

REVIEW OF ELECTRIC UTILITY  
1998 TEN-YEAR SITE PLANS

VOLUME 2:  
WRITTEN COMMENTS FROM  
REVIEW AGENCIES AND  
OTHER INTERESTED PARTIES

December 31, 1998

FLORIDA PUBLIC SERVICE COMMISSION

Division of Electric and Gas  
Division of Auditing and Financial Analysis

DOCUMENT NO. DATE

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FPSC - COMMISSION CLERK

**STATE AGENCIES**

Florida Department of Community Affairs (DCA) ..... 3

Florida Department of Environmental Protection (DEP) ..... 19

**INTERESTED PARTIES**

Consumer and Environmental Groups (led by the American Planning Association) ... 21

Florida Industrial Power Users Group (FIPUG) ..... 23

Legal Environmental Assistance Foundation (LEAF) ..... 33

U.S. Generating Company ..... 37

**REGIONAL PLANNING COUNCILS**

Apalachee Regional Planning Council ..... 39

Central Florida Regional Planning Council ..... 41

East Central Florida Regional Planning Council ..... 44

North Central Florida Regional Planning Council ..... 46

Northeast Florida Regional Planning Council ..... 50

South Florida Regional Planning Council ..... 54

Southwest Florida Regional Planning Council ..... 58

Tampa Bay Regional Planning Council ..... 62

Treasure Coast Regional Planning Council ..... 78

West Florida Regional Planning Council ..... 89

Withlacoochee Regional Planning Council ..... 95

**DOCUMENT NO.    DATE**

14734-98    12/31/1998

**FPSC - COMMISSION CLERK**

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## WATER MANAGEMENT DISTRICTS

South Florida Water Management District .....	98
Southwest Florida Water Management District .....	99

## COUNTIES

Bay County .....	101
Broward County .....	102
Duval County (City of Jacksonville) .....	104
Hardee County .....	105
Manatee County .....	106
Polk County .....	108
Volusia County .....	109

---



STATE OF FLORIDA

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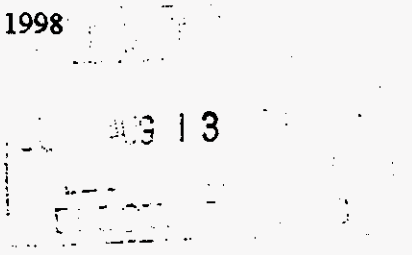
"Helping Floridians create safe, vibrant, sustainable communities"

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11 August 1998

Joseph D. Jenkins
Division of Electric and Gas
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Dear Mr. Jenkins:

At your request we have reviewed the 1998 10-year site plans of the electric utilities. The focus of our review was the consistency of the 10-year site plan with applicable local government comprehensive plans and the compatibility of any proposed power plant sites with adjacent land uses. The attached comments are provided in the form of site analyses of proposed power plant sites in the 10-year site plans from the following utilities: Florida Municipal Power Agency (FMFA), Florida Power Corporation, Florida Power & Light Company, Gulf Power Company, Jacksonville Electric Authority (JEA), Kissimmee Utility Authority (KUA), Lakeland Electric & Water (Lakeland), Seminole Electric Cooperative (SEC), City of Tallahassee, and Tampa Electric Company (TECO).

The Department wishes to register a concern with several of the 10-year site plans submitted this year. FMFA, JEA, KUA, Lakeland, SEC, and TECO are all proposing to construct large (148-245 MW) simple cycle combustion turbines over the 1998-2007 planning period. KUA and TECO apparently intend to use their combustion turbines to meet system peak and intermediate loads. The FMFA, JEA, SEC, and TECO 10-year site plans are not clear on how the utility will use the proposed combustion turbines. The Lakeland 10-year site plan states that its proposed Unit 5 combustion turbine will achieve a capacity factor of 86 percent, indicating that this combustion turbine will be used to meet base-load requirements.

The Department objects to the use of simple cycle combustion turbines as base-load units when there is a more efficient and proven power-generating technology available. The combined cycle power plant, which utilizes waste heat from its combustion turbine component to power a steam turbine and generate additional electricity, is typically more thermally efficient than a simple cycle combustion turbine and emits lesser amounts of air pollutants per unit of energy output. Because of this, the use of combined cycle technology for base-load generation is considered by the Department to be more consistent with the State Comprehensive Plan than the simple cycle technology.

Should you have any questions regarding these comments please call Paul Darst at 922-1764.

Sincerely,

James L. Quinn
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## **1998 Florida Municipal Power Agency 10-Year Site Plan: Site Analysis**

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### **CANE ISLAND POWER PARK**

In last year's plan Florida Municipal Power Agency (FMPA) proposed to add 120 MW of combined cycle unit generation in 2001 at Kissimmee Utility Authority's Cane Island Power Park. FMPA's current plan is to add 120 MW of combined cycle generation at the Cane Island site, as before, and to add an 80-MW combustion turbine at Cane Island in 2007. The 120 MW of combined cycle generation would come from FMPA's 50 percent share of a new 240-MW combined cycle unit (Kissimmee Utility Authority would own the other 50 percent of this plant).

It is unclear whether the 80-MW combustion turbine to be added in 2007 would be used as a peaking unit or as a base-load or intermediate unit. If the combustion turbine is to be used as a base-load generating unit, the Department recommends that FMPA include in its plan the conversion of this unit to combined cycle operation when additional generation is needed in its system. The combined cycle power plant, which utilizes waste heat from its combustion turbine component to power a steam turbine and generate additional electricity, is typically more thermally efficient than a simple cycle combustion turbine and emits lesser amounts of air pollutants per unit of energy output. Because of this, the use of combined cycle technology for base-load generation is considered by the Department to be more consistent with the State Comprehensive Plan than the simple cycle technology.

The Osceola County Comprehensive Plan designates the land use for the Cane Island site as Rural/Agricultural. Public utilities are allowed in this and all land use categories, provided specified performance standards are met. Adjacent land use designations are Rural/Agricultural to the south, Reedy Creek Improvement District to the west and north, Institutional to the west, and Low Density Residential, allowing up to 5 dwelling units per acre, to the east.

Cane Island is a 100-acre natural upland area within Reedy Creek swamp, in Osceola County. It is located about 10 miles southwest of the city of Kissimmee and about 1.5 miles northwest of Intercession City, a low-density residential community. According to the Osceola County Comprehensive Plan, lands near Intercession City contain very high quality wetlands with minimal encroachments of nuisance species. Comprehensive Plan Conservation Policy 8.1.2.1 states that the county shall identify and protect wetland areas through requirements that include buffering and stormwater detention and retention. The proximity of this power plant to environmentally significant areas, particularly the Reedy Creek watershed, is of concern to the Department.

The FMPA plan contains little information about the combined cycle unit to be installed in 2001. Its partner, Kissimmee Utility Authority, has included environmental and land use information concerning the installation of this unit at the Cane Island site in its 1998 10-year site plan.

