dn} for the new equipment is 45.5 dBA at NSA 1. The proposed modifications would result in an increase of 2.3 dBA, and a new total compressor station total of 49.3 dBA. Because this is below 55 dBA L_{dn} , no significant impact is expected.

Compressor Station 15A

FGT proposes to add one Rolls Royce CR501-KC7/RFA-27 turbine-driven compressor unit at Compressor Station 15A, increasing the compression at the facility by 7,300 hp to a total station compression of 34,000 hp. FGT would use inlet and exhaust silencers on the turbine and install the compressor unit in an acoustically treated compressor building. In addition, FGT would add two GEA Rainey gas coolers to the existing cooling bank.

At the nearest NSA (NSA 2), the existing L_{dn} noise level is 51.4 dBA. The predicted L_{dn} for the new equipment is 42.6 dBA at NSA 2. The proposed modifications would result in an increase of 0.5 dBA, and a new total compressor station total of 51.9 dBA. Because this level would be below 55 dBA L_{dn} , no significant impact is expected.

Compressor Station 16

FGT proposed to add one Rolls Royce CR501-KC7/RFA-27 turbine compressor at Compressor Station 16, increasing the compression at the facility by 7,200 hp to a total station compression of 21,200 hp. FGT would use inlet and exhaust mufflers on the turbine and install the unit in an acoustically treated compressor building. In addition, FGT would add four GEA Rainey gas coolers to the existing cooling bank.

At the nearest NSA (NSA 1), the existing L_{dn} noise level is 49.1 dBA. The predicted L_{dn} for the new equipment is 41.0 dBA at NSA 1. The proposed modifications would result in an increase of 0.6 dBA, and a new total compressor station total of 49.7 dBA. Because this level would be below 55 dBA L_{dn} , no significant impact is expected.

Compressor Station 17

FGT proposes to install one Pignone PGT10B/PCL 502 gas turbine/compressor at Compressor Station 17, increasing the compression at the facility by 15,700 hp to a total station compression of 26,100 hp. FGT would use inlet and exhaust mufflers on the turbine and install it in an acoustically treated compressor building. In addition, FGT would add five GEA Rainey gas coolers to the existing cooling bank.

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3.11 AIR AND NOISE QUALITY





WEST FLORIDA ELECTRIC COOPERATIVE ASSOCIATION, INC.

LARGE POWER SERVICE

RATE SCHEDULE LP

RATE CODE E

AVAILABILITY: Available for large commercial and industrial power service located within the Cooperative's area, having a capacity requirement of at least 500 kVA, subject to the established rules and regulations of the Cooperative. No standby or auxiliary service provided.

<u>CHARACTER OF</u> SERVICE:

Three-phase, 60 Hertz, at secondary voltage.

MONTHLY RATE:	Customer Charge: Plus	\$105.00 per Meter
	Base Demand Charge: Plus	\$11.25 per kVA of Billing Demand
-	Energy Charge: · Plus	\$0.0211 per kWh
	Fuel Charge	\$(0.0003) per kWh

MINIMUM CHARGE:

In consideration of the Cooperative to furnish service, a minimum monthly charge shall be rendered equal to the Customer Charge plus the Demand Charge.

DETERMINATION OF

BILLING DEMAND:

The Billing Demand shall be the maximum kVA demand established by the Consumer for any period of fifteen (15) consecutive minutes during the month for which the bill is rendered, as indicated or recorded by a demand meter, but in no event less than seventy five (75%) of the highest demand established during the preceding eleven (11) months.

PRIMARY VOLTAGE DISCOUNT:

When the Cooperative renders service under this Rate Schedule at the local primary distribution voltage and any transformers required are furnished by the Consumer, the monthly rate will be subject to a discount of \$18.38 plus 0.26 per kVA of billing demand as determined above. A discount of one percent (1%) of the demand charge, energy charge, and fuel charge will also be included in the monthly billing.

In no event shall the primary voltage discount reduce the minimum monthly bill specified above.

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WEST FLORIDA ELECTRIC COOPERATIVE ASSOCIATION, INC.

LARGE POWER SERVICE (Continued)

BILLING ADJUSTMENTS:

(1) Wholesale Cost Adjustment:

This rate is based on the wholesale supplier's Rate Schedule P-14. Whenever this rate changes, this rate shall also change by increasing or decreasing the applicable unit charge by the change in the wholesale rate as indicated in the formula below. The customer shall be notified of any changes within ten (10) days of the official notification from the wholesale supplier.

Adjustment = (Existing Charge - New Charge) * 1.09

(2) <u>Tax Adjustment</u>:

The franchise fee set by each municipality is billed monthly by the cooperative to each affected customer.

(3) <u>Municipal Franchise Fee Adjustment</u>: The franchise fee set by each municipality is billed monthly by the Cooperative to each affected customer.

<u>TERMS OF PAYMENT</u>: Bills are due and payable when rendered and become delinquent if not paid within fifteen (15) days of the billing date of each month. After accounts become delinquent, written notice is provided and service may be disconnected after six (6) days if payment is not received.

Issued by: Jerry W. Smith, General Manager Effective July 1, 1994