



January 27, 2026

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Attn: Adam Teitzman

Re: 25-6.0185 Electric Utility Procedures for Long-Term Energy Emergencies

Dear Mr. Teitzman,

Pursuant to Rule 25-6.0185 of Florida Administrative Code, Lakeland Electric submits its 2025/2026 Emergency Fuel Shortage Plan via the Commissions electronic platform.

If you have questions please contact me at 863-834-6595.

Sincerely,

/s/Cynthia Clemmons

Cynthia Clemmons
City of Lakeland
Manager of Legislative and Regulatory Relations
Lakeland Electric
863-834-6595 Work
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Enclosure



Electric System Control

System Operating Procedures

Emergency Fuel Shortage Plan
LAK-SYS-E11

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Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

PURPOSE

The purpose of this Plan is to establish a systematic and efficient means of anticipating, assessing and responding, in an appropriate manner, to a short-term or long-term energy emergency caused by a fuel supply shortage in order to maximize capacity or conserve the fuel in short supply.

EFFECTIVE DATE

Ten working days after the final approval by the RC.

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

- FRCC – Document to be posted to the FRCC BA/TOP Posting area, annually or if procedural changes are made.
- FPSC – Document to be submitted to the Florida Public Service Commission every three years or if procedural changes are made.
- ORS – Submittal of FRCC BAs and TOPs Operating Plans to mitigate operating Emergencies to the FRCC RC to allow for a timely review of the material in accordance with FRCC RC processes, guidelines and needs per the *"FRCC BA/TOP Operating Plan for Operating Emergencies Submittal and Review Procedure"*.

PROCEDURE

1. FUEL EMERGENCY IDENTIFIED:

The Fuels Manager is the individual responsible for identifying a Fuel Emergency.

Electric System Control - System Operating Procedures

"Emergency Fuel Shortage Plan"

When a Fuel Emergency has been identified, the Fuels Manager will notify the General Manager (GM).

2. FUEL EMERGENCY DECLARED:

When the GM has been informed by the Fuels Manager that a Fuel Emergency has been identified, the GM will "Declare a Fuel Emergency and perform the following:

- Direct the Fuels Manager to inform the Energy Emergency Coordinator that a Fuel Emergency has been declared.
- Inform the City Manager.

3. ENERGY EMERGENCY COORDINATOR NOTIFICATION:

The Fuels Manager (by direction of the GM) will notify the Manager of System Operations, who will act as the Energy Emergency Coordinator, that a Fuel Emergency has been declared.

4. EMERGENCY FUEL PLAN INITIATED:

The Energy Emergency Coordinator (Manager of System Operations) is responsible for completing the following:

a. NOTIFYING THE ASSISTANT GENERAL MANAGERS (AGM's)

- Upon notification, the AGMs will inform their divisions.

b. NOTIFY THE FOLLOWING TO IMPLEMENT THE "EMERGENCY FUEL PLAN"

- System Control
- Energy Production
- Communications
- Account Managers
- Facilities
- Power Resources
- Fuels
- Energy Delivery

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

C. NOTIFICATION OF GOVERNMENTAL AGENCIES (THIS WILL BE COORDINATED WITH SYSTEM CONTROL)

Notification of applicable governmental agencies as the various steps of the Emergency Fuel Plan are implemented.

The Energy Emergency Coordinator will use a checklist that will contain the following:

- Dates and Times when each of the above were notified and updated.
- Dates and Times when entities listed above complete their steps of the Emergency Fuel Plan.

The Energy Emergency Coordinator will repeat the above notification process when the Fuel Emergency is over.

The GM & AGM - Prod will be informed of the end of the fuel emergency.

5. SYSTEM CONTROL:

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Plan, System Control will perform or coordinate the following in accordance with their Procedure, Appendix A:

a. NOTIFY INDEPENDENT POWER PRODUCERS (IPP's):

There are no IPP's under Lakeland's control Fuel Switching.

b. OPTIMIZE FUEL SUPPLY:

The Fuel Manager will identify which Fuel is in short supply; this will dictate what alternative Fuel is to be used.

This will be in conjunction with Energy Production, Fuel's and Florida Municipal Power Pool's (FMPP's) plans.

c. MAXIMIZING GENERATOR OUTPUT AND AVAILABILITY:

The Fuel Manager will identify which Fuel is in short supply, this will dictate what alternative Fuel is to be used, which in turn will dictate what units will be required to run.

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

d. THIS WILL BE IN CONJUNCTION WITH ENERGY PRODUCTION, FUELS AND FMPP'S PLANS. PURCHASING POWER:

This will be in conjunction with Power Resources Procedure and FMPP's plans.

e. LOAD MANAGEMENT:

Be prepared to implement Load Management if available.

f. VOLTAGE REDUCTION:

Implement Voltage Reduction.

g. INTERRUPTIBLE & CURTAILABLE LOADS:

Use interruptible and curtailable customer loads to reduce capacity requirements or to conserve the fuel in short supply.

h. LOAD CURTAILMENT:

Implement Load Shedding.

i. NOTIFICATIONS TO APPLICABLE OPERATING & GOVERNMENTAL AGENCIES:

This will be coordinated through the Energy Emergency Coordinator.

j. PROVISIONS FOR THE FULL REIMBURSEMENT BY AN ELECTRIC UTILITY RECEIVING ENERGY OR FUEL DURING AN ENERGY EMERGENCY:

Full reimbursement shall be all of the supplying utility's cost of replacing such energy or fuel with the same or alternate fuel or energy.

