FLORIDA PUBLIC SERVICE COMMISSION
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Tallahassee, Florida 32399-0850

M E M O R A N D U M

April 25, 1996

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYO)

FROM: DIVISION OF APPEALS (MOORE) CTM DES
DIVISION OF ELECTRIC & GAS (FUTRELL) MF TB
DIVISION OF AUDITING & FINANCIAL ANALYSIS (STALLCUP)
DIVISION OF LEGAL SERVICES (ERSTLING)
DIVISION OF RESEARCH & REGULATORY REVIEW (HARLOW) JDJ

RE: DOCKET NO. 960111-EU - - PROPOSED RULES 25-17.085, 25-17.0851, AND 25-17.0852, F.A.C., CONTENTS SUBMISSION, AND REVIEW OF TEN-YEAR SITE PLANS

AGENDA: MAY 7, 1996 - REGULAR AGENDA - RULE PROPOSAL - INTERESTED PERSONS MAY PARTICIPATE

RULE STATUS: PROPOSAL MAY BE DEFERRED

SPECIAL INSTRUCTIONS: S:\PSC\APP\WP\960111EU.RCM

CASE BACKGROUND

In 1995, the Florida Legislature amended section 186.801, Florida Statutes, (Attachment 1) to transfer responsibility for reviewing electric utility ten-year site plans from the Department of Community Affairs (DCA) to the Public Service Commission. Electric utilities have filed ten-year site plans pursuant to the former statute and the DCA's rules that were adopted in 1973. (Chapter 9J-25, Florida Administrative Code) In the past, the Commission has reviewed the plans and provided its comments to the DCA. For the past two years, staff has requested supplemental information from the utilities to assist it in analyzing the plans.

Section 186.801 as revised requires ten-year site plans to be submitted by electric utilities and reviewed by the Commission not less frequently than every two years. The Commission is required to make a preliminary study of the proposed plans and classify them as "suitable" or "unsuitable" within nine months of their receipt. The plans are "for planning purposes only" and may be amended by a utility at any time. The statute lists what the Commission must review, and authorizes it to adopt rules governing "the method of submitting, processing, and studying" the plans.

DOCUMENT NUMBER-DATE
04741 APR 25 96
FPSC-RECORDS/REPORTING

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission propose Rules 25-17.085, 25-17.0851, and 25-17.0852, Florida Administrative Code, providing definitions, and governing the submission and review of electric utility ten-year site plans?

RECOMMENDATION: Yes.

STAFF ANALYSIS: The attached recommended rules include definitions of terms; specify the utilities that are required to file plans; provide the procedure for submission of the plans and solicitation of comments from other agencies; and specify what information must be included in the plans. (Attachment 2) Staff used the DCA rule as the foundation for its recommended rules. Rather than list all of the required information in the rule text, staff has developed a form with schedules so that each utility's plan will be submitted to the Commission in the same format. This form is incorporated into Rule 25-17.0852 by reference and is included in Attachment 2 to this recommendation following the rule text.

The form requires information that 1) has been filed with DCA by the utilities in past ten-year site plans; 2) supplemental information requested informally by Commission staff in the past; and 3) additional information that staff believes is necessary for the Commission to adequately study and classify the plans as "suitable" or "unsuitable" pursuant to the statutory requirements. A summary of the information as categorized above follows:

Information Filed in Past Ten-Year Site Plans:

- Description and data about existing generating facilities.
- Maps of transmission lines, interties, and service area.
- Energy consumption by customer class, and number of customers.
- Winter and summer peak demand, and energy forecast.
- Fuel quantity forecast by type of generation.
- Net generation by fuel type.
- Forecast of electric capacity, demand, and reserve margins.
- Generating unit additions and changes.
- Information on transmission lines associated with new units.
- Identification of potential and preferred sites for new units.
- Air pollution control strategy for existing units.
- Land use and investment data for existing sites.

DOCKET NO. 960111-EU
DATE: April 25, 1996

Supplemental Information Previously Requested by Staff:

- High and low forecasts of winter and summer peak demand and energy.
- Twenty-year fuel price forecasts (base case, high, low).
- Future supply-side resources.
- Generation expansion plans and revenue requirements that correspond to the base, high, and low load forecasts.
- Discussion of how the base case plan would change under the base, high, and low fuel price scenarios (quantify revenue requirements).
- A generation expansion plan, and revenue requirements, assuming the current differential in the price of oil/gas and coal is kept constant over the planning horizon.
- Individual unit performance data.
- A forecast of reliability indices utilizing a base case, high, and low load forecast.
- Financial assumptions used in the electric utility's planning analyses. Escalation assumptions for general inflation, and plant costs.
- Customer participation data for each Demand Side Management (DSM) program.
- Definition and discussion of the utility's generation and transmission reliability criteria.
- Activities regarding the acquisition of renewable resources.
- Discussion of how the utility verifies the durability of energy savings for its DSM programs.
- Discussion of the potential for district heating and cooling applications in the utility's service territory.
- Identification of the major elements of risk to the electric utility, explanation of how the utility plans to mitigate such risk.
- Discussion of the effect non-utility generators have on the economic operation and reliability of the utility's system.

Additional Information:

- Description of the procurement process to be utilized to acquire the additional supply-side resources identified in the plan.
- The transmission construction and upgrade plans for lines that must be certified under the Transmission Line Siting Act.
- Identification of current transmission constraints, and discussion of plans for alleviating any transmission constraints.
- Description of the utility's Integrated Resource Planning process.

The statute authorizes the Commission, after a hearing, to establish a study fee not exceeding $1,000 for each plan. Staff has not included a provision for fees in the rules because utilities already pay regulatory assessment fees which cover the Commission's cost of regulation.

Economic Impact Statement

An Economic Impact Statement (EIS) was prepared based on the responses to a data request sent to the affected utilities and discussions with Commission staff. (Attachment 3) The responses from investor-owned electric utilities estimating the additional costs anticipated to comply with the rules ranged from negligible to substantial. In addition to the cost associated with the new data requested by the rules, several of these utilities expect indirect competitive costs due to disclosure of certain information or increased direct costs as a result of the need to file requests for confidentiality. The responses from municipal electric utilities vary from no anticipated additional costs to an expected cost of $45,000 to hire an additional staff member to produce the banded demand, energy, and fuel price forecasts. Staff notes that this information has been produced by the utilities in the past in response to staff's requests for additional information. The utilities' responses to the EIS data request are discussed in greater detail in the EIS.

