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Public Service Commission

April 8, 2002

The Honorable Magalie R. Salas
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Docket Nos. RM01-12-000, RT01-67-000, RT01-74-000,
RT01-75-000, RT01-77-000, RT01-100-000

Dear Ms. Salas:

Forwarded herewith are Comments of the Florida Public Service Commission regarding the Economic Assessment of RTO Policy in the above dockets.

Should you have questions, you may contact Jim Dean, the primary staff person in this matter, at (850) 413-6058

Sincerely,

/ s /

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

CBM:tf

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

RTO Cost Benefit Analysis Report) Docket Nos. RM01-12-000, RT01-67-000,
) RT01-74-000, RT01-75-000, RT01-77-000,
) RT01-100-000,

**FLORIDA PUBLIC SERVICE COMMISSION
COMMENTS ON THE REPORT, *ECONOMIC ASSESSMENT OF RTO POLICY***

The Florida Public Service Commission (FPSC) wants to express appreciation to the FERC for undertaking a macro-level analysis of its current policy with respect to regional transmission organizations. We are fully cognizant of how difficult such a task will be. Therefore, we applaud this initial step taken by the FERC and congratulate its consultant, ICF, for at least putting a first effort analysis on the table.

For a number of years, state commissions and utilities who have been working to achieve the goals expressed in Order 2000 have asked the FERC to quantify and estimate the benefits and costs associated with developing RTOs. Various regional studies have been performed, but no nationwide assessment has yet been offered. After an evidentiary hearing, the FPSC found that it was prudent for our utilities to join a regional transmission organization. However, we understand that many states are still in the process of developing an evidentiary basis for developing and moving forward with RTOs.

We carefully read the ICF study entitled the *Economic Assessment of RTO Policy* (the Study) and participated in the March 13th teleconference for the Southeastern state commissioners and staff. We took the opportunity to ask technical questions of both ICF and FERC staff who participated in the call. However, we must admit that our confidence in the conclusions of the Study was not buttressed after talking with the consultants and FERC staff.

We are concerned that the ICF consultants had to employ numerous, unsupportable assumptions to achieve any positive benefits in the context of this specific Study. In addition, we believe the very short time afforded ICF to prepare the Study has led to the utilization of these flawed assumptions, and if more realistic assumptions were employed, the quantified benefits would likely evaporate. As a result, we are concerned that many commissions and stakeholders will find that the Study does not provide a legally defensible or substantial basis for supporting the further development of RTOs.

Below are a number of the assumptions that we believe are fundamentally unsupportable and need to be clearly justified.

1. *Generator Availability Improvements* - The Study assumed a 15 percent increase in unit availability. No increased maintenance or operation expenses were associated with this gain.

These assumptions are not supported by empirical evidence from Florida's real world experience. For example, using equivalent availability as the metric, Florida Power & Light (FPL) which serves approximately half of the load in Florida had a system average availability factor of 76.3% in 1989. By 2001, after undertaking a massive early detection and maintenance program, its system average equivalent availability had risen to 90.1%. This represents a systemwide improvement of 18%. The NERC database indicates the system availability for all fossil units for 1999 was 83.4%. Thus, the ICF assumption would increase this number to more than 96% in six years. FPL's availability would have to exceed 100%. The gains at FPL were not without cost, and they were undertaken without the formation of an RTO. This data makes ICF's assumption of cost free improvements up to 96% for the nation's generator fleet seem unachievable.

Moreover, the FPSC initiated an incentive based program entitled the Generator Performance Improvement Factor which sets up regulatory benchmarks for rewarding operators of base loaded powerplants to improve both their heat rates and availability factors. This program was implemented in the early 1980's and has already achieved many of the improvements that this Study attributes to the mere formation of RTOs.

2. *Boiler Heat Rate Improvements* - ICF assumed a 6% improvement in heat rates between 2004 and 2010. It is not clear if this improvement assumption is applied to all units in the fleet or represents the change in the fleet average for all generators. It is unquestionable, that with the current deployment of highly efficient, combined cycle units with heat rates around 7,000 btu/kWh, that the fleet averages will improve. The national system average fossil heat rate in 2000 was 10,648, and this number is actually higher now than in the early 1990's. To assume that RTOs will result in a 6% reduction of all units is flawed reasoning. While the fleet averages will improve due to the statistical improvements associated with the introduction of combined cycle units—the introduction of combined cycle units are independent of the development of RTOs. To assume that all other units also improve without any incremental costs is not supportable.
3. *Assumption of Transfer Capability into Peninsular Florida* - Florida's transmission interface with the Southern Company region is rated at 3,600 mWs on a first contingency basis. Based on 2000 data, Florida imported approximately 16 terawatt/hours (tWh) of energy. By 2006, the Study assumes this number will increase to 47 tWh. This increase occurs with no identifiable improvements in the overall transfer capability and with no incremental cost. Even if the interface was fully loaded at 100 of its rated capacity—which, according to discussions with the Florida Reliability Coordinating Council, would be impossible—the

physical transfer capability would only be 31 tWh. How Florida imports the additional 16 tWh over this interface must be explained and appropriate costs assigned.

