

Florida Power
CORPORATION

**ORIGINAL
FILE COPY**

Pamela I. Smith
ASSISTANT COUNSEL

May 11, 1990

DOCUMENT NUMBER-DATE
04116 MAY 11 1990
FPSC-RECORDS/REPORTING

Mr. Steven C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0870

Re: Territorial Dispute between Clay Electric Cooperative, Inc. and
Florida Power Corporation - Docket No. ~~900064-EU~~
900064-EU

Dear Mr. Tribble:

Enclosed for filing in the subject docket are the original and 14 copies
of Florida Power Corporation's Prefiled Direct Testimony of Jimmie L. Troke,
William L. Park and Maurice H. Phillips

Please acknowledge your receipt of the above filing on the enclosed copy
of this letter and return to the undersigned. Thank you for your assistance

Very truly yours,

Pamela I. Smith
Assistant Counsel

DOCUMENT NUMBER-DATE
04115 MAY 11 1990
FPSC-RECORDS/REPORTING

PS:BR

Enclosures

Troke
DOCUMENT NUMBER-DATE
04114 MAY 11 1990
FPSC-RECORDS/REPORTING

RECEIVED & FILED

TB
FPSC-BUREAU OF RECORDS

GENERAL OFFICE

3201 THIRTY-FOURTH STREET SOUTH • POST OFFICE BOX 14042 • ST. PETERSBURG, FLORIDA 33733-4042 • (813) 866-5777

A Florida Progress Company

- ACK
- AFA _____
- APP _____
- C&F _____
- CMU _____
- CTR *Oris*
- EAG _____
- LEG *1*
- LIN *Le*
- OPC _____
- RCH _____
- SEC *1*
- VAS _____
- OTH _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**ORIGINAL
FILE COPY**

In re: Territorial Disputes between)
Clay Electric Cooperative, Inc. and)
Florida Power Corporation in)
Alachua County)

~~Docket No.~~ 900064-EU

Filed: May 11, 1990

FLORIDA POWER CORPORATION

PREFILED DIRECT TESTIMONY

OF

WILLIAM R. PARK

**OFFICE OF THE GENERAL COUNSEL
FLORIDA POWER CORPORATION**

**PAMELA I. SMITH
ASSISTANT COUNSEL
POST OFFICE BOX 14042
ST. PETERSBURG, FLORIDA 33733
(813) 866-5777**

DOCUMENT NO.
4115-90
5-11-90

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

PREFILED DIRECT TESTIMONY

OF

WILLIAM R. PARK

Docket No. 900064-EU

1 **Q. Please state your name and business address.**

2 **A. My name is William R. Park and my business address is 729 E.**
3 **Wade, Trenton, Florida 32693.**

4

5 **Q. Where are you employed?**

6 **A. I am employed by Florida Power Corporation as a District**
7 **Engineering Representative for the Trenton District. I have**
8 **held that position since August 1979.**

9

10 **Q. What other positions have you held with Florida Power**
11 **Corporation?**

12 **A. I have worked for Florida Power Corporation since August 28,**
13 **1972 when I was hired in as a District Line Crew. I held that**
14 **position until May 7, 1973 when I was promoted to Engineering**
15 **Aid for Central Division Engineering, Ocala, in Ocala. I held**
16 **that position until July 18, 1977 when I was promoted to**
17 **Engineering Technician for Central Division Engineering,**

1 Ocala. On August 27, 1979 I was promoted to my present
2 position.

3

4 Q. What training or education have you had since high school?

5 A. I graduated from Lake Weir High School in Ocklawaha, Florida,
6 in 1969. I then attended Central Florida Community College
7 in Ocala, Florida, earning an Associate of Arts Degree in
8 Business Administration. I have completed several Company
9 sponsored courses, including Florida Power Corporation 4-
10 module District Engineering Training Program and I have also
11 completed the McGraw Edison Overcurrent Protection Course.