Based on responses from several electric cooperatives that estimated major additional costs, staff has added a threshold filing requirement in Rule 25-17.0851(2) for planned additions to generation capacity by otherwise nonreporting utilities. This 50 mW threshold was in the DCA rule, but had been deleted from the draft of the Commission rule that was sent to utilities with the EIS data request.

Letter from CEPA

During the Commission's review of 1995 ten-year site plans, the Florida Competitive Energy Producers Association (CEPA) filed comments recommending that the Commission require utilities to demonstrate their intent to pursue competitive alternatives in their plans. On January 16, 1996, in a letter to Chairman Clark, CEPA urged the Commission to:

> proceed expeditiously to adopt new rules governing the Ten Year Site Plans that delineate the technical data the utilities must provide and the commitment to competitive procurement procedures they must incorporate in their plans to receive a "suitable" classification. In conjunction with these steps, the Commission should move to expand the very limited competitive bidding requirement that is contained in existing regulations.

In response to CEPA's concerns, staff has included a requirement in the rule that the electric utility describe the procurement process it intends to use to acquire the additional supply-side resources identified in its plan. Staff believes that the recommended rules require submission of the data needed by the Commission to determine whether a utility's ten-year site plan is "suitable" or "unsuitable." Bidding procedures and requirements are the subject of other Commission rules, and are not included in this docket.

Specifically, Rule 25-22.082, Florida Administrative Code, requires a utility to issue a request for proposals when the utility plans to construct a generating unit which is subject to the Power Plant Siting Act. While investor-owned utilities are not required to issue a request for proposals for units that do not require certification, the Commission expects utilities to select the least-cost generation alternative. The position that all additional generation should be bid was discussed extensively in the hearing that led to Rule 25-22.082, but was not approved. Additionally, since the ten-year site plan contains information necessary to evaluate a utility's plan, the independent power producers have access to valuable information in order to approach the utility to negotiate supply-side resource additions.

DOCKET NO. 960111-EU
DATE: April 25, 1996

ISSUE 2: If no requests for hearing or comments are filed, should the rules as proposed be filed for adoption with the Secretary of State and the docket be closed?

RECOMMENDATION: Yes.

STAFF ANALYSIS: Unless comments or requests for hearing are filed, the rule proposed may be filed with the Secretary of State without further Commission action. The docket may then be closed.

CTM/

Attachments

West's F.S.A. Sec. 186.801

WEST'S FLORIDA STATUTES ANNOTATED
TITLE XIII. PLANNING AND DEVELOPMENT
CHAPTER 186. STATE AND REGIONAL PLANNING

Current through End of 1995 1st Regular Session

186.801. **Ten-year site plans**

(1) Beginning January 1, 1974, each electric utility shall submit to the Public Service Commission a 10-year site plan which shall estimate its power-generating needs and the general location of its proposed power plant sites. The 10-year plan shall be reviewed and submitted not less frequently than every 2 years.

(2) Within 9 months after the receipt of the proposed plan, the commission shall make a preliminary study of such plan and classify it as "suitable" or "unsuitable." The commission may suggest alternatives to the plan. All findings of the commission shall be made available to the Department of Environmental Protection for its consideration at any subsequent electrical power plant site certification proceedings. It is recognized that 10-year site plans submitted by an electric utility are tentative information for planning purposes only and may be amended at any time at the discretion of the utility upon written notification to the commission. A complete application for certification of an electrical power plant site under chapter 403, when such site is not designated in the current 10-year site plan of the applicant, shall constitute an amendment to the 10-year site plan. In its preliminary study of each 10-year site plan, the commission shall consider such plan as a planning document and shall review:

(a) The need, including the need as determined by the commission, for electrical power in the area to be served.

(b) The anticipated environmental impact of each proposed electrical power plant site.

(c) Possible alternatives to the proposed plan.

(d) The views of appropriate local, state, and federal agencies, including the views of the appropriate water management district as to the availability of water and its recommendation as to the use by the proposed plant of salt water or fresh water for cooling purposes.

(e) The extent to which the plan is consistent with the state comprehensive plan.

(f) The plan with respect to the information of the state on energy availability and consumption.

(3) In order to enable it to carry out its duties under this section, the commission may, after hearing, establish a study fee which shall not exceed $1,000 for each proposed plan studied.
*18946 (4) The commission may adopt rules governing the method of submitting, processing, and studying the 10-year plans as required by this section.

CR01

CREDIT(S)

1996 Pocket Part

CR01 Amended by Laws 1994, c. 94-356, Sec. 41, eff. July 1, 1994; Laws 1995, c. 95-328, Sec. 2, eff. July 1, 1995.

25-17.085 Ten-Year Site Plans - Definitions.

(1) "Electric Utility" means any municipal electric utility, investor-owned electric utility, rural electric cooperative, public utility district, joint operating agency, or combinations thereof, that owns, maintains, or operates an electric generation, transmission, or distribution system within the state.

(2) "Site" means any location where an electric utility proposes to construct a power plant, a power plant alteration, or an addition resulting in an increase in generating capacity.

(3) "Power Plant" means any electrical generating facility using any process or fuel, including nuclear materials, and shall include those directly associated transmission lines required to connect to an existing transmission network.

(4) "Directly Associated Transmission Lines" means only new transmission lines from the power plant to the first structure on an existing transmission system.

(5) "Potential Sites" are sites that an electric utility is considering, or has considered, for possible location of a power plant.

(6) "Preferred Sites" are sites on which an electric utility intends to construct a power plant.

Specific Authority: 350.127(2), 186.801(4) F.S.

Law Implemented: 186.801 F.S.

History: New ______.

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

25-17.0851 Submission and Review of the Ten-Year Site Plans.

(1) All electric utilities in the State of Florida with existing generating capacity of 250 mW or greater shall submit a ten-year site plan to the Florida Public Service Commission's Division of Records and Reporting on the first working day of April of each year. The plan shall date from April 1 of the year in which it is submitted.

(2) Any electric utility that elects to construct an additional generating facility exceeding 50 mW gross generating capacity shall submit a ten-year site plan in the year the decision to construct is made or at least three years prior to application for site certification, and every year thereafter until the facility becomes fully operational.

(3) The Commission will provide a copy of the ten-year site plans to appropriate federal, state, and local agencies, water management districts, and regional planning councils.