This will be in conjunction with Power Resources Procedure and FMPP's plans.

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

6. ENERGY PRODUCTION

When notified by the Energy Emergency Coordinator to Implement the Fuel Emergency Plan, Energy Production will perform the following in accordance with their procedure, Appendix B.

a. FUEL SWITCHING:

The Fuel Manager will identify which Fuel is in short supply; this will dictate what alternative Fuel is to be used.

This will be in conjunction with System Controls Procedure, Fuel's Procedure, and FMPP's plans.

b. OPTIMIZE FUEL SUPPLY:

The Fuel Manager will identify which Fuel is in short supply; this will dictate what alternative Fuel is to be used.

This will be in conjunction with System Controls Procedure, Fuel's Procedure, and FMPP's plans.

c. MAXIMIZING GENERATOR OUTPUT AND AVAILABILITY:

The Fuel Manager will identify which Fuel is in short supply, this will dictate what alternative Fuel is to be used which in turn will dictate what units will be required to run.

This will be in conjunction with System Controls Procedure, Fuel's Procedure, and FMPP's plans.

d. SYSTEM ENERGY USE:

Reduce the plant's energy usage (station service) to a minimum.

e. ENVIRONMENTAL CONSTRAINTS:

Execute plans to seek removal of environmental constraints for generating units and plants (This takes the FRCC Plan into consideration and coordination).

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

7. FUELS:

When notified by the Energy Emergency Coordinator to Implement the Fuel Emergency Plan, Fuels will perform the following in accordance with their procedure, Appendix C:

a. FUEL SUPPLY AND INVENTORY:

Execute the fuel supply and inventory plan that recognizes reasonable delays or problems in the delivery or production of fuel.

b. OPTIMIZE FUEL SUPPLY:

Execute a plan for operation of all generating sources to optimize the fuel availability.

This will be in conjunction with Energy Production Procedure, and FMPP's Plans.

c. FORECASTING THE EXTENT OF THE FUEL SHORTAGE:

Execute the procedure for forecasting the extent of the fuel shortage.

d. NOTIFYING ENTITIES AND DEPARTMENT OF FUEL INVENTORIES

Execute the procedure for notifying applicable entities and departments (i.e. daily, weekly) of fuel inventories.

e. PROVISIONS FOR THE FULL REIMBURSEMENT BY AN ELECTRIC UTILITY RECEIVING FUEL DURING AN ENERGY EMERGENCY:

Provisions for the full reimbursement by an electric utility receiving fuel during an energy emergency. Full reimbursement shall be all of the supplying utility's cost of replacing such energy or fuel with the same or alternate fuel or energy.

This will be in conjunction with Fuel Department Procedures.

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

8. COMMUNICATIONS

When notified by the Energy Emergency Coordinator to Implement the Fuel Emergency Plan, Communications will perform the following in accordance with their procedure, Appendix D:

a. SYSTEM ENERGY USE:

Request the reduction of Lakeland Electric & City of Lakeland's energy use to a minimum.

b. PUBLIC APPEALS:

Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.

c. REQUESTS OF GOVERNMENT:

Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.

Notification of governmental officials and the news media.

9. ACCOUNT MANAGERS

When notified by the Energy Emergency Coordinator to Implement the Fuel Emergency Plan, Account managers will perform the following in accordance with their procedure, Appendix E:

a. PUBLIC APPEALS:

Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.

Account Managers will contact assigned account customers via email and/or phone requesting voluntary load reduction and energy conservation.

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

b. APPEALS TO CUSTOMERS TO USE ALTERNATE FUELS:

In a fuel emergency, appeals to large industrial and commercial customers to reduce non-essential energy use and maximize the use of customer-owned generation that rely on fuels other than the one in short supply.

Account Managers will maintain list of commercial/industrial customers with onsite generation.

In the event of a fuel shortage, the Account Managers will contact customers with generation and request they reduce non-essential usage and run onsite generation.

10. FACILITIES

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Plan, Facilities will perform the following in accordance with their procedure, Appendix F:

a. SYSTEM ENERGY USE:

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Plan, Facilities will take steps to reduce electric energy use by all City facilities (including Lakeland Electric facilities).

11. ENERGY DELIVERY

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Plan, Energy Delivery will perform the following in accordance with their procedures, Appendix G:

a. AVAILABLE TRANSFER CAPABILITY (ATC) CONSTRAINTS:

Review posted ATCs, transmission model used Total Transfer Capability (TTC)-calculation, and other ATC components for accuracy. If there are any inaccuracies identified, adjust the data in TTC-engine's model to better reflect real time system conditions.

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

b. T&D PLANNING SUPPORT

Provide necessary support to System Control during Load Management and Load Reduction measures, and restoration as necessary.

12. POWER RESOURCES

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Energy Resources will perform the following in accordance with their procedure, Appendix H:

a. PURCHASE POWER

Purchasing power from other sources (This must be developed in conjunction with System Control Procedure and FMPP's plans).

b. OPTIMIZE FUEL SUPPLY:

Assist with the scheduling of all generating sources to optimize the availability (This must be developed in conjunction with System Control Procedure, Energy Production Procedure, Fuels Procedure, and FMPP's Plans).

c. MAXIMIZING GENERATOR OUTPUT AND AVAILABILITY:

Assist with the scheduling of all generating sources to maximize output and availability. This should include plans to winterize units and plants during extreme cold weather (This must be developed in conjunction with System Control Procedure, Power Production Procedure, Fuel's Procedure, and FMPP's Plans).

d. ARRANGE DELIVERIES OF ELECTRICAL ENERGY OR FUEL:

Arrange deliveries of electrical energy from remote systems through normal operating channels.

