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ORIGINAL

REPLY TO

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August 25, 1998

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Ms. Blanca Bayo
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 980802-EM

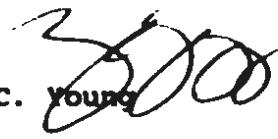
Dear Ms. Bayo:

Enclosed find original and 15 copies of Prehearing Statement in the above-captioned docket number. Also, enclosed is a diskette.

Please file this Prehearing Statement in the above docket.

Thank you.

Sincerely,


Roy C. Young

RCY:swp
Enclosures

- ACK _____
- AFA 4 _____
- APP _____ swp\kissimmee\bayo.825
- CAF _____
- CMU _____
- CTR _____
- EAG (circled) _____
- LEG 1 _____
- LIN 3 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____

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10:15

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition to determine)
need for Cane Island Power Park)
Unit 3 and related facility in Osceola)
County by Kissimmee Utility)
Authority and Florida Municipal)
Power Agency)
/

DOCKET NO. 980802-EM
FILED: August 25, 1998

Prehearing Statement
Kissimmee Utility Authority
Florida Municipal Power Agency

Pursuant to Order No. PSC-98-1007-PCO-EM dated July 24, 1998 signed by J. Terry Deason, Commissioner and Prehearing Officer, the following information is submitted in the sequence requested.

Order of Witnesses

<u>Witness</u>	<u>Appearing for</u>	<u>Issue#</u>
<u>Direct</u>		
James Welsh	KUA	4, 9, 16, 18, 19, 23, 24
Claude L'Engle	FMPA	5, 9, 16, 18, 20, 23, 24
Myron Rollins	KUA / FMPA	7, 13, 14, 18, 23, 24
Dick Van Meter	KUA / FMPA	10, 23, 24
Jim Dowden	KUA / FMPA	11, 12, 23, 24
Steve Schwieterman	KUA / FMPA	21, 23, 24
Bruce Knodel	KUA / FMPA	17, 23, 24
Scott Carpenter	KUA / FMPA	2, 22, 23, 24
A.K. Sharma	KUA	11, 12, 16, 19, 23, 24
Robert Miller	KUA	1, 2, 4, 6, 7, 8, 9, 15, 16, 23, 24
Bob Williams	FMPA	7, 9, 16, 18, 19, 23, 24
Rick Casey	FMPA	1, 3, 5, 6, 7, 8, 11, 12, 16, 23, 24
Dan Runyan	FMPA	9, 15, 20, 23, 24

FILED

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Exhibit List

<u>Witness</u> <u>Direct:</u>	<u>Proffered By</u>	<u>I.D. No.</u>	<u>Description</u>
Petitioner	KUA/FMPA KUA/FMPA	KUA-1 KUA-2	Need for Power Application. Table of Contents of Need for Power Application showing witnesses sponsoring subsections.
Myron Rollins	KUA/FMPA	KUA-1	Section 1A.1.0, Section 1A.2.1 through 1A.2.9, Section 1A.4.0, Section 1A.6.0, Section 1A.8.0, Section 1B.1.0, Section 1B.3.0, Section 1B.8.0 through 1B.8.4, Section 1B.15.0, Section 1C.1.0, Section 1C.15.0.
Dick Van Meter	KUA/FMPA	KUA-1	Section 1A.3.2, Section 1A.3.3, Section 1B.4.2, Section 1B.4.3, Section 1C.4.2, and Section 1C.4.3.
		RKV-1	Corrections to proffered sections.
Steve Schwieterman	KUA/FMPA SLS-1 SLS-2	KUA-1	Section 1A.2.9. Corrections to proffered sections. Transmission impact study.
Bruce Knodel	KUA/FMPA	KUA-1	Section 1A.5.0.
Scott Carpenter	KUA/FMPA	KUA-1	Section 1A.3.1, Section 1B.4.1, Section 1B.5.4, Section 1B.14.0,