(4) The Commission will solicit comments from various federal, state, and local agencies, water management districts, and regional planning councils regarding the individual utility ten-year site plans. Any written comments shall be filed with the Commission within 60 days from the date of receipt of the plans. The state agencies from which comments will be solicited will include:

(a) The Department of Environmental Protection.

(b) The Department of Transportation.

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

(c) The Department of Agriculture and Consumer Services.

(d) The Department of Health and Rehabilitative Services.

(e) The Game and Fresh Water Fish Commission.

(f) The Board of Trustees of the Internal Improvement Trust Fund.

(g) The Department of Community Affairs.

(5) The Commission shall provide its preliminary study pursuant to section 186.801(2), Florida Statutes, to the Florida Department of Environmental Protection within nine months of receipt of the plans.

(6) Section 186.801(2), Florida Statutes, states that ten-year site plans are tentative information for planning purposes only and are consequently subject to change. Accordingly, plans that have been previously classified by the Commission as unsuitable may be classified suitable based on additional data.

(7) The electric utilities in Florida shall compile aggregate state-wide and peninsular Florida data derived from the individual electric utility base case ten-year site plans and shall submit this data to the Commission by July 1 of each year.

Specific Authority: 350.127(2), 186.801(4) F.S.

Law Implemented: 186.801 F.S.

History: New ______.

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

25-17.0852 Contents of Ten-year Site Plans.

(1) Individual electric utility ten-year site plans required by Rule 25-17.0851 shall include at a minimum the information listed in Form PSC/EAG 43. Form PSC/EAG 43 (/96), entitled "Electric Utility Ten-Year Site Plan Information and Data Requirements," is incorporated by reference into this rule and is available from the Division of Electric and Gas.

(2) When an application for certification of a preferred site for a proposed facility has been filed with the Department of Environmental Protection, no further environmental or land use data need be submitted to the Commission for that site.

Specific Authority: 350.127(2), 186.801(4) F.S.

Law Implemented: 186.801 F.S.

History: New ______.

CODING: Words underlined are additions; words in ~~struck through~~ type are deletions from existing law.

State of Florida

Public Service Commission

ELECTRIC UTILITY TEN-YEAR SITE PLAN

INFORMATION AND DATA REQUIREMENTS

Form PSC/EAG 43
(/96)

ELECTRIC UTILITY TEN-YEAR SITE PLAN INFORMATION AND DATA REQUIREMENTS

The Ten-Year Site Plan shall include at a minimum the information and data specified in this form. Where numbered schedules are listed, the data required shall be reported on the schedules:

Description of Existing Facilities

A description of each existing generating and transmission facility shall be provided in the ten-year site plan to permit an evaluation of the capabilities of existing electric utility resources. The information to be provided shall include at least:

1. A description of electric power generating facilities.

2. **Schedule 1:** A tabular display of existing generating facilities as of December 31 of the year prior to the year the plan is filed.

3. An electric system map or maps showing all transmission lines with voltage rating of 230 kV or greater and all interties with voltage rating of 69 kV or greater.

4. A map showing the reporting electric utility's service area, where service area is defined as all areas in which the reporting utility provides electric service at both distribution and transmission levels.

Forecast of Electric Power Demand, Energy Consumption and Fuel Prices

The demand forecast will provide the key element of the demonstration of the need for additional generating capacity, and hence the requirement for additional power plant sites. The following data shall be provided for a ten year historical period and a ten year forecast period unless otherwise noted:

1. **Schedules 2.1, 2.2, 2.3:** Tabular displays of energy consumption (GWH) and number of customers by customer classification (residential, commercial, industrial, and other) within the reporting electric utility's service area. Other sales and purchases within the state and out-of-state shall be included and identified.

a. Provide a graph of the data in Schedules 2.1, 2.2, and 2.3.

2. **Schedules 3.1.1, 3.1.2, 3.1.3, 3.2.1, 3.2.2, 3.2.3, 3.3.1, 3.3.2, 3.3.3:** Tabular displays of winter and summer peak demand (MW), and net energy for load (GWH) in the reporting service area utilizing a base case load forecast. Provide high and low ten year load forecasts of winter and summer peak demand, and net energy for load in the reporting service area based upon high and low rates of growth. Provide the major assumptions for each growth scenario. The tables shall include electric utility-sponsored residential and commercial/industrial Demand Side Management (DSM) data.

a. Provide graphs of the data in Schedules 3.1.1, 3.1.2, 3.1.3, 3.2.1, 3.2.2, 3.2.3, 3.3.1, 3.3.2, 3.3.3.

3. **Schedule 4:** A tabular display of monthly peak demand and

net energy for load for the most recent calendar year that actual data is available and for the first two forecast years.

4. **Schedules 5.1.1, 5.1.2, 5.1.3, 5.2.1, 5.2.3, 5.2.3, 5.3.1, 5.3.2, 5.3.3, 5.4:** Tabular displays with ten years of historical data and 20 years of forecast data of fuel prices utilizing a base case forecast for all fuels used to generate electricity at the electric utility generating sites such as nuclear, natural gas, #2 fuel oil, #6 fuel oil, coal, and orimulsion. Provide high and low 20 year fuel price forecasts for each non-nuclear fuel used by the electric utility to produce electric power. Include ten years of historical data and 20 years of forecast data of prices for firm purchases utilizing a base case forecast.

a. Provide, explain, and discuss the assumptions used to derive the base case forecast.

b. Explain the changes to the major assumptions that were made from the base case to generate the high and low fuel price forecasts.

5. **Schedule 6:** A base case ten year fuel quantity forecast, in volumetric units such as tons of coal, cubic feet of natural gas, and barrels of oil for all fuels used to generate electricity at the electric utility generating sites. Include separate categories for purchases from other utilities and for purchases from non utility generators. The data shall be further broken down by type of unit within fuel type such as Combined Cycle (CC), Combustion Turbine (CT), and Steam. Include the most recent two years of actual data.

6. **Schedules 7.1, 7.2:** A base case ten year forecast showing the annual net energy for load (GWH), broken down by fuel type. Include separate categories for purchases from other utilities and for purchases from non utility generators. The data shall be further broken down by type of unit within fuel type such as CC, CT, and Steam. Include the most recent two years of actual data. Also, convert the data described above into percent of net energy for load.