REFERENCE DOCUMENTS

Document Title	Document ID	Date
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Electric System Control - System Operating Procedures

"Emergency Fuel Shortage Plan"

"FRCC Florida Electrical Emergency Contingency Plan"(Fuel Supply Shortage Element)	N/A	Current Version
"FRCC BA/TOP Operating Plan for Operating Emergencies Submittal and Review Procedure"	FRCC-MS-OPRC-038	Current Version

REVISION HISTORY

Version	Authority	Action/Description	Date
21.0	E. Pickles Libertz, John	Updated applicable NERC Standards; Added reference to "FRCC BA/TOP Operating Plan for Operating Emergencies Submittal and Review Procedure"; grammatical corrections	2017.02.27
22.0	E. Pickles	Removed references to EOP-001, Combined sec 6 and 11 (Energy Production) into one sec (sec 6 Energy Production)	2018.01.31
23.0	E. Pickles S. Bishop	Removed 'Revision History' prior to 2015; Corrected grammar for Fuels department; Revised item g. Interruptible and Curtailable Load to make it parallel with other items in list;	2018.09.17

Electric System Control - System Operating Procedures

"Emergency Fuel Shortage Plan"

24.0	Jim Howard Scott Bishop	Corrected revision history typo in Appendix H	2018.11.27
25.0	Scott Bishop	Reviewed – No Changes	2019.10.10
26.0	E. Pickles K. Bush	Replaced Manager of System Control with Manager of System Operations; Inserted/updated Attachment 1; Updated effective date	2020.09.28
27.0	E. Pickles K. Bush	Updated Energy Coordinator Contact List	2021.09.14
28.0	E. Pickles T. Bombard	Updated Energy Coordinator Contact List. Added Fuel Procedure 5 (d), (j) Remove word Fuel 7 (e) and 12(d) Updated titles, inserted cell phone numbers, (e) added Fuel Department	2022.09.09
29.0	R. Soich R. Clanton E. Pickles	Updated Energy Coordinator Contact List. Revised 'Applicable NERC Standards' EOP-011-1 to EOP-011-2	2023.10.10
30.0	R. Clanton E. Pickles	Revised 'Applicable NERC Standards' EOP-011-2 to EOP-011-4; Updated contact info for Fuels Manager, AGM of Fiscal Operations.	2024.09.09

Electric System Control - System Operating Procedures

"Emergency Fuel Shortage Plan"

31.0	R. Clanton J. Saenz E. Pickles	Added AGM – Prod to notification	2025.10.13
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COORDINATION/APPROVAL HISTORY

Version	Submitted To:	Submittal Date:	Approval Date:
15.0	FPSC (Submitted Originally as v11.0)	2011.01.31	N/A
15.0	ORS	2012.01.17	2012.01.17
16.0	ORS	2012.11.13	2012.11.13
17.0	ORS	2013.11.13	2013.11.19
18.0	FPSC	2014.10.23	N/A
19.0	BA/TOP Posting Area	2015.11.04	N/A
20.0	BA/TOP Posting Area	2016.10.13	N/A
21.0	ORS	2017.02.20-21	2017.02.28
22.0	ORS	2018.02.02	2018.02.20
23.0	ORS	2018.09.19	2018.10.23
24.0	ORS ⁴	2018.11.27	2018.11.28
25.0	ORS	2019.10.11	2019.10.22
26.0	ORS	2020.09.29	2020.10.20
27.0	ORS	2021.10.04	2021.10.19
28.0	ORS	2022.10.10	2022.10.18
29.0	ORS	2023.10.10	2023.10.17
30.0	ORS	2024.09.09	2024.09.17
31.0	ORS	2025.10.14	2025.10.21

⁴ Accepted as Errata; No letter will be received, but will be documented in the ORS meeting minutes (per Jim Howard)

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

ATTACHMENT 1 – ENERGY COORDINATOR CONTACT LIST⁵

ELECTRIC MANAGEMENT

ELECTRIC MANAGEMENT	NAME	OFFICE	PRIMARY NUMBER	ALTERNATE NUMBER	DATE	TIME	CALLERS NAME/COMMENTS
AGM Production	Tory Bombard	863.834. 6207	863.604. 2547				
AGM Customer Service	Korey Bush	863.834. 5558	863.412. 6674				
AGM Fiscal Operation	Willem Strauss	863.834. 6297		919.656. 9184			

⁵ Previously LAK-SYS-N07

Electric System Control - System Operating Procedures

"Emergency Fuel Shortage Plan"

CITY GROUPS

CITY GROUP(S)	CONTACT PERSON	OFFICE	PRIMARY NUMBER	ALTERNATE NUMBER	DATE	TIME	CALLERS NAME/COMMENTS
System Control	Jeff Saenz	863.834.5559					
System Control	Robert Clanton	863.834.5556					
System Control	Eric Pickles	863.834.5557					
Communications (Utility Marketing Manager)	Cathryn Lacy	863.834.6589					
Production	Miles Dentler	863.834.6664					
Account Managers	Derrick Gautney	863.834.1227					
Facilities	Richard Baker	863.834.2380	863.430.4033	N/A			

Electric System Control - System Operating Procedures

"Emergency Fuel Shortage Plan"

