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January 17, 2006

Ms. Blanca S. Bayo, Director Division of Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

RE: Seminole Electric Cooperative, Inc. - Long Term Fuel Emergency Plan

Dear Ms. Bayo:

Enclosed for filing on behalf of Seminole Electric Cooperative, Inc. are an original and fifteen (15) copies of its Long Term Fuel Emergency Plan filed pursuant to Rule 25-6.0185, F.A.C.

A 3 1/2 inch diskette containing the above-referenced document is also enclosed. Thank you for your assistance in this matter.

Sincerely,

Michelle Hershel

DOCUMENT NUMBER-DATE 00408 JAN 17 8 FPSC-COMMISSION CLERK

SEMINOLE ELECTRIC COOPERATIVE, INC.

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AND

MEMBER COOPERATIVES

LONG-TERM FUEL EMERGENCY PLAN

REVISED

January 2006

SEMINOLE ELECTRIC COOPERATIVE, INC. AND MEMBER COOPERATIVES LONG-TERM EMERGENCY PLAN

PREFACE

Fuel shortages caused by factors beyond those recognized as prudent planning and operating practices may result in a long-term electrical energy deficiency. The following plan was developed to provide a procedure for responding to a fuel supply shortage on the Seminole System or in the event of a Florida Fuel Supply Emergency.

To this end, the procedures described herein will first, establish steps to be taken by Seminole Electric Cooperative, Inc. and its member cooperatives (listed in Appendix A) to ascertain the existence of a fuel emergency and to respond to it, and second, establish steps to be taken by Seminole Electric Cooperative, Inc. and its member cooperatives in an effort to cooperate fully with the Florida Reliability Coordinating Council Fuel Supply Shortage Plan in the event of a Florida Fuel Supply Emergency.

Seminole and its member cooperatives have a unique relationship which must be recognized in the development and implementation of this emergency plan. Seminole Electric Cooperative, Inc., as the power supplier, has the responsibility of fuel supply, power generation, and wholesale purchases, and the member cooperatives have all responsibility for serving retail customers. In subscribing to this plan, Seminole and its members are committed to a joint coordinated implementation program. A list of the persons responsible for individual participant action under this plan is attached as Appendix A.

PLAN REQUIREMENT

Pursuant to Florida Statute 25-6.018S, each Florida electric untility must have on file with the Florida Public Services Commission, a Long-Term Energy Emergency Plan. This plan is to establish a systematic and effective means of anticipating, assessing, and responding to a long-term energy caused by a fuel supply shortage.

This plan was required on January 31,1999 and is to be reviewed every three (3) years. If Plan does not need revising, Seminole must file a letter stating that the required review has been conducted and that the Plan continues to be adequate. If a revised Plan is necessary, such a Plan shall be submitted for FPSC approval and informational filing with Florida Reliability Coordination Council.

SEMINOLE ELECTRIC COOPERATIVE, INC. AND MEMBER COOPERATIVES

LONG-TERM FUEL EMERGENCY PLAN

I. <u>PURPOSE</u>

The purpose of this plan is to provide an effective procedure for responding to a fuel supply shortage on the Seminole System or in the event of a Florida Fuel Supply Emergency.

II <u>FACILITIES</u>

Coal is the primary fuel presently utilized by Seminole Electric Cooperative and its member cooperatives. Nuclear fuel is utilized in Crystal River Unit No. 3 of which Seminole owns a 1.6994 percent share. However, as nuclear fuel is Florida Power Corporation's responsibility and is not included in this plan. Natural gas is an important fuel source for Seminole's gas fired station and various Purchased Power Agreement facilities. Coal and natural oil will be covered in this Plan. Fuel Oil is a back up fuel source which will be reviewed in this plan.

In addition to Coal, Seminole uses natural gas as a fuel source for its Payne Creek Facility and various Purchase Power Agreement facilities. These facilities also use fuel oil as a backup fuel when natural gas is not available.

