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REPLY TO:

Tallahassee

October 27, 1989

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Mr. Steve C. Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 323091

Re: Tampa Electric Company vs.  
Florida Power Corporation  
FISC Docket No.: 890646-BI

Dear Mr. Tribble:


Enclosed for filing in the above docket are the original and fifteen (15) copies of Prepared Direct Testimony of Don R. Morrow; Bruce C. Kelsey; Kenneth R. Bushea, P.E.; and Graeme R. Addie, P.E.

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMH \_\_\_\_\_
- CTR ary
- EAG 1
- LEG 1
- LIN 6
- OPC ALL Parties of Record (w/encl.)
- RCH \_\_\_\_\_
- SEC /RCY/rj
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

  
Roy C. Young

Addie  
DOCUMENT NUMBER  
10661 OCT 27 1989  
PSC-RECORDS/REPORTING

Bushea  
DOCUMENT NUMBER DATE

10660 OCT 27 1989

PSC-RECORDS/REPORTING

Kelsey  
DOCUMENT NUMBER DATE

10659 OCT 27 1989

PSC-RECORDS/REPORTING

Morrow  
DOCUMENT NUMBER DATE

10658 OCT 27 1989

PSC-RECORDS/REPORTING

AGRICO CHEMICAL COMPANY  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. 890646-E1

IN RE: PETITION OF TAMPA ELECTRIC COMPANY FOR RESOLUTION  
OF TERRITORIAL DISPUTE WITH FLORIDA POWER CORPORATION

Testimony of

Bruce C. Kelsey

October 27, 1989

DOCUMENT # 890646-E  
10659 OCT 27 1989  
FPSC-RECORDS/REPORTING

1                   BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION:

2                   RE: Tampa Electric Company Complaint

3                   Concerning Territorial Boundaries

4                   PREFILE TESTIMONY OF

5                   BRUCE C. KELSEY

6                   AGRICO CHEMICAL COMPANY

7

8 Q.    Please state your name and address.

9 A.    My name is Bruce Kelsey. My address is 87 Lake Otis Road, Winter  
10       Haven, Florida 33884.

11 Q.   What is your occupation?

12 A.   I am a registered professional electrical engineer and have been  
13       employed by Agrico Chemical Company since 1978.

14 Q.   Briefly state your responsibilities at Agrico.

15 A.   My job title is Electrical Superintendent for Agrico's Florida mining  
16       operations. My responsibilities related to this complaint are the  
17       planning, construction and maintenance of power distribution systems.

18 Q.   Briefly outline your education and professional experience prior to  
19       being employed by Agrico.

20 A.   I have a Bachelor of Science Degree in Electrical Engineering from  
21       the University of Florida. I was employed by Tampa Electric Company  
22       for 18 years and held several senior engineer and manager positions  
23       associated with the engineering, maintenance, and construction of  
24       power transmission and distribution systems.

25 Q.   Do you have any exhibits to file with your testimony?

1 A. Yes, I do. Exhibit \_ (BCK-1), titled Agrico Properties; Exhibit \_  
2 (BCK-2), Fort Green Schematic; and Exhibit \_ (BCK-4), Comparison  
3 of Interruptible Rates.

4 Q. Describe the Fort Green power distribution system.

5 A. The Fort Green mine and processing plant are served on the time of  
6 day IST-1 interruptible rates offered by Tampa Electric Company  
7 (TECO) and Florida Power Corporation (FPC). Exhibit BCK-2 is a  
8 schematic diagram showing the power distribution facilities and major  
9 electrical equipment at the Fort Green Mine. This exhibit shows how  
10 the Fort Green mining equipment and the processing plant are served  
11 by a temporary TECO 4 kv meter at the north end of the property,  
12 a 69 kv TECO meter in the center of the property, and a 69 kv FPC  
13 meter at the south end of the present mining area.