Energy Resources	Paul Shipps	863.834.6492	863.860.9023				
Fuels Manager	Sandra Ruede	863.834.6525	813-468-0730				

GOVERNMENT LISTING

GOVERNMENT AGENCY	NAME	TITLE	OFFICE NUMBER	ALTERNATE NUMBER	DATE	TIME	CALLERS NAME/COMMENTS
City of Lakeland	Shawn Sherrouse	City Manager	863.834.6240				
	Emily Colon	Assistant City Manager	863.834.6237				
Lakeland Electric	Michael Beckham	General Manager	863.834.6559	863.606.5689			
	Scott Bishop	AGM Delivery	863.834.6108	863.797.6818			
FRCC							
FRCC/RC							

Electric System Control - System Operating Procedures "Emergency Fuel Shortage Plan"

FMPP/ OUC							
FPSC							

FRCC = Florida Reliability Coordinating Council

FRCC/RC= FRCC Reliability Coordinator

FMPP = Florida Municipal Power Pool

FPSC = Florida Public Service Commission

FRCC/SCEC = FRCC State Capacity Emergency Coordinator

Electric System Control - System Operating Procedures

"Appendix A – System Control Emergency Fuel Shortage Procedure"

PURPOSE

The purpose of this Procedure is to expand on the elements outlined in the *"Emergency Fuel Shortage Plan"* (LAK-SYS-E11).

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

N/A – Not Applicable.

PROCEDURE

1. SYSTEM CONTROL:

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Plan, System Control will perform the following:

a. TRANSMISSION:

Cancel or recall all available Transmission.

b. NOTIFY IPP's:

No Identified IPP's in Lakeland Electric's (LAK) control.

c. FUEL SWITCHING:

System Control will relay information that the Fuel Emergency Plan has been implemented.

d. OPTIMIZE FUEL SUPPLY:

System Control will relay information that the Fuel Emergency Plan has been implemented.

Electric System Control - System Operating Procedures

"Appendix A – System Control Emergency Fuel Shortage Procedure"

e. MAXIMIZING GENERATOR OUTPUT AND AVAILABILITY:

System Control will relay information that the Fuel Emergency Plan has been implemented.

f. PURCHASING POWER:

The System Operator will communicate with LAK's Power Resources.

g. LOAD MANAGEMENT:

Be prepared to implement Load Management if available.

h. VOLTAGE REDUCTION:

Implement Voltage Reduction; see LAK-SYS-T23 "*Voltage Control and Schedule*".

i. INTERRUPTIBLE & CURTAILABLE LOADS:

Communicate with Account Managers to alert Interruptible & Curtailable customers.

j. LOAD CURTAILMENT:

Implement Load Shedding; see LAK-SYS-E06 "*Load Shedding Plan*".

k. NOTIFICATIONS TO APPLICABLE OPERATING & GOVERNMENTAL AGENCIES:

- Florida Reliability Coordinating Council (FRCC)
- Reliability Coordinator (RC)
- FMPP Balancing Authority (BA)
- Orlando Utility Commission (OUC)
- Tampa Electric Company (TECO)
- DUKE Energy Florida (DEF)

Electric System Control - System Operating Procedures

"Appendix A – System Control Emergency Fuel Shortage
Procedure"I. PROVISIONS FOR THE FULL REIMBURSEMENT BY AN ELECTRIC UTILITY
RECEIVING ENERGY OR FUEL DURING AN ENERGY EMERGENCY:

Coordinate with the LAK's Power Resource Manager on Energy and the Fuel Manager on Fuel.

REFERENCE DOCUMENTS

Document Title	Document ID	Date
"Voltage Control and Schedule"	LAK-SYS-T23	Current Version
"Load Shedding Plan"	LAK-SYS-E06	Current Version
"Energy Coordinator Contact List"	LAK-SYS-N07	Current Version

REVISION HISTORY

Version	Authority	Action/Description	Date
8.0	Pickles, Eric	Updated applicable NERC Standards	2017.02.10
9.0	Pickles, Eric Shipps, Paul	Removed references to EOP-001, Changed title to "Power Resource Manager" where needed	2018.01.31
10.0	Pickles, Eric Bishop, Scott	Removed 'Revision History' prior to 2015; Corrected grammar related to Fuels department;	2018.09.17
11.0	Paul Shipps Scott Bishop	Reviewed – No Changes	2019.10.10
12.0	Eric Pickles Korey Bush	Reviewed – No Changes	2020.09.28
13.0	Eric Pickles Tory Bombard Korey Bush	Added cancel or recall Transmission to System Control duties, Section I: Added Fuel Manager as point of contract for Fuel reimbursement.	2021.09.14

Electric System Control - System Operating Procedures

“Appendix A – System Control Emergency Fuel Shortage Procedure”

14.0	Eric Pickles	Reviewed – No Changes	2022.09.09
15.0	Robert Soich Robert Clanton Eric Pickles	Revised 'Applicable NERC Standards' EOP-011-1 to EOP-011-2	2023.10.10
16.0	Robert Clanton Eric Pickles	Revised 'Applicable NERC Standards' EOP-011-2 to EOP-011-4;	2024.09.09
17.0	Robert Clanton Jeff Saenz Eric Pickles	Reviewed – No Changes	2025.10.13

Power Production - Standard Operating Procedures

"Appendix B – Power Production Emergency Fuel Shortage Procedure"

PURPOSE

The purpose of this Procedure is to expand on the elements outlined in the "Emergency Fuel Shortage Plan" (LAK-SYS-E11).