All three of these fuels; coal, natural gas and fuel oil will be addressed in this plan.

III. DEFINITION

A fuel supply shortage is deemed an energy emergency whenever anticipated fuel stocks are not judged sufficient to provide for existing energy obligations over an extended period of time.

IV. FUEL INVENTORY PLAN - COAL and PETROLEUM COKE

Coal is the primary fuel presently utilized by Seminole Electric Cooperative and its member cooperatives at the Seminole Generating Station at Palatka, Florida. Coal is sourced from various coal regions in Illinois, Indiana, Kentucky, Virginia, and Pennsylvania. The facility is permitted to utilize up to 30% of its feed stock in the form of petroleum coke. The following plan references the total coal and petroleum coke inventory located at the plant. The facilities transportation of coal and petroleum coke is currently served by the CSX Railroad.

For the purpose of this plan, the available fuel inventory will be considered as the fuel on hand. However, fuel in transit which is known to be unaffected by causes related to the fuel shortage will be considered in the assessment of any particular situation. The equivalent of an additional 3-6 days burn is normally in transit.

Normal Operating Inventory

The normal operating fuel inventory range will be 35-55 days burn at the Seminole plant.

Alternative Action Level

The fuel inventory level at which alternative actions must be considered is 30 days burn and declining. At this level, measures must be taken first to assess the situation duration and secondly to facilitate existing transportation of fuel, locate alternate fuel or energy sources, and/or implement utility and customer conservation.

Emergency Inventory Level

The fuel inventory level at which an emergency condition is considered to exist between 25 and 20 days burn and declining. At this level, more substantial steps must be taken to significantly reduce fuel consumption in order that a fuel supply at the generating plant site may be continuous.

Critical Inventory Level

Below the 20 day level of inventory, all available methods must be used to reduce fuel consumption, including curtailment of firm load.

V. <u>FUEL INVENTORY PLAN - FUEL OIL</u>

Fuel oil is used for several reasons by Seminole Electric Cooperative and its member cooperatives. No.2 diesel fuel oil is a flame stabilizing fuel and startup fuel presently utilized at the Seminole Generating Station at Palatka, Florida. For the Payne Creek facility and several facilities under Purchase Power Agreements, fuel oil is a backup fuel that can be utilized in an emergency when the primary fuel - natural gas is interrupted.

For the purpose of this plan, the available fuel oil inventory will be considered as the fuel on hand. However, fuel in transit which is known to be unaffected by causes related to the fuel shortage will be considered in the assessment of any particular situation.

Normal Operating Inventory

The normal operating fuel inventory range will be 24 to 48 hours burn for full load operation at the gas fired generating facilities, that have dual pipeline access or have firm natural gas transportation capacity to meet partial plant operations. For facilities that have only one pipeline access and no firm natural gas transportation capacity, the fuel oil inventory range will be 48 to 72 hours burn for full load operation.

Alternative Action Level

The fuel oil inventory level at which alternative actions must be considered is 24 hour burn level and declining. At this level, measures must be taken first to assess the situation duration and secondly to facilitate existing transportation of fuel, locate alternate fuel or energy sources, and/or implement utility and customer conservation.

Emergency Inventory Level

The fuel inventory level at which an emergency condition is considered to exist between 24 and 18 hour burn level and declining. At this level, more substantial steps must be taken to significantly reduce fuel consumption in order to preserve the available fuel oil supply at the generating plant site for further emergency operation.

Critical Inventory Level

Below the 18 hour burn level of inventory, all available methods must be used to reduce fuel consumption, including curtailment of firm load.

VI. NATURAL GAS STORAGE PLAN

Natural gas is the primary fuel type utilized by Seminole Electric Cooperative and its member cooperatives for the Payne Creek facility and several facilities under purchase power agreements. While fuel oil is provided at several sites as a backup fuel, certain situations can be protected by temporarily storing natural gas in the existing pipelines, if storage capacity is available.