14 The temporary 4 kv meter was abandoned in October when the No. 13  
15 dragline moved west across high way 37. The TECO 69 kv meter now  
16 serves the processing plant, the No. 13 dragline, and the No. 13  
17 pipeline. The FPC 69 kv meter serves the two southern draglines  
18 and their associated pipelines.

19 The 69 kv received from the utilities is stepped down by Agrico-owned  
20 transformers to 34 kv, 13 kv, and 4 kv. Power is distributed at 34  
21 kv throughout the mining areas and stepped down to 4 kv or less by  
22 numerous portable field substations. The portable field substations  
23 serve the draglines, pumps associated with the pipelines, and other  
24 field equipment. The draglines and all large pump motors shown on  
25 the schematic, Exhibit BCK-2, are powered at 4 kv. Power for the

1 processing plant is supplied by two 7,500 kva, 69/13 kv transformers,  
2 distributed at 13 kv, and stepped down further to 4 kv and 480 volt  
3 by 25,000 kva of transformers within the plant but not shown on the  
4 schematic.

5 Q. What facilities has TECO or FPC provided past the meters at Fort  
6 Green?

7 A. Agrico owns all power distribution equipment, transformers,  
8 substations, and power lines past the meters with one exception.  
9 TECO owns approximately 1-1/2 miles of transmission lines from the  
10 69 kv meter to Agrico-owned substations. FPC does not own  
11 equipment past their 69 kv meter.

12 Q. What facilities did FPC provide or enlarge in order to serve the mining  
13 facilities in Hardee County?

14 A. FPC built approximately 1-1/2 miles of 69 kv transmission lines from  
15 their existing lines and terminated them at a 69 kv meter on Agrico's  
16 property in Hardee County. FPC enclosed the meter and associated  
17 disconnect switches with a chain link fence. To my knowledge, this  
18 is all that was provided by FPC and no substations were enlarged as  
19 alleged in the TECO complaint.

20 Q. Comment on the duplication of utility facilities that TECO claims would  
21 be prevented if the territorial agreement is interpreted in the manner  
22 requested by TECO.

23 A. In my opinion there will be a greater duplication of facilities if the  
24 territorial agreement is interpreted in the manner requested by TECO  
25 than if Agrico is served by only FPC. This is because each of the

1 utilities will have to provide transmission facilities to serve part of the  
2 load even though FPC's facilities are capable of serving the entire  
3 load. Eventually the Fort Green mine will also extend into Manatee  
4 County and at that time three utilities would have to provide facilities  
5 to serve the load that could be served by facilities from one utility.

6 Q Is the transmission line built by FPC to serve the Agrico Fort Green  
7 facilities in Hardee County a duplication of TECO's facilities?

8 A Yes, the territory boundary line has caused this duplication of  
9 transmission lines. The FPC transmission line was built to serve the  
10 existing load in Hardee County but it is capable of serving the entire  
11 load in Polk and Hardee Counties. The FPC line will serve 25 square  
12 miles of Agrico mining area in Hardee County even if no FPC power  
13 is ever used in Polk County. Agrico proposes to use the capacity of  
14 FPC's transmission line and eliminate a duplication of facilities by  
15 serving the Fort Green processing plant and the all of the mining  
16 equipment in Polk and Hardee Counties from the one FPC transmission  
17 line.

18 Q How does Agrico propose to serve the entire Fort Green mine from  
19 the FPC transmission line?

20 A Agrico has purchased the material and has plans to build a 69 kv  
21 power line that would originate at the existing FPC 69 kv meter  
22 located two and a quarter miles inside of the FPC territory. The  
23 power line would be built entirely on Agrico land and terminate at  
24 the existing Fort Green Main Plant substation in Polk County. The  
25 route of the power line can be seen on exhibit BCK-1. All of the

1 Fort Green facilities would be served by FPC and TECO would serve  
2 the remaining meters shown at Pierce, South Pierce, and Payne  
3 Creek.

