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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 07 _____ -EI
IN RE: TAMPA ELECTRIC'S
PETITION TO DETERMINE NEED FOR
POLK POWER PLANT UNIT 6

TESTIMONY AND EXHIBIT
OF
WILLIAM A. SMOTHERMAN

DOCUMENT NUMBER-DATE

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ORIGINAL

TAMPA ELECTRIC COMPANY
DOCKET NO. 07 _____ -EI
FILED: 7/20/2007

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **PREPARED DIRECT TESTIMONY**

3 **OF**

4 **WILLIAM A. SMOTHERMAN**

5
6 **Q.** Please state your name, business address, occupation and
7 employer.

8
9 **A.** My name is William A. Smotherman. My business address is
10 702 N. Franklin Street, Tampa, Florida 33602. I am
11 employed by Tampa Electric Company ("Tampa Electric" or
12 "company") as Director of the Energy Services Department.

13
14 **Q.** Please provide a brief outline of your educational
15 background and business experience.

16
17 **A.** I received a Bachelor of Electrical Engineering degree in
18 1986 from the University of South Florida. In May 1986,
19 I joined Tampa Electric as an associate engineer, and I
20 have worked in the areas of system planning, commercial/
21 industrial account management and wholesale power
22 marketing. In February 2001, I was promoted to Director,
23 Resource Planning. My responsibilities included the
24 areas of system reliability, generation expansion and
25 system fuel and purchased power forecasting and related

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1 economic analyses. I was also responsible for directing
2 system optimization and overall operating and
3 profitability performance. In May 2007, I became
4 Director, Energy Services. My present responsibilities
5 include directing storeroom operations, parts and
6 material inventory, and procurement for all Energy Supply
7 operations departments. I am also responsible for coal
8 combustion byproduct management.

9
10 **Q.** What is the purpose of your testimony?

11
12 **A.** The purpose of my testimony is to describe Tampa
13 Electric's integrated resource planning ("IRP") process
14 and the resulting resource plan which supports the need
15 for Polk Unit 6, an integrated gasification combined
16 cycle ("IGCC") unit with 610 MW and 647 MW summer and
17 winter net capacity, respectively. My testimony will (1)
18 describe Tampa Electric's existing system and resource
19 mix, (2) describe Tampa Electric's IRP process for
20 selection of future demand and supply-side alternatives,
21 (3) demonstrate that Polk Unit 6 is the most cost-
22 effective alternative to reliably meet Tampa Electric's
23 customer needs, and (4) explain the adverse consequences
24 if the Polk Unit 6 is deferred or denied.

1 Q. Have you prepared an exhibit to support your testimony?

2

3 A. Yes, Exhibit No. _____ (WAS-1) was prepared under my
4 direction and supervision. It consists of the following
5 six documents:

6 Document No. 1 Energy Mix by Fuel Type

7 Document No. 2 Reliability Analyses

8 Document No. 3 Resource Plans

9 Document No. 4 Economic Analysis Results

10 Document No. 5 Scenario Analysis Results

11

12 Q. Are you sponsoring any sections of Tampa Electric's
13 Determination of Need Study for Electrical Power: Polk
14 Unit 6 ("Need Study")?

15

16 A. Yes. I am sponsoring the following sections of the Need
17 Study: I. "Executive Summary", II. "Introduction,
18 Purpose and Overview", III.A. "Description of Tampa
19 Electric's System", III.E.4. "Advanced Recovery of
20 Carrying Costs During Construction", III.E.5. "Impact of
21 Advanced Recovery of Carrying Costs", III.F.2. "Supply-
22 Side Technologies", IV. "Need for Capacity in 2013" (with
23 the exception of IV.A.2.), V. "Screening of Potential
24 Technologies", VI. "Detailed Economic Analysis", VIII.
25 "Scenario Analysis", IX. "Adverse Consequences if Polk

1 Unit 6 is Delayed or Denied" and X. "Conclusion".

2

3 **DESCRIPTION OF EXISTING SYSTEM AND RESOURCE MIX**

4 **Q.** Please describe Tampa Electric's service area.

5

6 **A.** Tampa Electric, an investor-owned electric utility, is
7 the principal subsidiary of TECO Energy, Inc. The
8 service area for Tampa Electric spans approximately 2,000
9 square miles and consists of Hillsborough County, western
10 Polk County and parts of Pasco and Pinellas counties.
11 Tampa Electric served approximately 654,000 customers as
12 of December 31, 2006.

13

14 **Q.** What types of units make up Tampa Electric's existing
15 generating system?

16

17 **A.** Tampa Electric has five generating stations that include
18 steam coal and IGCC baseload units, natural gas combined
19 cycle ("NGCC") intermediate load units, natural gas and
20 oil combustion turbine peaking load units, and internal
21 combustion peaking units. The total net system
22 generating capacity in summer 2007 is 4,300 MW and
23 represents 44 percent solid fuel, 53 percent natural gas
24 and 3 percent oil on a capacity basis.

25

1 Big Bend Station includes four pulverized coal-fired
2 steam units and three distillate fueled combustion
3 turbines. In May 2007, Big Bend Unit 4 was retrofitted
4 with additional environmental control systems including
5 selective catalytic reduction ("SCR") to reduce nitrogen
6 oxides ("NO_x") emissions. The remaining three coal units
7 will be retrofitted in 2008, 2009 and 2010 to complete
8 the station's comprehensive air emissions reduction
9 program.