For the purpose of this plan, the available natural gas storage capability is on a case by case situation. It is Seminole's plan to facilitate the storage of natural gas prior to a Gulf of Mexico Hurricane to facilitate re-supply of natural gas interrupted during such storms. No specific levels can be determined or provided in this plan.

VII. FORECASTING EXTENT OF FUEL SHORTAGE

In the event of a slowdown or interruption in the fuel supply (coal, petroleum coke, fuel oil or natural gas), the Director of Fuel Supply will forecast the extent of the shortage. If, as a result of this determination, the fuel inventory situation meets the definition of an energy emergency as described in Section II, the Director of Fuel Supply will report such findings to the Director of System Operations and Seminole's senior management for further action.

Proceed with Step VIII.

VIII. ALTERNATE FUEL SOURCES

Seminole's Executive Vice President and General Manager shall authorize the Director of Fuel Supply to investigate potential alternate sources of similar fuels. The Director of Fuel Supply will communicate directly with the Director of System Operations to coordinate his findings with any alternate sources of purchased power.

In the event of the necessity to affect physical transfers of fuel stocks from Seminole to other utilities or vice versa, it is the intent of Seminole and its member cooperatives that the supplying party will be made whole in terms of all of the supplying utility's costs of replacing such fuel. These replacement costs will include, but are not limited to, the following components.

- 1. Fuel Market
- 2. Direct transportation
- 3. Indirect transportation
- 4. Sampling
- 5. Insurance
- 6. Applicable internal overhead

IX. <u>PURCHASED POWER</u>

The Director of Operations shall authorize the Manager of Control Center Operations to investigate potential sources of supplemental purchased power. The Operations Department will communicate directly with the Fuel Supply Department to compare the alternative energy sources and perform an economic evaluation of those alternatives. The Operations Department will determine which, if any, energy source is feasible and proceed to carry out that alternative. If the alternative fuel and energy sources are not sufficient to alleviate the energy emergency, the Director of System Operations will so notify the Executive Vice President and General Manager. Accompanying this notification will be an evaluation of the potential cumulative effect of all conservation measures described herein and a recommendation as to which measures should be carried out immediately to aid in alleviating the energy emergency.

In the event of the necessity to affect the purchase of energy from other utilities or the sale of energy to other utilities during a fuel shortage situation, it is the intent of Seminole and its member cooperatives that the supplier of such energy shall be made whole in terms of all costs associated with the transaction.

Proceed with Step X

X. <u>EXTERNAL NOTIFICATION</u>

In the event that alternative fuel and energy sources and recommended conservation measures are judged insufficient to alleviate the energy emergency, and after consultation with the Vice President of Operations, and the Executive Vice President General Manager and the Member System Managers, the Director of System Operations will notify the Chairman of the FRCC Reliability Assessment Group. Such notification will be in accordance with Section V of the FRCC Florida Electrical Emergency Contingency Plan, Fuel Supply Shortage Element for the purpose of requesting initiation of a Fuel Supply Alert.

In addition, the Director of Supply Operations will immediately initiate actions as described in the following section entitled "Chronology of Conservation Measures."

XI.. CHRONOLOGY OF CONSERVATION MEASURES

The Director of System Operations, after consultation with the Vice

President of Operations, and the Executive Vice President and General Manager, will work with the Member System Managers to affect the necessary steps to implement the following conservation measures to the extent that they are feasible, productive, and do not subject Seminole or its Member Cooperatives to significant liability.