			and Section 1C.4.1.
		SDC-1	CPI-U Historical changes
		SDC-2	Historical Municipal Bond Interest Rates
A.K. Sharma	KUA	KUA-1	Section 1B.2.0.
		AKS-1	Corrections to proffered sections.
		AKS-2	RFP Responses.
		AKS-3	Summary of Stage I Evaluation.
		AKS-4	Proposals Evaluated at Stage II.
		AKS-5	Performance of Stage II Bidders 7-Year Cumulative Present Worth.
		AKS-6	Performance of Stage II Bidders 15-Year Cumulative Present Worth.
		AKS-7	Performance of Stage II Bidders 20-Year Cumulative Present Worth.
		AKS-8	Non-Price Evaluation Results.
Robert Miller	KUA	KUA-I	Section 1A.7.0, Section 1B.5.1-5.3 and 1B.5.5-5.6, Section 1B.6.0, Section 1B.8.5, Section 1B.9.0, Section 1B.10.0, Section 1B.11.0, Section 1B.12.0, Section 1B.13.0, Section 1B.16.0.
		RGM-1	Corrections to proffered sections.
		RGM-2	Summary of KUA Load Forecast.
		RGM-3	Base Case Expansion Plan.
Bob Williams	FMPA	KUA-1	
Rick Casey	FMPA	KUA-1	Section 1C.2.0, Section 1C.5.0, Section 1C.6.0, Section 1C.7.0, Section 1C.12.0, and Section 1C.16.0.
		RLC-1	Corrections to proffered sections.
		RLC-2	FMPA's 1997 RFP.
		RLC-3	FMPA Capacity by Fuel Type.
		RLC-4	Summary of FMPA Load Forecast.

Dan Runyan

FMPA

KUA-1

Section 1C.3.0, Section
1C.8.0, Section 1C.9.0,
Section 1C.10.0, Section
1C.11.0, Section 1C.13.0,
and Section 1C.14.0.

DJR-1

Corrections to proffered sections.

Basic Position
Kissimmee Utility Authority

Kissimmee Utility Authority (KUA) and Florida Municipal Power Agency (FMPA) are jointly seeking a determination of need for Cane Island Unit 3, a nominal 250 MW gas-fired 1x1 F class combined cycle unit with a projected in-service date of June 1, 2001. The unit will be located at the existing Cane Island Power Park in Osceola County, Florida and will be a joint ownership project with 50 percent ownership for KUA and 50 percent for FMPA. It is KUA's basic position that the joint petition for determination of need for Cane Island Unit 3 should be granted.

KUA's need for Cane Island Unit 3 is evident by the high growth rate that continues to occur for its service territory, the addition of the World Expo Center, and the potential for reserve margins to fall well below the established 15 percent minimum level. KUA's system has historically and continues to be one of the fastest growing systems in the U.S. Over the last ten years, KUA's net energy for load, summer peak demand, and winter peak demand have increased at an average annual rate of 6.5, 6.0, 4.0 percent respectively. The World Expo Center will require a significant amount of power to serve its anticipated loads. KUA has attempted to address the direct loads associated with the Expo Center, but has not projected indirect loads due to additional customers and jobs. Even without these indirect loads projected, KUA will need capacity by 2001 to meet its established 15 percent reserve margin criteria. KUA uses a 15 percent reserve margin criteria which is consistent with general utility practice and the requirement of the Florida Public Service Commission.

Cane Island Unit 3 was identified as the least-cost alternative by KUA as part of the planning process for long-term power supply. The planning process considered several factors including an in-depth test of the marketplace for purchase power

opportunities, potential conservation and demand-side alternatives, and extensive analysis of generation alternatives. A thorough test of the marketplace was conducted with the request for proposals (RFP) issued in May of 1997. No feasible purchase power opportunities were identified that were more cost-effective than the proposed combined cycle. Approximately 80 conservation and demand-side programs were evaluated using the Florida Integrated Resource Evaluator (FIRE) model against the self-build alternative. None of the conservation or demand-side programs were cost-effective options compared to the proposed combined cycle. Through the base case analysis and several sensitivities, the F class 1x1 combined cycle was determined to be the most cost effective option for KUA's system with a 50 percent joint ownership.