10
11 H. L. Culbreath Bayside Station includes two NGCC units.
12 Bayside Unit 1 utilizes three combustion turbines, three
13 heat recovery steam generators ("HRSG") and one steam
14 turbine. Bayside Unit 2 utilizes four combustion
15 turbines, four HRSG and one steam turbine.

16
17 Polk Station includes one baseload and four peaking
18 generating units. Polk Unit 1 is an IGCC unit fired with
19 synthesis gas produced from gasified petroleum coke ("pet
20 coke"), coal or other solid fuels. This unit is capable
21 of using distillate oil as a backup fuel which improves
22 overall unit reliability. Polk Units 2 through 5 are
23 combustion turbines fired by natural gas. Units 2 and 3
24 can also use distillate oil as a backup fuel.

25

1 Partnership Station is comprised of two natural gas-fired
2 internal combustion engines. Phillips Station is
3 comprised of two residual or distillate oil fired
4 internal combustion engines.

5
6 **Q.** Does Tampa Electric include any purchased power in its
7 total supply resource mix?

8
9 **A.** Yes, Tampa Electric has existing purchased power
10 agreements ("PPA") for firm power from cogeneration and
11 renewable generating facilities. Tampa Electric also
12 purchases power, both firm and non-firm, from other
13 utilities and independent power producers operating in
14 the Florida market. Firm purchased power is included in
15 the IRP process for reliability and need assessments.

16
17 Tampa Electric's PPA include 822 MW of firm power
18 purchases during summer 2007. In June 2013, however,
19 these purchases are expected to decline to 623 MW, due to
20 contract expirations. These agreements are described in
21 more detail in section III.A.2. of the Need Study.

22
23 **Q.** What is the expected energy mix by fuel type for Tampa
24 Electric's total supply resources including purchases?

25

1 **A.** The energy mix for 2007 by fuel type is expected to be 49
2 percent solid fuel, 45 percent natural gas and 6 percent
3 oil and other sources. This is reflected in Document No.
4 1 of my Exhibit No. ____ (WAS-1).

5
6 **Q.** Has Tampa Electric developed and implemented demand and
7 energy reduction programs in its existing resource mix?

8
9 **A.** Yes. As described in section III.A.3. of the Need Study,
10 Tampa Electric has successfully developed and implemented
11 numerous demand and energy reduction programs for over 30
12 years. The cumulative effect of these programs has
13 delayed the need for more than three 180 MW generating
14 plants by slowing growth in the company's peak demand and
15 energy requirements. Witness Howard T. Bryant describes
16 the company's demand-side management ("DSM") achievements
17 in his direct testimony.

18
19 **INTEGRATED RESOURCE PLANNING PROCESS OVERVIEW**

20 **Q.** What are the objectives of Tampa Electric's IRP process?

21
22 **A.** Tampa Electric's IRP process determines the timing, type
23 and amount of additional resources required to maintain
24 system reliability in a cost-effective manner. The
25 process considers expected growth in customer demand and

1 existing and future DSM, renewable and supply-side
2 resources needed to meet reliability requirements.

3
4 **Q.** Please describe Tampa Electric's IRP process.

5
6 **A.** The IRP process balances existing and future demand and
7 supply resources in a reliable and cost-effective manner
8 while considering strategic factors. Since cost-
9 effectiveness is a requirement for both demand and
10 supply-side resources, the process can require multiple
11 iterations to capture the value of deferring new
12 generating units resulting from additional DSM programs.

13
14 The supply-side resources are initially screened based on
15 several criteria: construction and operating costs,
16 technology applicability, commercial availability, and
17 construction lead times. Multiple resource plans are
18 developed that consist of various combinations of
19 technologies. The relative impacts of each resource plan
20 are evaluated for total system production costs including
21 purchased power and the incremental costs to build all
22 new generating units in each plan. The plans are then
23 ranked based on the lowest cumulative present worth
24 revenue requirements ("CPWRR") of the system over a 30-
25 year operating period.

1 The highest ranked plans are then evaluated under various
2 scenarios or sensitivities to test key planning
3 assumptions and compare the relative cost impact on a
4 CPWRR basis. Strategic factors such as reliability, fuel
5 diversity and environmental impacts may be considered in
6 determining the most cost-effective and viable resource
7 mix for both Tampa Electric and Florida.

8
9 The preliminary resource plan incorporates an initial
10 demand and energy forecast including DSM and supply-side
11 resources. The supply-side resources in the preliminary
12 plan are then used to determine the avoided cost for an
13 economic analysis of additional viable DSM programs.

14
15 Next, the cost-effective DSM programs are included in a
16 revised demand and energy forecast which effectively
17 reduces system peaks and energy requirements. The
18 revised system demand and energy forecast is used in a
19 final reliability analysis to determine the new timing
20 and magnitude of additional supply-side resources needed
21 to meet system reliability criteria. Final economic
22 evaluations and sensitivities are performed to determine
23 the recommended resource plan.