4 Q. Are there other duplication of facilities because the Agrico Fort  
5 Green Mine is served from two utilities?

6 A. Yes. Dividing the Fort Green Mine between FPC and TECO also  
7 causes the utilities to provide approximately 11 mva more than the  
8 actual peak load. This is due to the diversity lost by not serving the  
9 load from one FPC source. The sum of peak demands served by both  
10 companies will be approximately 56 mva by the end of 1989. However,  
11 the actual peak for the mine will only be about 45 mva because the  
12 peak demands served by the two companies do not occur  
13 simultaneously. The 11 mva difference represents 24 percent more  
14 peak load that must be supplied by both utilities.

15 Q. Will TECO have to abandon existing transmission facilities if all of the  
16 Fort Green load is transferred to FPC?

17 A. No, with one possible exception. About two miles of TECO's  
18 transmission line on Agrico's property along the entrance road to the  
19 processing plant might be abandoned if the entire load is transferred  
20 to FPC. This power line could be salvaged or perhaps sold to Agrico.  
21 I suspect it has been paid for many times over. The remainder of  
22 TECO's transmission facilities that serve the Agrico Fort Green Mine  
23 would continue to be used to serve a much larger mining operation at  
24 the IMC Four Corners Mine.

- 1 Q. Will there be a duplication of generating equipment and production  
2 plant investment if Agrico transfers service from TECO to FPC?
- 3 A. In my opinion, there would be no physical duplication of generating  
4 equipment because Agrico is an interruptible customer and by  
5 definition no generating equipment is planned or built for  
6 interruptible customers. TECO claims the Equivalent Peaker method  
7 used to design TECO's rates has allocated \$17MM of production plant  
8 investment to serve Agrico. However, TECO's power plants were  
9 planned or built prior to adopting the Equivalent Peaker method and  
10 therefore were not built to serve interruptible customers such as  
11 Agrico. The Equivalent Peaker method has not been adopted for any  
12 other utilities and should not be used to resolve this boundary  
13 dispute.
- 14 Q. Mr. Rowe stated on page 8, lines 19 through 24 of his testimony, that  
15 allowing Agrico to switch power companies would totally frustrate the  
16 planning, development and maintenance of a cost effective,  
17 coordinated electric power grid throughout Florida. How does an  
18 interruptible customer such as Agrico affect the power grid?
- 19 A. It is my understanding that no power generation is planned for  
20 interruptible customers. The power sold to these customers comes  
21 from the reserve capacity that each utility is required to maintain for  
22 the grid. It shouldn't matter to the grid who serves the interruptible  
23 load since it can be interrupted at any time.
- 24 Q. How would other customers be affected if Agrico transfers Fort Green  
25 from TECO to FPC?



1 A. I suspect there would be little or no noticeable impact on other TECO  
2 customers. Most of TECO's loss of revenue would be for fuel, which  
3 would mostly be nullified because the fuel would not be burned.  
4 There may be an impact on fuel costs for a few years because less fuel  
5 would be purchased at the present low spot market cost. However,  
6 the few customers who qualify for the SSI special service rider would  
7 probably be the only ones affected. The SSI program passes on 80  
8 percent of the savings in spot market fuel purchases to interruptible  
9 customers who have increased their use of power. Those companies  
10 with an increase in power consumption receive \$4 or \$5 credit per  
11 mwh. I suspect these are the only customers that would be  
12 significantly affected if Agrico transfers to FPC. Agrico should not  
13 be required to continue purchasing power from TECO so that a few  
14 customers with increased consumption can receive a benefit that  
15 Agrico itself does not receive.