Cane Island Unit 3 will minimize environmental impacts on several levels, by utilizing an existing site, minimizing ground water usage, and controlling emission levels. The existing Cane Island site provides existing resources capable of accommodating the new unit and will significantly minimize environmental impacts. Cane Island Unit 3 will minimize the usage of ground water usage by using treated sewage effluent for cooling water makeup. The unit will utilize dry low NO_x burners to meet emission requirements.

The F class technology used by Cane Island Unit 3 has been extensively proven in commercial operation and will provide reliable economic power to KUA and Peninsular Florida.

Delaying the proposed unit would require KUA to implement more expensive alternatives to maintain adequate reliability, and would impose increased costs on KUA ratepayers.

Florida Municipal Power Agency

Florida Municipal Power Agency (FMPA) and Kissimmee Utility Authority(KUA) are jointly seeking a determination of need for Cane Island Unit 3, a 250 MW gas-fired F class combined cycle unit with a projected in-service date of June 1, 2001. The unit will be located at the existing Cane Island Power Park in Osceola County, Florida. Cane Island Unit 3 will be a joint ownership project with 50 percent ownership for FMPA and 50 percent for KUA. It is FMPA's basic position that the joint petition for determination of need for Cane Island Unit 3 should be granted.

FMPA is committed to meet its All-Requirements customers' needs and identify projects that will provide economical power to Peninsular Florida residents through the combination of demand-side and supply-side resources. FMPA's mission to provide low cost power while striving to meet or exceed environmental regulations will continue with the Cane Island Unit 3 project. Cane Island Unit 3 will burn natural gas as the primary fuel with dry low NO_x burners providing a very clean burning, high efficiency unit.

Load growth for FMPA's All-Requirements Project is projected to continue with annual average growth of 2.1, 1.9, 2.4 percent for net energy for load, summer peak demand, and winter peak demand, respectively over the 20 year planning period from 1998 to 2017. With reserve margins for FMPA projected to fall well below the minimum level in 2001, FMPA must add resources to meet the capacity deficit. FMPA evaluated appropriate alternatives to Cane Island Unit 3 to determine if they are lower in cumulative present worth revenue requirements. Even with a low growth forecast, FMPA would be required to find generation resources to meet its members needs for the year 2001.

FMPA uses an 18 percent reserve margin criteria which is slightly more conservative than a 15 percent criteria. Even with a 15 percent criteria, FMPA needs to add additional capacity in 2001. FMPA believes that Cane Island Unit 3 represents the minimal cost and performance risk to its members due to the proven performance of the "F" class technology and its high efficiency. Cane Island Unit 3 represents FMPA's least cost alternative that has been demonstrated through exhaustive evaluations as well as a thorough test of the marketplace through a request for proposal (RFP) process.

The demonstrated performance of the F class technology will provide reliable, economic power to FMPA's All-Requirements Project and Peninsular Florida. Delays to the installation of Cane Island Unit 3 will result in decreased reliability to the All-Requirements project and increased costs.

Issues and Positions

ISSUE 1: Are the reliability criteria used by the Kissimmee Utility Authority and Florida Municipal Power Agency to determine the need for Cane Island

3 reasonable?

Position:

KUA: Yes, KUA has adopted the 15 percent minimum reserve margin criteria for planning purposes which is consistent with Florida Public Service Commission policy and industry practice.

FMPA: Yes, FMPA has adopted an 18 percent planning reserve margin criteria which is slightly more conservative than the 15 percent reserve margin criteria required by the Florida Public Service Commission and consistent with industry practice. Capacity is required by FMPA in 2001 even with a 15 percent reserve margin criteria.

ISSUE 2: Is the load forecast used by the Kissimmee Utility Authority to determine the need for its 50% (125 MW) share of Cane Island 3 reasonable?

Position:

KUA: Yes, KUA's load forecasts apply industry standard practices and represents KUA's expert opinion on the potential for load growth within their service territory. KUA has attempted to bracket the potential load growth with a high and low load growth scenario.

FMPA: Yes it is.

ISSUE 3: Is the load forecasts used by the Florida Municipal Power Agency to determine the need for its 50% (125 MW) share of Cane Island 3 reasonable?

Position:

KUA: Yes it is.

