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September 24, 2002

**VIA HAND DELIVERY**

Ms. Blanca S. Bayó, Director  
Division of Commission Clerk and  
Administrative Services  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

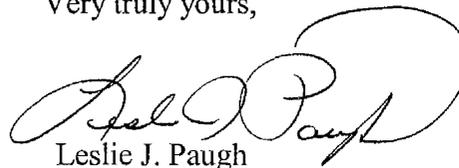
***Re: Docket No. 020233-EI; Petition For Formal Hearing of Mirant  
Americas Development, Inc. and Calpine Corporation***

Dear Ms. Bayó:

Enclosed for filing please find one (1) original and fifteen (15) copies of the Petition For Formal Hearing of Mirant Americas Development, Inc. and Calpine Corporation, submitted for filing in the above referenced docket. Please also find the enclosed diskette, containing an electronic version of the Filing in WordPerfect format.

Please acknowledge receipt of this document by time/date stamping the enclosed additional copy of the Petition, as indicated.

Very truly yours,

  
Leslie J. Paugh

LJP:trc

Enclosures: Petition For Formal Hearing of Mirant Americas Development, Inc. and Calpine Corporation; original and fifteen copies

Diskette

DOCUMENT NUMBER - DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of GridFlorida Regional )  
Transmission Organization Proposal )  
\_\_\_\_\_ )

Docket No. 020233-EI  
Filed: September 24, 2002

**PETITION FOR FORMAL HEARING OF  
MIRANT AMERICAS DEVELOPMENT, INC. AND CALPINE CORPORATION**

Come now, Mirant Americas Development, Inc. and Calpine Corporation (“Petitioners”) and, pursuant to Rules 25-22.029 and 28-106.201, Florida Administrative Code and Order Determining GridFlorida’s Compliance with Order No. PSC-01-2489-FOF-EI and Requiring Evidentiary Hearing and Notice of Proposed Agency Action Order Regarding Specific Changes to the GridFlorida Compliance Filing, Order No. PSC-02-1199-PAA-EI, issued September 3, 2002, (“Compliance Order”) hereby file their petition for formal proceedings and in support thereof state as follows:

**I. Background.**

In December of 1999, the Federal Energy Regulatory Commission (“FERC”) issued Order No. 2000<sup>1</sup> requiring, among other things, public utilities that own, operate or control transmission facilities to file proposals to participate in a regional transmission organization by October of 2000. In response to Order No. 2000, Florida Power & Light Company, Florida Power Corporation and Tampa Electric Company (“Applicants”) launched an extensive stakeholder collaborative process that resulted in the GridFlorida Transco filing at FERC. Thereafter, Florida Public Service Commission (“PSC” or “Commission”) Docket Nos. 001148-EI, 010577-EI and 000824-EI were

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<sup>1</sup> *Regional Transmission Organizations*, Order No. 2000, 89 FERC ¶61,285 (1999); 65 Fed. Reg. 809 (Jan 6, 2000), FERC Stats. & Regs. ¶ 31,089 (2000).

established to review rates, earnings and the impact of the Applicants' participation in GridFlorida on retail ratepayers. The PSC investigation into GridFlorida commenced in earnest in June of 2001 with the issuance of the Order Granting in Part and Denying in Part Joint Motion to Establish a Docket as to the Prudence of the Formation of and Participation in GridFlorida, Inc., Order No. PSC-01-1372-PCO-EI, issued June 27, 2001 (Phase 1). In October of 2001, an evidentiary hearing was held to determine the prudence of the Applicants' formation of and participation in GridFlorida. Following the hearing, the PSC issued Order Finding Proactive Formation of GridFlorida Prudent and Requiring the Filing of a Modified GridFlorida Proposal, Order No. PSC-01-2489-FOF-EI, issued December 20, 2001. (December 20 Order) The March 20, 2002 Compliance Filing of the Applicants which is the subject of this continuing litigation was in response to the December 20 Order.