## **1998 Florida Power Corporation 10-Year Site Plan: Site Analysis**

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### **HINES ENERGY COMPLEX**

Florida Power Corporation (FPC) is proposing to expand the generating capacity of its existing Hines Energy Complex in Polk County over the 10-year forecast period. The 8,200-acre power plant site is located northwest of Fort Meade and south of Bartow. The Hines site was certified by the Siting Board in January 1994 for a generating capacity of 470 MW. As part of this proceeding, the construction and operation of the combined cycle unit or units, with associated facilities, was determined to be consistent with applicable land use plans and zoning ordinances. According to the 10-year site plan, the 470-MW combined cycle Unit 1 is scheduled to come on-line in November 1998. FPC's current plan also proposes to install the 470-MW combined cycle Unit 2 in November 2004 and the apparently identical 470-MW Unit 3 in November 2006. FPC expects to eventually locate up to 3,000 MW of capacity on this site. Subsequent installations of generating capacity at this site, except for stand-alone combustion turbines, will require certification by the Siting Board. The Department will review any subsequent applications for modification of the site certification for consistency with the State Comprehensive Plan and with applicable local comprehensive plans.

The Hines site is located in an area designated as PM (Phosphate Mining) on the Future Land Use Map of Polk County and is compatible with adjacent land uses nearby. The nearest land uses to the site are designated A/RR (Agriculture/Residential-Rural) and RCC (Rural-Cluster Center). The Hines facility is consistent with applicable local land use and zoning ordinances.

U.S. Highway 98 provides north-south access to the site, and County Road 640 provides the site with east-west access through Polk County.

FPC proposes to construct eight relatively short 230-kV electric transmission lines during the 10-year planning horizon. None of these would be required to be certified under the Transmission Line Siting Act.

## **1998 Florida Power & Light Company 10-Year Site Plan: Site Analysis**

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### **FORT MYERS PLANT**

Florida Power & Light Company (FPL) lists its existing Fort Myers Plant site as preferred site no. 1 for additional power generation. In last year's 10-year site plan the Fort Myers Plant site was described as a potential site for additional power generation. As befits a preferred site, FPL has provided more information about this site in the 1998 site plan.

The Fort Myers Plant comprises 480 acres in Lee County. It is located along the Caloosahatchee River, about 8 miles east of the city of Fort Myers. The plant site can be accessed by a four-lane highway. It is currently in industrial use and is surrounded by industrial use (power generation), light commercial, residential, and mangrove wetland. The Caloosahatchee River will allow access to the site by large barges.

The existing plant contains two steam-electric generating units of 160 MW and 400 MW capacity and twelve simple-cycle combustion turbines that are used as peaking units. FPL proposes to add

new capacity by repowering the two existing oil-fired steam-electric units with six natural-gas-fired combustion turbines and six heat recovery steam generators. The combined cycle units thus formed will produce an additional 837 MW (summer rating) beyond what the Fort Myers Plant is currently producing.

FPL estimates that 150 gallons per minute will be needed by the repowered project for boiler makeup, service water, and inlet fogger makeup. The source of this industrial processing water is expected to be groundwater or municipal reuse water. Recycled water from equipment washing, boiler blowdown, and equipment area runoff could also be used, according to FPL. The Department notes that the use and reuse of water of the lowest acceptable quality for the purposes intended is a stated policy of the State Comprehensive Plan.

The amount of water needed for cooling the repowered project is not expected to increase significantly beyond the 433,000 gallons per minute taken by the existing plant from the Caloosahatchee River.

FPL states that the heat content of the water used for cooling the repowered project will be dissipated using the existing once-through cooling system and possibly a small cooling tower. Disposal of the cooling water from the repowered project, if the amount or temperature of the used water will vary from the current plant discharge, will need to be carefully planned to avoid adverse impacts on receiving waters and their flora and fauna. As acknowledged in FPL's 10-year site plan, manatees are attracted to the area where the current plant discharges heated water; however, the plan did not provide a discussion of the actions to be taken to minimize or avoid impact to manatees. FPL should coordinate with environmental agencies during the planning for the Fort Myers repowering to assure that the project does not adversely affect this endangered species. The Department notes that Objective 77.7 of the Coastal and Conservation Element in the Lee County Comprehensive Plan requires the County to minimize impact and mortality of manatees to maintain their existing population. This project will be required to undergo certification pursuant to the Florida Electrical Power Plant Siting Act. Any associated linear facilities, such as a new or expanded gas transmission pipeline or new or upgraded electric transmission lines, would also be subject to review during the same site certification process.

#### **SANFORD PLANT**

FPL lists its existing Sanford Plant site as preferred site no. 2 for additional power generation. In last year's 10-year site plan the Sanford Plant was described as a potential site for additional power generation. As befits a preferred site, FPL has provided more information about this site in the 1998 site plan.

The Sanford Plant site is located within the city of DeBary in southwestern Volusia County. The site comprises 1,718 acres, including a 1,100-acre cooling pond (Konomac Lake, a man-made impoundment) and lands extending south of the cooling pond to the Seminole County line. The site currently contains three steam-electric units (Units 3, 4, and 5) generating 926 MW from heavy oil and natural gas fuels, which are transported, respectively, by barge and by pipeline. Two of the units were brought on-line in the early 1970s and the other has been in service since 1959. Pollutants are controlled through existing mechanical collectors and controlled sulfur content of the fuel. The site is accessible by the C&S Railway and U.S. Highway 17/92. Other facilities owned by FPL in the vicinity include a deepwater port on the adjacent St. Johns River and

non-operational plant facilities on Lake Monroe (docking facilities). Another utility, Florida Power Corporation, owns a power generation facility to the north of DeBary, which has recently been expanded.

FPL proposes to repower existing Units 3 and 4 with six natural-gas-fired combustion turbines and six heat recovery steam generator. This repowering, which is planned for 2004, would produce 914 additional MW (summer rating) beyond what is currently projected for these units (560 MW). The repowering will require additional water for cooling; however, FPL states that the extra water needs will be negligible. FPL expects the repowered natural-gas-burning units to have substantially lower air emissions than the existing oil-fired units.

Supplying natural gas to the repowered units will require the installation of a larger gas pipeline to the site. It will also be necessary for FPL to construct a new substation and two new 230-kV electric transmission lines from the Sanford Plant site to the Poinsett substation, a distance of 60 miles, in order to integrate the Sanford capacity expansion with the FPL grid. There is insufficient information in the current 10-year site plan for the Department to estimate the land use impacts from construction of the gas pipeline expansion and the two electrical transmission lines.

The existing land use at the Sanford site is industrial, with open space and recreational uses surrounding the site to the east and west. Lake Konomac lies to the north of the site and the St. Johns River to the south. The land use designations shown on the City of DeBary's Future Land Use Map indicate that the land use will be Industrial/Utility, surrounded by Agricultural/Residential to the east and west, the manmade Konomac lake to the north, and the St. Johns River to the south. The Industrial/Utility use allows specifically for major electric power generation and distribution facilities within the City of DeBary. Permitted uses include power production such as power plants, industrial buildings, open space, cooling ponds, and accessory uses. The Agricultural/Rural residential designation allows agriculture, agriculture-related businesses, and silvicultural activities. The allowable maximum residential density is 1 dwelling unit per 5 acres. Based on the information provided, the Department has not identified any land use concerns with regard to listing the Sanford Plant site as a preferred site for the proposed repowering.