Forecasting Methods and Procedures

Each electric utility shall provide documentation of the forecasting procedures used and the rationale for their use. Describe the types of data and data sources used, and discuss any significant assumptions and informed judgments implicit in the forecast.

Forecast of Facilities Requirements

Each electric utility submitting a ten-year site plan shall illustrate how its existing and proposed generating facilities will provide for the forecasted load. The capacity forecast shall consider all existing generating capability and all plants currently under construction, and compare this total capability to projected demand plus required reserves to determine requirements for additional generating facilities. The requirements forecast shall identify all such facilities for which construction is planned during the ten-year period following April 1 of the forecast year. Specific information to be provided in the forecast of facilities requirement shall include:

1. **Schedules 8.1, 8.2:** Tabular displays listing a ten-year projection of electric capacity, and summer and winter peak demand with resulting reserve margins.

2. **Schedule 9:** A tabular display of the generating unit additions and changes, including unit specific data for each unit on which construction may commence during the ten-year forecast period.

3. **Schedule 10:** A status report and specifications of proposed generating facilities.

4. **Schedule 11:** A status report and specifications of proposed directly associated transmission lines corresponding with proposed generating facilities.

5. Identify the supply-side resources, by year and type, that will need to be constructed by the electric utility or purchased from a non utility source, after fully integrating cost-effective demand-side resources for the ten-year planning horizon. Include any repowerings, life extensions, and purchases from electric utility and non utility sources.

6. Describe the procurement process the electric utility intends to utilize to acquire the additional supply-side resources identified in the electric utility's ten-year site plan.

7. Provide the transmission construction and upgrade plans for electric utility system lines that must be certified under the Transmission Line Siting Act (403.52 - 403.536, F.S.). Also,

provide the rationale for any new or upgraded line.

Other Planning Assumptions and Information

1. Identify current transmission constraints, both interstate and intrastate, that affect transfer of power to and from the electric utility. Discuss any plans for alleviating any transmission constraints that cause uneconomic operation of the electric utility's system.

2. Provide the results of generation expansion plans, along with the annual and cumulative present worth revenue requirements, that correspond to the base, high, and low load forecasts shown in Schedule 3.

3. Discuss how the base case expansion plan would change, including quantification of revenue requirements, under the base, high, and low fuel price scenarios.

4. Provide the results of a generation expansion plan, along with the annual and cumulative present worth revenue requirements, assuming the current differential in the price of oil/gas and coal is kept constant over the planning horizon.

5. **Schedule 12:** Provide for each existing generating unit for the most recent calendar year and for the ten year forecast period, the Planned Outage Factor (%), the Forced Outage Factor (%), the Equivalent Availability Factor (%), and the Average Net Operating Heat Rate (Btu/mWh).

6. **Schedules 13.1, 13.2, 13.3:** Provide a tabular display of a ten year forecast of Loss of Load Probability, Reserve Margin,

and Expected Unserved Energy utilizing a base case, high, and low load forecast as shown in Schedule 3.

7. **Schedules 14.1, 14.2:** Provide financial assumptions including capitalization ratios, rate of return, and tax rates used in the electric utility's planning analyses. Provide a tabular display of a ten year forecast of escalation assumptions for general inflation, plant construction cost, and fixed and variable operation and maintenance cost.

8. **Schedule 15:** A tabular display of customer participation data for each Commission-approved demand side management program with five years of historical data and five years of forecasted data.

9. Describe in detail the electric utility's Integrated Resource Planning process. Discuss whether the optimization was based on revenue requirements, rates, or total resource cost. Identify and explain how strategic concerns affect the planning process.

10. Define and discuss the electric utility's generation and transmission reliability criteria.

11. Discuss the electric utility's current and proposed activities regarding the acquisition of renewable resources.

12. Discuss how the electric utility verifies the durability of energy savings for its DSM programs.

13. Discuss the electric utility's evaluation of the potential for district heating and cooling applications in its service territory.

14. Identify the major elements of risk to the electric utility such as the risk of over-reliance on particular fuels, potential oil embargoes, and potential stranded investment. Explain how the electric utility plans to mitigate such risk.

15. Discuss the dispatchability and other forms of control or lack of control of non utility generators supplying electricity to the electric utility's system and how these factors affect the economic operation and reliability of the electric utility's system.

Environmental and Land Use Information

1. Potential sites for each new generating facility identified in the requirements forecast shall be generally disclosed. A Regional Planning Council map shall be provided designating the general location for each potential site and the areas within that region considered not suitable for a site shall be clearly shown. The relative acceptability among the potential sites disclosed shall be indicated. Whenever it is possible for an electric utility to disclose the general location of a potential site more precisely than by designation of the Regional Planning Council region, it shall do so in the plan.

2. A preferred site shall be fully disclosed for each required facility. At the time of disclosing a preferred site, the electric utility shall designate one of the potential sites considered in the selection process as an alternative to the preferred site. A description shall be given of each preferred

site disclosed in the plan and of the facility to be located thereon. **A description shall be given of the preferred site selection process.** The site description shall include appropriate maps indicating physical characteristics of the site and corridors for proposed transmission lines directly associated with the proposed facility, as well as facilities layouts and site preparation plans. The facility description shall include specifications of the proposed generating, cooling and pollution-control equipment and of directly associated transmission lines, as well as descriptions of all major structures. Data provided in the facility descriptions shall be the best available at the date **the plan is submitted** and shall be updated in each subsequent submission.

3. **Schedule 16:** Provide the air pollution control strategy and cooling method for each existing steam generating unit as of December 31 of the year prior to the year of filing.

4. Explain the anticipated environmental impact of proposed power plant sites.

5. **Schedule 17:** Provide land use and investment data of each plant site as of December 31 of the year prior to the year of filing.

6. Provide the status of the application for certification of the preferred site with the Department of Environmental Protection: certified, certification pending, or certification denied.