16 Q. Would the fixed costs in the base rates now being collected from  
17 Agrico be passed on to other customers?

18 A. It is questionable whether or not fixed cost collected from Agrico  
19 would be eventually passed on to other customers. New rates would  
20 have to be established in a future full rate case in order to pass these  
21 costs on to other customers. The loss of Agrico's contribution to  
22 fixed cost may be offset by customer growth or increased earnings,  
23 and existing customers may never be impacted. If other customers  
24 are required to bear the loss in fixed cost collected from Agrico, this  
25 would eventually happen anyway when all of the Fort Green mining

1 facilities are moved into Hardee County. In fact, the Fort Green  
2 mining area in TECO's territory would have been depleted in 1990 if  
3 2,265 acres had not first been mined in Hardee County. This area is  
4 in FPC territory but the power used was purchased from TECO.  
5 Therefore TECO has already collected fixed cost that should have  
6 been collected from FPC.

7 Q. Mr. Rowe mentioned the Payne Creek facilities on page 6 of his  
8 testimony and again on page 10 he mentioned a \$2.7 million lose of  
9 base revenues if Agrico is permitted to continue to take power from  
10 FPC for Polk County facilities. What does this have to do with Agrico's  
11 intent to serve Fort Green from FPC?

12 A. Payne Creek has nothing to do with this case. This mine is now  
13 entirely in Polk County and there are no plans to use Agrico's  
14 proposed 69 kv power line from FPC to serve Payne Creek. The  
15 Payne Creek dragline was in Hardee County but moved back into Polk  
16 County in March of 1989. While the dragline was in Hardee County,  
17 part of the \$2.7 million of base rates collected by TECO was for  
18 power used in FPC's Hardee County area. Furthermore, Payne Creek  
19 will be mined out in one to two years and the revenue will be lost  
20 regardless of how it is served.

21 Q. Mr. Rowe stated on page 18, line 20, in his concluding remarks, that  
22 TECO would lose \$6.5 million in base revenues if Agrico is served  
23 from FPC. Is this correct?

24 A. No, it is not. He has included \$2.7 million of base revenue lost from  
25 Payne Creek which I mentioned earlier has nothing to do with this

1 case. The remaining \$3.8 million for Fort Green is also too high  
2 because it is an estimate of the revenue collected before the facilities  
3 in Hardee County were transferred to FPC.

4 Q. What is the difference in cost of the TECO and FPC interruptible  
5 rates?

6 A. It is difficult to compare the rates due to the volatility of fuel costs  
7 and TECO's uncertain mechanism for refunding over collected federal  
8 income taxes. However, I have estimated TECO's rate to be an  
9 average of nearly 19 percent greater than FPC's during 1989, 1990,  
10 and 1991. The billing determinates and itemized components for this  
11 calculation are shown on Exhibit \_ (BCK-4). This exhibit assumes all  
12 Fort Green facilities are served from one meter and is based on fuel  
13 cost projections provided by both companies. Fuel makes up the  
14 greatest portion of the bills, but the major difference in TECO's and  
15 FPC's interruptible rates is due to base rates and other non fuel  
16 items. The three year average non fuel related cost, shown on  
17 Exhibit \_ (BCK-4), are \$15.16/mwh for TECO and an average of  
18 \$10.89 for FPC, a difference of 39 percent. The three-year average  
19 total difference in cost, including sales tax, is \$6.54 per mwh. Only  
20 \$1.90 of this difference is due to fuel, and the remainder, \$4.27 plus  
21 sales tax, is due to base rates and non fuel items. The bottom line  
22 of Exhibit \_ (BCK-4) indicates Agrico would pay annually an average  
23 of nearly \$1,600,000 more than the cost of the same amount of power  
24 served from FPC. Most of the difference is due to the Equivalent  
25 Peaker cost of service methodology applied to TECO's rates. This

1 method charges a much greater portion of TECO's production plant  
2 investment to the energy portion of base rates than any other utility  
3 in Florida.