This project will be required to undergo certification pursuant to the Florida Electrical Power Plant Siting Act. Any associated linear facilities, such as a new or expanded gas transmission pipeline or new or upgraded electric transmission lines, would also be subject to review during the same site certification process.

#### MARTIN PLANT

FPL's existing Martin Plant site is listed in the 10-year site plan as preferred site no. 3. This is virtually the same project designated as a preferred site in last year's 10-year site plan.

The Martin Plant is located just east of Lake Okeechobee and 7 miles west of Indiantown, in the southwest corner of Martin County. This site was identified by FPL in 1987 as a preferred location for development of coal gasification combined cycle facilities. FPL filed a site certification application in 1989 for the construction and operation of 1,600 MW of coal gasification combined cycle capacity at the Martin Plant site. The Siting Board approved the first phase (Units 3 and 4) of 832 MW of combined cycle capacity in 1991. Units 3 and 4 began commercial service in 1994.



Phase II (Units 5 and 6) will require state certification before construction can begin. Unit 5 is projected to begin operation in 2006; Unit 6 is scheduled for operation in 2007. Each of these natural-gas-burning units would be rated at 419 MW summer capacity.

Up to 1,300 acres of the site could potentially be used for Units 5 and 6. Associated coal handling, coal storage, and by-product handling and storage facilities will only be constructed during Phase III (coal gasification stage), if needed. The site contains 11,267 acres in all.

According to the future land use element of the adopted Martin County comprehensive plan, the site is designated Public Facilities-Major Power Generation Facilities, which is described as follows (Policy M.1.h):

Currently, the only such designated area is the FPL Martin Plant site and cooling reservoir west of Indiantown. This designation is required for all power generation sites of 10 acres or more in size which contribute electricity to the power grid in Martin County. Such land uses are subject to the same locational and compatibility considerations as required of industrial development.

The Martin Plant site was specifically designated and zoned for the power plant through a planned unit development (PUD) agreement. During state certification, the Siting Board found that the land use designation and zoning was appropriate for the construction and operation of Units 3 and 4. Adjacent land uses consist of mobile homes, residential (density of over 5 units per acre), agriculture (including croplands and pastures), and wetlands.

As a condition of the PUD agreement, FPL has set aside certain portions of its property for upland preserves and wetland mitigation areas. The development agreement addresses the potential environmental impacts of the plant expansion. Detrimental environmental impacts will be either corrected or mitigated to meet the development agreement conditions.

According to FPL's 1997 10-year site plan, construction of Phase III (coal gasification) at the Martin Plant site could result in the loss of 166 acres of "isolated" wetlands. A mitigation program was being completed in advance of actual impacts to wetlands. This is not mentioned in the current 10-year site plan.

Because Martin is an existing site, it has been already impacted by power generating operations (and by years of cattle grazing).

Included on the site is a 6,800-acre cooling pond whose water supply is maintained by withdrawals from the St. Lucie Canal. To avoid impacts to the surficial aquifer, FPL and the South Florida Water Management District have agreed that the process water shall be obtained initially from the cooling pond with additional process water for the project being obtained as needed solely from the Floridan aquifer through 1,500-foot-deep wells. Aquifer performance tests show that no offsite wells within 5 miles of the site will be impacted by any of the project phases.

Martin County planning staff affirmed that the site remains consistent with the Martin County Comprehensive Growth Management Plan.

#### CAPE CANAVERAL PLANT

The FPL 10-year site plan lists the existing FPL Cape Canaveral Plant as a potential site for capacity expansion. It does not specify the generating units that might be located there or when they might be installed.

The Cape Canaveral Plant site is located in the Port St. John area of unincorporated Brevard County on the shoreline of the Indian River. The plant site comprises 82 acres, with 40 acres located east of U.S. Highway 1 and 42 acres west of the highway. The eastern 40-acre parcel contains two existing steam power units, each of which has a generating capability of 405 MW (summer). The western 42-acre parcel is vacant. The site has direct access to U.S. Highway 1, barge access is available on the Indian River, and a rail line is located near the plant. The land on the site is primarily maintained grassy areas and industrial use areas. The adjacent land use is industrial, light commercial, and residential.

The Future Land Use Map in the Brevard County Comprehensive Plan designates the site as Public Facility, which allows electric power generation. The Brevard County Planning Department affirmed that use of the site for power generation is consistent with the Brevard County Comprehensive Plan. The surrounding Future Land Use Map designations are as follows:

Eastern 40-acre parcel—the Indian River, Residential (12 dwelling units per acre), and Recreation to the north; the Indian River, Residential (12 dwelling units per acre), and Mixed Use (12 dwelling units per acre) to the south; the Indian River to the east; and U.S. Highway 1 to the west.

Western 42 acre parcel—Residential (12 dwelling units per acre) and Mixed Use (12 dwelling units per acre) to the north; Residential (12 dwelling units per acre) and Mixed Use (12 dwelling units per acre) to the south; U.S. Highway 1 on the east; Residential (12 dwelling units per acre), Railroad, and Industrial (1 dwelling units per acre) to the west.

Future power plant development on the vacant 42-acre western parcel of the site would raise concerns regarding land use compatibility with surrounding residential use. However, the 10-year site plan does not propose new power generation units on the western parcel during the 1998–2007 period.

#### **PORT EVERGLADES PLANT**

The FPL 10-year site plan lists the existing FPL Port Everglades Plant as a potential site for capacity expansion. It does not specify the generating units that might be located there or when they might be installed.

This power plant site is located within Port Everglades in Broward County. It is depicted in the Port Everglades Master Plan with a land use designation of “Florida Power and Light.” The land use on the site is primarily industrial. Adjacent land uses are electric power generation (FPL), port facilities, oil storage, commercial, and cruise ship docking and related uses. Therefore, the FPL plan appears to be consistent with the port master plan and compatible with adjacent land uses with regard to the Port Everglades potential site.

The availability of water to serve the proposed plant expansion is a concern to the Department. The 10-year site plan notes that FPL would need up to 130 gallons per minute of industrial processing water for uses such as boiler makeup, fogger usage, and service water. It is not clear from the 10-year site plan, however, whether this 130 gallons per minute would be available from the existing municipal water supply. Currently, the Port has a large user agreement with the City of Fort Lauderdale for potable water. For cooling water, FPL expects to continue the existing withdrawal of 320,000 gallons per minute of seawater in the plant’s once-through cooling system.

## **DESOTO COUNTY SITE**

The FPL 10-year site plan lists this 13,468-acre site as a potential site for capacity expansion. It does not specify the generating units that might be located there or when they might be installed. In last year's 10-year site plan FPL listed three separate potential power plant sites in DeSoto County, including this site (it was the second of the three sites described in the 1997 plan). This large site is mostly owned by FPL.

The DeSoto County site is located just south of the Hardee County line in north central DeSoto County. Access is provided by U.S. Highway 17, which crosses the western portion of the property, and there is an abandoned rail line roughly paralleling the highway which could potentially provide some access. The site extends west nearly to the Peace River.

