

T

# HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

KATHLEEN BLIZZARD  
RICHARD W MOORE  
ANGELA R MORRISON  
MARIBEL N NICHOLSON  
DIANA M PARKER  
LAURA BOYD PEARCE  
GARY V PERKO  
MICHAEL P PETROVICH  
DAVID L POWELL  
DOUGLAS S ROBERTS  
CECELIA C SMITH

OF COUNSEL  
W ROBERT FOXES

**ORIGINAL  
FILE COPY**

CARLOS ALVAREZ  
JAMES S ALVES  
BRIAN H BIBEAU  
ELIZABETH C BOWMAN  
WILLIAM L BOYD, IV  
RICHARD S BRIGHTMAN  
PETER C CUNNINGHAM  
THOMAS M DeROSE  
WILLIAM H GREEN  
WADE L HOPPING  
FRANK E MATTHEWS  
RICHARD D MELSON  
WILLIAM D PRESTON  
CAROLYN S RAEPPEL  
GARY P SAMS  
ROBERT P SMITH, JR  
CHERYL G STUART

June 19, 1991

**BY HAND-DELIVERY**

Mr. Steve C. Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: Docket No. 910578-EI

Dear Mr. Tribble:

Enclosed for filing on behalf of Florida Power Corporation are the original and fifteen copies of FPC's Prehearing Statement.

Very truly yours,

*Cheryl G. Stuart*  
Cheryl G. Stuart

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 1 \_\_\_\_\_  
LIN 6 \_\_\_\_\_  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

CGS/cia  
Enclosure  
cc (w/encl.): Bob Elias  
Roland Floyd  
Pat Brady

/cla:TribbleFPC

RECEIVED & FILED

SS 6/19/91  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER 910578-EI  
06153 JUN 19 1991  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Power Corporation for Determination of Need for DeBary-Winter Springs 230 kV Transmission Line )  
Docket No. 910578-EI )  
Filed: June 19, 1991 )

PREHEARING STATEMENT

FLORIDA POWER CORPORATION (FPC), by and through its undersigned attorneys, files this prehearing statement.

A. Known Witnesses. FPC intends to present direct testimony of the following witnesses:

<u>Witness</u>	<u>Issues</u>	<u>Subject Area</u>
Michael B. Foley	All	Overview of FPC and the transmission line project.
John E. Odom	All	Technical basis of FPC's need for the transmission line project; FPC's analysis of the project and alternatives; project cost estimate.

FPC reserves the right to sponsor rebuttal testimony at the final hearing if necessary to respond to any testimony filed by the FSC staff or intervenors on June 28, 1991.

B. Known Exhibits. FPC will sponsor the following exhibits as part of its direct case:

<u>Exhibit No.</u>	<u>Witness</u>	<u>Description</u>
Exhibit ___ (MBF-1)	Foley	General location map of Project

DOCUMENT # 910578-EI  
06153 JUN 19 1991  
FSC RECORDS/REPORTING

Exhibit ____ (JEO-1)	Odom	Exhibit 1 to Petition to Determine Need
Exhibit ____ (JEO-2)	Odom	Map of Project Study Area
Exhibit ____ (JEO-3)	Odom	Load Flows Before and After Project
Exhibit ____ (JEO-4)	Odom	Comparison of Alternatives

FPC reserves the right to submit rebuttal exhibits at the final hearing if necessary to respond to any testimony filed by the PSC staff or intervenors on June 28, 1991.

In addition, FPC is in the process of identifying large-scale visual aids for use at the hearing. FPC will attempt to identify these visuals at the time of the prehearing conference.

C. Basic Position. FPC should be granted a determination of need for the DeBary-Winter Springs 230 kV Transmission Line (the "Project"). The Project is needed by December, 1995, to avoid a violation of single contingency transmission criteria related to the outage of the Sanford-North Longwood 230 kV circuit. The Project also avoids a violation of single contingency criteria by 1997 related to the outage of the North Longwood-Winter Springs 230 kV circuit. In addition, the Project addresses an existing situation in which the 230 kV transmission system in the Greater Orlando Area would overload for the loss of the

double-circuit segment of the Sanford-North Longwood and Sanford-Altamonte 230 kV circuits; improves the power transfer capability into the Greater Orlando Area load center; supports the future growth of the 230 kV and 69 kV transmission grid in the area; and overcomes transmission limitations at the DeBary site by supporting the installation of 450 MW of additional CT capacity at that site, thus providing FPC with the ability to add CTs on short notice to respond to planning contingencies.