4 Q. What safety problems would be caused by serving Fort Green from two  
5 utilities?

6 A. Mr. Morrow and Mr. Addie have discussed the hazard of water hammer  
7 that can develop in a pipeline due to a partial loss of power from  
8 either utility. There is also an electrical safety problem due to the  
9 confusion that arises from having more than one source of power.  
10 The draglines and other portable equipment are served by 5,000-volt  
11 power cables that are a few hundred feet to 5,000 feet long. Agrico's  
12 employees must work in adverse conditions of mud, water, and piles  
13 of overburden that make it difficult to trace the source of power for  
14 the cables. The overhead power lines are also being continually  
15 relocated to serve the portable substations. Employees are required  
16 to handle and make connections to these cables, and power lines and  
17 service from two utilities will definitely add to the confusion of  
18 determining when a cable or power line is energized.

19 Q. Are there devices that can detect a partial power outage and shut  
20 down pipeline pumps in order to prevent the water hammer hazard?

21 A. The technology exists but I am not aware of any off the shelf devices  
22 that will function quickly enough with the radio controls used on  
23 Agrico's pipelines. Each of the pumps has a radio and  
24 microprocessor that is remotely controlled by an operator with a  
25 master radio control from the last pump in the pipeline. It took 3

1 years and nearly \$400,000 to develop and install a reliable radio  
2 control system on two of the pipelines at Fort Green. Another  
3 system is being installed on the third pipeline this year and the total  
4 investment in radio controls will exceed \$500,000. Given enough time  
5 and money, the system could be modified to sense a partial power  
6 outage and shut down the remaining pumps but it is doubtful that the  
7 system could send a stop command to each of the pumps quickly  
8 enough to prevent water hammer.

9 Q. What about the devices Mr. Rowe mentioned on page 12 of his  
10 testimony that other companies use to prevent water hammer?

11 A. Other companies do install such devices with varying success but  
12 those companies have shorter pumping distances and/or fewer pumps  
13 installed in their pipelines. The longer pipelines used by Agrico are  
14 more susceptible to water hammer. Mr. Addie is a recognized authority  
15 on slurry pumping systems and stated in his testimony that he is not  
16 aware of a reliable device to prevent water hammer at Agrico. The  
17 longer pipelines also require staggered start up and shut down  
18 sequences in order to prevent a build up of excessive pressure. For  
19 example, the first pump may be programmed to shut down first, next  
20 the tenth pump, next the third pump, next the sixth pump etc.  
21 Obviously, this sequence cannot be duplicated if all the pumps lose  
22 power on one side of an arbitrary boundary line between two power  
23 companies.

24 Q. How is the number of power outages affected if Fort Green is served  
25 by more than one utility?

1 A. The Fort Green Mine is served on an interruptible rate, so we expect  
2 to be interrupted when the power company has insufficient capacity  
3 to serve firm load customers. Fortunately this is not a frequent  
4 occurrence. However, weather-related and other accidental outages  
5 are recorded by TECO and occur on an average of once or twice a  
6 month. As Mr. Morrow mentioned in his testimony, Fort Green will  
7 be in double jeopardy of being interrupted if served by two utilities.  
8 There would be many additional miles of power lines exposed to  
9 lightning and interruptions on the second utility's system. The  
10 number of outages may increase to four or more times a month. The  
11 actual number will be greater because the outages mentioned above do  
12 not include all the momentary blinks that are not recorded by the  
13 power companies. A blink in the lights due to a lightning strike on  
14 either company may go unnoticed by other customers but can shut  
15 down an entire phosphate mine or processing plant.