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

N/A – Not Applicable.

PROCEDURE

1. ENERGY PRODUCTION

When notified by the Energy Emergency Coordinator to Implement the Fuel Emergency Plan, Power Production will perform the following:

a. FUEL SWITCHING:

▪ GT2:

In the event of a gas shortage and GT2 is needed to make generation needs and as directed by the BA GT2 fuel should be changed to low sulfur #2 diesel. The procedure 2160 combination fuel firing should be used. If the shortage is low sulfur #2 diesel then the same procedure can be used for #2 diesel to gas.

▪ UNIT 8:

In the event of a gas shortage and U8 is needed to make generation needs and as directed by the BA U8 fuel should be changed to #2 Diesel.

Power Production - Standard Operating Procedures

"Appendix B – Power Production Emergency Fuel Shortage Procedure"

■ UNIT 5:

In the event of a gas shortage Unit 5 load will have to be adjusted as gas allotment allows. Unit 5 has no backup fuel, so with no gas, the unit will have to be removed from service. The unit can run at a reduced load (30%) as gas allows. The usage will be monitored by the MCO and the unit removed from service when there is no more gas.

b. OPTIMIZE FUEL SUPPLY:

During a fuel shortage, all testing of back-up systems should be suspended until after the emergency is over. No valve testing or pump changeover should be done during this emergency. No monthly or quarterly test running of generators should be conducted to conserve fuel.

c. MAXIMIZING GENERATOR OUTPUT AND AVAILABILITY:

All heat tracing on all units should be double checked for proper operation once the emergency is declared. The annual work orders in Maximo for heat trace inspection and PM should be verified complete.

Ensure that essential equipment is available and released from maintenance activities to maximize generator output and availability.

d. SYSTEM ENERGY USE:

In an emergency, and system energy use needs to be reduced, all non-essential systems should be shutdown. All lighting, fans and pumps not needed should be shutdown. All computers and A/C systems not needed after hours should be turned off.

No one shall take any actions or perform any maintenance that may jeopardize the steady state operation of any system or unit that have been declared part of the emergency.

e. ENVIRONMENTAL CONSTRAINTS:

Power Production - Standard Operating Procedures

"Appendix B – Power Production Emergency Fuel Shortage Procedure"

Environmental Permitting will coordinate activities with the City Attorney/ FRCC/ FCG (depending on specific issue) toward obtaining necessary Federal and State regulatory variances. See Environmental Permitting Fuel Emergency Preparedness Plan for more detail.

REFERENCE DOCUMENTS

Document Title	Document ID	Date

REVISION HISTORY

Version	Authority	Action/Description	Date
7.0	Pickles, Eric Libertz, John	Updated Applicable NERC Standards; grammatical corrections	2017.02.27
8.0	Pickles, Eric	Removed references to EOP-001	2018.01.31
9.0	Pickles, Eric Bishop, Scott	Removed 'Revision History' prior to 2015;	2018.09.17
10.0	Robinson, Kevin Bishop, Scott	Reviewed – No Changes	2019.10.10
11.0	Robinson, Kevin Bush, Korey	Changed U2 to GT2 & fuel designation	2020.09.28
12.0	Pickles, Eric Bush, Korey	Removed reference to Unit 3	2021.09.14
13.0	Pickles, Eric Robinson, Kevin	Reviewed – No Changes	2022.09.09
14.0	Soich, Robert Clanton, Robert	Revised 'Applicable NERC Standards' EOP-011-1 to EOP-011-2	2023.10.10
15.0	Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-2 to EOP-011-4;	2024.09.09
16.0	Clanton, Robert Jeff Saenz	Reviewed – No Changes	2025.10.13

Power Production - Standard Operating Procedures
“Appendix B – Power Production Emergency Fuel Shortage
Procedure”

	Pickles, Eric		
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CONFIDENTIAL

Fuels - Standard Operating Procedures

"Appendix C – Fuels Emergency Fuel Shortage Procedure"

PURPOSE

The purpose of this Procedure is to expand on the elements outlined in the "*Emergency Fuel Shortage Plan*" (LAK-SYS-E11). The Fuels group is responsible for keeping fuel supplied to LAK generators. Maintaining adequate fuel supplies will:

- Assure adequate supplies of fuel for power generation. Develop plans of replenishment of primary and alternate fuel supplies under ordinary and emergency scenarios.
- Assess risks in physical fuel supply chain and develop targets that balance risk abatement at reasonable costs.
- Actively pursue a plan of inventory as follows (Levels assessed and adjusted (up or down) per management discretion):
 - Oil: Assessed storage levels for: market and expected dispatch and replenishment. The storage capacity affords a reserve of 4-5 days reserve for #2 oil.
- Determine minimum volumes of natural gas to run generating units at minimum load and attempt to secure those volumes for delivery.

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

N/A – Not Applicable.

PROCEDURE

1. FUELS:

At all times the Fuels group shall engage in surveillance of physical conditions of access to primary and alternate generation fuel resources, assessing changes in risk condition and communicating prevailing and developing factors that may affect a shortage

Fuels - Standard Operating Procedures

"Appendix C – Fuels Emergency Fuel Shortage Procedure"

emergency to supervisor, plant and electric dispatching operations.

Prior to any fuel emergency condition such as a storm or condition that may affect fuel delivery and replenishment Fuels Purchasing shall coordinate efforts to determine appropriate inventory for fuel oil and solid fuels and ensure that purchases are arranged to achieve those inventory levels.