24
25 Q. Please describe the reliability criteria that Tampa

1 Electric utilizes in its IRP process to determine the
2 need for additional resources.

3
4 **A.** Tampa Electric utilizes a 20 percent firm reserve margin
5 reliability criteria above the system firm peak, as
6 required by the Florida Public Service Commission
7 ("Commission") in Order No. PSC-99-2507-S-EU, issued on
8 December 22, 1999. The company also maintains a minimum
9 seven percent summer supply-side reserve margin criteria,
10 a voluntary yet important qualitative component for
11 reliability purposes. The system firm peak is determined
12 by including all firm wholesale agreements and excluding
13 non-firm customer demand from the total system demand.
14 Non-firm demand includes all interruptible service
15 customers and DSM load reduction programs. Customers
16 participating in these voluntary programs defer the need
17 for additional supply-side resources by reducing peak
18 demands.

19
20 **SUPPLY-SIDE RESOURCE ANALYSIS**

21 **Q.** What supply-side alternatives were considered in the
22 analysis that resulted in the selection of Polk Unit 6 as
23 the company's next planned generating unit?

24
25 **A.** Tampa Electric considered a variety of options prior to

1 identifying IGCC technology as the best option for Tampa
2 Electric and its customers. Tampa Electric's screening
3 process included solid fuel, natural gas-fired and
4 renewable technologies. General characteristics of solid
5 fuel technologies include lower variable costs, such as
6 fuel costs, and higher fixed costs, such as capital
7 construction costs. Solid fuel technologies are
8 typically better suited for large capacity and high
9 utilization applications because these assets will
10 operate for longer continuous periods of time due to
11 their lower variable operating costs.

12
13 Natural gas-fired generating technologies typically have
14 lower fixed costs and higher variable operating costs
15 that result in energy costs greater than solid fuel
16 technologies. Natural gas is more expensive than solid
17 fuels and this price differential is expected to grow
18 over time. Fuel forecasts are discussed in more detail
19 in the testimony of witness Joann T. Wehle.

20
21 Renewable technologies tend to have lower or no fuel
22 costs but have significant fixed costs. In addition,
23 technologies such as geothermal and hydroelectric have
24 limited practical application in Florida. Similarly,
25 wind and solar have limited, intermittent and

1 unpredictable operating hours due to the nature of their
2 energy source. Witness Bryant describes Tampa Electric's
3 efforts and achievements in incorporating available
4 renewable energy in system resources.

5
6 **Q.** Which options were determined to be appropriate for Tampa
7 Electric's needs and system characteristics and analyzed
8 in greater detail?

9
10 **A.** Tampa Electric requires peaking and baseload capacity
11 additions to its existing supply-side resource mix.
12 Strategic considerations included fuel price stability,
13 fuel diversity, environmental impacts, technology
14 viability, construction lead times, and site
15 availability. Tampa Electric's screening analysis
16 narrowed the focus to solid fuel and natural gas-fired
17 baseload technologies as well as simple cycle natural
18 gas-fired peaking technologies for further analysis in
19 the IRP process.

20
21 **Q.** Please describe the solid fuel alternatives considered.

22
23 **A.** Tampa Electric considered three different solid fuel
24 alternatives: supercritical pulverized coal ("SCPC"),
25 circulating fluidized bed ("CFB") and IGCC technologies.

1 SCPC technology is similar to the pulverized coal
2 technology used at Big Bend Station; however, SCPC units
3 operate at higher operating pressures and temperatures.
4 Where pulverized coal boilers like the Big Bend units
5 operate at pressures under 3,208 psi and have a reheat
6 temperature of 1,000 degrees Fahrenheit, supercritical
7 boilers operate at pressures between 3,200 psi and 4,500
8 psi and have steam temperatures of approximately 1,050
9 degrees Fahrenheit or greater.

10
11 CFB boilers are designed to operate in a significantly
12 different manner. In a CFB boiler, a portion of the
13 combustion air is introduced through the bottom of the
14 furnace. This air is spread evenly across the bottom of
15 the furnace to produce a "fluidized bed" of air with
16 entrained fuel where combustion occurs. In addition to
17 solid fuel, limestone and other agents may be added to
18 control sulfur dioxide ("SO₂") emissions.

19
20 IGCC technology uses a gasification process operated at
21 high pressures utilizing pure oxygen instead of air to
22 convert coal, pet coke, and biomass into synthesis gas
23 that is used to fuel a combined cycle unit. The
24 gasification process allows for the removal of impurities
25 from the synthesis gas prior to combustion in the

1 combined cycle power block. The overall IGCC process is
2 described in the testimony of witness Mark J. Hornick.

3
4 **Q.** Please describe the results of Tampa Electric's screening
5 analysis used to select the best supply-side alternatives
6 for the detailed economic analyses.

7
8 **A.** Tampa Electric's screening analysis of the various
9 alternatives compared the levelized annual cost of each
10 technology at various capacity factors. Tampa Electric
11 selected IGCC, NGCC, and SCPC as viable baseload options
12 and combustion turbines as peaking options. The results
13 of the levelized cost screening curves are depicted in
14 Figures 6 and 7 of the Need Study.

15
16 **DEMAND-SIDE RESOURCE ANALYSIS**

17 **Q.** How were demand-side resources factored into the IRP
18 process?

19
20 **A.** Tampa Electric included all DSM programs in its
21 preliminary demand and energy forecast, which effectively
22 reduced system peaks and energy requirements. Through
23 2006, approved DSM programs achieved a cumulative 2006
24 summer and winter peak reduction of 222 MW and 659 MW,
25 respectively. In 2007, Tampa Electric proposed new and

1 modified DSM programs which increase its DSM goals. Upon
2 Commission approval of the proposed programs, the summer
3 and winter cumulative reductions through 2012 are
4 expected to increase to 263 MW and 707 MW, respectively.
5 The updated DSM impacts and the effects of appliance
6 efficiency standards mandated by the Energy Policy Act of
7 2005 ("EPACT") were included in the revised final system
8 demand and energy forecast.