16 Q. Do you have any concluding remarks?

17 A. The territorial agreement is supposed to prevent a duplication of  
18 facilities but the contrary would be true in this case if TECO's  
19 interpretation of the agreement is adopted. Serving the Agrico Fort  
20 Green Mine from two utilities causes duplication of facilities and  
21 imposes serious operating and safety hazards. A three year average  
22 cost analysis shows Agrico would pay TECO nearly \$1,600,000 more  
23 annually for the same amount of power than competing phosphate  
24 companies pay FPC. One of these same competitors is also paying  
25 TECO approximately \$1,000,000 less for a similar amount of power due

1 to the SSI service rider program. That same company has built 69  
2 kv power lines in order to use TECO's power in FPL's area and  
3 additional 69 kv power lines to use FPC's power in TECO's area.  
4 Using power from a utility in another utility's area has been common  
5 practice in the phosphate industry. Teco has been a party to this  
6 practice and has no basis to complain at this late date. Furthermore,  
7 Agrico should not be held hostage to the Equivalent Peaker cost of  
8 service method in settling this dispute when this method has not been  
9 applied to any utility except TECO.

10

11

12

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16

COMPARISON OF INTERRUPTIBLE RATES

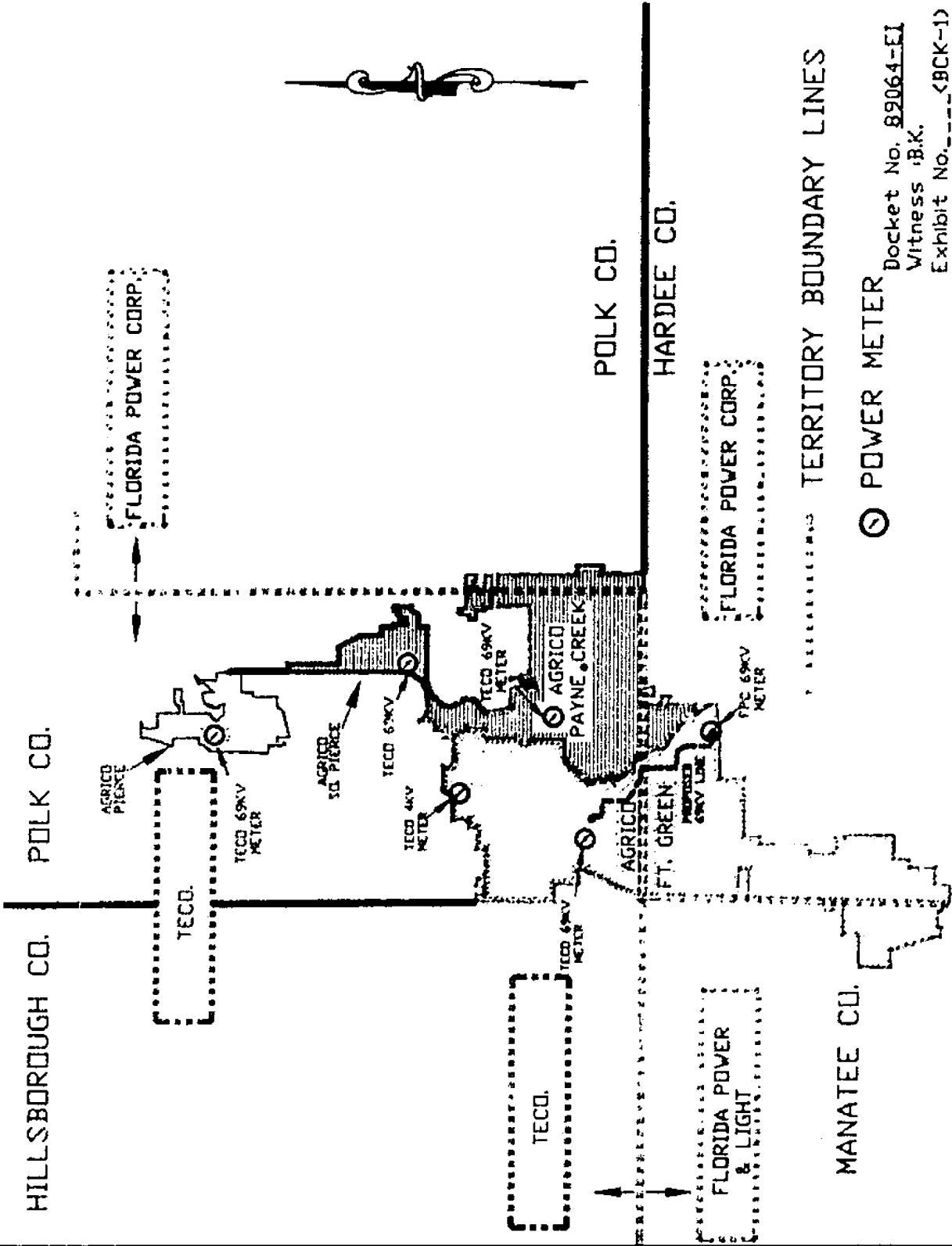
AVERAGE POWER COST FOR YEARS 1989, 1990, 1991

