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January 20, 2006

Florida Public Service Commission CCA Records 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 Attn: Kay Flynn COMMISSION CLERK

RE: FPSC O# PSC-03-0770-PAA-EM Long Term Energy Emergency Plan

Attached are Orlando Utilities' Commission revised Fuel Supply Shortage Plan and Capacity and Energy Emergency Plans. These are to replace the older plans the are contained in the above mentioned document. I have also attached a copy of the older plan that is being replaced.

Should you have any questions or comments please feel free to call me at (407) 384-4192.

Sincerely,

Brad Chase

Director System Operations

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OUC Capacity and Energy Emergency Plan

(Revised August 30, 2005)

1. Purpose

To ensure that OUC and the Florida Municipal Power Pool member cities meet NERC and FRCC requirements for a capacity and energy emergency plan.

2. Scope

The requirements listed in this document are responses to NERC standard EOP-002-0 and FRCC requirements provided by the FMPP Balancing Authority. OUC is the FMPP Balancing Authority agent.

3. Requirements

- R1. The FMPP Balancing Authority operator and the Reliability coordinator have the decision making authority to implement plans to mitigate capacity and energy emergencies as outlined in the FRCC generation capacity shortage plan. The FMPP Balancing Authority shall direct its pool members to take what ever steps necessary to alleviate a capacity or energy emergency as outlined in the FMPP Capacity and Energy Emergencies manual.
- R2. The FMPP Balancing Authority shall implement and coordinate with FRCC Reliability Coordinator its capacity and Energy emergency plan immediately to reduce risk to the interconnection
- **R3.** The FMPP Balancing Authority shall communicate its capacity and energy emergency with the FRCC Reliability Coordinator and its member cities and neighboring Balancing Authorities.
- R4. FRCC Reliability Coordinator will report current and future plans and system Conditions to all balancing authorities within the FRCC region until all advisory alerts and capacity emergencies are terminated. The FMPP Balancing Authority will also inform its member cities.
- R5. If the FMPP Balancing Authority is anticipating a capacity or energy Emergency its member cities will be notified to contact FMPP Energy Control Center and Florida Energy Marketing to Coordinate postponement of equipment Maintenance, scheduling interchange purchases in advance and request the FMPP Balancing Authority updates the FMPP generation assessment Program to determine if any pool member is deficient and be prepared to shed firm load

- R6. The FMPP Balancing Authority shall only use the assistance provided by the Interconnection's frequency bias for the time needed to implement corrective actions, the FMPP Balancing Authority is a member of the FRCC Reserve Sharing Group. The FMPP Balancing Authority will **not** unilaterally adjust generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes. Such unilateral action may overload transmission facilities. As with all Capacity and Energy Emergencies coordination will be done through the FRCC Reliability Coordinator.
- R7. The FMPP Balancing Authority shall monitor all member cities load and generation demand to ensure that the pool capacity is sufficient to meet FMPP control performance and disturbance control standards. If failing the FMPP Balancing Authority shall immediately implement capacity and energy emergency plans as defined in each pool member's capacity and emergency plan. These steps include but are not limited to.
 - **R7.1** Loading all available generation.
 - **R7.2** Deploying all available operating reserves. And curtail non firm sales.
 - **R7.3** Request FMPP members implement interruptible load management and Curtail recallable sales.
 - **R7.4** Request emergency assistance from other balancing authorities. Purchase emergency energy.
 - **R7.5** Notify FRCC that a FMPP pool member is declaring an energy capacity Emergency.
 - **R7.6** Reduce load through public appeals, voltage reduction, DSM or shed firm Load as a last resort.
- **R8.1** If after completing steps R7.1 thru R7.6 and a FMPP member is experiencing a Capacity or energy emergency the generation assessment program will be updated and the deficient Pool member will be directed to shed load as described in appendix A.
- R8.2 After FMPP Balancing Authority (ACE) returns to zero the system operator will request the FRCC Reliability Coordinator declare Energy Alert Levels 1,2 or 3 as outlined in NERC standard 1-EOP-002-0 attachment titled Energy Emergency Alerts
- **R9.** The FRCC Reliability Coordinator will act to help mitigate an emergency Condition including a request for emergency assistance.
- **R10.** The deficient FMPP member shall request the FRCC Reliability Coordinator post the declared Alert Level to NERC using EEA1 and EEA2