Schedule 1
Existing Generating Facilities
As of December 31, 19XX

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
				Fuel		Fuel Transport						Net Capability	
Plant Name	Unit No.	Location	Unit Type	Pri	Alt	Pri	Alt	Alt. Fuel Days Use	Commercial In-Service Month/Year	Expected Retirement Month/Year	Gen. Max. Nameplate KW	Summer MW	Winter MW

Schedule 2.1
History and Forecast of Energy Consumption and Number of Customers by Customer Class

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
	Rural and Residential					Commercial		
Year	Population	Members per Household	GWH	Average No. of Customers	Average KWH Consumption Per Customer	GWH	Average No. of Customers	Average KWH Consumption Per Customer

Schedule 2.2
History and Forecast of Energy Consumption and Number of Customers by Customer Class

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	Industrial						
Year	GWH	Average No. of Customers	Average KWH Consumption Per Customer	Railroads and Railways GWH	Street & Highway Lighting GWH	Other Sales to Public Authorities GWH	Total Sales to Ultimate Consumers GWH

Schedule 2.3
History and Forecast of Energy Consumption and Number of Customers by Customer Class

(1)	(2)	(3)	(4)	(5)	(6)
Year	Sales for Resale GWH	Utility Use & Losses GWH	Net Energy for Load GWH	Other Customers (Average No.)	Total No. of Customers

Schedule 3.1.1
History and Forecast of Summer Peak Demand
Base Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Year	Total	Wholesale	Retail	Interruptible	Residential Load Management	Residential Conservation	Comm./Ind. Load Management	Comm./Ind. Conservation	Net Firm Demand

Schedule 3.1.2
History and Forecast of Summer Peak Demand
High Case

(1) Year	(2) Total	(3) Wholesale	(4) Retail	(5) Interruptible	(6) Residential Load Management	(7) Residential Conservation	(8) Comm./Ind. Load Management	(9) Comm./Ind. Conservation	(10) Net Firm Demand

Schedule 3.1.3
History and Forecast of Summer Peak Demand
Low Case

(1) Year	(2) Total	(3) Wholesale	(4) Retail	(5) Interruptible	(6) Residential Load Management	(7) Residential Conservation	(8) Comm./Ind. Load Management	(9) Comm./Ind. Conservation	(10) Net Firm Demand

Schedule 3.2.1
History and Forecast of Winter Peak Demand
Base Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Year	Total	Wholesale	Retail	Interruptible	Residential Load Management	Residential Conservation	Comm./Ind. Load Management	Comm./Ind. Conservation	Net Firm Demand

Schedule 3.2.2
History and Forecast of Winter Peak Demand
High Case

(1) Year	(2) Total	(3) Wholesale	(4) Retail	(5) Interruptible	(6) Residential Load Management	(7) Residential Conservation	(8) Comm./Ind. Load Management	(9) Comm./Ind. Conservation	(10) Net Firm Demand

Schedule 3.2.3
History and Forecast of Winter Peak Demand
Low Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Year	Total	Wholesale	Retail	Interruptible	Residential Load Management	Residential Conservation	Comm./Ind. Load Management	Comm./Ind. Conservation	Net Firm Demand

Schedule 3.3.1
History and Forecast of Annual Net Energy for Load – GWH
Base Case

(1) Year	(2) Total	(3) Residential Conservation	(4) Comm./Ind. Conservation	(5) Retail	(6) Wholesale	(7) Utility Use & Losses	(8) Net Energy for Load	(9) Load Factor %

Schedule 3.3.2
History and Forecast of Annual Net Energy for Load – GWH
High Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Year	Total	Residential Conservation	Comm./Ind. Conservation	Retail	Wholesale	Utility Use & Losses	Net Energy for Load	Load Factor %

Schedule 3.3.3
History and Forecast of Annual Net Energy for Load – GWH
Low Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Year	Total	Residential Conservation	Comm./Ind. Conservation	Retail	Wholesale	Utility Use & Losses	Net Energy for Load	Load Factor %

Schedule 4
Previous Year and 2–Year Forecast of Retail Peak Demand and Net Energy for Load by Month

(1)	(2)	(3)	(4)	(5)	(6)	(7)
	Actual		Forecast		Forecast	
Month	Peak Demand MW	NEL GWH	Peak Demand MW	NEL GWH	Peak Demand MW	NEL GWH
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						

Schedule 5.1.1
Residual Oil Prices
Base Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
	Residual Oil (By Sulfur Content)								
	Less Than 0.7%		Escalation	0.7 – 2.0%		Escalation	Greater Than 2.0%		Escalation
Year	$/BBL	c/MBTU	%	$/BBL	c/MBTU	%	$/BBL	c/MBTU	%

Schedule 5.1.2
Residual Oil Prices
High Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
	Residual Oil (By Sulfur Content)								
	Less Than 0.7%		Escalation	0.7 – 2.0%		Escalation	Greater Than 2.0%		Escalation
Year	$/BBL	c/MBTU	%	$/BBL	c/MBTU	%	$/BBL	c/MBTU	%

Schedule 5.1.3
Residual Oil Prices
Low Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
	Residual Oil (By Sulfur Content)								
	Less Than 0.7%		Escalation	0.7 – 2.0%		Escalation	Greater Than 2.0%		Escalation
Year	$/BBL	c/MBTU	%	$/BBL	c/MBTU	%	$/BBL	c/MBTU	%

Schedule 5.2.1
Distillate Oil and Natural Gas Prices
Base Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)
	Distillate Oil			Natural Gas		
			Escalation			Escalation
Year	$/BBL	c/MBTU	%	c/MBTU	c/Therm	%

Schedule 5.2.2
Distillate Oil and Natural Gas Prices
High Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)
	Distillate Oil			Natural Gas		
			Escalation			Escalation
Year	$/BBL	c/MBTU	%	c/MBTU	c/Therm	%

Schedule 5.2.3
Distillate Oil and Natural Gas Prices
Low Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)
	Distillate Oil			Natural Gas		
			Escalation			Escalation
Year	$/BBL	c/MBTU	%	c/MBTU	c/Therm	%

Schedule 5.3.1
Coal Prices
Base Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
	Low Sulfur Coal (< 1.0%)				Medium Sulfur Coal (1.0 – 2.0%)				High Sulfur Coal (> 2.0%)			
Year	$/Ton	c/MBTU	Escalation %	% Spot Purchase	$/Ton	c/MBTU	Escalation %	% Spot Purchase	$/Ton	c/MBTU	Escalation %	% Spot Purchase

Schedule 5.3.2
Coal Prices
High Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
	Low Sulfur Coal (< 1.0%)				Medium Sulfur Coal (1.0 – 2.0%)				High Sulfur Coal (> 2.0%)			
Year	$/Ton	c/MBTU	Escalation %	% Spot Purchase	$/Ton	c/MBTU	Escalation %	% Spot Purchase	$/Ton	c/MBTU	Escalation %	% Spot Purchase