JEA, an intervenor in this proceeding only since May 29, 2002<sup>2</sup>, filed pre- and post-workshop comments addressing, *inter alia*, the treatment of Capacity Benefit Margin ("CBM") in the calculation of Available Transfer Capability ("ATC"). Prior to the filing of its intervention and comments, JEA had not participated in either the extensive collaborative process that resulted in the FERC filing or Phase 1 of this proceeding preferring instead to participate fully in the SeTrans RTO<sup>3</sup>. JEA now raises the issue of CBM for the first time in the final stages of this investigation and threatens not to join GridFlorida if its demands are not met. Petitioners will demonstrate that their substantial interests will be adversely affected by a PSC determination made as JEA proposes. In

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<sup>2</sup>Order Granting Intervention, Order No. PSC-02-0726-PCO-EI, issued May 29, 2002.

<sup>3</sup>JEA is a SeTrans Sponsor. *See e.g.* May 24, 2002 letter to FERC Secretary Salas in SeTrans Docket Nos. RT01-100, RT01-75 and RT01-77 from Robert Weinberg.

addition, the threat of nonparticipation in GridFlorida is an inappropriate basis upon which to make a decision regarding CBM.

**II. Affected Agency.**

Florida Public Service Commission  
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**III. Petitioner Information.**

1. The names and addresses of the Petitioners are:

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3. Notice:

Petitioners received notice of the agency decision by their presence, through their representative, at the August 20, 2002 Agenda Conference.

4. Petitioners' Substantial Interests:

In its Comments filed May 8, 2002<sup>4</sup> ("May Comments"), JEA alleges that it has an "ownership entitlement" to 1228 MW of the State's 3,600 MW of import capability, 375 MW of which is reserved by JEA as CBM to meet part of its Florida Reliability Coordinating Council ("FRCC") imposed operating reserve requirement. (May Comments, pg. 4) JEA further states that the amount of CBM varies with dispatch and loading conditions and "[t]hat being the case, JEA routinely makes its CBM capacity available for non-firm, short term transmission service,..." (May Comments, pg. 5) In other words, JEA has profited by controlling access across the intertie and selling its CBM.<sup>5</sup> In order to protect its interests both in the calculation of operating reserves and the earnings from the sale of that capacity, JEA threatens not to participate in GridFlorida. "Without a favorable resolution of this issue, JEA will find it extremely difficult to participate in the GridFlorida ISO." Id. The threat is repeated in JEA's Post-Workshop Comments, filed June 21, 2002.<sup>6</sup> ("June Comments") JEA supplies specific language changes to the Open Access Transmission Tariff ("OATT") that it alleges must be made to maintain its operating reserves and states: "[w]ithout these changes, JEA's system integrity and its ability to meet its own emergency

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<sup>4</sup>Document No. 04972-02, Docket No. 020233-EI.

<sup>5</sup>In its June Comments, JEA alleges that it will lose 10 million dollars a year in short-term wheeling revenues, (June comments, pg 11).

<sup>6</sup>Document No. 06443-02, Docket No. 020233-EI.

needs will be placed in great jeopardy and its ability to join GridFlorida foreclosed.” (June Comments, pg. 11) What JEA is attempting to do is hardwire CBM into the ATC calculation.

In the Compliance Order, the PSC states that it finds merit in JEA’s clarification even though the “clarification does not appear to be necessary in order to comply with our December 20 Order, it may help to mitigate concerns that JEA has in joining GridFlorida.” (Compliance Order, pgs. 41-42) On that basis, the PSC orders the Applicants to include the language that requires that CBM be taken into account in the calculation of ATC. Petitioners submit that this section of the Compliance Order adversely affects their substantial interests, and that it is contrary to evolving FERC policy. In addition, Petitioners contend that while it would be preferable for JEA to be a member of GridFlorida rather than SeTrans, the mitigation of JEA’s concerns is not an appropriate basis on which to order a noncompliant revision. JEA is continuing its SeTrans sponsorship and clearly retains the option to not join GridFlorida regardless of the PSC’s action in this docket.