> Reduction of Power Usage at Utility-Owned Facilities Public Appeals to Conserve Energy Optimization of Fuel in Short Supply Direct Customer Appeals Voltage Reductions Load Management Notice to Local Governments by Member Cooperatives Relaxation of Environmental Constraints

The chronology and trigger points for each of these conservation measures are described as follows:

Step A Normal Operating Level

If the Director of Fuel Supply determines that the fuel inventory levels are projected to decline to below normal burn levels and are anticipated to continue an uncontrolled decline, he shall immediately inform the Director of System Operations and, upon consultation with the Vice President of Operations and, Vice President Technical Services, it will be the responsibility of the Director of System Operations to work with the Member System Managers to effect the following steps:

1. Reduction of Power Usage at Utility-Owned Facilities (Seminole and Member Cooperatives).

> Energy use, which is not necessary for production or minimum safety standards, will be reduced to minimum practical levels. These reductions shall include, but not be limited to indoor lighting, outdoor lighting, air conditioning set no lower than 80°F and heating set no higher than 65°F.

2. Public Appeals (Member Cooperatives)

All on-going advertising by Member Cooperatives, including billing stuffers and member meeting programs, through the local media will encourage conservation.

All Member Cooperatives will make public appeals through the local media for a general conservation effort.

- NOTE: In the event of a statewide energy emergency, which has been officially designated as such by the Governor of the State of Florida, all public appeals may be made uniformly under the direction of the Florida Reliability Coordinating Council.
- 3. Optimization of Fuel in Short Supply (Seminole)

The Director of Operations will authorize the Chief System Coordinator to take necessary actions to optimize the fuel in short supply. It is understood that this may require operation of the generation system at less than optimum conditions with regard to cost. This measure may require suspension of normal economic dispatch, utilization of offspecification fuel, supplemental firing of igniter fuels, variations in normal unit commitments, and energy purchases not normally considered prudent for reasons of cost.

4. Direct Customer Appeals (Member Cooperatives)

Direct appeals will be made by Member Cooperatives to large industrial and commercial customers to reduce consumption and fully utilize all customer-owned generation equipment which uses fuels not in short supply. Such appeals shall be disseminated by each individual member cooperative.

5. Voltage Reductions (Member Cooperatives)

No action required at this time.

6. Load Management (Member Cooperatives)

No action required at this time.

7. Notice to Local Government (Member Cooperatives)

Member cooperatives will inform local government officials of the energy emergency situation and request that steps be taken to reduce energy consumption used for street lighting, outdoor sporting events, advertising, and other general and specific functions.

8. Relaxation of Environmental Constraints (Seminole)

The Director of System Operations will request that Environmental Affairs begin investigations into possible emergency permit revisions which would significantly increase the efficiency of operation of any generating unit and/or permit the utilization of available off-specification fuel.

Step B Alternative Action Level

If the Director of Fuel Supply determines that the fuel inventory levels are projected to decline to alternative action level and are anticipated to continue an uncontrolled decline, he shall immediately inform the Director of System Operations and, upon consultation with the Vice President of Operations and Vice President Technical Services, and the Executive Vice President and General Manager, it will be the responsibility of the Director of System Operations to work with the member systems to effect the following steps:

- 1. Continue all previous steps (Seminole and Member Cooperatives).
- 2. Conservation at Utility-Owned Facilities (Seminole and Member Cooperatives).

Request further reductions in energy use. Air conditioning will be set no lower than 85° F. Heating will be set no higher than 60° F. Non-essential hot water heating will be discontinued.

3. Public Appeals (Member Cooperatives)

The public shall be apprised of the energy emergency through the local media. Requests for conservation will ask for a 25% reduction in energy consumption. These appeals should include information on the possibility of load curtailment if conservation measures do not alleviate the energy emergency. Request that all thermostats be set according to guidelines established in Item 2 above.

- NOTE: In the event of a statewide emergency which has been officially designated as such by the Governor of the State of Florida, all public appeals may be made uniformly under the direction of the Florida Reliability Coordinating Council.
- 4. Optimization of Fuel in Short Supply (Seminole)

The Director of Operations will direct the Chief System Coordinator to take any further action toward optimization of the fuel in short supply. At the discretion of the Director of Operations, the Chief System Coordinator may discontinue any consideration of cost in system dispatch actions.