12

13 Q. Who is your supervisor?

14 A. Raul Roman.

15

16 Q. What is his position?

17 A. He is Distribution Engineering Supervisor for Central Division
18 Engineering in Ocala, Florida. He is a Registered
19 Professional Engineer whose license number is 30886.

20

21 Q. What is the purpose of your testimony?

22 A. As District Engineering Representative I am responsible for
23 engineering in the Trenton District. I am involved in
24 maintaining and rebuilding lines. I also plan and design new
25 construction.

1 Q. Are you familiar with the area in Alachua County that is known
2 as Marchant Meadows?

3 A. Yes, I am. It is the area of dispute in the petition Clay
4 filed with the Commission.

5

6 Q. How did you come to be familiar with this area?

7 A. In early November, 1989 I was contacted by Stacy Hall about
8 relocating a pole at Marchant Meadows. He was doing some
9 survey work of the subdivision for the Patten Corporation.
10 Then, on November 16, 1989 I was present at a meeting at
11 Marchant Meadows with Jim Troke who is District Manager for
12 the Trenton District of Florida Power, Terry Clayton of the
13 Patten Corporation and two other employees of the Patten
14 Corporation.

15

16 Q. Were you present during conversations between Mr. Troke and
17 Mr. Clayton at that meeting?

18 A. Yes, I was.

19

20 Q. Please describe the substance of those conversations.

21 A. Mr. Clayton asked about the relocation of a pole of Florida
22 Power's that was in the middle of a driveway on one of the
23 lots of the subdivision. Mr. Troke told him that we would
24 move the pole to another location and that there would be a
25 charge for doing that. The cost of moving that pole would

1 have been \$778 but we didn't have a quote at that time to tell
2 Mr. Clayton. I don't believe that he was quoted any price.
3 Mr. Clayton was told that if Florida Power provided electric
4 service to the subdivision, there would be no cost to the
5 developer for moving the pole because that cost would be
6 recovered from the revenues received from the customers in the
7 subdivision. However, if Florida Power did not serve the
8 customers, then we would have to recover the cost of moving
9 the pole at the time that it was relocated.

10

11 At that same meeting there was also discussion about how Mr.
12 Clayton wanted the rights-of-way cleared. After the clearing
13 was done, he wanted the cuttings to be removed and not just
14 left laying out there. Well, after Florida Power does the
15 clearing of the right-of-way, we chip what has been cut and
16 clean the right-of-way. Mr. Clayton was told that there would
17 be no charge for this service because that is just the way
18 Florida Power always does it.

19

20 Q. At that meeting on November 16, 1989 did Mr. Clayton ask
21 Florida Power to provide service to Marchant Meadows?

22 A. No, not at that time. Mr. Clayton wanted to know if there
23 would be a charge to the developer for Florida Power to
24 service the subdivision. I looked over the drawing that Mr.
25 Clayton had given us and told him that I thought we could

1 provide overhead service to Marchant Meadows at no charge to
2 the Patten Corporation. Mr. Clayton told us that he would get
3 back to us on this. I believe that he later sent a letter to
4 Mr. Troke formally requesting service from Florida Power.

5

6 Q. Have you developed a design to provide service to Marchant
7 Meadows?

8 A. Yes, I have.

9

10 Q. Please describe the design.

11 A. Florida Power's design for serving Marchant Meadows is based
12 on several assumptions at this time. First, we are assuming
13 that this type of subdivision would be purchased for use as
14 a homesite. The type home that we anticipate serving would
15 either be a double wide mobile home with three to four tons
16 of airconditioning, which is classified by Florida Power as
17 a "class three mobile home" or a 1500 to 1700 square foot
18 house with 3 to 3.5 tons of airconditioning which is
19 classified by Florida Power as a "class D home". In addition
20 to the size homes described above, we are anticipating that
21 they will be placed 300 to 400 feet back from the front lot
22 line.