Schedule 5.3.3
Coal Prices
Low Case

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
	Low Sulfur Coal (< 1.0%)				Medium Sulfur Coal (1.0 – 2.0%)				High Sulfur Coal (> 2.0%)			
Year	$/Ton	c/MBTU	Escalation %	% Spot Purchase	$/Ton	c/MBTU	Escalation %	% Spot Purchase	$/Ton	c/MBTU	Escalation %	% Spot Purchase

Schedule 5.4
Nuclear Fuel and Firm Purchases

(1)	(2)	(3)	(4)	(5)
	Nuclear		Firm Purchases	
		Escalation		Escalation
Year	c/MBTU	%	$/MWh	%

Schedule 6
Fuel Requirements

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	Fuel Requirements		Units	Actual	Actual										
(1)	Nuclear		Trillion BTU												
(2)	Coal		1000 Ton												
(3)	Residual	Total	1000 BBL												
(4)		Steam	1000 BBL												
(5)		CC	1000 BBL												
(6)		CT	1000 BBL												
(7)		Diesel	1000 BBL												
(8)	Distillate	Total	1000 BBL												
(9)		Steam	1000 BBL												
(10)		CC	1000 BBL												
(11)		CT	1000 BBL												
(12)		Diesel	1000 BBL												
(13)	Natural Gas	Total	1000 MCF												
(14)		Steam	1000 MCF												
(15)		CC	1000 MCF												
(16)		CT	1000 MCF												
(17)	Other (Specify)		Trillion BTU												

Schedule 7.1
Energy Sources

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
				Actual	Actual										
	Energy Sources		Units												
(1)	Annual Firm Interchange		GWH												
(2)	Nuclear		GWH												
(3)	Residual	Total	GWH												
(4)		Steam	GWH												
(5)		CC	GWH												
(6)		CT	GWH												
(7)		Diesel	GWH												
(8)	Distillate	Total	GWH												
(9)		Steam	GWH												
(10)		CC	GWH												
(11)		CT	GWH												
(12)		Diesel	GWH												
(13)	Natural Gas	Total	GWH												
(14)		Steam	GWH												
(15)		CC	GWH												
(16)		CT	GWH												
(17)	Other (Specify)		GWH												
(18)	Net Energy for Load		GWH												

Schedule 7.2
Energy Sources

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	Energy Sources		Units	Actual	Actual										
(1)	Annual Firm Interchange		%												
(2)	Nuclear		%												
(3)	Residual	Total	%												
(4)		Steam	%												
(5)		CC	%												
(6)		CT	%												
(7)		Diesel	%												
(8)	Distillate	Total	%												
(9)		Steam	%												
(10)		CC	%												
(11)		CT	%												
(12)		Diesel	%												
(13)	Natural Gas	Total	%												
(14)		Steam	%												
(15)		CC	%												
(16)		CT	%												
(17)	Other (Specify)		%												
(18)	Net Energy for Load		%												

Schedule 8.1
Forecast of Capacity, Demand, and Scheduled Maintenance at Time of Summer Peak

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
	Total Installed Capacity	Firm Capacity Import	Firm Capacity Export	QF	Total Capacity Available	System Firm Summer Peak Demand	Reserve Margin before Maintenance		Scheduled Maintenance	Reserve Margin after Maintenance	
Year	MW	MW	MW	MW	MW	MW	MW	% of Peak	MW	MW	% of Peak

Schedule 8.2
Forecast of Capacity, Demand, and Scheduled Maintenance at Time of Winter Peak

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
	Total Installed Capacity	Firm Capacity Import	Firm Capacity Export	QF	Total Capacity Available	System Firm Winter Peak Demand	Reserve Margin before Maintenance		Scheduled Maintenance	Reserve Margin after Maintenance	
Year	MW	MW	MW	MW	MW	MW	MW	% of Peak	MW	MW	% of Peak

Schedule 9

Planned and Prospective Generating Facility Additions and Changes

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
				Fuel		Fuel Transport						Net Capability		
Plant Name	Unit No.	Location	Unit Type	Pri	Alt	Pri	Alt	Const. Start Mo/Yr	Commercial In-Service Mo/Yr	Expected Retirement Mo/Yr	Gen. Max. Nameplate KW	Summer MW	Winter MW	Status

Schedule 10
Status Report and Specifications of Proposed Generating Facilities

(1) Plant Name and Unit Number:

(2) Capacity
a. Summer:
b. Winter:

(3) Technology Type:

(4) Anticipated Construction Timing
a. Field construction start–date:
b. Commercial in–service date:

(5) Fuel
a. Primary fuel:
b. Alternate fuel:

(6) Air Pollution Control Strategy:

(7) Cooling Method:

(8) Total Site Area:

(9) Construction Status:

(10) Certification Status:

(11) Status with Federal Agencies:

(12) Projected Unit Performance Data
Planned Outage Factor (POF):
Forced Outage Factor (FOF):
Equivalent Availability Factor (EAF):
Resulting Capacity Factor (%):
Average Net Operating Heat Rate (ANOHR):

(13) Projected Unit Financial Data
Book Life (Years):
Total Installed Cost (In–Service Year $/kW):
Direct Construction Cost ($/kW):
AFUDC Amount ($/kW):
Escalation ($/kW):
Fixed O&M ($/kW–Yr):
Variable O&M ($/MWH):
K Factor:

Schedule 11
Status Report and Specifications of Proposed Directly Associated Transmission Lines

(1) Point of Origin and Termination:

(2) Number of Lines:

(3) Right–of–Way:

(4) Line Length:

(5) Voltage:

(6) Anticipated Construction Timing:

(7) Anticipated Capital Investment:

(8) Substations:

(9) Participation with Other Utilities:

Schedule 12
Existing Generating Unit Operating Performance

(1) Plant Name	(2) Unit No.	(3) Planned Outage Factor (POF)	(4) Forced Outage Factor (FOF)	(5) Equivalent Availability Factor (EAF)	(6) Average Net Operating Heat Rate (ANOHR)

Schedule 13.1
Loss of Load Probability, Reserve Margin,
and Expected Unserved Energy
Base Case Load Forecast

(1)	(2)	(3)	(4)	(5)	(6)	(7)
	Annual Isolated			Annual Assisted		
Year	Loss of Load Probability (Days/Yr)	Reserve Margin % (Including Firm Purch.)	Expected Unserved Energy (MWh)	Loss of Load Probability (Days/Yr)	Reserve Margin (%)	Expected Unserved Energy (MWh)