FMPA: Yes, FMPA's load forecasts apply industry standard practices and

represents FMPA's expert opinion on the potential for load growth for their members of the All-Requirements Project. FMPA has attempted to bracket the potential load growth with a high and low load growth scenario.

Issue 4: Does the Kissimmee Utility Authority have a need for 125 MW of additional capacity in the year 2001?

Position:

KUA: Yes, KUA has a need for capacity in 2001 to meet reserve margin criteria. While KUA does not require the full 125 MW in 2001, Cane Island Unit 3 represents the least-cost option for KUA and will allow itself to grow into the capacity over a short period of time.

FMPA: Yes, they do.

Issue 5: Does the Florida Municipal Power Agency have a need for 125 MW of additional capacity in the year 2001?

Position:

KUA: Yes, they do.

FMPA: Yes, FMPA has demonstrated need for the 125 MW from Cane Island 3 in 2001. FMPA has demonstrated this need under the base case planning assumptions and multiple sensitivity analyses. In addition to Cane Island 3, FMPA will need to purchase additional capacity to maintain the 18 percent reserve criteria.

Issue 6: Is the timing of the Kissimmee Utility Authority and Florida Municipal Power Agency's joint petition to determine the need for Cane Island Unit 3 appropriate?

Position:

KUA: Yes, the timing of the joint petition is critical for Cane Island Unit 3 for commercial operation by June 1, 2001. KUA has demonstrated the need for power in 2001 to maintain reserve margins above minimum planning criteria.

FMPA: Yes, the timing of the joint petition is critical for Cane Island Unit 3 for commercial operation by June 1, 2001. FMPA has demonstrated the need for power in 2001 to maintain reserve margins above minimum planning criteria.

Issue 7: Will the proposed Cane Island Unit 3 contribute to the electric system reliability and integrity of the Kissimmee Utility Authority, Florida Municipal Power Agency, and Peninsular Florida?

Position:

KUA: Yes, KUA's system will risk potential system reliability and integrity problems if the proposed Cane Island Unit 3 is not constructed. The proposed Cane Island Unit 3 will use reliable commercially demonstrated technology. The use of No. 2 oil as backup fuel provides additional reliability for KUA and Peninsular Florida.

FMPA: Yes, FMPA must have a reliable source of generation in 2001 to maintain system integrity for its members and the use of reliable commercially demonstrated F class technology provides that. The use of No. 2 oil as backup fuel provides additional reliability for FMPA and Peninsular Florida.

Issue 8: Will the proposed Cane Island Unit 3 contribute to fuel diversity for the Kissimmee Utility Authority, Florida Municipal Power Agency, and Peninsular Florida?

Position:

KUA: Yes, the addition of the dual fueled Cane Island Unit 3 would increase KUA's natural gas generation. With natural gas prices projected to remain low and ample supplies projected, it is apparent that natural gas is the optimal fuel choice.

FMPA: Yes, the addition of the dual fueled Cane Island Unit 3 would increase the All-Requirements Project's natural gas generation to 21 percent of generation resources and provide No. 2 oil as a backup fuel. The use of domestically produced natural gas will reduce dependency upon foreign oil overall.

Issue 9: Are there any adverse consequences to the customers of the Kissimmee Utility Authority and Florida Municipal Power Agency if Cane Island Unit 3 is not completed in the time frame requested?

Position:

KUA: Yes, KUA's system will fall well below specified 15 percent minimum reserve margin if Cane Island Unit 3 is not completed on time, which would result in decreased reliability and increased costs to KUA's customers.

FMPA: Yes, All-Requirements customers would suffer through inadequate power supply or potentially very high cost electricity in the event Cane Island Unit 3 is not completed in the time frame requested. All-Requirements System costs would increase \$1.8 million with a one year delay in Cane Island Unit 3.

Issue 10: Is the fuel price forecast jointly used by the Kissimmee Utility Authority and Florida Municipal Power Agency reasonable?

Position:

KUA: Yes, the fuel price projections are generally consistent with other projections and industry acknowledged forecasts.

FMPA: Yes, the fuel price projections are generally consistent with other projections and industry acknowledged forecasts.