5. Direct Customer Appeals (Member Cooperatives)

Further and stronger appeals to large industrial and commercial customers for conservation and full utilization of customer-owned generation will be made. These appeals should include information on the possibility of load curtailment if conservation measures do not alleviate the energy emergency. Ask for a 25% reduction in energy consumption.

6. Voltage Reductions (Member Cooperatives)

To the extent practical, distribution voltage will be reduced in an effort to reduce demand and energy by customers. The following criteria shall be considered by the Member Cooperative Manager in the implementation of this measure:

- A. A suitable means of controlling voltage is available to the cooperative.
- B. The extent of the voltage reduction does not, in the opinion of the Cooperative Manager, subject customer or cooperative equipment to damage or present a significant safety hazard.
- C. The voltage reduction is not counterproductive in reducing energy and/or demand.
- D. The acceptable percent voltage reduction will be left to the judgement of the Member Manager.
- 7. Load Management (Member Cooperatives)

The use of Load Management will be maximized to reduce customer demand during peak periods.

8. Notice to Local Government (Member Cooperatives)

Member Cooperatives will appeal to local government officials for action which would mandate restrictions on energy consumption for street lighting, outdoor sporting events, and other outdoor events, advertising, and other general and specific functions.

9. Relaxation of Environmental Constraints (Seminole)

Based upon the results of the Environmental Section's investigation into relaxed environmental constraints, the Director of System Operations will recommend a plan of action to the Vice President, who will initiate action to notify appropriate agencies and/or obtain necessary variances.

Step C Emergency Inventory Level

If the Director of Fuel Supply determines that the fuel inventory levels are projected to decline to emergency levels and are anticipated to continue an uncontrolled decline, he will immediately inform the Director of System Operations and, upon consultation with the Vice President of Operations and Vice President of Technical Services and Executive Vice President and General Manager, it will be the responsibility of the Director of System Operations to work with the Member System Managers to effect the following steps:

- 1. Continue all previous steps (Seminole and Member Cooperatives)
- 2. Conservation at Utility-Owned Facilities (Seminole and Member Cooperatives)

Reduce energy consumption to minimum possible levels. Set air conditioning to highest manageable levels and heating to lower manageable levels. Reduce lighting levels to minimum. Reduce office hours and occupied work space.

3. Public Appeals (Member Cooperatives)

Warn public of possibility of upcoming power curtailments. Explain procedures to be used during rotating blackouts. Appeal to all customers for 50% reduction of energy consumption. Ask that air conditioning and heating use be curtailed to minimum levels.

- NOTE: In the event of a statewide energy emergency, which has been designated a such by the Governor of the State of Florida, all public appeals may be made under the direction of the Florida Reliability Coordinating Council.
- 4. Optimization of Fuel in Short Supply (Seminole)

Suspend all economic dispatch considerations and fully utilize available alternatives fuels.

5. Direct Customer Appeals (Member Cooperatives)

Appeal for a 50% reduction in energy consumption by all large industrial and commercial customers. Warn customers of possibility of upcoming power curtailments and explain procedures to be used during rotating blackouts.

6. Voltage Reductions (Member Cooperatives)

Continue efforts.

7. Load Management (Member Cooperatives)

Continue efforts.

8. Notice to Local Government (Member Cooperatives)

Continue efforts to reduce non-essential energy usage through government mandate. Appeals should encourage partial shutdown of public institutions and other large facilities as judged feasible.

9. Relax Environmental Constraints (Seminole)

Continue efforts.

NOTE: In addition to the above measures, the Director of System Operations will take the appropriate steps to request the initiation of a Fuel Supply Alert as prescribed in Section V of the FRCC Florida Electrical Emergency Contingency Plan, Fuel Supply Shortage Element, if such an alert is not already in effect.