23

24 Considering these assumptions, Florida Power's design would
25 bring primary distribution facilities along the back lot lines

1 or the inside perimeter of the triangle of Marchant Meadows
2 Phase I. A portion of the distribution mentioned above would
3 have as its source the existing line that Florida Power
4 constructed to serve the Patten Corporation sales office at
5 US 41 and US 27.

6
7 Florida Power's design would allow for a primary distribution
8 lateral down every other lot line, terminating at a
9 distribution transformer designed to serve two homes of the
10 type of I described earlier, the "class three mobile home" or
11 the "class D home". The rationale for this design is in
12 keeping with all applicable Florida Power Corporation
13 standards and PSC rules and regulations.

14
15 Florida Power Corporation's rules and regulations which are
16 currently on file with the Commission incorporate the voltage
17 standards of Rule 25-6.046 which require that the customer
18 should experience no more than 5% flicker due to
19 airconditioning startup, or a constant voltage drop of more
20 than 2%, as referenced in the District Engineering Manual in
21 Section 1, Subsection G, Page 1-G-10 and Section 2, Subsection
22 A, Page 2-A-11.

1 This design would also provide service to the eight interior
2 lots of Marchant Meadows Phase II. I have that design shown
3 in yellow highlighter on Exhibit WRP-1 of my testimony.

4
5 **Q. Would this design duplicate any facilities?**

6 **A. No. Mr. William Phillips' testimony seemed to suggest that**
7 **if Florida Power served Marchant Meadows, there would be**
8 **duplication of facilities but that isn't the case. Florida**
9 **Power would be required to construct primary distribution just**
10 **as Clay would.**

11
12 **Q. What is the cost of the facilities necessary to implement this**
13 **design?**

14 **A. The estimated cost of constructing those facilities is**
15 **\$83,499. A detailed breakout of that cost is shown on Exhibit**
16 **WRP-2 of my testimony. I realize that that is higher than the**
17 **estimate of Clay. I believe the reason for the difference is**
18 **that I assumed a home site around 400 feet back from the front**
19 **lot line and included primary lateral distribution down every**
20 **other lot line terminating at a distribution transformer**
21 **designed to serve two homes, while Clay's design seems to**
22 **place the home 90 feet from the back lot line. I think it is**
23 **more likely that the house would be placed towards the middle**
24 **of the tract rather than at the rear. If my assumption is**

1 wrong our cost would be lower. If Clay's assumed placement
2 is wrong, they will have additional costs.

3

4 **Q. Does your estimate include the cost of the facilities already**
5 **constructed to service the sales office?**

6 **A. Yes, it does.**

7

8 **Q. How will the facilities that were constructed to serve the**
9 **sales office contribute to the overall design for service to**
10 **the subdivision?**

11 **A. That existing line will be the source for a portion of the**
12 **distribution along the back lot lines that I described as my**
13 **design for servicing the subdivision.**

14

15 **Q. Will additional distribution facilities beyond those internal**
16 **to Marchant Meadows be required?**

17 **A. No.**

18

19 **Q. Will any expansion of existing facilities be required in order**
20 **to serve Marchant Meadows?**

21 **A. No.**

22

23 **Q. What substation serves Marchant Meadows?**

24 **A. Florida Power's Archer substation does.**

- 1 Q. What other areas does this substation serve?
- 2 A. It serves the Florida Power customers in the City of Archer,
3 the Town of Bronson and everything in between.
4
- 5 Q. What is the substation's capacity?
- 6 A. The Archer substation has two transformer banks. Bank no. 2
7 would serve Marchant Meadows. It has a capacity of 5 MW.
8 Bank no. 1 has a capacity of 3.8 MW. Each bank backs up the
9 other. The summer peak is 2800 KW. The winter peak is 2900
10 KW. The substation operates at 12,470 volts.
11
- 12 Q. What kind of extra load will service to Marchant Meadows place
13 on that substation?
- 14 A. Servicing the subdivision will not have any significant impact
15 upon the substation. No adjustments will be required to
16 assure adequate capacity.
17
- 18 Q. On Exhibit WRP-1 you have shown the design that you developed
19 for service to Marchant Meadows. What other information is
20 contained there?
- 21 A. The Florida Power facilities existing on the property are
22 shown in blue highlighter and Clay's distribution facilities
23 are shown in pink highlighter. There is one clarification I
24 must give regarding Clay's facilities. The way it is drawn,
25 it may appear that their line is not within the right-of-way

1 but rather that it is on private property. That is not the
2 case. The poles and line are actually within the right-of-
3 way of County Road 241 and US 41-27.