All operations and activity of Fuels Purchasing personnel during any impending or developing fuel emergency condition shall support the best efforts of plant and electric dispatching operations to assure sustainable operations.

Following the storm or any fuel emergency condition Fuel Purchasing personnel will endeavor to secure fuel supply for LAK generators to fulfill replenishment of any shortfall / gaps created under the extraordinary condition.

When notified by the Energy Emergency Coordinator to Implement the Fuel Emergency Plan, Fuel's will perform the following:

a. FUEL SUPPLY AND INVENTORY:

■ Phase I – Readiness

Review the Fuels Purchasing section of the EOP with all members of the group.

Determine the appropriate inventory levels for fuel oil. Fill tanks to achieve the desired inventory levels.

Work on natural gas portfolio to include access to some baseload gas and imbalance in pipeline to nominate against as storage gas.

■ Phase II –Watch

Discuss storm plans with fuel vendors and transportation providers.

Monitor storm track and evacuations from natural gas production areas.

■ Phase III –Warning

Fuels - Standard Operating Procedures

"Appendix C – Fuels Emergency Fuel Shortage Procedure"

Top-off fuel tanks.

Coordinate truck deliveries of solid fuel to be unloaded and departed from the power plant at least 12-hours prior to the storm arrival.

- **Phase IV –Emergency**

Shut down all truck deliveries of fuel to the power plants.

- **Phase V – Restoration**

Coordinate deliveries of natural gas based upon the intended schedule for gas burning generators.

Coordinate deliveries of oil pursuant to the intended schedule of the generators.

b. OPTIMIZE FUEL SUPPLY:

See Phase I – Phase V above.

c. FORECASTING THE EXTENT OF THE FUEL SHORTAGE:

See Phase I – Phase V above.

d. NOTIFYING ENTITIES AND DEPARTMENT OF FUEL INVENTORIES

Fuels department will inform System Control and plant operations of measures being taken in the event of a Fuel Emergency.

Fuels department will coordinate with any appropriate government agency as the various affected steps of the Fuel emergency plan are implemented.

Fuels department will also communicate internal cost accounting issues that may affect, or cause need to adjust the fuel rate during an emergency of fuel. The intent of this is to assure timely reimbursement of supplying utility's cost of fuel with the same of alternate fuel or energy during the emergency event(s).

Fuels - Standard Operating Procedures

"Appendix C – Fuels Emergency Fuel Shortage Procedure"

e. PROVISIONS FOR THE FULL REIMBURSEMENT BY AN ELECTRIC UTILITY RECEIVING FUEL DURING AN ENERGY EMERGENCY:

Document all financial activities pre and post emergency for possible FEMA reimbursement.

Document any activities that would help enhance the overall EOP plan and provide them as lessons learned to the Restoration Team.

f. ARRANGE DELIVERIES OF FUEL:

Coordinate with FMPP to arrange deliveries of fuel from remote systems through normal operating channels.

REFERENCE DOCUMENTS

Document Title	Document ID	Date

REVISION HISTORY

Version	Authority	Action/Description	Date
8.0	Pickles, Eric Libertz, John	Updated Applicable NERC Standards; grammatical corrections	2017.02.27
9.0	Pickles, Eric	Removed references to EOP-001	2018.01.31
10.0	Pickles, Eric Baker, Richard Bishop, Scott	Removed 'Revision History' prior to 2015;	2018.09.17
11.0	Bombard, Tory Bishop, Scott	Reviewed – No Changes	2019.10.10
12.0	Pickles, Eric Bush, Korey	Reviewed – No Changes	2020.09.28
13.0	Pickles, Eric Bombard, Tory Bush, Korey	Revised-removed reference to solid fuel and coal. Phase I change of NG.	2021.09.14
14.0	Pickles, Eric Bombard, Tory	Remove (3) energy and Electrical Energy (f) and days of #2 inventory available	2022.09.09

Fuels - Standard Operating Procedures

"Appendix C – Fuels Emergency Fuel Shortage Procedure"

15.0	Soich, Robert Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-1 to EOP- 011-2	2023.10.10
16.0	Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-2 to EOP- 011-4; Grammatical corrections	2024.09.09
17.0	Clanton, Robert Jeff Saenz Pickles, Eric	Reviewed – No Changes	2025.10.13



Communications - Standard Operating Procedures

"Appendix D – Communications Emergency Fuel Shortage Procedure"

PURPOSE

The purpose of this Procedure is to expand on the elements outlined in the "*Emergency Fuel Shortage Plan*" (LAK-SYS-E11).

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

N/A – Not Applicable.

PROCEDURE

1. COMMUNICATIONS

When notified by the Energy Emergency Coordinator to Implement the Fuel Emergency Plan, Communications will perform the following:

g. SYSTEM ENERGY USE:

See the Generation Deficiency Communications section in the City of Lakeland's Crisis Communication Plan.

h. PUBLIC APPEALS:

See the Advisory and EEA sections under Generation Capacity Deficiency Plan (LAK-SYS-E10).

i. REQUESTS OF GOVERNMENT:

See the Advisory and EEA sections under Generation Deficiency Communications in the City of Lakeland's Crisis Communication Plan.



