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**BEFORE THE PUBLIC SERVICE COMMISSION**

**PREFILED REBUTTAL TESTIMONY OF**

**BRIAN DIETZ**

**ON BEHALF OF PANDA-KATHLEEN, L.P.**

**DOCKET NO. 950110-EI**

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY OF J. BRIAN DIETZ

ON BEHALF OF PANDA-KATHLEEN, L.P.

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Q. Have you reviewed the prefiled testimony of Robert Dolan in this case?

A. Yes.

Q. In Mr. Dolan's testimony, he states that Panda intends to build a plant that will produce 115 MW or more at all times. Is Mr. Dolan's testimony accurate?

A. No. The planned Panda-Kathleen plant would have a net generating capacity of 115 MW at ISO conditions -- 59 degrees fahrenheit and 15 percent humidity. The normal climate conditions in Florida are much less conducive than ISO for the operation of a power plant, and the net generating capacity of the plant under normal climate conditions will usually be less than 115 MW. The net generating capacity of the plant would exceed 115 MW only on rare occasions.

Q. Could the effect of climate conditions be alleviated through the use of chillers?

A. Chillers could be used to mitigate the effects of temperature on combustion turbines. However, the use

1 of chillers would require substantial amounts of  
2 electrical power or steam to operate. Accordingly,  
3 Panda would need to design and construct a plant with  
4 a net generating output substantially higher than 74.9  
5 MW in order to use chillers to mitigate the effects of  
6 temperature degradation and also meet Panda's  
7 Committed Capacity obligations at all times.

8  
9 Q. If the design of the Panda-Kathleen facility included  
10 the use of chillers, would that have led to the  
11 selection by Panda of different equipment from that  
12 which was chosen?

13 A. No. The need for extra energy to run the chillers,  
14 coupled with the other performance degradation factors  
15 discussed in my prefiled direct testimony, would have  
16 led to the selection of the same equipment that Panda  
17 actually did choose. In addition, the emissions  
18 requirements of 15 PPM of NOX would also lead to the  
19 use of the equipment that Panda selected.

20  
21 Q. Mr. Dolan has stated in his direct testimony, at page  
22 15, that all of the other standard offer contracts  
23 submitted to FPC during the 1991 open season involved  
24 facilities less than 75 MW. Is this statement  
25 correct?

1           A.    No.  I have reviewed the proposed plant configurations  
2                   of the other standard offer contracts proposals  
3                   submitted to FPC during the 1991 open season, and the  
4                   proposals of Noah IV, Destec, and Sparrow (as well as  
5                   Panda's proposal) would each have involved the  
6                   construction of a facility with a net generating  
7                   capacity in excess of 75 MW.

8

9           Q.    Does this conclude your testimony?

10          A.    Yes, it does.

11

J. Brian Dietz

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7 STATE OF TEXAS )

8 )  
9 COUNTY OF Dallas )

SS: 467-54-5763

10  
11 The foregoing instrument was acknowledged before me  
12 this 14th day of January, 1996 by J. Brian Dietz. He is  
13 personally known me, and did take an oath.  
14

15  
16  
17 [NOTARIAL SEAL]

18 Notary: Theresa M. Bone

19 Print Name: THERESIA M. BONE

Notary Public, State of Texas

My commission expires: 6-23-97

