

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Ten-Year Site Plans of
Electric Utilities

DOCKET NO.: 20210000 (Undocketed)

FILED: August 18, 2021

**WRITTEN COMMENTS RELATED TO THE FILING OF THE
GAINESVILLE REGIONAL UTILITIES TEN-YEAR SITE PLAN FOR 2021**

Nathan A. Skop, as a GRU residential customer, and pursuant to the Purpose and Procedure section of the Amended Notice of Commission Workshop dated August 4, 2021, hereby files written comment to the Gainesville Regional Utilities (“GRU”) Ten-Year Site Plan (“TYSP”) for 2021 in the above captioned docket requesting that the Florida Public Service Commission (“Commission” or “FPSC”): (1) open a formal docket to investigate the adequacy, reliability, and resiliency of the GRU electric system, and (2) order GRU to amend its 2021 TYSP filing to clarify omissions and information submitted to the Commission as set forth within the written comments provided herein. The written comments providing the basis for the requested Commission action are set forth as follows:

I. SINGLE POINT ELECTRIC SYSTEM FAILURE

On March 3, 2021, the GRU General Manager sent an e-mail to the Gainesville City Commission communicating information from GRU Chief Operating Officer Tom Brown relating to the siting of the Origis solar project. Within the body of the subject e-mail, GRU advised the Gainesville City Commission that:

- “GRU has two transmission lines that run from the North at Deerhaven around the city to the East. GRU has one transmission line that runs from Deerhaven around to the West to Parker substation.”

- **“If/when GRU losses the singular west circuit, all the power has to be wheeled through the east circuits. When this occurs, depending on system load, we come close to exceeding the thermal limits of the East transmission lines.”**
(Emphasis Added).
- **“The solution on would be to build a second T-line around the west.** The towers on the west side were not constructed with a second line in mind. They would have to be modified to allow for the second line. **Cost would be in 25MM range** (if my memory serves me correctly).” (Emphasis Added).

A true and correct copy of the e-mail sent by GRU to the Gainesville City Commission is attached herein as Exhibit A.

Ironically, Section 1.2 (Transmission), Section 1.3 (Distribution), and Section 3.4 (Distribution System Additions) of the 2021 GRU TYSP dated April 1, 2021 fail to disclose and discuss the GRU assertion that the reliability and resiliency of the entire GRU electric system is seemingly at risk from a single point transmission line failure. Additionally, in Section 1.2.2 (Transmission Lines) of the 2021 GRU TYSP, GRU states that, “GRU participates in Florida Reliability Coordinating Council, Inc. (FRCC) studies that analyze multi-level contingencies. Contingencies are occurrences that depend on changes or uncertain conditions and, as used here, represent various equipment failures or fault conditions that may occur.” Furthermore, in Section 1.2.3 (State Interconnections) of the 2021 GRU TYSP, GRU claims that, “The System is planned, operated, and maintained to be in compliance with all FERC, NERC, and FRCC requirements to assure the integrity and reliability of Florida’s Bulk Electric System (BES)”.

In response to a public records request, GRU stated that GRU had no responsive documents relating to GRU notifying the FPSC, FRCC, SERC, and/or NERC regarding this electric system reliability and resiliency issue. Despite requesting approval for a \$81 million dollar Advanced Metering Infrastructure (“AMI”) capital project that provides no tangible return on investment for GRU customers, GRU was also unable to produce any records over the past five (5) years associated with GRU requesting approval of a capital project (e.g., \$25 million) relating to installing a second transmission line to address the alleged single point failure condition that GRU failed to communicate to regulatory authorities.

Pursuant to Section 366.05 (7) and 366.05 (8), Florida Statutes, the Commission has exclusive jurisdiction relating to electric system reliability, adequacy, and resiliency for all electric utilities in the state of Florida, including municipal utilities.

Section 3.2 (Reserve Margin) of the 2021 GRU TYSP dated April 1, 2021, further illustrates that GRU has an excessive reserve margin (if not the highest in the state) which greatly exceeds the 15% capacity reserve margin by the Commission pursuant to Rule 25-6.035, Florida Administrative Code.

Most importantly, transmission and electric system reliability that is so threatened by a single point failure and the limitations alleged by GRU management should be immediately addressed to ensure adequate reliability and resiliency of the GRU electric system prior to adding additional generating capacity and pursuing far more costly discretionary capital projects (i.e., AMI). The recent ERCOT winter storm outage further illustrates the need

for the Commission to exercise its jurisdiction related to this matter to ensure the adequacy, reliability, and resiliency of the GRU electric system.

Based upon the above, the Commission is respectfully requested to open a formal docket to investigate the adequacy, reliability, and resiliency of the GRU electric system. Upon a finding of probable cause that an inadequacy exists, the Commission should order GRU to take corrective action to make the necessary improvements to ensure the adequacy, reliability, and resiliency of the GRU electric system is maintained for the benefit of GRU customers.