Communications - Standard Operating Procedures
"Appendix D – Communications Emergency Fuel Shortage
Procedure"

REFERENCE DOCUMENTS

Document Title	Document ID	Date
"City of Lakeland Crisis Communications Plan"	N/A	Current Version
"Generation Capacity Deficiency Plan"	LAK-SYS-E10	Current Version

REVISION HISTORY

Version	Authority	Action/Description	Date
7.0	Eric Pickles Libertz, John	Updated applicable NERC Standards; grammatical corrections	2017.02.27
8.0	Eric Pickles	Removed references to EOP-001; changed 'Alert' to 'EEA'	2018.01.31
9.0	Eric Pickles Scott Bishop	Removed 'Revision History' prior to 2015;	2018.09.17
10.0	Scott Bishop	Reviewed – No Changes	2019.10.10
11.0	Eric Pickles Korey Bush	Reviewed – No Changes	2020.09.28
12.0	Eric Pickles Korey Bush	Reviewed – No Changes	2021.09.14
13.0	Eric Pickles	Reviewed – No Changes	2022.09.09
14.0	Robert Soich Robert Clanton Eric Pickles	Revised 'Applicable NERC Standards' EOP-011-1 to EOP-011-2	2023.10.10
15.0	Robert Clanton Eric Pickles	Revised 'Applicable NERC Standards' EOP-011-2 to EOP-011-4;	2024.09.09
16.0	Robert Clanton Jeff Saenz Eric Pickles	Reviewed - No Changes	2025.10.13

Account Managers - Standard Operating Procedures

"Appendix E – Account Managers Emergency Fuel Shortage Procedure"

PURPOSE

The purpose of this Procedure is to expand on the elements outlined in the *"Emergency Fuel Shortage Plan"* (LAK-SYS-E11).

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

N/A – Not Applicable.

PROCEDURE

1. ACCOUNT MANAGERS

When notified by the Energy Emergency Coordinator to Implement the Fuel Emergency Plan, Account managers will perform the following:

j. PUBLIC APPEALS:

Account Managers will contact assigned account customers via email and/or phone requesting voluntary load reduction and energy conservation.

k. APPEALS TO CUSTOMERS TO USE ALTERNATE FUELS:

Account Managers will maintain list of commercial/industrial customers with onsite generation.

In the event of a fuel shortage, the Account Managers will contact customers with generation and request they reduce non-essential usage and run onsite generation.

REFERENCE DOCUMENTS

Document Title	Document ID	Date
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Account Managers - Standard Operating Procedures

"Appendix E – Account Managers Emergency Fuel Shortage Procedure"

"Large Customer Generator Sizes"	n/a	Current Version
"Top 100 Electric Customers by Revenue"	n/a	Current Version

REVISION HISTORY

Version	Authority	Action/Description	Date
7.0	Pickles, Eric	Updated applicable NREC Standards	2017.02.10
8.0	Pickles, Eric Adkinson, John	Removed references to EOP-001	2018.01.31
9.0	Pickles, Eric Adkinson, John Bishop, Scott	Removed 'Revision History' prior to 2015;	2018.09.17
10.0	Adkinson, John Bishop, Scott	Reviewed – No Changes	2019.10.10
11.0	Pickles, Eric Bush, Korey	Reviewed– No Changes	2020.09.28
12.0	Pickles, Eric Bush, Korey	Reviewed– No Changes	2021.09.14
13.0	Pickles, Eric	Reviewed– No Changes	2022.09.09
14.0	Soich, Robert Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-1 to EOP-011-2	2023.10.10
15.0	Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-2 to EOP-011-4;	2024.09.09
16.0	Clanton, Robert Jeff Saenz Pickles, Eric	Reviewed – No Changes	2025.10.13



Facilities - Standard Operating Procedures

"Appendix F – Facilities Emergency Fuel Shortage Procedure"

PURPOSE

The purpose of this Procedure is to expand on the elements outlined in the *"Emergency Fuel Shortage Plan"* (LAK-SYS-E11).

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

N/A – Not Applicable.

PROCEDURE

1. FACILITIES

I. SYSTEM ENERGY USE:

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Plan, Facilities Maintenance will implement the following procedure in order to reduce electric energy usage within the major city buildings:

- 1) Automatically raise and lock air conditioning temperature set points.
- 2) Set time schedules on air conditioners to turn off after work hours.
- 3) Turn off lights in offices that have exterior windows.
- 4) Turn off interior building lighting after work hours.
- 5) Turn off non-essential garage lighting during daylight hours.
- 6) Turn off all non-essential exterior building and sign lights.
- 7) Turn off exterior sports complex lighting.



Facilities - Standard Operating Procedures

"Appendix F – Facilities Emergency Fuel Shortage Procedure"

8) Power production facilities are excluded from this action.

When notified by the Energy Emergency Coordinator that the Fuel Emergency Plan is no longer in effect Facilities will act to return city facilities to normal operating mode

REFERENCE DOCUMENTS

Document Title	Document ID	Date

REVISION HISTORY

Version	Authority	Action/Description	Date
7.0	Eric Pickles	Updated applicable NERC Standards	2017.02.10
8.0	Eric Pickles	Removed references to EOP-001	2018.01.31
9.0	Eric Pickles Scott Bishop	Removed 'Revision History' prior to 2015;	2018.09.17
10.0	Baker, Richard Bishop, Scott	Reviewed – No Changes	2019.10.10
11.0	Pickles, Eric Bush, Korey	Reviewed – No Changes	2020.09.28
12.0	Pickles, Eric Bush, Korey	Reviewed – No Changes	2021.09.14
13.0	Pickles, Eric	Reviewed – No Changes	2022.09.09
14.0	Soich, Robert Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-1 to EOP-011-2	2023.10.10
15.0	Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-2 to EOP-011-4;	2024.09.09
16.0	Clanton, Robert Jeff Saenz Pickles, Eric	Reviewed - No Changes	2025.10.13

Energy Delivery- Standard Operating Procedures

"Appendix G –Energy Delivery Emergency Fuel Shortage Procedure"

PURPOSE

The purpose of this Procedure is to expand on the elements outlined in the "*Emergency Fuel Shortage Plan*" (LAK-SYS-E11).