Schedule 13.2
Loss of Load Probability, Reserve Margin, and Expected Unserved Energy
High Case Load Forecast

(1)	(2)	(3)	(4)	(5)	(6)	(7)
	Annual Isolated			Annual Assisted		
Year	Loss of Load Probability (Days/Yr)	Reserve Margin % (Including Firm Purch.)	Expected Unserved Energy (MWh)	Loss of Load Probability (Days/Yr)	Reserve Margin (%)	Expected Unserved Energy (MWh)

Schedule 13.3
Loss of Load Probability, Reserve Margin,
and Expected Unserved Energy
Low Case Load Forecast

(1)	(2)	(3)	(4)	(5)	(6)	(7)
	Annual Isolated			Annual Assisted		
Year	Loss of Load Probability (Days/Yr)	Reserve Margin % (Including Firm Purch.)	Expected Unserved Energy (MWh)	Loss of Load Probability (Days/Yr)	Reserve Margin (%)	Expected Unserved Energy (MWh)

Schedule 14.1
Financial Assumptions
Base Case

AFUDC RATE ____________%

CAPITALIZATION RATIOS:
DEBT ____________%
PREFERRED ____________%
EQUITY ____________%

RATE OF RETURN
DEBT ____________%
PREFERRED ____________%
EQUITY ____________%

INCOME TAX RATE:
STATE ____________%
FEDERAL ____________%
EFFECTIVE ____________%

OTHER TAX RATE: ____________%

DISCOUNT RATE: ____________%

TAX
DEPRECIATION RATE: ____________%

Schedule 14.2
Financial Escalation Assumptions

(1)	(2)	(3)	(4)	(5)
		Plant	Fixed	Variable
	General	Construction	O&M	O&M
	Inflation	Cost	Cost	Cost
Year	%	%	%	%

Schedule 15
Commission–Approved Demand Side Management Programs

Program: ______________________ _____.

(1)	(2)	(3)	(4)	(5)
	Number of Customers			
Year	Total In Service Area	Eligible To Paticipate In Program	Participating In Program	Penetration Rate (%)

Schedule 16
Existing Generating Facilities
Environmental Considerations
for Steam Generating Facilities
As of December 31, 19XX

(1)	(2)	(3)	(4)	(5)	(6)
	Unit	Flue Gas Cleaning			Cooling
Plant Name	No.	Particulate	SOx	NOx	Type

Schedule 17
Existing Generating Facilities
Land Use and Investment
As of December 31, 19XX

(1)	(2)	(3)	(4)	(5)	(6)	(7)
	Land Area		Plant Capital Investment in $1,000			
	Total	In–Use		Site	Buildings &	
Plant Name	Acres	Acres	Land	Improvements	Equipment	Total

MEMORANDUM

January 19, 1996

TO: DIVISION OF APPEALS (Moore)

FROM: DIVISION OF RESEARCH AND REGULATORY REVIEW (Harlow) JDH PJ DMM

SUBJECT: ECONOMIC IMPACT STATEMENT FOR PROPOSED RULES 25-17.085, 25-17.0851, 25-17.0852, FAC, TEN-YEAR SITE PLANS

SUMMARY OF THE RULE

Proposed Rules 25-17.085, 25-17.0851 and 25-17.052, FAC, implement the statutory requirement for electric utilities to submit ten-year site plans to the Commission. The plans include information on future power needs and the locations of proposed power plants. The Commission is required to evaluate the utilities' plans and classify them as suitable or unsuitable. The Commission will also solicit and accept comments from affected agencies regarding the plans. The plans were previously submitted to the Department of Community Affairs (DCA) by all utilities with existing generating capacity of 250 MW (or greater) and by other utilities with planned facilities greater than a 50 MW capacity.

The proposed rules are based on the DCA rules regarding ten-year site plans. Modifications to the DCA rules include: (1) the statutory purpose is deleted; (2) references to DCA are changed to the Commission; (3) the filing fee is deleted; (4) additional information previously requested informally by Commission staff is included; (5) schedules specifying the data format are included; and (6) specific Department of Environmental Protection requirements have been deleted. Some additional information is also required: (1) high and low ten-year load forecasts of winter and summer peak demand, and net energy for load based on projected growth rates; (2) a description of the procurement process for additional supply-side resources; and (3) the transmission construction and upgrade plans that must be certified under the Transmission Line Siting Act.

Under the DCA rule, utilities with less than 250 MW of existing generating capacity are exempted from filing, unless the utility plans to construct additional generating facilities with capacity greater than 50 MW. The proposed rules modify the DCA rules by requiring all utilities with planned additional capacity to file, regardless of the proposed facility's capacity. This change would result in a larger number of utilities being required to file plans than under the DCA rule.

DIRECT COSTS TO THE AGENCY AND OTHER STATE OR LOCAL GOVERNMENT ENTITIES

Commission staff expects additional administrative costs for distributing plans to local, state, and federal agencies, and other interested parties, and for the review of the comments provided by those parties. Additional staff time may also be required to evaluate the ten-year site plans of utilities not previously required to file the plans. However, including data in the ten-year site plans which was previously obtained informally should reduce staff effort to obtain that information.

No additional direct costs are expected to result for other state or local government entities. Those entities will continue to have the opportunity to provide input on the ten-year site plans to the Commission.

COSTS AND BENEFITS TO THOSE PARTIES DIRECTLY AFFECTED BY THE RULE

A data request was sent to 57 utilities, including investor owned electric utilities, rural electric cooperatives, municipal electric utilities, the Florida Municipal Electric Association (FMEA) and the Florida Electric Cooperatives Association (FECA). Fifteen responses were received. The following analysis is based on those responses and discussions with other Commission staff.

Reporting utilities may experience some increased level of effort in providing the new data required by the proposed rule. The major cost impacts will be experienced by those utilities which currently do not file plans but will be required to file under the proposed rule, due to the removal of the 50 MW minimum filing threshold for planned new generation capacity.

Utilities are expected to benefit from the deletion of the annual filing fee required by the DCA rule. This fee ranged from $250 to $1,000, depending on the MWH of energy sold annually. Utilities may also benefit from streamlined communications with state agencies through the Commission and by having a central focal point for ten-year site plan review.