There are currently no existing power plant facilities on the site. Existing land uses on site include citrus groves and pasture land. Remnants of pine flatwoods are scattered throughout the site and there are also small areas of oak-dominated hardwoods along small streams. The site is designated as Rural/Agricultural on the county's future land use map and is zoned A-10, which allows a power plant as a special exception. The adjacent land uses consist of citrus operations and pasture land, with a residential community located a few miles away. The adjacent land use designation is Rural/Agricultural, allowing agriculture and residences at 1 dwelling unit per 10 acres.

FPL has projected an average water use of up to 130 gallons per minute for industrial processing (boiler makeup and service water needs) and up to 4,800 gallons per minute for industrial cooling purposes. It is expected that all water needs for the DeSoto site would be met from groundwater; however, the 10-year site plan states that FPL would evaluate all available sources of water to meet the expected needs of the site, including the surficial and intermediate aquifers, nearby surface waters, or reclaimed wastewater. This may be necessary, because the site is located within the Southern Water Use Caution Area established by the Southwest Florida Water Management District.

## **RIVIERA PLANT**

The FPL 10-year site plan lists the existing FPL Riviera Plant as a potential site for capacity expansion. It does not specify the generating units that might be located there or when they might be installed. This site was also listed by FPL as a potential power plant site in last year's 10-year site plan.

The Riviera Plant site is located in the coastal portion of Palm Beach County, within the City of Riviera Beach. It is near the Port of Palm Beach, making it conveniently located for barge deliveries of fuel oil. It is also accessible from four-lane U.S. Highway 1 and a rail line. Units 3 and 4, in operation since 1962 and 1963, are oil-burning steam turbines generating 290 MW (summer rating) apiece.

With a total land area of 32.4 acres, Riviera is the smallest power plant site in the FPL system. According to FPL, the land use onsite is primarily industrial (power generation). Surrounding land uses are listed as industrial (power generation), port facilities and associated industrial facilities, oil storage, facilities for cruise ships, commercial, and residential.

Note on the FPL 10-year site plan: FPL deserves credit for providing information and maps for its potential power plant sites. Previously it had not provided maps that enabled the reader to

discover the exact location of its potential sites. At the same time, FPL has dropped several potential sites that were described in its 1997 10-year site plan. It may be that FPL does not own these sites and does not wish to provide detailed information concerning them.

The FPL 10-year site plan also deserves credit for not proposing the installation of any large simple cycle combustion turbines to provide base-load or intermediate capacity. FPL is relying instead on the more thermally efficient combined cycle generating units, which combine combustion turbines with heat recovery steam generators to generate power. Because of this greater efficiency, the use of combined cycle technology for base-load generation is considered by the Department to be more consistent with the State Comprehensive Plan than the simple cycle technology.

### **1998 Gulf Power Company 10-Year Site Plan: Site Analysis**

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#### **LANSING SMITH POWER PARK**

Gulf Power Company (Gulf) is expecting to add three new generating units between 2002 and 2007. The first of these units is scheduled to be a 532-MW combined cycle plant at Gulf's existing Lansing Smith Power Park in Bay County.

The Lansing Smith power plant site is currently designated Industrial on the Bay County Future Land Use Map. It is located in a sparsely populated area of rural Bay County on the north shore of North Bay, approximately 4 miles west of the Town of Southport. Surrounding land uses include silviculture to the north and east and agriculture to the west and southwest. Because the proposed combined cycle unit will be located on this existing site, its construction is not expected to require a comprehensive plan amendment. It will, however, require certification under the Florida Electrical Power Plant Siting Act. There is no mention in the 10-year site plan of any linear facilities associated with this project, but the large size of the proposed combined cycle unit suggests that it will require a new or upgraded transmission electric line and perhaps a new natural gas pipeline. Any new associated facilities would need to be included in the site certification pursuant to the Power Plant Siting Act.

In last year's 10-year site plan Gulf had identified its existing Sneads power plant site as the location for two planned 100-MW combustion turbines in 2003; however, the company's plans have changed and it is now planning to add two small (30-MW) combustion turbines, one in 2006 and the other in 2007, at an unnamed location.

### **1998 Jacksonville Electric Authority 10-Year Site Plan: Site Analysis**

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#### **NORTHSIDE GENERATING STATION REPOWERING**

In the 1998 10-year site plan Jacksonville Electric Authority (JEA) proposes to repower Units 1 and 2 at the existing Northside Generating Station in 2002.

Northside Generating Station, where the repowered Units 1 and 2 will be constructed, is located on or near the St. Johns River, just south of JEA's large St. Johns River Power Park. The 754-acre Northside site currently contains three steam turbine and four combustion turbine units. Two

of the steam turbines, Units 1 and 2, will be repowered using fluidized-bed boilers burning coal and pet coke for fuel. According to JEA, the 1996 groundwater usage of the Northside facility will be reduced by at least 10 percent as part of the repowering project. JEA also has committed to reduce both the sulfur dioxide and nitrogen oxides emissions by 10 percent from the 1994-95 baseline levels of the Northside steam units.

The Northside Generating Station is located in an industrial area. The site is surrounded by land zoned Heavy Industrial, Light Industrial, and Industrial Business Park to the west and north, the JEA St. Johns River Power Park to the north, the Northside Municipal Landfill to the west, the Blount Island industrial port to the south, and the St. Johns River to the east. Thus the repowering, if it does not increase noise, runoff, traffic, and air pollution, should not present any new impacts to surrounding land uses.

Since the output of the turbines will not be increased, JEA maintains that the project will not require certification under the Florida Electrical Power Plant Siting Act.

#### COMBUSTION TURBINES

JEA also is proposing to construct and operate a 142-MW (summer rating) combustion turbine (Kennedy CT 7) at JEA's Kennedy Generating Station by January 2000. This unit would burn natural gas as its primary fuel with fuel oil as backup. JEA is also considering the installation of several other combustion turbines in the 10-year planning period; however, JEA states that its planning process for the combustion turbines has only recently started and a detailed analysis is not yet available. Table 6-7 in the 10-year site plan lists six 168-MW combustion turbines being installed between 2000 and 2007. It also lists a 227-MW combined cycle unit being built in 2005. This may represent the addition of a heat recovery steam generator to one of the proposed combustion turbines to form a combined cycle plant. The potential sites for these other combustion turbines include JEA's existing Northside, Southside, and Kennedy generating stations and an undetermined new site.

The availability of water may not be a crucial factor in JEA's decision of where to locate the other five combustion turbines since water usage for combustion turbines is relatively modest. The ability of a site to receive the natural gas fuel and to locate storage tanks for fuel oil, the alternate fuel, may be determining factors in locating the combustion turbines. JEA should also consider aesthetic and noise impacts on surrounding land uses in deciding where to locate the combustion turbines.