Step D Critical Inventory Level

If the Director of Fuel Supply determines that the fuel inventory levels have dropped below critical level and are anticipated to continue an uncontrolled decline, he will immediately inform the Director of System Operations, and upon consultation with the Vice President of Operations and Vice President of Technical Services, General Manager and Executive Vice President, and all Member System Manager, it will be the responsibility of the Director of System Operations to work with the Member Systems to effect the following steps:

- 1. Continue all previous steps (Seminole and Member Cooperatives)
- 2. Determine Required Extent of Curtailment (Seminole)

Director of Operations will consult with the Director of Fuel Supply, Manager of Operations Control Center, and other to determine the most prudent level of continued service.

 Begin manually initiated rotating blackouts of feeders to achieve the desired energy reduction. Exclude, if possible, only those facilities considered as essential services. A guideline for determination of which facilities should be considered as essential services is attached at Appendix B.

APPENDIX A

It is the intent of Seminole Electric Cooperative, Inc. and its member cooperatives to cooperate fully with the FRCC Florida Electrical Emergency Contingency Plan, Fuel Supply Shortage Element, in the event that activities under this plan are triggered by an energy emergency on the system of any participating utility. In such cases, the individual steps outlined in the SECI/Member Cooperative Plan will be implemented under the direction of the FRCC through the SECI Director of Operations. The persons responsible for the actions of individual participants in this plan are listed below:

Mr. Mike Campbell	Central Florida Electric Cooperative, Inc.
Mr. Wm. C. Phillips	Clay Electric Cooperative, Inc.
Mr. Tommy Todd	Glades Electric Cooperative, Inc.
Ms. Pam May	Lee County Electric Cooperative, Inc.
Mr. Wm. T. Mulcay, Jr.	Peace River Electric Cooperative, Inc.
Mr. James P. Duncan	Sumter Electric Cooperative, Inc.
Mr. John Martz	Suwannee Valley Electric Cooperative, Inc.
Mr. Gary Stallons	Talquin Electric Cooperative, Inc.
Mr. Ronald Bass	Tri-County Electric Cooperative, Inc.
Mr. Billy E. Brown	Withlacoochee River Electric Cooperative, Inc.

APPENDIX B

GUIDELINE FOR DEFINING ESSENTIAL SERVICES

Energy usage by certain consumers which is essential to the health, safety, or welfare of the community should be considered and, <u>insofar as the situation makes</u> <u>it practical</u>, their special requirements should be allowed to continue. Such continuation applies only to energy requirements for essential services and not to the entire customer service.

Although not an exhaustive list, the following types of services may be included in this category:

- A. Hospitals and similar medical services.
- B. Police and fire protection.
- C. Operation, guidance control, and navigation services for public transportation and shipping, including rail, mass transit, licensed commercial air transportation, and other forms of transportation.
- D. Communication services, including telephone and telegraph systems, television, and radio broadcasts.
- E. Water supply and sanitation services, including waterworks, pumping, and sewage disposal activities which cannot be reduced without seriously affecting public health.
- F. Central cold storage and mass distribution services required for the preservation of medical and/or food supplies essential to the community.
- G. Federal activities essential for national defense and state and local activities essential for providing emergency services.
- H. Operations essential for the production, refining, transmission, or distribution of fuel required to provide essential services to the community.
- I. Essential construction, operation, and maintenance activities for production and supply of energy required to provide essential services to the community.

Although customers providing these types of services may be given special consideration from the curtailment provisions of this plan, they should participate in all energy reductions involving non-essential services and should be encouraged to install emergency generation equipment, if continuity of service is essential. In case of customers supplied from multiple sources, only one source will typically be given special consideration.

Although not within the definition of essential services, the special situation of life sustaining medical equipment may be considered. Life sustaining medical equipment is defined as equipment:

- which is necessary to sustain the life of the user,
- which has been prescribed by the user's physician, and
- where any interruption of electricity to such equipment poses an <u>immediate</u> threat to the user.

Customers in this category should fully understand the need for sufficient and proper backup power sources. In addition, during emergency conditions, cooperation, and coordination should be provided to community service agencies and other governmental units which make special provisions for the needs of those with life sustaining medical equipment.