Issue 11: Have the Kissimmee Utility Authority and Florida Municipal Power Agency provided adequate assurances regarding available primary and secondary fuel to serve Cane Island Unit 3 on a long term and short term basis at a reasonable cost?

Position:

KUA: Yes, KUA is able to purchase adequate supplies of natural gas at reasonable prices through their participation in Florida Gas Utility. The installation of a 1 million gallon No. 2 oil storage tank at the Cane Island Power Park will increase storage capability to 2 million gallons.

FMPA: Yes, FMPA is able to purchase adequate supplies of natural gas at reasonable prices through their participation in Florida Gas Utility. The installation of a 1 million gallon No. 2 oil storage tank at the Cane Island Power Park will increase storage capability to 2 million gallons.

Issue 12: Have the Kissimmee Utility Authority and Florida Municipal Power Agency provided appropriate assurances that sufficient natural gas pipeline capacity will be available to transport natural gas to the Cane Island Unit 3?

Position:

KUA: Yes, KUA has conducted several measures to ensure sufficient natural gas pipeline capacity. The measures include: utilizing existing pipeline capacity, discussions with FGT about the project, transportation requests through the open season of FGT, and retained membership in FGU.

FMPA: Yes, FMPA has conducted several measures to ensure sufficient natural gas pipeline capacity. The measures include: utilizing existing pipeline capacity, discussions with FGT about the project, transportation requests through the open season of FGT, and retained membership in FGU.

Issue 13: Were the costs of environmental compliance adequately considered by the Kissimmee Utility Authority and Florida Municipal Power Agency when they evaluated their future generation needs?

Position:

KUA: Yes, the cost estimate for Cane Island Unit 3 contains the estimated cost for environmental compliance. Cane Island Unit 3 will use dry low NO_x combustors to Control NO_x emissions. In addition, a 6.4 percent contingency is included in the capital cost estimate.

FMPA: Yes, the cost estimate for Cane Island Unit 3 contains the estimated cost for environmental compliance. Cane Island Unit 3 will use dry low NO_x combustors to Control NO_x emissions. In addition, a 6.4 percent contingency is included in the capital cost estimate.

Issue 14: Have the Kissimmee Utility Authority and Florida Municipal Power Agency provided sufficient information on the site, design, and engineering characteristics of Cane Island Unit 3 to evaluate their proposal?

Position:

KUA: Yes, costs and performance characteristics including information on the site, design, and engineering characteristics were provided for the Cane Island Unit 3 addition. This included detailed drawings, cost estimates, and operating performance.

FMPA: Yes, costs and performance characteristics including information on the site, design, and engineering characteristics were provided for the Cane Island Unit 3 addition. This included detailed drawings, cost estimates, and operating performance.

Issue 15: Have the Kissimmee Utility Authority and Florida Municipal Power Agency adequately explored alternative generating technologies to Cane Island Unit 3?

Position:

KUA: Yes, KUA studied several generating technologies under base case and sensitivity analysis using the EGEAS optimized generation expansion program. EGEAS evaluates all combinations of generating units provided to develop the least-cost expansion plan.

FMPA: Yes, FMPA reviewed and evaluated several generating technologies to arrive at the least-cost cumulative present worth plan. Detailed production cost modeling was conducted to determine the least-cost plan using the EGEAS software.

Issue 16: Have the Kissimmee Utility Authority and Florida Municipal Power Agency adequately explored and evaluated the availability of purchase power options, such as firm capacity purchases from other electric utilities or non-utility generators?

Position:

KUA: Yes, KUA has conducted a recent RFP process to identify potential power supply alternatives to the proposed Cane Island Unit 3 combined cycle. No feasible alternatives were lower in cost than Cane Island Unit 3.

FMPA: Yes, FMPA has conducted a recent RFP process to identify potential power supply alternatives to the proposed Cane Island 3 combined cycle. FMPA identified short and medium term proposals that we are considering, but no long-term feasible proposals were identified that were lower in cost than Cane Island Unit 3.

Issue 17: Are there any conservation measures, including self-service generation, taken by or reasonably available to the Kissimmee Utility Authority and Florida Municipal Power Agency which might mitigate the need for all or part of Cane Island Unit 3?