The combustion turbine (Kennedy CT 7) to be installed at the Kennedy Generating Station in January 2000 will be used as a peaking unit, as suggested by its estimated capacity factor of 5 percent. It is unclear, however, whether the other combustion turbines that may be installed during the 1998-2007 planning period will be used as peaking units or as base-load or intermediate units. If the need is for base-load generating units, the Department would prefer that JEA install combined cycle units instead of the simple cycle combustion turbines. The combined cycle power plant, which utilizes waste heat from its combustion turbine component to power a steam turbine and generate additional electricity, is typically more thermally efficient than a simple cycle combustion turbine and emits lesser amounts of air pollutants per unit of energy output. Because of this, the use of combined cycle technology for base-load generation is considered by

the Department to be more consistent with the State Comprehensive Plan than the simple cycle technology.

### **1998 Kissimmee Utility Authority 10-Year Site Plan: Site Analysis**

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Kissimmee Utility Authority (KUA) did not file a 10-year site plan last year. It has filed a plan this year because it is planning to build a new power plant within the next 10 years.

#### **CANE ISLAND POWER PARK**

KUA's current plan forecasts a capacity deficit of 44 MW in 2001. To meet this deficit KUA is considering several different generating unit alternatives: pulverized coal, fluidized bed, combined cycle, and simple cycle combustion turbine. After evaluating the different generating alternatives, KUA determined that the lowest-cost expansion plan would consist of a 247-MW combined cycle unit (Cane Island No. 3) installed in 2001 and a simple cycle combustion turbine installed in 2005 (the Department notes, however, that the combustion turbine is not identified in the 10-year site plan's Schedule 8, "Planned and Prospective Generating Facility Additions and Changes") at the Cane Island Power Park in Osceola County.

The Florida Municipal Power Agency (FMPA) would own 50 percent of the proposed combined cycle unit. It is unclear whether KUA will share ownership of the proposed combustion turbine with another utility. The 1998 FMPA 10-year site plan proposes the addition of a 80-MW combustion turbine at the Cane Island Power Park site in 2007, 2 years later than the date KUA proposed for installation of its combustion turbine. However, the KUA 10-year site plan states that "a 50 percent ownership percentage was modeled for candidate units included in the generation expansion simulation." This partnering intention, which presumably also applies to the proposed combustion turbine, coupled with the large size of the preferred combustion turbine (a Westinghouse 501G has a generating capability of about 240 MW) suggests that KUA may also intend to be a part-owner of the combustion turbine.

KUA currently has Units 1 and 2 in operation at the Cane Island site, which together generate 162 MW. According to KUA, the site is suitable for approximately 1,000 MW of capacity; however, the site has not been certified under the Florida Electrical Power Plant Siting Act for that capacity.

The 247-MW combined cycle project will be required to undergo certification pursuant to the Florida Electrical Power Plant Siting Act. Any associated linear facilities, such as a new or expanded gas transmission pipeline or new or upgraded electric transmission lines, would also be subject to review during the same site certification process.

The planned simple cycle combustion turbine, even though it has a generating capacity roughly equal to the combined cycle unit, will not be required to be certified under the Florida Electrical Power Plant Siting Act. The 10-year site plan is not absolutely clear about whether this heavy-duty combustion turbine will be used as a peaking unit or to provide intermediate-load or base-load capacity. On page 5-22 of the plan KUA does state that the operating and maintenance costs for the Westinghouse simple cycle 501G are based on a 10 percent capacity factor and on 200 starts per year. This suggests that the combustion turbine will be used to meet peak-to-intermediate loads.

If KUA is proposing to use the combustion turbine to provide base-load capacity, then the Department would recommend that KUA alter its plan by substituting a second combined cycle unit in 2005 for the proposed combustion turbine. The combined cycle power plant, which utilizes waste heat from its combustion turbine component to power a steam turbine and generate additional electricity, is typically more thermally efficient than a simple cycle combustion turbine and emits lesser amounts of air pollutants per unit of energy output. Because of this, the use of combined cycle technology for base-load generation is considered by the Department to be more consistent with the State Comprehensive Plan than the simple cycle technology.

The land use designation on the Cane Island site is Rural/Agricultural, which allows one dwelling unit per 5 acres. Public utilities are allowed in all land use categories, provided specified performance standards are met. KUA was issued a conditional use/special development plan permit by Osceola County for the development of the existing generating units there. The 10-year site plan does not indicate whether KUA will need to apply for another conditional use permit for its proposed new combined cycle unit.

Adjacent land use designations are Rural/Agricultural to the south, Reedy Creek Improvement District to the west and north, Institutional to the west, and Low Density Residential, allowing up to 5 dwelling units per acre, to the east.

According to KUA's 10-year site plan, Cane Island is a 100-acre natural upland area within Reedy Creek swamp. It is located about 10 miles southwest of the city of Kissimmee and about 1.5 miles northwest of Intercession City, a low density residential community. According to the Osceola County Comprehensive Plan, lands near Intercession City contain very high quality wetlands with minimal encroachments of nuisance species. Osceola County Comprehensive Plan Conservation Policy 8.1.2.1 states that the county shall identify and protect wetland areas through requirements that include buffering and stormwater detention and retention. The proximity of this power plant to environmentally significant areas, particularly the Reedy Creek watershed, is of concern to the Department. KUA's 10-year site plan states that no significant impacts to surface or ground waters are expected, because of the probable small magnitude of sedimentation and the short duration of plant construction, and that no wetlands will suffer adverse impacts during the construction of Cane Island Unit 3.

The 10-year site plan states that KUA will employ water conservation measures in the operation of Unit 3, including the use of reclaimed municipal wastewater for cooling tower makeup. The Department recommends that KUA use recycled water and reclaimed wastewater to the maximum extent feasible. The Department notes that the use and reuse of water of the lowest acceptable quality for the purposes intended is a stated policy of the State Comprehensive Plan.

On page 7-1 of the 10-year site plan, KUA notes that "the facility's contribution of NOx should have no noticeable impact on the local or global temperature." Though true, this statement could mislead. The facility's release of NOx and carbon dioxide will contribute to the buildup of "greenhouse gases" in the atmosphere. Though still subject to debate, it appears likely that the buildup of greenhouse gases in the atmosphere over the last 200 years, which is due primarily to man's activities, will, if continued, lead to an increase in the world's average temperature. Although no one facility, including KUA's proposed combined cycle unit, will have a "noticeable impact on the local or global temperature," they will all contribute to producing a noticeable impact.

## 1998 Lakeland Electric & Water 10-Year Site Plan: Site Analysis

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### MCINTOSH POWER STATION

The power generation expansion plan proposed in the current Lakeland Electric & Water (Lakeland) 10-year site plan will be located at Lakeland's existing McIntosh Power Station, which currently comprises six power generating units on a 370-acre site located along the northeastern shore of Lake Parker. The McIntosh expansion would be located in an area designated as Industrial on the Future Land Use Map for the City of Lakeland. Power generation is an allowable use in the Industrial land use classification. The McIntosh plant is adjacent to lands designated in the Future Land Use Map as Industrial, Recreation and Open Space, Conservation, and Preservation. In addition to these land uses, which act as buffers between the power plant and the populated land uses, the McIntosh plant site is located adjacent to a railroad line and is accessible by East Lake Parker Drive.