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

N/A – Not Applicable.

PROCEDURE

1. ENERGY DELIVERY

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Plan, Energy Delivery will perform the following:

a. AVAILABLE TRANSFER CAPABILITY (ATC) CONSTRAINTS:

Review posted ATC values, transmission model used TTC-calculation, and other ATC components for accuracy. If there are any inaccuracies identified, adjust the data in TTC-engine's model to better reflect real time system conditions.

b. T&D PLANNING SUPPORT

Provide necessary support to System Control during Load Management and Load Reduction measures, and restoration as necessary.

REFERENCE DOCUMENTS

Document Title	Document ID	Date
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Energy Delivery- Standard Operating Procedures

“Appendix G –Energy Delivery Emergency Fuel Shortage Procedure”

“Environmental Permitting Fuel Emergency Preparedness Plan”	N/A	Current Version
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REVISION HISTORY

Version	Authority	Action/Description	Date
7.0	Pickles, Eric	Updated applicable NERC Standards	2017.02.10
8.0	Pickles, Eric Tran, Phuong	Removed references to EOP-001	2018.01.31
9.0	Pickles, Eric Bishop, Scott	Removed 'Revision History' prior to 2015;	2018.09.17
10.0	Tran, Phuong Bishop, Scott	Reviewed – No Changes	2019.10.10
11.0	Pickles, Eric Bush, Korey	Reviewed – No Changes	2020.09.28
12.0	Pickles, Eric Bush, Korey	Reviewed – No Changes	2021.09.14
13.0	Pickles, Eric	Reviewed – No Changes	2022.09.09
14.0	Soich, Robert Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-1 to EOP-011-2	2023.10.10
15.0	Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-2 to EOP-011-4;	2024.09.09
16.0	Clanton, Robert Jeff Saenz Pickles, Eric	Reviewed – No Changes	2025.10.13

Power Resources - Standard Operating Procedures

"Appendix H –Power Resources Emergency Fuel Shortage Procedure"

PURPOSE

The purpose of this Procedure is to expand on the elements outlined in the "*Emergency Fuel Shortage Plan*" (LAK-SYS-E11).

APPLICABLE NERC STANDARDS AND REQUIREMENTS

EOP-011-4

REVIEW CYCLE

Annual – Once per calendar year or if procedure changes.

POSTING/PUBLISHING

N/A – Not Applicable.

PROCEDURE

1. POWER RESOURCES

When notified by the Energy Emergency Coordinator to implement the Fuel Emergency Energy Plan, Power Resources will perform the following:

a. PURCHASE POWER

Contact Power Resources in accordance with FMPP-PLA-002 "Capacity, Energy, and Fuel Emergency Plan" to schedule power purchases.

b. OPTIMIZE FUEL SUPPLY:

Contact Power Resources in accordance with FMPP-PLA-002 "Capacity, Energy, and Fuel Emergency Plan" to schedule generation resources for optimization of fuel supply.

c. MAXIMIZING GENERATOR OUTPUT AND AVAILABILITY:

Contact Power Resources in accordance with FMPP-PLA-002 "Capacity, Energy, and Fuel Emergency Plan" to schedule generation resources.

Power Resources - Standard Operating Procedures

"Appendix H –Power Resources Emergency Fuel Shortage Procedure"

d. ARRANGE DELIVERIES OF ELECTRICAL ENERGY:

Coordinate with Florida Municipal Power Pool (FMPP) to arrange deliveries of electrical energy from remote systems through normal operating channels.

REFERENCE DOCUMENTS

Document Title	Document ID	Date
"Capacity, Energy, and Fuel Emergency Plan"	FMPP-PLA-002	Current Version

REVISION HISTORY

Version	Authority	Action/Description	Date
8.0	Pickles, Eric	Updated applicable NERC Standards	2017.02.10
9.0	Pickles, Eric Shipps, Paul	Removed references to EOP-001	2018.01.31
10.0	Pickles, Eric Shipps, Paul Bishop, Scott	Removed 'Revision History' prior to 2015;	2018.09.17
11.0	Howard, Jim Bishop, Scott	Corrected the revision date from 2019 to 2018 for version 10.0	2018.11.27
12.0	Bishop, Scott	Reviewed – No Changes	2019.10.10
13.0	Pickles, Eric Bush, Korey	Reviewed – No Changes	2020.09.28
14.0	Pickles, Eric Bush, Korey	Reviewed – No Changes	2021.09.14
15.0	Pickles, Eric Bombard, Tory	Removed Fuel under (d)	2022.09.09
16.0	Soich, Robert Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-1 to EOP-011-2	2023.10.10
17.0	Clanton, Robert Pickles, Eric	Revised 'Applicable NERC Standards' EOP-011-2 to EOP-011-4;	2024.09.09
18.0	Clanton, Robert	Reviewed – No Changes	2025.10.13

Power Resources - Standard Operating Procedures
“Appendix H –Power Resources Emergency Fuel Shortage
Procedure”

	Jeff Saenz Pickles, Eric		
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