	FPC	TECO	DIFFERENCE
MW	42.00	42.00	
MWH	20,000	20,000	
Power Factor	97.0%	97.0%	
% On Peak	20.0%	20.0%	
Customer Charge	\$0.02	\$0.05	\$0.03
Demand Charge \$/MW	\$2.29	\$2.73	\$0.44
Base Rate STD	\$8.71	\$13.74	\$5.03
Base Rate On Peak	\$14.97	NA	NA
Base Rate Off Peak	\$5.84	NA	NA
Composite of Base Rate	\$7.67	\$13.74	\$6.07
Conservation / MWH	\$1.96	\$0.00	(\$1.96)
Oil Back Out / MWH	\$0.00	\$1.32	\$1.32
Fuel, Peak, \$/MWH	\$28.31	\$26.80	
Fuel, Off Peak, \$/MWH	\$20.75	\$23.50	
Composite of Fuel	\$22.26	\$24.16	\$1.90
FPC Billing Credit	\$0.04	\$0.00	(\$0.04)
TECO Tax Refund	\$0.00	(\$1.61)	(\$1.61)
Power Factor Credit	(\$0.17)	(\$0.69)	(\$0.52)
Transformer Credit	\$0.00	(\$0.21)	(\$0.21)
Voltage Credit	(\$0.92)	(\$0.16)	\$0.76
Total Non Fuel	\$10.89	\$15.16	\$4.27
Total Fuel	\$22.26	\$24.16	\$1.90
Total Bill	\$33.15	\$39.32	\$6.17
Sales Tax	\$1.99	\$2.36	\$0.37
Total with Sales Tax	\$35.14	\$41.68	\$6.54
Annual Cost	\$8,433,600	\$10,002,166	\$1,568,566
Percent Difference			18.6%

Docket No. 89064-EI  
Witness BK  
Exhibit \_\_\_\_\_ (BCK-4)



