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Sent: Thursday, December 27, 2007 8:02 PM
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Cc: Howard, Donna; Budnik, Bernie
Subject: Reedy Creek Improvement District Fuel Emergency Plan
Attachments: Generating Fuel Emergency Plan Rev 2.doc

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Attached is the revised long-term fuel emergency plan for Reedy Creek Improvement District as required by Commission Rule 25-6.0185

The fuel emergency plan is 3 pages in length and provided in Microsoft Word format. Please contact me if you have any questions at 407-824-6441.

s/Bernie Budnik
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STANDARD OPERATING PROCEDURE GENERATING FUEL EMERGENCY PLAN

Revision 2, Effective 12/18/07

REV. #	DATE	REVISION DESCRIPTION
2	12/18/07	Modified to fit new procedure template and added additional detail in responsibilities.
1	01/27/06	Required three year review per Florida Public Service Commission
0	03/07/03	Initial

1. FORWARD

- a) Reedy Creek Energy Services (RCES) is the operating agent for the Reedy Creek Improvement District (RCID) utility systems. RCES is responsible for procuring/generating the electrical capacity and energy to provide service to the RCID electrical customers. Currently RCES operates three generating units; one 55 MW combined cycle unit and two 2.5 MW diesel engines. The combined cycle unit has dual fuel capability with natural gas being the primary fuel and fuel oil as the alternate. Both diesel-generating units operate solely on fuel oil. RCID's generation equals roughly 30% of its electrical resources with the balance provided through purchase power agreements from neighboring utilities and generating resources.

2. PURPOSE

- a) The purpose of this procedure is to outline the responsibilities and actions taken by personnel to ensure a continuous source of fuel for RCID's electrical generation resources and contingency actions necessary in the event of a shortage of fuel resources.

3. REFERENCES

- a) Florida Public Service Commission Rule 25-6.0185
- b) FRCC Generating Capacity Shortage Plan, August 2002
- c) NERC Reliability Standard EOP-001-1; Emergency Operations Planning

4. NOTES

- a) Per Public Service Commission Rule 25-6.0185 this procedure is to be reviewed every three years with subsequent notification to the Commission of the review completion. Any modification to the plan requires Commission approval upon the notification of review.
- b) All modifications to the plan require notification and submission of the plan to the Florida Reliability Coordinating Council.
- c) This procedure serves as a supplement to the FRCC Generating Capacity Shortage Plan. Local action necessary to respond to and mitigate the impact of fuel emergencies are contained in this document. Regional reporting and coordination requirements are contained in the FRCC procedure and will not be reproduced within this document.

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5. RESPONSE TO ENERGY EMERGENCIES DUE TO INADEQUATE FUEL SUPPLY

- a) Entrance Conditions – *The following conditions will constitute the declaration of a Energy Emergency and require action per the following steps:*
 - i) Declaration of a fuel supply emergency by the Governor of Florida.
 - ii) Implementation of any element of the FRCC Generating Capacity Shortage Plan by the FRCC State Capacity Emergency Coordinator or designee.
 - iii) Inability to meet projected firm RCID electrical load due to inadequate (or *projected inadequate*) fuel supplies and/or purchase power.
 - iv) Inability to meet real-time firm RCID electrical demand due to inadequate fuel supplies.
- b) The RCES Energy Control Center shall be notified of the Energy Emergency as soon as possible after identification.
- c) The FRCC shall be notified of the Energy Emergency by means of the FRCC Daily Capacity Assessment report and by notification to the State Emergency Capacity Coordinator. **NOTE:** *The daily capacity assessment report is completed day ahead during winter months and morning of the peak during summer months. The FRCC State Capacity Emergency Coordinator may request more frequent capacity assessments during emergency conditions in order to more accurately assess the region's capabilities.*
- d) **Plant operations** personnel shall be notified of the Energy Emergency and determine the following:
 - i) Generating unit availability and maximum capacity.
 - a) Report to Utility Business Affairs expected fuel burn on each fuel to achieve maximum capacity.
 - ii) Unit fuel source and availability of alternate fuels in the event of a primary fuel shortage.
 - a) Report to Utility Business Affairs alternate fuel inventory levels and any limitations of plant operation on alternate fuels due to equipment issues or regulatory requirements.
 - b) If alternate fuel inventory levels will not support the maximum allowed hours of operation based on the current air permit, inquire into the availability of fuel oil purchases to increase inventory.
 - iii) Potential for rescheduling, restoring from or postponing maintenance activities.
- e) **RCES Utility Business Affairs** will initiate contact with natural gas suppliers and/or the natural gas pipeline companies upon a natural gas energy emergency to determine the availability of additional natural gas supply volumes and/or pipeline capacity to support RCID generation facilities.

- i) An evaluation shall be made of expected future natural gas delivery capabilities, alternate fuel inventory and available resource capacity to meet firm electrical demand.
- f) **RCES Utility Business Affairs** will contact all suppliers of its firm energy resources to verify and/or take action with regard to the availability of firm contractual energy capacity.
- g) **RCES Utility Business Affairs** will contact all regional electrical energy marketing entities to identify availability of electrical capacity and/or energy for the periods identified as being deficient and unable to meet load requirements.
- h) **RCES Utility Business Affairs** will maintain frequent communications with the RCES Energy Control Center and/or RCID's designated representative for the FRCC fuel emergency conference calls concerning fuel supply inventory and electrical energy availability.
 - i) During actual or potential fuel emergency conditions the FRCC will request periodic data submittals regarding fuel inventory levels and operating capabilities of each fuel.
- i) **RCES Utility Business Affairs** shall develop resource dispatch plans, with appropriate deference to economic dispatch, to preserve fuel types with limited availability or limited inventory while also operating within all operating permit requirements.
 - i) If available resource capacity is not sufficient to meet firm electrical demand due to limited fuel deliveries, fuel switching to the alternate fuel shall be considered.
- j) If load/resource imbalance conditions require, the **Energy Control Center** shall notify large customers to curtail unnecessary electrical load.
- k) **RCES Energy Plant Operations** shall evaluate any current operational constraints due to environmental limitations and the ability to request a waiver of those limitations.
- l) **RCES Utility Business Affairs** shall evaluate contractual options to acquire additional capacity and energy to meet load requirements.
- m) The **Energy Control Center** shall notify the FRCC Reliability Coordinator of the Energy Emergency and the potential for shedding load if necessary.
- n) In the event sufficient energy resources cannot be obtained, the current Load Shed Procedure shall be initiated by the **Energy Control Center** to balance load/generation resources.

6. Restoration From Potential and Real-Time Energy Emergencies

- a) Energy emergency activities shall be restored from at the point at which the necessary energy resources are obtained to adequately serve all firm RCID electrical load. As required, the FRCC Reliability Coordinator shall be notified of the current condition of the RCID Balancing Area