4
5 Q. Why do you think Florida Power should serve Marchant Meadows?

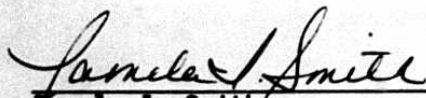
6 A. We have primary distribution on the east side of the property
7 and, unlike Clay, we wouldn't have to cross any roads or
8 highways to bring service to the subdivision. Clay serves
9 many customers in the Archer area but so does Florida Power.
10 We have sufficient capacity to adequately and reliably serve
11 Marchant Meadows without expanding any facilities, except for
12 those on the property itself. Florida Power has no agreement
13 with Clay that would prevent us from providing service there.
14 I know this area is rural in nature, but I don't think that
15 means that Clay is entitled to serve there. There are many
16 customers of Florida Power in rural areas. Also, the
17 customer, a developer of the property, asked Florida Power to
18 provide service.

19
20 Q. Does this conclude your testimony?

21 A. Yes, it does but I reserve the right to make additional
22 statements as other matters may arise.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prefiled Direct Testimony of William R. Park has been furnished to JOHN H. HASWELL, ESQUIRE, P.O. Box 23879, Gainesville, Florida 32602 and MICHAEL A. PALECKI, ESQUIRE, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32301 by regular U.S. mail this 10th day of May, 1990.



Pamela I. Smith
Assistant Counsel
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733
(813) 866-5777

Exhibit WRP-1 will be furnished as a Late Filed Exhibit

AUTOMATED CONSTRUCTION ESTIMATING

WORK ORDER COST ANALYSIS

PROJECT ID: K2590401EST A
 PROJECT LOCATION: US-41 N. ARCHER
 LINE EXTENSION COST : \$ 71,372
 ESTIMATED ANNUAL REV: \$ 0
 RATIO, NET COST TO REV: 00.0 TO 1

AMS SHORTHAND ID: K25129144516
 WORK ORDER NO.: 70640
 ENGINEER ID: WRP
 DATE: 05/09/90
 STORES LOADING RATE: 11.2

	LABOR -----	MATERIAL -----	TOTAL -----
CONSTRUCTION	21,305.45	37,627.93	58,933.38
MISCELLANEOUS COSTS			0.00
SUBTOTAL			58,933.38
TRUCK & LOADING (4.0% OF SUBTOTAL)			2,357.34
ENG. & SUPERVSN (15.0% OF SUBTOTAL PLUS ABOVE)			9,193.61
1. WORK ORDER ESTIMATE			70,484.33
2. CONTRIBUTION IN AID			(0.00)
3. WORK ORDER COST			70,484.33
4. TRANSFORMER COST		12,127.80	12,127.80
5. METER COST		0.00	0.00
6. O & M COST	887.72	0.00	887.72
7. REMOVAL COST	0.00		0.00
8. "OTHER" COST	0.00	0.00	0.00
9. RELATED COSTS			0.00
10. SERVICE COST	0.00		0.00
CREDITS:			
11. SALVAGE		(0.00)	(0.00)
12. REIMBURSEMENTS			(0.00)
13. NET PROJECT COST	22,193.17	49,755.73	83,499.85

BREAKDOWN OF REMOVAL COST BY PRIMARY ACCOUNT:

ACCOUNT NO. -----	PCT ---
364	---
365	---
366	---
367	---
368	---
369	---
370	---
373	---