In its current 10-year site plan, Lakeland discusses a number of generation alternatives. In last year's 10-year site plan, Lakeland's preferred alternative for providing base-load capacity was the installation by January 2003 of a new pressurized circulation fluidized bed unit (Unit No. 4) at Lakeland's existing McIntosh power plant site which would burn coal or petroleum coke (see below) as fuel. The 1998 10-year site plan continues to propose the construction of McIntosh Unit 4, which is now projected to be completed and in service by May 2003. Unit 4 would be partially funded under the auspices of the U.S. Department of Energy's Clean Coal Technology Program. The DOE grant would apparently require Lakeland to burn coal in the unit for 4 years to meet the Clean Coal demonstration objectives, after which Unit 4 could be switched to burning petroleum coke, which is currently a cheaper fuel than coal. This unit would require certification under the Florida Electrical Power Plant Siting Act. The Lakeland 10-year site plan does not describe any electric transmission lines associated with Unit 4.

Besides Unit 4, the 1998 10-year site plan includes the installation of McIntosh Unit 5, which would be a simple cycle combustion turbine of 245-MW (summer) capacity. This unit would burn natural gas as its primary fuel and fuel oil as backup. The construction start date is June 1998 with a commercial in-service date of June 1999. This project would not require certification under the Florida Electrical Power Plant Siting Act. The Lakeland 10-year site plan does not describe any electric transmission lines or natural gas pipelines associated with Unit 5.

Lakeland is apparently installing the proposed Unit 5 simple cycle combustion turbine to provide base load capacity (Schedule 9.1 shows an estimated capacity factor for Unit 5 of 86 percent). The 10-year site plan mentions the possibility of converting Unit 5 to combined cycle operation in 2001. The Department would prefer that Lakeland alter its plan by substituting a combined cycle unit for the combustion turbine. The combined cycle power plant, which utilizes waste heat from its combustion turbine component to power a steam turbine and generate additional electricity, is typically more thermally efficient than a simple cycle combustion turbine and emits lesser amounts of air pollutants per unit of energy output. Because of this, the use of combined cycle technology for base-load generation is considered by the Department to be more consistent with the State Comprehensive Plan than the simple cycle technology.



## **1998 Seminole Electric Cooperative 10-Year Site Plan: Site Analysis**

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### **HARDEE POWER STATION**

Hardee Power Station is an existing Seminole Electric Cooperative (SEC) power plant site located in Polk and Hardee counties, about 9 miles northwest of Wauchula and 16 miles south-southwest of Bartow. The site has access through two-lane County Road 663 and the CSX rail line. Payne Creek flows along the site's western and southern borders.

The site was certified in 1990 under the Florida Electrical Power Plant Siting Act for an ultimate capacity of 660 MW. A 220-MW combined cycle unit and a 75-MW combustion turbine have been constructed on the site thus far. In 1995 SEC received approval for a 440-MW combined cycle unit (Unit No. 3; reported in Schedule 8 and 9 of the 10-year site plan as having a summer net capability of 451 MW), which would hike the site's total generating capability to 735 MW by year 2002. SEC plans an ultimate site capacity for Hardee Power Station of 880 MW.

As part of the state certification of the site, it was determined that the proposed use of the site was consistent with applicable local government comprehensive plans and land development regulations. Mining was the primary land use on the site and surrounding areas.

SEC is also proposing to install ten 150-MW gas combustion turbines between 2002 and 2005. No location is given in the 10-year site plan for these units.

The 10-year site plan does not specify how SEC will use these combustion turbines. Combustion turbines are usually installed for use as peaking units. If, however, SEC intends to use them to meet base-load requirements, the Department would then recommend that SEC include heat recovery steam generators with the combustion turbines to form combined cycle units. The combined cycle power plant, which utilizes waste heat from its combustion turbine component to power a steam turbine and generate additional electricity, is typically more thermally efficient than a simple cycle combustion turbine and emits lesser amounts of air pollutants per unit of energy output. Because of this, the use of combined cycle technology for base-load generation is considered by the Department to be more consistent with the State Comprehensive Plan than the simple cycle technology.

## **1998 City of Tallahassee 10-Year Site Plan: Site Analysis**

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### **PURDOM POWER STATION**

The City of Tallahassee 10-year site plan proposes the installation of one new power plant, Purdom Unit 8, during the 10-year planning period. This power plant was certified earlier this year by the Siting Board pursuant to the Florida Electrical Power Plant Siting Act. The Department participated fully in the certification process and has no further comment on this project.

## 1998 Tampa Electric Company 10-Year Site Plan: Site Analysis

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### POLK POWER STATION

Tampa Electric Company (TECO) plans to expand the operating capacity at its existing Polk Power Station. The 4,347-acre site is located in southwestern Polk County, bordering the Hillsborough County line and 4 miles north of the Manatee County line.

An integrated coal-gasification combined cycle unit of 220-MW capacity (note—the current 10-year site plan lists the unit at 250 MW) was certified for the Polk Power Station site by the Siting Board in January 1994. This unit was placed in service in September 1996. TECO expects to eventually locate up to 1,150 MW of capacity on this site. Subsequent installations of generating capacity at this site, except for stand-alone combustion turbines, will require certification by the Siting Board.

Polk Power Station consists primarily of lands recently mined for phosphate. It is located in an area designated as PM (Phosphate Mining) on the Future Land Use Map of Polk County. The nearest non-PM land use to the Polk site is an area immediately north of the western part of the site which is designated A/RR (Agriculture/Residential-Rural). This facility is consistent with applicable local land use and zoning ordinances.

During the planning period TECO proposes to locate three combustion turbines at the Polk site. All three are rated at 148-MW (summer rating) capacity, burning natural gas as primary fuel with distillate oil as backup. Construction is scheduled to begin on Unit 2 in January 2001, with an in-service date of January 2003. Unit 3 has a projected in-service date of January 2004, and Unit 4's projected in-service date is January 2006.

The 10-year site plan presents estimated capacity factors of 18.5 to 20.3 percent for these combustion turbines. It appears, therefore that these units will be used to meet system peak loads and intermediate loads. If, however, TECO intends to use them to meet base-load requirements, the Department would then recommend that TECO include heat recovery steam generators with the combustion turbines to form combined cycle units. The combined cycle power plant, which utilizes waste heat from its combustion turbine component to power a steam turbine and generate additional electricity, is typically more thermally efficient than a simple cycle combustion turbine and emits lesser amounts of air pollutants per unit of energy output. Because of this, the use of combined cycle technology for base-load generation is considered by the Department to be more consistent with the State Comprehensive Plan than the simple cycle technology.

### NEW TRANSMISSION LINE

TECO is planning a new 11-mile transmission line in eastern Hillsborough County from the proposed Lithia Switching Station to the existing Wheeler Road Substation. A location map of this line was not included with the site plan.

Based upon the information provided, the transmission line will be placed in an area of the county that is mostly designated Residential-4 and Residential-6. The transmission lines may also impact areas designated as environmentally sensitive wetlands on the Hillsborough County Future Land Use Map. In addition, the transmission lines may encroach upon the Bloomingdale Development of Regional Impact. The Department is concerned about the potential impacts to the wetlands

designated as environmentally sensitive on the county's Future Land Use Map and the resources that were to be protected within the Bloomingdale DRI.