Fundamentally, CBM is a discriminatory physical and economic withholding of transmission capacity that costs the ratepayers untold losses in foregone competitively priced generation and unjustified subsidies to the holder of the CBM. In its Notice of Proposed Rulemaking, Docket No. RM01-12-000, 18 CFR Part 35, issued July 31, 2002, the FERC recognizes this enormous problem and proposes to eliminate it. The FERC states:

330. Capacity Benefit Margin is the set-aside of transmission capability by a transmission provider to ensure the ability to import external resources to meet generation reliability requirements or in case of a generation capacity deficiency....

331. We propose to standardize the treatment of Capacity Benefit Margin to ensure that (1) only customers benefitting from it pay for it, and (2) transfer capability needed to access resources on a neighboring system is treated consistent with all other portions of the transmission grid. Thus an

Independent Transmission Provider itself would not be permitted to set aside transfer capability for generation reliability reasons. Rather, a load-serving entity wanting access to resources on a neighboring transmission system to meet its resource adequacy requirement should instead acquire Congestion Revenue Rights from the interface to its load to ensure that access. This will free up transfer capability now unavailable to wholesale transmission customers and prevent cross-subsidization of transmission customers that serve load within the Independent Transmission Provider's service area by point-to-point transmission system users.

Based on the foregoing, it is clear that a PSC order requiring that CBM be taken into account in the calculation of ATC is directly contrary to FERC policy and market efficiency, as such, may create inter-jurisdictional inconsistencies requiring further litigation to resolve as well as inter-RTO seams issues. Moreover, even if it were appropriate to place a market participant like JEA in the position of gatekeeper between Florida and the rest of the Southeast, a corresponding capacity adjustment to such a transmission customer network service billing demand would need to reflect the full quantity of such network facility reservation above and beyond its network service needs associated with serving load in Florida in order to prevent other Florida transmission customers from subsidizing such superior market privilege. The Compliance Order accepting JEA's suggested change in ATC determination language did not require a corresponding change to the calculation of JEA's network service charges.

CBM adversely affects Petitioners' substantial interests because it denies access to the grid. JEA's reservation of 375 MW of CBM is a discriminatory physical withholding of valuable inertie capability. Of the 3,600 MWs of total inertie capability, 1,623 MWs are under firm import contracts<sup>7</sup> leaving approximately 1,977 MW available for non-firm transactions. Of JEA's 1,228

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<sup>7</sup>2002 FRCC Load and Resource Plan, pg. 26.

MWs of ownership entitlement, 282 MWs are contracted firm imports<sup>8</sup> leaving approximately 946 MWs of JEA's entitlement available for non-firm transactions. Based on these figures, JEA controls roughly half of the intertie capability remaining after firm imports and more than a third of that capability is reserved as CBM for exclusive use of JEA. This withholding of intertie capability, vital to Petitioners' existing and planned market activities, thwarts Petitioners' access to markets on both sides of the interface and frustrates the development of a wholesale competitive generation market. Whether or not Florida's RTO ever merges with another RTO in the Southeast, the Commission should not allow a market participant, such as JEA, to be placed in the position of gatekeeper between Florida and the wholesale market in the rest of the Southeast.

In addition, absent a corresponding increase to a CBM recipient's network service charges, Petitioners are further adversely affected because they and other users of the intertie subsidize JEA's specific reservation. This occurs because CBM withholds transfer capability from the market but collectively wholesale transmission customers such as Petitioners or their wholesale customers would be asked to pay the entire transmission cost - including the cost of facilities whose capabilities are withheld by virtue of CBM through their transmission charges. Petitioners submit that only customers benefitting from the CBM should pay for the CBM or the reservation should be discontinued. In any event, all available transmission capacity on the network should be available for delivery of the lowest cost generation to network customers on an equal basis. To do otherwise is unjust, inequitable and adversely impacts all potential users of the transmission system.