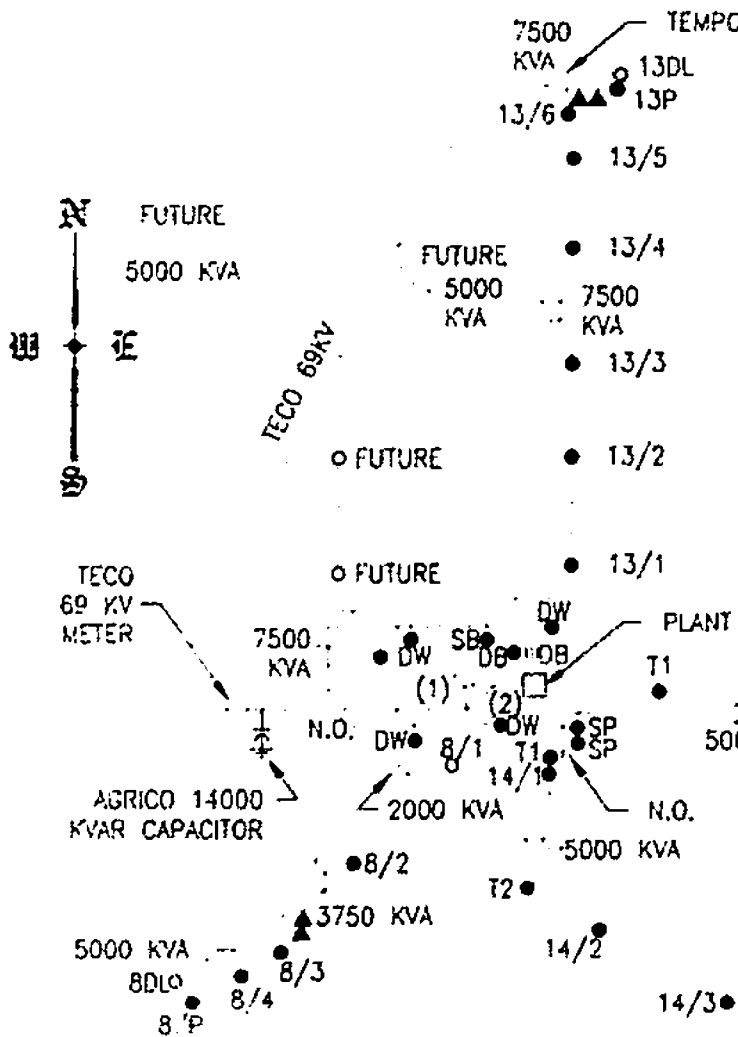
# AGRICOLA PROPERTIES



TERRITORY BOUNDARY LINES

⊙ POWER METER

Docket No. 89064-EI  
 Witness B.K.  
 Exhibit No. ----(BCK-1)



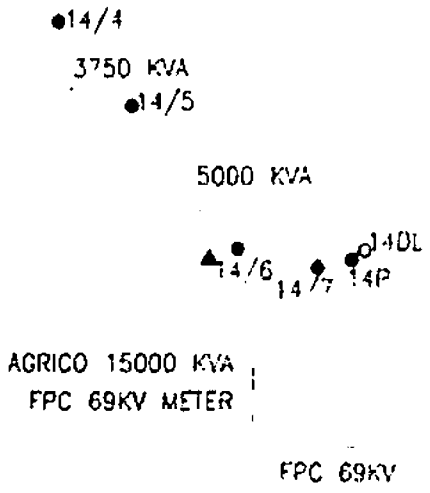
- 7500 KVA — TEMPORARY 4KV METER (TECO)
- 13DL  
13P  
13/6
- 13/5
- 13/4
- 7500 KVA
- 13/3
- 13/2
- 13/1
- FUTURE
- FUTURE
- FUTURE
- 14/3-14 LINE/13 MATRIX BOOSTER PUMP
- DW - DEEP WELL PUMP
- SB - SLIME BOOSTER PUMP
- OB - DEBRIS BOOSTER PUMP
- T1 - #1 TAILINGS PUMP
- SP - SLIMES PUMP
- DL - DRAGLINE
- P - PIT PUMP
- N.O. - NORMALLY OPEN

**NOTES**

- (1) FIELD SUB, 22.5MVA, 69/34KV
- (2) PLANT SUB, 15MVA, 69/13KV WITH 3 SUBMETERS

**LEGEND**

- PUMP
- DRAGLINE
- ▲ HYDRAULIC PUMP
- 69KV LINE, TECO
- 69KV, FPC
- 34KV LINE, AGRICO
- 4KV LINE, AGRICO
- 34KV POLE TOP SWITCH, AGRICO



**FORT GREEN SCHEMATIC EXHIBIT (BCK-2)**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

TAMPA ELECTRIC COMPANY, )

Complainant, )

vs. )

FLORIDA POWER CORPORATION, )

Respondent. )

DOCKET NO. 890646-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Prepared Direct Testimony of Don R. Morrow; Bruce C. Kelsey; Kenneth R. BuShea, P.E.; and Graeme R. Addie, P.E. has been furnished by U.S. Mail to the following parties of record, this 27th day of October, 1989:

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