Position:

KUA: No, KUA has identified no conservation measures or self-service

generation alternatives that will be more cost effective than Cane Island Unit 3. This is verified by the numerous alternatives evaluated in the FIRE model which resulted in no cost effective options.

FMPA: No, FMPA identified no cost effective conservation or self-service generation alternatives that will be more cost effective than Cane Island Unit 3 including numerous alternatives evaluated in the FIRE model.

Issue 18: Is the addition of Cane Island Unit 3 expected to contribute to the provision of adequate electricity at a reasonable cost for the Kissimmee Utility Authority and Florida Municipal Power Agency?

Position:

KUA: Yes, Cane Island Unit 3 will provide reliable generation with very reasonable power costs for KUA. The unit will be very economical due to its high performance and low cost fuel.

FMPA: Yes, Cane Island Unit 3 will add capacity to meet FMPA's need in 2001 to maintain system reserve margins and increase reliability. Cane Island Unit 3 represents the industry's most efficient demonstrated technology and offers a reliable clean burning fuel source.

Issue 19: Has the Kissimmee Utility Authority demonstrated that the addition of its 50% (125 MW) share of Cane Island Unit 3 is the most cost-effective alternative available?

Position:

KUA: Yes, KUA conducted base case and sensitivities analyses using EGEAS to insure Cane Island 3 is the most cost-effective alternative available. In addition, KUA conducted an extensive request for proposals process which requested purchase power offers. None of the feasible purchase power offers were more cost-effective than Cane Island 3.

FMPA: Yes.

Issue 20: Has the Florida Municipal Power Agency demonstrated that the addition of its 50% (125 MW) share of Cane Island Unit 3 is the most cost-effective alternative available?

Position:

KUA: Yes.

FMPA: Yes, FMPA has demonstrated that the addition of its 50 percent share of Cane Island Unit 3 is the most cost-effective alternative. The analysis considered conservation programs, demand-side alternatives, power purchase options, and numerous generating alternatives.

Issue 21: What associated facilities and transmission improvements are required in conjunction with the construction of Cane Island Unit 3, and were their costs adequately considered?

Position:

KUA: A new transmission line from the Cane Island switchyard to the Intercession City switchyard will be required to provide system reliability. The estimated cost for the line was included in all economic evaluations.

FMPA: Detailed transmission studies indicate overload conditions exist if an outage occurs on the Cane Island - Taft 230 kV line. A new line from Cane Island to Intercession City provides a reliable and most cost effective option. The costs of the transmission line were included in all evaluations.

Issue 22: Are the economic and financial assumptions used by the Kissimmee Utility Authority and Florida Municipal Power Agency in their integrated resource planning studies reasonable?

Position:

KUA: Yes, the economical and financial assumptions are reasonable for KUA's system.

FMPA: Yes, the economical and financial assumptions are reasonable for FMPA's system.

Issue 23: Based on the resolution of the previous factual and legal issues, should the joint petition by the Kissimmee Utility Authority and the Florida Municipal Power Agency for determination of need for Cane Island Unit 3 be granted?

Position:

KUA: Yes. Cane Island Unit 3 is KUA's least cost alternative will provide economical reliable power, and there are no cost effective conservation measures available which will eliminate the need for Cane Island Unit 3.

FMPA: Yes. Cane Island Unit 3 is FMPA's least cost alternative will provide economical reliable power, and there are no cost effective conservation measures available which will eliminate the need for Cane Island Unit 3.

Issue 24: Should this docket be closed?

Position:

KUA: No position at this time.

FMPA: No position at this time.

Questions of Law
Policy Questions
Stipulated Issues
Pending Motions

No pending questions of law, or policy questions, or stipulated issues, or motions have

been identified at this juncture by Kissimmee Utility Authority or Florida Municipal Power Agency.

Dated this 25th day of August, 1998.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of KUA and FMPA's Preliminary List of Issues has been furnished by U.S. Mail, this 25th day of August, 1998, to William Cochran Keating, IV, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Gerald L. Gunter Building, Room 370, Tallahassee, Florida 32399-0850.