D. - G. Issues. FPC submits positions on the following issues identified by the parties at the informal meeting held on June 12, 1991.

Issue 1: Is the proposed project needed for electric system reliability and integrity?

Yes. The Project is needed by December, 1995 to maintain single contingency reliability on FPC's transmission system. Unless the line is in-service by December, 1997, single contingency criteria will be violated for an additional contingency. (Foley, Odom)

Issue 2: Is the proposed project needed for abundant, low-cost electrical energy to assure the economic well-being of the citizens of this state?

Yes. The Project is needed to overcome transmission limitations at the DeBary generating site so that FPC can reliably disperse power from that site if additional CTs need to be added on short notice. The Project is also needed to minimize the impact on service to customers in a number of single and double contingency situations. (Foley, Odom)

Issue 3: Have the major transmission alternatives been adequately addressed?

Yes. FPC examined a number of alternatives that would address the need to maintain transmission reliability by protecting against various contingency situations, and that would overcome the DeBary site's transmission limitations. The only single-line alternative that would solve all of these problems is a longer, more expensive version of the same line. While there are several two-line projects that would address these needs, each of these combinations is more costly than the Project and is less desirable from a technical viewpoint. (Foley, Odom)

Issue 4: Have the specific situations which indicate a need for the project been adequately addressed?

Yes. The Project is needed to maintain and improve the reliability of service to FPC's customers in the Greater Orlando Area and to overcome transmission limitations at the DeBary generating site. Specifically, the Project will maintain single contingency reliability; will improve transmission reliability in the Greater Orlando Area by minimizing the customer impact of an outage of a double-circuit transmission line; will improve the power transfer capability on FPC's system by providing an additional transmission path from the electrical sources in the North at DeBary and FPL's Sanford Plant to load in the Greater Orlando Area in the South; will support future extension of the 230 kV and 69 kV transmission grid as the load continues to grow in the eastern portion of FPC's service territory; and will overcome transmission limitations at the DeBary generating site. (Foley, Odom)

Issue 5: Will there be adverse consequences to the electrical system if approval of the project is delayed or denied?

Yes. FPC's customers will face a risk of more frequent and more severe outages if approval of the Project is delayed or denied. (Foley, Odom)

Issue 6: Are the DeBary Plant in Volusia County and the Winter Springs Substation in Seminole County the appropriate starting and ending points for the Project?

Yes. (Foley, Odom)

Issue 7: Has FPC satisfied the informational requirements of Rule 25-22.076, F.A.C.?

Yes. (Foley, Odom)

H. Stipulations. FPC is not aware of any issues that have been stipulated.

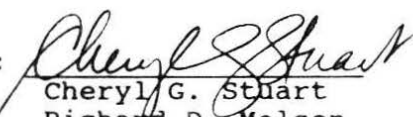
I. Pending Motions. FPC is not aware of any pending motions that require action by the Prehearing Officer.

J. Requirements of Order. FPC believes that this prehearing statement is fully responsive to the Commission's requirements for prehearing statements.

RESPECTFULLY SUBMITTED this 19th day of June, 1991.

HOPPING BOYD GREEN & SAMS

By:

  
Cheryl G. Stuart  
Richard D. Melson  
Carolyn S. Raeppe  
Post Office Box 6526  
Tallahassee, FL 32314  
(904) 222-7500

and

PAMELA I. SMITH  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, FL 33733

ATTORNEYS FOR FLORIDA POWER  
CORPORATION

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing  
Prehearing Statement was furnished by hand delivery this  
19th day of June, 1991, to:

Robert Elias  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

  
\_\_\_\_\_  
Attorney