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 29, 1998

Mr. Michael S. Haff  
Bureau of Conservation, System Planning  
And Electric Safety  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Ten-Year Site Plans

Dear Mr. Haff:

The Florida Department of Environmental protection has reviewed the 1998 Ten-Year Site Plans (TYSP) for Florida utilities and offers the following comments:

1. The Florida Municipal Power Agency is relying on Kissimmee for additional capacity. No significant environmental information is included in their TYSP.
2. Florida Power Corporation's announced expansion is planned to occur at the Hines Energy Center in Polk County. Adequate environmental information exists in the initial application submitted for Unit 1 for the Hines Site. Based on the initial review of the Hines Site, the DEP foresees no significant environmental or land use impediments for future expansion of that site. No information is included concerning environmental impacts of units or plants scheduled for repowering. The lack of information on candidate sites for repowering makes their TYSP insufficient.
3. Florida Power and Light Company' TYSP contains sufficient information to evaluate their proposed expansion via repowering at the Ft Myers or Sanford sites. No significant environmental issues are expected to hinder repowering either site provided that a source of natural gas can be obtained and the pipeline licensed. With no information on the route of the pipeline, the department can not comment on the suitability of its location or on any potential environmental difficulties in the gas provider obtaining environmental licenses. Some of the land use information concerning the Sanford site is incorrect, i.e the location of Deland. Since the Ft. Myers, Sanford, and Martin sites are all existing, repowering or expansion should not pose any land use conflicts. Sufficient information to evaluate the Martin Plant expansion exists in the application covering Units 3 & 4 as submitted in December 1989.

4. Gainesville Regional Utilities plans no expansion in the near future.
  
5. Gulf Power Company's TYSP is unsuitable for the following reasons:
  - a. No environmental or unit design information is provided for the planned new unit at the Lansing Smith site.
  - b. The TYSP indicates start of construction in June 1999, while the certification process can take an average of fourteen months to complete. If Gulf Power submits an application by October 1998, they could conceivably start construction in December 1999, or January 2000.
  
6. Jacksonville Electric Authority no certifiable units planned in near future.
  
7. Kissimmee Utility Authority's TYSP contains sufficient information to indicate no major environmental or land use impediments to certifying Unit 3.
  
8. City of Lakeland - McIntosh Unit 5 has been permitted as a simple cycle combustion turbine. Their TYSP does not discussed the timing of certifying the unit to operate in a combined cycle mode adding 100 MW of steam capacity. Certification as a combined cycle unit will not create any significant adverse air quality impacts. Consumptive use of water may increase in the combined cycle mode. Unit 5's water requirements will fall within existing permitted limits.
  
9. Orlando Utilities Commission plans no new facilities during the planning horizon.
  
10. Seminole Electric Cooperative's TYSP indicates that they will start construction of Hardee Unit 3 in January 2000. Their PSD permit requires compliance by January 1, 2000. Seminole will have to obtain an extension of the PSD permit before it expires.
  
11. City of Tallahassee - The Purdom Site was certified by the Siting Board on April 28, 1998. No additional sites are planned at this time.

If there are any questions concerning these comments, I can be reached at 487-0472.

Sincerely,

*Hamilton S. Owen*

Hamilton S. Owen, P.E.  
Administrator, Siting  
Coordination Office

## **CONSUMER & ENVIRONMENTAL GROUPS WANT TRANSITION TO SUSTAINABLE ENERGY**

The planning process for meeting Florida's energy needs has substantial bearing on the energy sources we use, how much that energy costs, the siting of energy facilities and the reliability of energy services. As such, it impacts the environment, public health, the economy and the disposable income of consumers, and it thereby affects all Floridians.

The undersigned organizations, representing thousand of Floridians who care about the future of our state, want that process to provide for clean and safe alternative energy sources.

Absent a timely transition to renewable energy, Florida cannot be sustainable for the long - term. Yet the proposed Ten Year Site Plans (TYSPs) for electric utilities reflect no plans for renewable energy sources and a limited role for energy efficiency. This concerns us greatly — and we are troubled that, despite many compelling reasons for change, Florida continues an almost exclusive reliance on fossil fuels and nuclear power.

We do not object to building new power plants where they are needed. To the contrary, we enjoy the benefits of electric power and appreciate the importance of electric utilities in our society. However, as the consumers who pay for whatever plants are built, we worry about proposals to significantly increase utility generating capacity— and particularly when Demand Side Management (conservation and efficiency) alternatives that cost less than building new power plants are readily available. Conservation and efficiency are also a way to avoid pollution, which is vitally important from the standpoint of human health and the

health of our ecosystems. The use of such practices and technologies is good for the economy as well.

We are pleased that the utility plans emphasize natural gas as a fuel choice over other conventional energy options that are far more polluting and less efficient. We further believe that capacity additions utilizing natural gas should replace dirty and inefficient plants that are aging and warrant retirement.

Floridians want clean, sustainable energy for our future and that of generations to come. We are entering a new Millennium, and energy decision making that affects the public and our quality of life must keep pace with changing times. Towards that end, we urge that the Florida Public Service Commission call on Florida utilities to amend their plans in accordance with these needs and concerns. The future of all of us and those we care about depends on your action.

American Planning Association,  
Florida Chapter

Legal Environmental Association  
Foundation

League of Women Voters  
of Florida

American Lung Association  
of Florida

Florida Consumer Action Network

Common Cause of Florida

League of Conservation Voters

Florida Legal Services

Florida Catholic Conference

Florida Public Interest Research Group

Sierra Club, Florida Chapter

Project for an Energy Efficient Florida

Presbyterian Caring for Creation Coalition

# MCWHIRTER REEVES

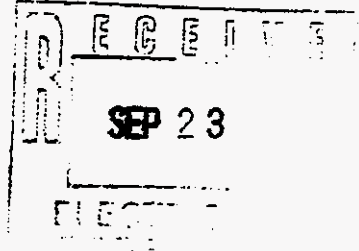
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PLEASE REPLY TO:  
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TAMPA

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TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
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September 21, 1998



Mr Joseph Jenkins  
Director Division of Electric & Gas  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, Fl. 32399-0850

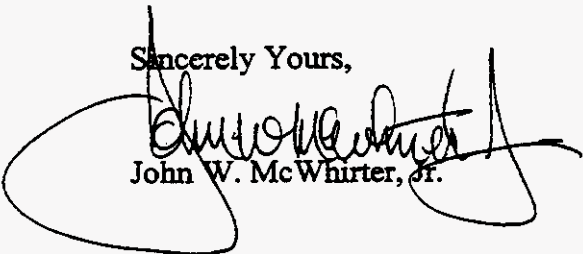
In re: Capacity Reserve Workshop  
Our File # F17-13904

Dear Mr Jenkins:

One of the Commissioners asked me to put my remarks from the September 11<sup>th</sup> workshop in writing. I submit a paraphrased version herewith due to the fact that I didn't speak from a prepared text.

Rather than communicating with the Commissioner directly on a pending docket you are requested to give the item appropriate distribution.