9
10 **Q.** Is it possible for Tampa Electric to meet its expected
11 resource needs through additional DSM and renewable
12 energy resources?

13
14 **A.** No. As previously stated, Tampa Electric identified all
15 available cost-effective DSM reductions and utilized that
16 potential in the assessment of this determination of
17 need. There are no additional cost-effective DSM
18 alternatives or viable renewable options that would defer
19 the need for additional generating capacity in 2013.

20
21 **RESOURCE PLAN**

22 **Q.** Please describe the results of the preliminary
23 reliability analysis.

24
25 **A.** The preliminary reliability analysis was based on

1 generating unit operating data and projected system firm
2 peak and energy requirements which were developed in
3 2006. This data supported the development of Tampa
4 Electric's 2007 Ten-Year Site Plan filed with the
5 Commission in April 2007. This analysis indicated
6 incremental capacity resources were needed in every year
7 from 2008 through 2016 to meet the 20 percent reserve
8 margin criteria as shown in Document No. 2 of my Exhibit
9 No. _____ (WAS-1).

10
11 **Q.** Please describe the results of the preliminary IRP
12 analysis.

13
14 **A.** The preliminary resource plan identified the need for
15 simple cycle combustion turbines or firm peaking purchase
16 additions from 2008 through 2012, an IGCC unit at Polk
17 Station in 2013, and additional simple cycle combustion
18 turbines in 2014, 2015, and 2016. Tampa Electric's
19 economic evaluation process and consideration of
20 qualitative factors determined that constructing IGCC
21 technology at Polk Station represented the most cost-
22 effective option for Tampa Electric and its customers.

23
24 The preliminary expansion plan was then used to develop
25 avoided cost parameters to evaluate new DSM programs.

1 The final economic analysis included the impacts of the
2 new and modified DSM programs which were ultimately
3 reflected in the revised system demand and energy
4 forecast.

5
6 **Q.** Please describe, in more detail, the company's 2013
7 capacity need.

8
9 **A.** In the preliminary resource plan, Tampa Electric
10 identified the need for additional demand and supply
11 resources of 501 MW and 590 MW in the summer and winter
12 of 2013, respectively. The minimum capacity need for
13 2013 was revised in 2007 to reflect an updated load
14 forecast. The load forecast was updated to reflect the
15 impacts of revised cost-effective DSM programs and EFACT
16 effects. Operating and financial assumptions were also
17 updated. These revised assumptions resulted in a 2013
18 capacity need of 482 MW and 576 MW in summer and winter
19 2013, respectively. Both the preliminary and final
20 reliability analyses are shown in Document No. 2 of my
21 Exhibit No. ____ (WAS-1). The testimony of witness
22 Lorraine L. Cifuentes presents the demand and energy
23 forecasts.

24
25 **Q.** Please describe the results of the final IRP analysis.

1 **A.** The final resource plan confirmed the need for additional
2 peaking capacity in each year from 2008 through 2012 and
3 the baseload capacity in 2013. The final resource plan
4 is shown in Document No. 3 of my Exhibit No. ____ (WAS-
5 1). The final plan also demonstrated a CPWRR savings of
6 \$184 million and \$93 million when the IGCC plan was
7 compared to a NGCC or SCPC plan, respectively. A summary
8 of the economic analysis is shown in Document No. 4 of my
9 Exhibit No. ____ (WAS-1).

10
11 **Q.** Did Tampa Electric conduct an RFP to solicit proposals to
12 meet its peaking needs from 2008 through 2012?

13
14 **A.** Yes. In August 2006, a request for proposals ("RFP")
15 yielded several proposals to provide Tampa Electric
16 peaking capacity via PPA. All PPA are contingent upon
17 securing firm transmission service to support required
18 reliability criteria. The company is negotiating with
19 leading bidders regarding potential peaking PPA.

20
21 **Q.** Did Tampa Electric conduct an RFP to solicit alternatives
22 to meet its baseload need in 2013?

23
24 **A.** Yes. In February 2007, Tampa Electric issued an RFP
25 soliciting firm offers for cost-effective alternatives to

1 Polk Unit 6. The RFP development and assessment process
2 are discussed in detail in the testimony of witnesses
3 Alan S. Taylor and Wehle.

4
5 **Q.** What was the result of the RFP for baseload capacity?

6
7 **A.** Tampa Electric did not receive any bids in response to
8 its RFP.

9
10 **Q.** Please describe Tampa Electric's proposed Polk Unit 6.

11
12 **A.** Polk Unit 6 will be an IGCC facility located at Polk
13 Station, the site of Tampa Electric's existing IGCC unit.
14 Polk Unit 6 will have a net summer and winter rating of
15 610 MW and 647 MW, respectively.