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FMPP OPERATING COMMITTEE HANDBOOK

EMERGENCY OPERATIONS OUC Fuel Emergency Plan	REVISION: June 2004

Emergency Plan Manual

October 1990

OUC FUEL SUPPLY SHORTAGE PLAN (Revised 6/10/04)

This plan was developed to facilitate an orderly procedure by which the Orlando Utilities Commission (OUC) could appropriately distribute its available electrical energy in the event of a fuel supply shortage. This plan is designed to protect the health, safety, and welfare of the people in the OUC service area, which includes the City of St. Cloud by virtue of the Interlocal Agreement entered into by and between OUC and the City of St. Cloud effective May 1, 1997, during such periods when a fuel supply shortage emergency exists. This plan will be invoked at the OUC's initiative and will be coordinated with the emergency plans of other utilities in the State of Florida through the Florida Reliability Coordinating Council (FRCC).

The purpose of the plan is to establish an organize and effective means of anticipating, assessing, and responding, in an appropriate and coordinated manner, to a long-term emergency caused by reason of a fuel supply shortage.

An Energy Emergency exists when OUC has inadequate generating capability by reason of a fuel supply shortage and is thereby prevented from operating at required levels to supply its energy obligations. An energy emergency differs from a Generating Capacity Shortage emergency in that energy requirements cannot be met over an extended period. The period of advance warning and expected duration of an Energy Emergency is usually measured in terms of weeks or months, as opposed to minutes or hours for a Generating Capacity Shortage.

This plan covers the following:

Notifications

Fuel Conservation Actions

Plan Termination Guideline

Public Information and Appeals

Voltage Reduction Procedure

Load Shed Procedure

Fuel Payback Procedure

NOTIFICATIONS

The Director, Fuels Division is responsible for continuously monitoring the adequacy of the fuel inventory. When fuel supplies are decreasing, or are anticipated to decrease, below a level adequate to provide for continuous, uninterrupted service to OUC customers the Director, Fuels Division will notify the Vice President, Power Resources Business Unit. The Vice President, Power Resources Business Unit will assess the fuel situation and if the Vice President, Power Resources Business Unit determines that a fuel supply emergency exists, the General Manager & CEO and all Vice Presidents will be notified. Following internal notifications, the Chair of FRCC Reliability Assessment Group (RAG) will be notified of the impending emergency.

If, as a result of the FRCC notification, a Fuel Supply Alert is designated by the Florida Public Service Commission and the Governor of the State of Florida declares a fuel supply emergency pursuant to Chapter 377.703, Florida Statutes, or other appropriate statutory authority, then the U.S. Department of Energy (DOE) shall be notified of the fuel emergency and the following Fuel Conservation Actions will be initiated by OUC.

FUEL CONSERVATION ACTIONS

Upon designation by the Governor of the State of Florida that a fuel supply emergency exists, the following steps will be implemented and followed. Should it become necessary in the implementation of this plan to by-pass any of the steps below and immediately proceed with more severe measures, the actions under the by-passed steps shall be implemented as appropriate.

Step A

Curtail all use of electrical energy at all OUC buildings and facilities

- Turn off all unnecessary lights
- Turn off or adjust the thermostat on all A/C or Heating as required

Curtail energy consumption of customers subscribed to OUC's Curtail able Rate as specified in the Curtailable Rate Schedule of OUC's Administrative Policy Manual.

Discontinue all non-firm sales of electric energy to other utility companies which increases the use of fuel in short supply.

Operate all existing OUC generating sources to minimize the use of the fuel in short supply.

Purchase power from other utilities, where possible, to conserve the fuel in short supply.

Request authorization from the proper authorities to ease environmental and other regulations where such actions will be effective in increasing the supply of alternate fuels.

Request the City of Orlando and the City of St. Cloud to make the same reduction in energy use as OUC.