This latter assumption is particularly important, since according to the data presented on page 61 of the Study, the Florida region is responsible for the majority of prospective inter-regional energy transfers in the Southeast. Thus, most of the estimated economic benefits are associated with these increased transactions. If the power transfers into the state are over estimated, then the economic benefits are also over estimated.

4. *Cost Free Improvements in Transmission Transfer* - As the ICF report points out, some 31% of energy produced in the United States is sold into the wholesale market. Thus, under the existing transmission structure, substantial transactions are occurring. To the extent that economic opportunities exist to engage in mutually beneficial transactions, transmission system users and owners will make the necessary investments to enhance these opportunities as long as the necessary hurdle rates can be achieved. However, physically increasing transfer capabilities within regions will require additional costs. For reasons not clearly articulated in the Study, ICF assumed at the onset of its analysis that the transfer capability between regions would increase 5% with the mere formation of RTOs. This important assumption should be better explained. Otherwise, it appears to be introduced simply to bias the Study to show system benefits without incurring any costs associated with increasing transfer levels.
5. *Speculative Assignments of Benefits to RTOs* - Perhaps the most disturbing result of the Study is the relative proportion of benefits attributable to different policy scenarios. Only one of the three cases analyzed by ICF explicitly has benefits attributable to the creation and operation of RTOs. The Transmission Only Case posits assumptions about the contributions

of RTOs in minimizing hurdle rates and improving transmission operations—changes that can be reasonably attributable to the actions of RTOs. However, the net present value of benefits associated with the Transmission Only case is rather insignificant and, given the systemic problems with assumptions described above, is in reality probably negative or at best indeterminate. However, in what appears to be a “hunt for savings,” ICF goes on to run two more analyses--the generation efficiency case and the demand side responsiveness case. With these two cases, substantial new savings are found and such savings are spuriously attributed to the creation of RTOs.

The logic of causally assigning the benefits of generation efficiency and demand responsiveness to the formation of RTOs is again in error. We have already noted the generation improvements made by Florida’s largest utility. A similar example is offered for demand side response programs. Peninsular Florida utilities have approximately 2800 mWs, or 7% of their 2001 summer peak, subject to dispatchable, interruptible demand programs. Gulf Power in the panhandle is deploying a near real time pricing program down to the residential customer class. Georgia Power, our northern neighbor utility, has the largest real time pricing program in the country, with over 1600 commercial and business customers enrolled. Clearly, the empirical evidence shows substantial economic efficiency gains with various demand response programs. However, the implementation of such programs resides nearly exclusively with state commissions and utilities through retail rate design and demand side programs. Economic gains of such actions can not be attributable to the mere formation of RTOs.

These concerns are meant to highlight the more critical flaws with the ICF Study. Again, we recognize the tight time frame in which ICF prepared this report and want to give credit to this admittedly challenging economic analyses undertaken by the FERC. Nonetheless, given the fundamental restructuring of the electric system that is embodied in the formation of RTOs, the universally-acknowledged startup costs, and what appears to be a critically flawed attempt at estimating benefits, it seems to the FPSC that further analytical work is required to build a defensible and factual basis to help additional states move forward with RTOs.

Therefore, the FPSC urges that ICF be commissioned to refine its analyses, correcting the more egregious mistakes described above. Second, ICF needs to ensure that NERC-defined transmission transfer capabilities are used as caps on the regional powerflow levels. Lastly, while we understand that the gains in economic efficiency attributable to RTOs are by their nature somewhat speculative, the methodology employed by ICF to assign generator efficiency gains and demand side responsiveness programs to RTOs should be completely eliminated from future analyses. This is simply not a defensible design in this study.

Respectfully submitted,

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DATED: April 8, 2001

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FEDERAL ENERGY REGULATORY COMMISSION**

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)	RT01-100-000,

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Comments of the Florida Public Service Commission will be sent today by U.S. Mail to all parties on the attached service list.

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