16
17 The proposed unit is conceptually similar to Tampa
18 Electric's Polk Unit 1, a highly reliable IGCC unit which
19 began commercial operation in 1996. Tampa Electric's
20 strategy in designing Polk Unit 6 is to utilize General
21 Electric's ("GE") proven IGCC technology currently
22 utilized at Polk Unit 1. The proposed unit's overall
23 reliability will be enhanced with a second gasification
24 train. Enhancements to the technology also include an
25 improved acid gas removal system that minimizes SO₂

1 emissions and the addition of SCR equipment to minimize
2 NO_x emissions. Finally, overall reliability will be
3 enhanced with natural gas as a backup fuel. The backup
4 fuel provides an alternative to synthesis gas in the
5 event that one or both gasification trains are not
6 available. The proposed Polk Unit 6 design is further
7 described in the testimony of witness Michael R. Rivers.

8
9 **Q.** Did any assumptions change from the preliminary resource
10 plan in developing the final recommended plan?

11
12 **A.** Yes. As described in the testimony of witness Rivers,
13 Tampa Electric has continued to work with the GE and
14 Bechtel teams to develop the engineering scope of the
15 project since early 2006. The revised Polk Unit 6 in-
16 service costs are projected to be \$2.013 billion. While
17 the Polk Unit 6 construction costs have increased,
18 proportionate increases in construction costs have also
19 occurred for other solid fuel and gas-fired technologies.

20
21 Another significant update to the preliminary plan
22 occurred in November 2006 when Tampa Electric was awarded
23 federal tax credits totaling \$133.5 million for the
24 proposed Polk Unit 6. The tax credits are contingent
25 upon several conditions which are further discussed in

1 the testimony of witness Chrys A. Remmers.
2
3 In addition, House Bill 549 was signed into law June 12,
4 2007. The law expands the 2006 statute that authorized
5 advanced cost recovery of carrying costs during
6 construction and other preconstruction activities for
7 IGCC technology. Stemming from legislative and executive
8 branch concerns over the growing dependency on natural
9 gas-fired electric generation in Florida, the law
10 expressly states that the intent is to "promote" and
11 "encourage" investor owned utility investment in nuclear
12 power and IGCC technology.

13
14 **Q.** Please describe, in more detail, the benefits of the
15 qualitative factors considered in the selection of Polk
16 Unit 6.

17
18 **A.** The use of solid fuel for Polk Unit 6 will help ensure
19 diverse fuel source mix and fuel price stability. With
20 Polk Unit 6, Tampa Electric's energy mix by fuel type
21 will be 64 percent solid fuel and 34 percent natural gas.
22 If the company's 2013 need was met by a NGCC unit, Tampa
23 Electric's reliance on natural gas for energy would
24 increase to 51 percent.

25

1 Another significant consideration was the fuel
2 flexibility of IGCC technology. Polk Unit 6 will be able
3 to use a wide variety of solid fuels, including biomass
4 and high amounts of pet coke, which is typically
5 difficult for other technologies to burn. The unit's
6 fuel flexibility will allow utilization of several fuel
7 transportation options resulting in lower delivered fuel
8 costs.

9
10 The gasification process produces lower emissions than
11 other currently proposed solid fuel technologies and the
12 unit can be retrofitted to meet future environmental
13 requirements. Polk Unit 6 will have lower emissions than
14 other proposed solid fuel fired units in the state.
15 Witness Paul L. Carpinone provides a comparison of the
16 expected emissions from these proposed units.

17
18 Polk Unit 6 will require less water than a conventional
19 coal unit because IGCC technology derives a smaller
20 portion of generating capability from the steam cycle. A
21 comparison of water use by technology is provided in the
22 testimony of witness Mark J. Hornick.

23
24 Additional benefits of Polk Unit 6 are that Tampa
25 Electric has more than a decade of successful experience

1 with IGCC technology and the existing infrastructure at
2 Polk Station can be modified to support Polk Unit 6.
3 There are numerous opportunities for efficiencies in the
4 operations of Polk Unit 6.

5
6 **SCENARIO ANALYSIS**

7 **Q.** Did Tampa Electric conduct scenario analyses related to
8 the selection of Polk Unit 6?

9
10 **A.** Yes. Tampa Electric conducted three scenario analyses to
11 assess the Polk Unit 6 plan against potential price
12 sensitivities. The first scenario analysis tested the
13 sensitivity of the base fuel forecast using both high and
14 low price bands around the base fuel forecast. High
15 and low fuel forecast bands are discussed in the
16 testimony of witness Wehle. The analysis held all other
17 factors constant while varying the prices of coal and
18 natural gas. The 30-year production cost streams were
19 calculated for each sensitivity.

20
21 The second scenario analysis assessed the relative cost
22 impacts of potential carbon dioxide ("CO₂") emission
23 restrictions. Tampa Electric utilized three price bands
24 for CO₂ reductions. The three price bands used were \$5,
25 \$15 and \$30 per ton of CO₂ with a five percent yearly

1 escalation starting in 2010. This wide range of price
2 signals was chosen since the detail of potential CO₂
3 regulations, if any, is unknown.

4
5 The third scenario analysis assessed lower and higher
6 than expected capital costs for the NGCC, SCPC and IGCC
7 technologies. Recognizing that the estimated in-service
8 costs for Polk Unit 6 are based on preliminary estimates,
9 capital cost sensitivities were analyzed. The high and
10 low cases were established utilizing 15 percent higher
11 and lower in-service costs.

12
13 **Q.** Please summarize the results of the sensitivity analysis.