Four investor-owned utilities responded to the data request. Florida

Power Corporation (FPC) expects no significant additional costs beyond its recent costs of filing with DCA and the supplemental data requests of the Commission. Tampa Electric Company (TECO) also expects there will be minimal additional direct costs resulting from the proposed rule, because the utility prepares most of the additional analysis as part of its internal energy resources planning program. However, TECO believes the company may experience indirect costs from impaired future negotiations due to the disclosure of the information in Schedules 5, 10, 11, 12 and 14 and the analysis required in "Other Planning Assumptions and Information." Florida Power and Light (FP&L) expects added costs to be negligible because the company already performs most of the analysis which is required by the proposed rule, with the exception of the map identifying sites that are not suitable for facility siting. However, FP&L also expects to experience indirect competitive costs if data relating to future operating costs and strategies is published. Gulf Power Company (Gulf) expects to experience substantial costs if the proposed rule is adopted, because the company believes there is "alot more data being requested under the proposed rules than in the DCA's previous process." In particular, Gulf expects to experience "extensive additional man-hours" to produce banded winter and summer peak demand and net energy for load projections based upon high and low rates of growth. Additional man-hours would also be required to produce additional documentation regarding generating unit additions or capacity purchases, fuel risks, stranded investment, and dispatchability of non-utility resources. The company also expects increased costs as a result of the need to file and review requests for confidentiality with respect to banded fuel price forecasts.

Two of the four responding municipal electric utilities (Gainesville Regional Utilities and City of Vero Beach) do not expect any additional costs as a result of the proposed rules. However, the City of Tallahassee electrical department (Tallahassee) expects $2,400 in additional man-hour costs to result from the expanded data requirement. The utility notes that there would also be a savings of the $1,000 filing fee, for a net cost of $1,400. Lakeland Electric and Water (Lakeland) expects added costs to produce banded demand, energy, and fuel price forecasts. The company stated that the forecasts would require the hiring of an additional staff member at a total expected annual cost of $45,000. Lakeland expects man-hour costs of $17,000 annually to produce the banded forecasts and other additional data requirements.

4

Seminole Electric Cooperative (Seminole) does not expect additional costs from the proposed rule. The Alabama Electric Cooperative (AEC), responding for its Florida member systems, noted that with the exception of a 10 MW combustion turbine, all generation is located in Alabama. However, if an AEC member is required to file in the future, an additional staff member may be required. The Florida Electric Cooperatives Association (FECA), Clay Electric Cooperative (Clay), and the Florida Keys Electric Cooperative Association (FKEC) responded that the deletion of the current 50 MW minimum planned generation filing requirement will impose major costs on utilities which are currently not required to file. Clay and the FKEC estimate their cost of filing for non-reporting utilities at $40,000 to $50,000 annually.

REASONABLE ALTERNATIVE METHODS

Staff considered the alternative of a Commission Order stating that utilities are required to file ten-year site plans, the information to be contained in the plans and the procedures to be followed. However, the Division of Legal Services determined that the statute must be implemented by rule.

The FECA, Clay, and the FKEC requested that the 50 MW minimum filing threshold in DCA's rule be retained for non-reporting utilities. According to Clay the proposed rule would, "require utilities to file ten-year site plans even if they were adding small increments of generation for peaking units, back-up generators for reliability purposes, or for load management purposes." Both FECA and Clay also responded that under the Florida Electrical Power Plant Siting Act, only power plants over 75 MW must apply for certification. The Cooperatives believe that filing a ten-year site plan for minimal amounts of generation which are not required to apply for certification is burdensome, particularly for distribution cooperatives which were not required to file in the past.

Several utilities expressed concern about confidentiality and the level of detailed data required by the rule. To address these concerns, TECO suggested that the additional information required by the proposed rule should be filed confidentially under separate cover from the ten-year site plan. TECO also requested that the information be used by the Commission only for purposes of reviewing the economics of the ten-year site plan within a utility-specific determination of need proceeding. FP&L suggested that the plans should be filed as they have been in the past, and that the supplemental data should be dropped.

If the Commission determines that the supplemental data is necessary, FP&L recommends that the supplemental information be requested on a case-by-case basis, as required. Gulf recommended that if the level of data proposed by the rule is adopted in the rule, the frequency of filings should be reduced from annual to biennial. Lakeland also responded that there is no need to supply forecasted non-specific data in the required detail on an annual basis. Lakeland believes the current need hearing process is the proper forum to present that level of detailed information.

Tallahassee responded that the ten-year site plan should be prepared electronically as a spreadsheet and distributed to utilities. The utility believes this would save preparation time for utilities as well as analysis time for Commission staff.

Seminole suggested that the data requested in the ten-year site plan which is similar to the Department of Energy data in form EIA-411, should be submitted in the same format as the DOE form. The utility believes this will save effort as well as minimize errors.

IMPACT ON SMALL BUSINESSES

No direct impact on small businesses is foreseen as none of the affected utilities qualify as a small business as defined in Section 288.703(1), Florida Statutes (1991).

IMPACT ON COMPETITION

Several of the utilities expressed concerns that providing detailed regulatory filings, which are not required from all participants in the energy marketplace, may place a utility at a competitive disadvantage. Specifically, TECO responded that the disclosure of generating unit operating characteristics, fuel price forecasts, financial assumptions, and new unit capital costs may impair the company's ability to compete. FP&L also expressed concerns that the disclosure of specific information on proposed plant sites could result in escalation of land prices. However, the reporting utilities are already supplying the data required by the proposed rule under the DCA rule or informally with the Commission.

IMPACT ON EMPLOYMENT

Impact on employment is expected to be minimal for most of the utilities which are currently required to file ten-year site plans. However, several of the reporting utilities responded that some additional effort would be required to prepare the additional data required by the proposed rules. The largest hiring impact could be experienced by currently non-reporting utilities which are required to file according to the proposed rule. As noted earlier, Clay and FKEC estimate expenditures of $40,000 to $50,000 annually for outside consultant fees if non-reporting utilities were required to file plans.

METHODOLOGY

A data request was sent to 57 utilities, including investor-owned electric utilities, rural electric cooperatives, municipal electric utilities, the FMEA and the FECA. Several meetings were held with other Commission staff for the purpose of discussion and review of the existing DCA rule and the proposed Commission rule. Follow up meetings were held regarding data responses. Data responses were compared to previous ten-year site plans submitted by the respondents. Standard economic analysis was employed.

JGH:tf/e-tenyrs