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September 22, 1997

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

RE: Docket No. 970512

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies each of the Rebuttal Testimony of Messrs. Hood, Noble and Brill on behalf of Florida Power & Light Company. Please file these documents in the captioned docket.

ACK  A copy of this letter is enclosed. Please mark it to indicate that the originals were filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

AFA

APP

CAF

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LIN  MKL/ths

OPC  Enclosures

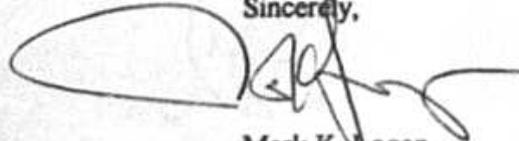
RCH

SEC  cc: All parties of record

WAS

OTH

Sincerely,



Mark K. Logan

Hood - 09647-97  
Noble - 09648-97  
Brill - 09649-97

RECEIVED & FILED

FPSC-BUREAU OF RECORDS



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BEFORE THE PUBLIC SERVICE COMMISSION  
FLORIDA POWER & LIGHT COMPANY  
REBUTTAL TESTIMONY OF ROBERT A. HOOD  
DOCKET NO. 970512-EU  
SEPTEMBER 22, 1997

Q) CAN YOU PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.

A) My name is Robert A. Hood.

Q) MR. HOOD, WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A) To rebut certain aspects of Mr. Dyal's and Mr. Barrow's testimony with respect to FPL's proposed provision of service to River City Plastics as well as that proposed by Clay.

Q) In Mr. Dyal's testimony, page 5, lines 18-20, Mr. Dyal states that "The service offered by Florida Power & Light is, for lack of a better way of saying it, standard three phase service just like its other customer, Florida Wire & Cable is receiving". Do you agree, that standard three

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FPSC-RECORDS/REPORTING

1 phase service is what FPL will provide to RCP?

2  
3 A) No. In fact, due to RCP's unique reliability requirements,  
4 FPL would provide a much different type of service. FPL  
5 would provide two three-phase services, fed from two  
6 separate power transformers. One service would be the  
7 primary service and the other would be the backup (dual)  
8 service. These two services would be connected by a  
9 throwover switch device, which would automatically sense an  
10 interruption and transfer RCP's load to the backup service.  
11 The switch will accomplish this transfer in 8.5 cycles or  
12 .14 seconds. By Mr. Dyal's testimony, page 6, lines 8 & 9,  
13 "An outage to RCP is any interruption of electricity of over  
14 12 - 18 cycles". Therefore, RCP would not experience an  
15 outage during this transfer. In addition, the transfer back  
16 from the backup service to the primary service would be in  
17 parallel and no interruption would occur.

18  
19 Q) Mr. Barrow provided data to the consultant, Post, Buckley,  
20 Schuh & Jernigan, reviewing RCP'S service requirements. In  
21 HDB-3, Exhibit "A", Mr. Barrow states, "One service to RCP  
22 would be from an existing substation approximately 2 miles  
23 away". Do you agree with this distance and that RCP is  
24 approximately 2 miles from Clay Electric's Sanderson

1 Substation?

2  
3 A) No. RCP is approximately twice that distance from Sanderson  
4 Substation. Mr. Dyal, in his testimony, page 6, line 2,  
5 states "3.5 miles" and his Exhibit #2 shows a total distance  
6 of 3.75 miles. The distance from Clay's Sanderson  
7 Substation is 3.75 miles.

8  
9 Q) On page 3 of Mr. Dyal's Direct Testimony, from line 20 to  
10 page 4 line 2, Mr. Dyal states the system improvements  
11 required to provide service to River City Plastics (RCP).  
12 Do you agree that these system improvements will provide for  
13 RCP's needs?

14  
15 A) According to data provided by Mr. Dyal, the step-up  
16 transformer in Phase two will be overloaded with RCP's  
17 initial load.

	Proposed RCP KVA Existing KVA	Proposed RCP KVA startup load	load with 20% growth
Transformer rating	3750	4688	4688
Transformer loading	<u>2630</u>	<u>4983*</u>	<u>5980</u>

25  
26 Over/Under Capacity 1120 (295) (1192)

27 \* (2630 KVA + 2353 KVA (2000 KW/85% power factor) = 4983 KVA)

1  
2 The step-up transformer would be operating at 106% of  
3 capacity with RCP's current load requirements. With RCP's  
4 load growth, Clay Electric will be required to increase the  
5 capacity of this step-up transformer. In addition, this  
6 does not address any increase in load from other customers  
7 in the area. Ginger Barber with the Baker County Chamber  
8 of Commerce has told FPL that as soon as the road is in and  
9 RCP is up and operating, they will begin to actively market  
10 the other two parcels in this industrial park. This could  
11 also result in loading problems for Clay's Sanderson  
12 Substation's power transformer (Phase one of the system  
13 improvements). FPL knows its existing Wiremill Substation  
14 capacity is ample to meet all of RCP's needs and the needs  
15 of the surrounding area. Also FPL believes Clay Electric's  
16 substation is insufficient to meet RCP's initial load  
17 requirements, RCP's growth load requirements and the  
18 surrounding area's growth load requirements without costly  
19 additional system improvements.  
20

21 Q) After reviewing Clay's testimony and documents in this  
22 dispute, do you have any concluding remarks?  
23

24 A) Yes. The decision for who should be awarded this customer

1 should be based on the Commission's usual criteria in  
2 resolving territorial disputes, and that is Rule 25-06.0441.  
3 This rule addresses the capability of each utility, the  
4 nature of the area and foreseeable future requirements as  
5 well as the cost of each utility to provide the service. I  
6 is clear that FPL should be awarded this customer for the  
7 following reasons:

- 8 1) FPL has the substation capacity to provide reliable  
9 electric service with its existing facilities to not  
10 only service River City Plastics but to serve the two  
11 additional industrial customers planned for the  
12 industrial park.
- 13 2) The only new facilities required would be the  
14 distribution facilities extended to serve this customer  
15 and the addition of regulators in the substation.
- 16 3) FPL's Wiremill Substation is situated adjacent to this  
17 industrial park and also serves the community of  
18 Sanderson within 1/2 mile of the disputed area.
- 19 4) The cost for FPL to serve this customer is  
20 substantially lower, \$205,431 (including the substation  
21 improvements) compared to Clay Electric's stated costs  
22 of \$1,198,000.
- 23 5) The customer's preference should not be considered as  
24 factors are not substantially equal.
- 25 6) The effect on FPL's ratepayers would be higher costs

1 and reduced utilization of its existing Wiremill  
2 Substation.

3 7) Duplication of facilities would be avoided, including  
4 duplicating substation capacity.

5 8) FPL would provide this customer with extremely reliable  
6 electric service. A utility can spend any amount of  
7 money to ensure the customer the very highest level of  
8 reliability; however, the impact of these costs on the  
9 other utility members/customers should be considered as  
10 well.

11

12 Q) Does this conclude your rebuttal testimony?

13 A) Yes.