14
15 **A.** Polk Unit 6 was more cost-effective than the SCPC plan in
16 all of the sensitivities except for the low fuel price
17 sensitivity. Polk Unit 6 continued to demonstrate the
18 lowest system CPWRR compared to the NGCC plan in the high
19 fuel, low capital, and low and medium CO₂ price
20 sensitivities. The results of these scenarios reinforce
21 Tampa Electric's selection of Polk Unit 6 as the best
22 alternative for Tampa Electric and its customers.
23 Document No. 5 of my Exhibit No. ____ (WAS-1) contains a
24 summary of the sensitivity analyses.

25

1 Q. What is the expected relative rate impact of Polk Unit 6
2 compared to the NGCC alternative?

3
4 A. The relative residential customer rate for the two
5 technologies was calculated and compared on MWH basis.
6 In 2013, the projected rate impact for the IGCC plan is
7 \$2.72 per MWH higher than the NGCC plan, driven by higher
8 capital costs; however, the rate impact for IGCC is
9 estimated to be lower by 2017 and through the balance of
10 the remaining life of the unit due primarily to lower
11 fuel and purchased power costs.

12
13 Whether or not Tampa Electric requests advanced cost
14 recovery for carrying costs during construction, the
15 overall CPWRR savings for the IGCC plan is \$184 million
16 and \$93 million when compared to the NGCC and SCPC plans,
17 respectively.

18
19 **BASIS FOR DETERMINATION OF NEED**

20 Q. Has Tampa Electric adequately established that there is a
21 need for Polk Unit 6?

22
23 A. Yes. Tampa Electric will require an additional 482 MW of
24 firm supply resources in summer 2013 and 576 MW in winter
25 2013 based upon the updated 2007 reliability analysis

1 which reflects the revised system demand and energy
2 requirements.

3
4 **Q.** Is the addition of Polk Unit 6 consistent with the needs
5 of peninsular Florida?

6
7 **A.** Tampa Electric's need for additional solid fuel capacity
8 in January 2013 is consistent with the Peninsular Florida
9 energy mix of 25.8 percent coal-fired generation to meet
10 the Peninsular Florida net energy for load of 284,886 GWH
11 in 2013, as identified by the Florida Reliability
12 Coordinating Council ("FRCC") and reported in the FRCC
13 2007 Regional Load and Resource Plan. The FRCC 2007 plan
14 uses Tampa Electric specific data in conjunction with
15 similar information from other Florida electric
16 utilities. Polk Unit 6 is consistent with state policy
17 actions that encourage fuel diversity and avoid the
18 reliance on any single fuel. The 2007 Regional Load and
19 Resource Plan published by the FRCC indicates that
20 reliance on natural gas-fired resources will increase
21 from 2007 projections of 38 percent to 49 percent, in
22 2011. State reliance on natural gas will decrease to 44
23 percent in 2014 after the addition of Polk Unit 6 and
24 other planned solid fuel-fired units in the state that
25 are included in the reserve margin and energy mix

1 assessment in the FRCC plan.

2

3 **ADVERSE CONSEQUENCES**

4 **Q.** What would be the adverse consequences if the Polk Unit 6
5 in-service date were delayed from 2013 to 2014?

6

7 **A.** In the event that Polk Unit 6 is delayed by one year,
8 Tampa Electric would forfeit the advanced coal project
9 federal tax credits of \$133.5 million, project costs
10 would increase, and fuel savings for 2013 would not be
11 realized. It is likely that system energy requirements
12 would be served by natural gas fired generators in
13 Florida resulting in higher fuel costs, due to increased
14 dependence on natural gas and a greater exposure to the
15 supply disruptions and price volatility associated with
16 this fuel.

17

18 **Q.** What would be the adverse consequences if the proposed
19 Polk Unit 6 were denied?

20

21 **A.** If Tampa Electric's proposed Polk Unit 6 is denied, Tampa
22 Electric would most likely construct an NGCC unit in
23 2013. This would result in higher costs for customers of
24 \$184 million on a CPWRR basis. The customers would
25 experience an increase in supply and price volatility

1 resulting from an increased reliance on natural gas.
2 Tampa Electric's energy mix by fuel type would be 51
3 percent natural gas in 2013.

4
5 **Q.** Should Tampa Electric's petition for determination of
6 need for Polk Unit 6 be approved?

7
8 **A.** Yes. For the reasons I have described, Polk Unit 6 is
9 the best option for Tampa Electric to cost-effectively
10 maintain system reliability and enhance fuel diversity.
11 Tampa Electric requests that the Commission issue an
12 affirmative determination of need for Polk Unit 6 in this
13 proceeding.

14
15 **Q.** Please summarize your testimony.

16
17 **A.** Tampa Electric's IRP process determined that Tampa
18 Electric will have future capacity needs in 2013. It
19 also determined that Polk Unit 6 is the most cost-
20 effective option while providing additional benefits in
21 the areas of reliability, fuel diversity, price stability
22 and environmental impacts.

23
24 Despite consideration of all existing, new and modified
25 DSM programs and renewable energy initiatives, the

1 construction of Polk Unit 6 for a January 2013 in-service
2 date cannot be deferred. Tampa Electric also determined
3 that fuel diversity is a key objective and the addition
4 of coal technology in 2013 maintains a prudent balance in
5 Tampa Electric's energy mix.