#### **IV. Disputed Issues of Material Fact.**

Petitioners have identified the following disputed issues of material fact in this proceeding:

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<sup>8</sup>Id for the year 2002.

- Issue 1: Should the GridFlorida OATT specifically require that CBM be taken into account in the calculation of ATC?
- Issue 2: Does JEA sell its CBM at market-based rates?
- Issue 3: Can JEA withhold transmission capability in real time or day ahead? Can such authority compromise the efficiency of the GridFlorida market or create the potential for JEA to inappropriately affect the market price of energy inside Florida?
- Issue 4: Will the cost of network facilities which make JEA's CBM possible be subsidized by the ratepayers of Florida?
- Issue 5: Does JEA's CBM reservation reduce the access to competitively priced generation ratepayers could otherwise receive from the Southeast?
- Issue 6: Can JEA's ability to withhold limited intertie capability and control the price and timing of release of such capability be used by it to manipulate market prices in Florida or the cost to access generation outside of Florida?

**V. Ultimate Facts:**

Petitioners allege the following ultimate facts:

1. The CBM reservation by JEA is a discriminatory physical withholding of valuable transmission intertie capability.
2. As currently ordered, the CBM reservation is subsidized by other users of the transmission system and is, therefore, an unjustified financial windfall to JEA.
3. The CBM reservation prohibits ratepayers from receiving competitively priced generation from the Southeast and limits the generating supply options of competitors.
4. FERC policy is to standardize the treatment of CBM to ensure that only customers benefitting from it pay for it and that transfer capability needed to access resources in neighboring systems is treated uniformly with other portions of the grid.
5. JEA is a Sponsor of SeTrans.

6. JEA's suggested clarification requiring that CBM be taken into account in the calculation of ATC is not necessary in order to comply with the PSC's December 20 Order.

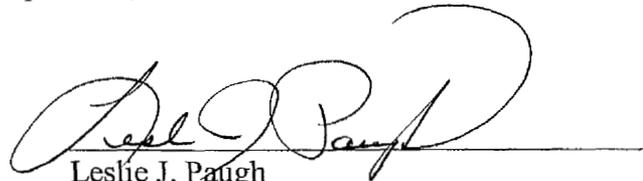
**VI. Statement of Rule, Statute or Agency Action Requiring Modification.**

Petitioners submit that the Compliance Order must be modified to omit the following finding on page 41: “[t]herefore, we find that the Applicants shall include language that clarifies that CBM is taken into account when calculating the ATC used by GridFlorida.” Petitioners further submit that the PSC should omit the first phrase of the sixth ordering paragraph which states: “ORDERED that GridFlorida shall adopt the language identified in the body of this Order to clarify that CBM is taken into account when calculating the ATC used by GridFlorida; ...”

**VII. Relief Sought.**

Petitioners respectfully request the Commission to set this matter for formal evidentiary hearing and such other relief as the Commission deems appropriate.

Respectfully submitted this 24<sup>th</sup> day of September, 2002.



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Attorney for: Calpine Corporation and  
Mirant Americas Development, Inc.

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 020233**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by facsimile (\*), electronic mail (\*\*), and U.S. Mail to the following parties on this 24<sup>th</sup> day of September, 2002.

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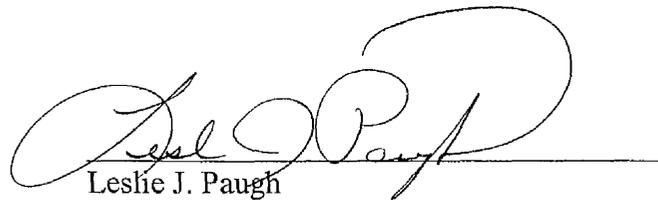
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