Step B

If the actions of the preceding step A have not been adequate to mitigate the energy emergency and a continued downward trend in energy supplies is anticipated, the following <u>additional</u> measures will be implemented.

All previously implemented steps shall be continued. Make public appeals to all customers, both residential and commercial, to reduce their consumption of electrical energy.

Large commercial and industrial customers will be contacted individually and requested to reduce their consumption of electrical energy.

Make request to customers to reduce all outdoor decorative lighting and lighting used for advertisement except for the minimum required to indicate commercial facilities open after dark.

Reduce all street lighting to a minimum level necessary for life and property protection, per agreement with the City of Orlando and Orange County.

Step C

If action of the preceding Steps A and B have not been adequate to mitigate this energy emergency and a continued downward trend in fuel supplies is anticipated, the following <u>additional</u> measures will be implemented.

All the previously implemented steps shall be continued.

Maximize the use of purchase power.

Implement a 5% voltage reduction (see Voltage Reduction below).

Step D

In the event the energy emergency continues to worsen, then the following steps will be implemented as a last resort.

All the previously implemented steps shall be continued.

To the extent legally permissible, through the use of legal authority, enforce the reduction of energy consumption to the degree necessary to protect public health and welfare.

If fuel is available from other utilities, it may be purchased at an agreed upon price or payback plan. (see Fuel Payback Plan below)

As a last resort, implement rotating blackouts on selected feeders as designated on the most current Load Shed Priority List which is on file in the Energy Control Center (ECC). (see Load Shedding below)

PLAN TERMINATION GUIDELINE

When the fuel supply shortage eases, the General Manager & CEO will request the measures taken under this plan be relaxed to the appropriate step until at which time a return to normal operations can be achieved. The General Manager & CEO will terminate the plan when fuel supplies return to normal levels and can be maintained at those levels.

PUBLIC INFORMATION AND APPEALS

All communications with the public, the Media and local agencies shall be made by the Media Relations Coordinator.

The following City and local agencies will be contacted:

Mayor of Orlando

Chairmen of Orange and Osceola County Commissions

Police Chiefs from Orlando, Orange County, St. Cloud, and Osceola County

Fire Chiefs from Orlando, Orange County, St. Cloud, and Osceola County

Directors of Waste Water Departments for Orange and Osceola Counties

Orange and Osceola Counties Civil Emergency Management Departments

All public appeals to both large and small customers will be accompanied by suggestions on how they can conserve energy:

Turn off all unnecessary lights

Reduce or curtail the use of A/C and electric heat

If A/C is essential, set thermostat at 80 to 85 degrees

If electric heat is essential, set thermostat at 60 to 65 degrees

Curtail all use of clothes dryers, dishwashers and use of hot water.

Set hot water thermostat at 120 degrees.

These communications should be coordinated with the Public Information committee of the FRCC so as to be as non-conflicting as possible.

VOLTAGE REDUCTION

The Energy Control Center will be responsible for implementing a 5% system-wide voltage reduction if necessary.

LOAD SHEDDING

The Energy Control Center will be responsible for implementing Load Shedding if it becomes necessary. The System Operator shall use the most current Load Shed Priority List on file in Energy Control Center. Feeder circuits will be rotated every 10 to 15 minutes. The Load Shed Priority List is reviewed and revised, as required, by the Electric Engineering Division to ensure that it contains only feeders that serve non-essential loads.

FUEL PAY-BACK PLAN

If, during the emergency, a physical transfer of fuel should become practical or necessary due to some physical limitation of the electrical system, the bilateral transfers will be accomplished through mutual agreement between the utilities involved. The principle upon which these transfers will be based is that the original owner or procurer of the fuel shall be made whole in terms of the cost, quantity, and quality of fuel transferred as soon after the emergency as practical.

Emergency Plan Manual

October 1990

FUEL SUPPLY SHORTAGE PLAN (Revised 4/15/03)

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emergency and a continued downward trend in energy supplies is anticipated, the following additional measures will be implemented.

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VOLTAGE REDUCTION

The Energy Control Center will be responsible for implementing a 5% system-wide voltage reduction when authorized by the General Manager & CEO.

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