6
7 The selection of Polk Unit 6 was supported by subsequent
8 economic analysis of viable supply-side alternatives,
9 demonstrating that the unit provides the lowest CPWRR
10 compared to natural gas-fired and other solid fuel
11 technologies. Polk Unit 6 provides significant savings
12 of \$93 million to \$184 million to Tampa Electric's
13 customers when compared to other possible alternatives.
14 The results of these scenarios reinforce Tampa Electric's
15 selection of Polk Unit 6 as the best alternative for
16 Tampa Electric and its customers.

17
18 **Q.** Does this conclude your testimony?

19
20 **A.** Yes, it does.

21

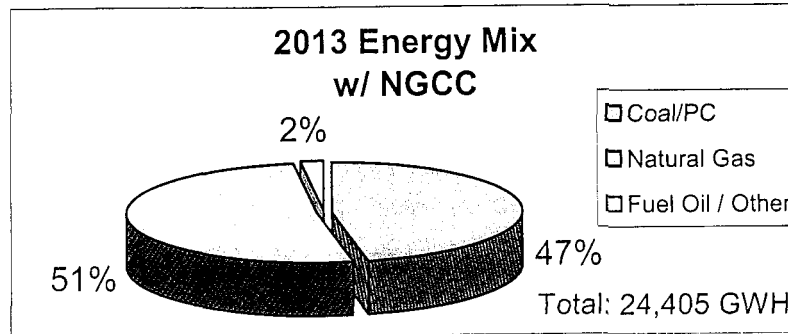
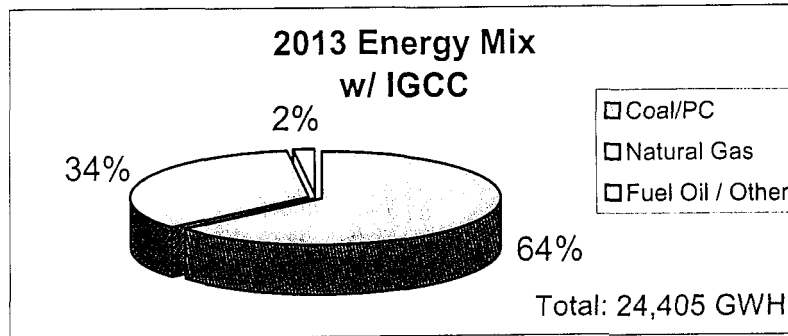
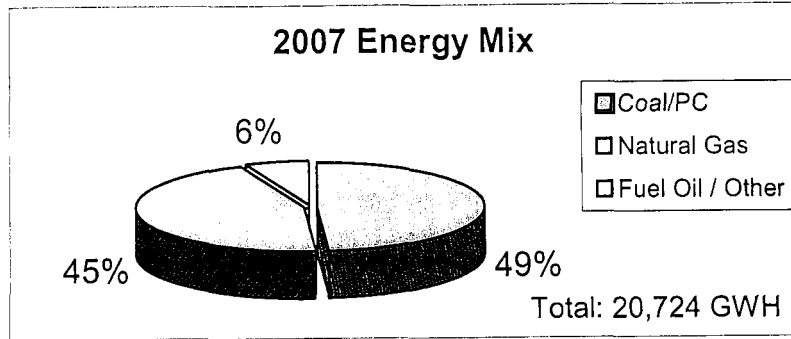
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Energy Mix by Fuel Type



Preliminary Reliability Analysis

Minimum Capacity Needed to Maintain Summer 20% Reserve Margin

Year	Total Installed Capacity MW	Incremental Capacity for 20% Res Margin MW	Firm Capacity Import MW	QF MW	Total Capacity Available MW	Retail Firm Summer Peak Demand MW	Whls Firm Summer Peak Demand MW	System Firm Summer Peak Demand MW	Reserve Margin MW	% of Peak
2008	4,332	89	526	65	5,012	3,991	186	4,176	835	20%
2009	4,461	95	526	65	5,146	4,113	176	4,288	858	20%
2010	4,555	169	526	42	5,292	4,235	175	4,410	882	20%
2011	4,724	231	356	42	5,353	4,357	104	4,461	892	20%
2012	4,955	171	356	23	5,505	4,484	104	4,588	918	20%
2013	5,126	501	0	23	5,650	4,620	89	4,709	942	20%
2014	5,627	159	0	23	5,810	4,765	77	4,841	968	20%
2015	5,670	297	0	23	5,990	4,915	77	4,991	998	20%
2016	5,967	207	0	0	6,173	5,068	77	5,144	1,029	20%

Preliminary Reliability Analysis

Minimum Capacity Needed to Maintain Winter 20% Reserve Margin

Year	Total Installed Capacity MW	Incremental Capacity for 20% Res Margin MW	Firm Capacity Import MW	QF MW	Total Capacity Available MW	Retail Firm Winter Peak Demand MW	Whls Firm Winter Peak Demand MW	System Firm Winter Peak Demand MW	Reserve Margin MW	% of Peak
2007-08	4,686	0	611	65	5,362	4,178	188	4,365	997	23%
2008-09	4,656	63	611	65	5,395	4,308	188	4,496	899	20%
2009-10	4,729	156	611	42	5,538	4,440	176	4,615	923	20%
2010-11	4,875	183	592	42	5,692	4,568	176	4,743	949	20%
2011-12	5,068	233	441	23	5,764	4,700	104	4,804	961	20%
2012-13	5,300	590	0	23	5,913	4,839	89	4,928	986	20%
2013-14	5,890	164	0	23	6,077	4,988	77	5,064	1,013	20%
2014-15	5,916	348	0	0	6,264	5,143	77	5,220	1,044	20%
2015-16	6,264	192	0	0	6,456	5,304	77	5,380	1,076	20%