II. DUAL FUEL UPGRADE (DEERHAVEN 2)

The Deerhaven 2 (“DH2”) unit is identified as a 228 MW baseload unit within the 2021 GRU TYSP. On Section 2.51 (Page 25) of the 2021 GRU TYSP dated April 1, 2021, GRU stated that, “In late 2020, GRU began a *dual fuel upgrade on Deerhaven Unit 2 to allow it to be able to operate fully on natural gas.*” (Emphasis Added). During the recent Gainesville City Commission meeting on July 19, 2021, GRU Chief Operating Officer Tom Brown claimed (in response to my question) that GRU never represented that DH2 could operate fully on natural gas stating that, “I don’t believe we ever represented the plant would be capable of 100% fire on gas”. The GRU claim is seemingly contradicted by the representations that GRU made to the Gainesville City Commission when seeking approval of the dual fuel upgrade project before the City Commission on July 16, 2020, along with the representation that GRU made to the FPSC within Section 2.51 (Page 25) of the 2021 GRU TYSP. Most recently, GRU updated the City Commission on the DH2 dual fuel upgrade stating:

“The retrofit project has gone well from standpoint of being able to burn natural gas up to 175 MW of load. The outstanding issue is we have not been able to get the main gas valve to operate in automatic mode as required. We have operated the valve in manual with no issues, and the OEM for the valve states that the valve actuator capability is inadequate to put valve in auto. We are working with the OEM to resolve the valve actuator issue design. Once this issue is resolved we will be conducting a full load test of DH2 to determine maximum load on natural gas, as well as the associated heat rate curves. [sic] s going very well.”

Based upon the inconsistencies identified above, the Commission should order GRU to clarify the statement that GRU made to the FPSC within Section 2.51 (Page 25) of the 2021 GRU TYSP relating to the ability of DH2 to operate fully on natural gas at the baseload rated capacity of 228 MW.

WHEREFORE, the Commission is respectfully requested to: (1) open a formal docket to investigate the adequacy, reliability, and resiliency of the GRU electric system, and (2) order GRU to amend its 2021 TYSP filing to clarify omissions and information submitted to the Commission as set forth within the written comments above.

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Respectfully submitted this 18th day of August 2021.

/s/ Nathan A. Skop
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GRU Residential Customer

EXHIBIT A

: Message View

[Back to message results](#) | [Download Message \(.eml\)](#)

Date: 3/4/2021 3:29:35 PM
Received:

To: citycomm

Cc: DL_Utility Advisory Board

From: Bielarski, Edward J

Subject: Origis solar siting facts

Attachments:

Message: Mayor, Commissioners and UAB members;

Tom Brown has shared some of the technical challenges GRU considered when Origis responded to the Invitation to Negotiate (ITN), as reflected as follows:

- In the ITN, GRU told developers that the Deerhaven area would not be viewed favorably because of the technical challenges it would pose by connecting it into the switchgear in that area, as well as:
 - o A significant portion of the Deerhaven site is wetland. Permitting this as a site would be difficult. The area around Archer is higher and drier. The buffer area around Deerhaven is part of a Regulated Strategic Ecosystem known as the Hague Flatweeds. It is referred to as an environmental corridor between various ecosystems surrounding the Deerhaven site. Any development is regulated and restricted.
 - o There are about 3,577 acres of land on the entire Deerhaven property. The original site is approximately 1,300 acres which GRU owns outright. The balance of the land (2,327 acres) is owned as a buffer, but not the timber rights. Weyerhaeuser ownership of the timber rights will make solar development much more expensive.
 - o There is a City Ordinance with developmental restrictions on the Deerhaven property.
 - o The Fawnhaven site is an alternative site, not actually owned by GRU, proposed by Origis. It is north of the Deerhaven site. GRU recognized there are technical challenges for GRU to add this amount of generation capacity into the Deerhaven substation.
 - GRU has two transmission lines that run from the North at Deerhaven around the city to the East. GRU has one transmission line that runs from Deerhaven around to the West to Parker substation.
 - If/when GRU loses the singular west circuit, all the power has to be wheeled through the east circuits. When this occurs, depending on system load, we come close to exceeding the thermal limits of the East transmission lines.
 - The solution would be to build a second T-line around the west. The towers on the west side were not constructed with a second line in mind. They would have to be

modified to allow for the second line. Cost would be in 25MM range (if my memory serves me correctly).

- From a system reliability perspective, feeding the power into Parker provides a more diverse distribution network and reduces the probability of power disruption.

I have asked Lisa Bennett from the city attorney's office to weigh in on the legal issues you have questioned. I have asked Chuck Height in our energy supply department to gain details about Origis' public outreach program. I hope to have more to follow after more meetings this week.

Ed B