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Final Reliability Analysis

Minimum Capacity Needed to Maintain Summer 20% Reserve Margin

Year	Total Installed Capacity MW	Incremental Capacity for 20% Res Margin MW	Firm Capacity Import MW	QF MW	Total Capacity Available MW	Retail Firm Summer Peak Demand MW	Whls Firm Summer Peak Demand MW	System Firm Summer Peak Demand MW	Reserve Margin	
									MW	% of Peak
2008	4,255	134	526	64	4,979	3,963	186	4,149	830	20%
2009	4,379	125	526	64	5,093	4,069	176	4,244	849	20%
2010	4,509	151	526	40	5,226	4,179	175	4,355	871	20%
2011	4,664	222	356	32	5,274	4,291	104	4,395	879	20%
2012	4,886	157	356	23	5,422	4,415	104	4,519	904	20%
2013	5,048	482	0	23	5,553	4,539	89	4,627	925	20%
2014	5,530	143	0	23	5,696	4,670	77	4,747	949	20%
2015	5,570	263	0	23	5,856	4,803	77	4,880	976	20%
2016	5,833	189	0	0	6,022	4,942	77	5,018	1,004	20%

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Final Reliability Analysis

Minimum Capacity Needed to Maintain Winter 20% Reserve Margin

<u>Year</u>	<u>Total Installed Capacity MW</u>	<u>Incremental Capacity for 20% Res Margin MW</u>	<u>Firm Capacity Import MW</u>	<u>QF MW</u>	<u>Total Capacity Available MW</u>	<u>Retail Firm Winter Peak Demand MW</u>	<u>Whls Firm Winter Peak Demand MW</u>	<u>System Firm Winter Peak Demand MW</u>	<u>Reserve Margin MW</u>	<u>% of Peak</u>
2007-08	4,650	0	611	64	5,325	4,130	188	4,318	1,006	23%
2008-09	4,610	42	611	64	5,326	4,250	188	4,438	888	20%
2009-10	4,662	119	611	64	5,455	4,370	176	4,546	909	20%
2010-11	4,785	166	611	32	5,594	4,486	176	4,662	932	20%
2011-12	4,951	242	441	23	5,657	4,610	104	4,714	943	20%
2012-13	5,198	576	0	23	5,797	4,742	89	4,831	966	20%
2013-14	5,774	146	0	23	5,944	4,876	77	4,953	991	20%
2014-15	5,786	302	0	23	6,112	5,016	77	5,093	1,019	20%
2015-16	6,089	194	0	0	6,283	5,159	77	5,236	1,047	20%

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2007 Detailed Economic Analysis Resource Plans

	IGCC	SCPC	NGCC
2008	Peaking Need	Peaking Need	Peaking Need
2009	Peaking Need	Peaking Need	Peaking Need
2010	Peaking Need	Peaking Need	Peaking Need
2011	Peaking Need	Peaking Need	Peaking Need
2012	Peaking Need	Peaking Need	Peaking Need
2013	Polk IGCC	SCPC	NGCC and NGCT
2014	Peaking Need	Peaking Need	Peaking Need
2015	Peaking Need	Peaking Need	Peaking Need
2016	Peaking Need	Peaking Need	Peaking Need

Final Economic Analysis Results
Total System Costs¹
(2007 \$ Million)

IGCC	SCPC	NGCC	Delta SCPC	Delta NGCC
\$ 24,622	\$ 24,715	\$ 24,806	\$ 93	\$ 184

¹ Total system costs include system fuel and purchased power, system O&M and incremental capital and O&M annual revenue requirements associated with new unit additions over a 30-year study period and shown on a cumulative present worth basis in 2007 dollars.

Fuel Scenario CPWRR Results

Total System Costs ¹
 (2007\$ million)

	IGCC	SCPC	NGCC	Delta	
				SCPC	NGCC
Low Fuel	\$ 18,673	\$ 18,553	\$ 17,507	\$ (120)	\$ (1,167)
Base Fuel	\$ 24,622	\$ 24,715	\$ 24,806	\$ 93	\$ 184
High Fuel	\$ 30,435	\$ 30,659	\$ 31,577	\$ 224	\$ 1,142

Environmental Scenario CPWRR Results

Total System Costs ¹
 (2007\$ million)

	IGCC	SCPC	NGCC	Delta	
				SCPC	NGCC
Low Price Band	\$ 26,224	\$ 26,312	\$ 26,348	\$ 88	\$ 125
Medium Price Band	\$ 29,426	\$ 29,505	\$ 29,432	\$ 79	\$ 5
High Price Band	\$ 34,231	\$ 34,295	\$ 34,057	\$ 64	\$ (173)

Capital Cost Scenario CPWRR Results

Total System Costs ¹
 (2007\$ million)

	IGCC	SCPC	NGCC	Delta	
				SCPC	NGCC
Low Capital Cost	\$ 24,245	\$ 24,401	\$ 24,715	\$ 156	\$ 470
High Capital Cost	\$ 24,999	\$ 25,030	\$ 24,898	\$ 31	\$ (102)

¹ Total system costs include system fuel and purchased power, system O&M and incremental capital and O&M annual revenue requirements associated with new unit additions over a 30-year study period and shown on a cumulative present worth basis in 2007 dollars.