Sincerely Yours,

  
John W. McWhirter, Jr.



## WHY ISN'T THE CANARY SINGING

I won't say that one of my interruptible industrial clients was grumbling about the 60 times Florida Power or Tampa Electric generating plants were unable to serve his company's mine during June, July and August this summer. Never the less he was dismayed about the fact that for 270 hours his company was either served with expensive spot market power the utilities purchased from third parties or was cut off altogether making it necessary to send workers home early. He openly chafed over the fact that it will cost his company several million dollars in higher electric bills and lost production this summer added to a similar amount suffered last year.

His aspect didn't improve much when I told him the Public Service Commission (Commission) staff has concluded that Florida doesn't have a capacity problem in the summer. It is the winter when trouble may be brewing.

He gasped, "My company is like the canary they used to provide an early warning that miners are heading for disaster."

The ten year energy forecast filed with the Commission this summer by the utility controlled Florida [Electric] Reliability Coordinating Council (FRCC) doesn't indicate there is any problem. It concludes that a 15% reserve margin is adequate. The Council says Florida has that much excess peak period capacity (reserve margin) and more for the next ten years if all goes according to plan. The forecast glosses over the great change that has taken place in the nature of the reserve margin.

Heretofore the reserve margin was composed of machinery which would make electricity. This is no longer true. Today more than half the state's capacity reserve is made up of people who will be denied electricity in critical times. It is orchestrated to get worse.

"How did this happen?" My client moaned, "what can we do about it?"

How it happened is a fascinating, if ancient, story about how monopolies make money. I will encapsulate the Florida version for you. There are many ways the problem can be solved if it is exposed to the sunshine so that enlightened people can see it and deal with it. The Commission should be the leader in this endeavor.

## THE BIG PICTURE COMPETITION HAS ALWAYS BEEN THE DRIVING FORCE

The electric utilities are a government protected industry in Florida. The presumed regulatory bargain is that the government will protect the electric company against competition in its service area. Customers are obligated to buy only from their designated utility but are assured that prices will be reasonable because electric rates must be approved by the Commission.

The regulatory bargain has never been in place. Instead we have seen a continuous cycle of competition evolving into monopoly power as competitors are knocked off only to be replaced with a new form of competition which affects rates and capacity.

In the 1920's electric utility holding companies based in Boston, Chicago and New York actively competed with one another in Florida to buy the municipally owned power plants, industrial generators and power lines. According to a congressional investigation they sold stocks and bonds using misleading advertising and creative accounting. The holding companies used the proceeds to get control of electric plants and lines in densely populated areas coupled with the exclusive right to use city streets for running electric lines. They bought and dismantled municipal and industrial power plants and replaced them with central power stations. The utilities paid far more for the assets than their original cost. This year's debate about whether Tallahassee should sell its power system for a large profit is reminiscent of 1920's activity. This competition to acquire drove up the price of electricity.

Local electric utilities had local operators, but they were required to buy fuel, financial services, engineering services and management services from the national holding company. Once they got the exclusive use of the right of way in densely populated areas prices went up. There was no government regulation in Florida. According to a Department of Energy Study the price for electricity in the 1920's was about 16 cents per kwh.

In the 1930's competition which drove the price down came from public power. The national holding companies were broken up. The federal government supplied low cost power directly to unserved rural areas and gave first preference for low cost power to the remaining municipal utilities. In the 1940's Florida's newly divested electric utilities struggled to survive. World War II brought military bases and population

growth to Florida. The post war boom of the 1950's made electric utilities healthy. They were able to expand. As the demand for home appliances grew, competition came from the gas industry. Electric companies lowered the price per kwh to compete with gas. They were able to gain customers and sell electric appliances to increase demand and electric bills even though the price per kwh was less. Electric utilities won the first round in the competition with gas which was limited in supply.

Florida utilities fought regulation in the state, but were forced into it when Nelson Pointer the Publisher of the St Petersburg Times made electric rates an editorial issue. The Times endorsed candidates who promised to create a Pinellas County Utility Rate Control Board. It was created and reduced Florida Power's rates in that county. The Utilities saw the hand writing on the wall and sponsored state wide rate supervision over rates, but kept franchised territories out of the bill because they wanted to continue to compete for customers with one another, public power and the gas companies.

Competition for customers between Florida's electric utilities after they were emancipated from the holding companies led to the first non firm rates through the back door. It happened when Florida Power and Tampa Electric Company both sought to serve the phosphate mining and chemical business in central Florida. They wanted to compete in price to get the business, but price discrimination was properly the principal focus of the new state regulators.

Price discrimination by the railroads in favor of John D Rockefeller's Standard Oil Company had allowed that company to monopolize the oil refining industry. The consequent abuses led to the passage of the Sherman Antitrust Act and the Interstate Commerce Act in the latter part of the 19<sup>th</sup> Century. The Florida Railroad Commission was founded early in the 20<sup>th</sup> Century to protect consumers against rate discrimination by the railroads. Its powers were expanded in the 1930's to protect trucking and taxi cab companies from "destructive competition." It was given rate making jurisdiction over the electric utilities in 1951 by the bill mentioned above. By its charter it scorned price competition, the keystone of the free enterprise system.

The initial solution to permit competition while eschewing it was to establish a "favored nations" rate. This rate was reluctantly approved by the Commission. It enabled the utilities to compete for the phosphate business. The utilities ultimately concluded that it would be better to divide the business than to compete for it so they entered into territorial agreements to end competition for customers. When the city of Bartow was denied competitive rates it complained to the U.S. Justice department which concluded that the newly drafted territorial agreements violated the Sherman Act

prohibition against agreements to restrain trade. The Justice Department complaint was settled by new utility sponsored legislation in 1974 that gave the Public Service Commission authority to supervise the anti competitive territorial agreements.

## A BRIEF HISTORY OF NON FIRM ELECTRIC RATES

Although territorial agreements now curtailed competition between utilities for customers, the phosphate rate couldn't be raised because there was another source of competition in the wings, self generation. In the 1970's electric rates had increased to the degree that self generation was again a viable alternative to utility supplied power. Something like "favored nations" under a new name had to stay in place. The interruptible rate was born.

### 1. The Interruptible non firm rate

Florida Power came up with the idea that if the firm phosphate mining rate was renamed "interruptible service," the "favored nations" appellation which connoted competition could be dropped. Ironically this interruptible rate was more expensive than firm service rates offered by Gulf Power and industrial rates in other parts of the U.S. and foreign countries where Florida industry had to compete. Other Florida industries demanded rates to keep their companies competitive. They were offered lower quality interruptible service. As long as a 15% reserve capacity in back up generation was maintained the probability of interruption was a manageable risk.

Currently new competitive rates have been approved for all utilities which are designed to lure new firm customers to their service areas and retain wavering load. These customers will receive firm service at whatever price the traffic will bear. This time the competitive rates aren't called "favored nations" rates. They are called "economic development rates." The trick for regulators will be to insure that other customers will not get rate increases to protect the utilities' profit margin from the new customers.

### 2. Load Management non firm rates.

The OPEC oil crisis of the 1970's drove up prices and triggered the demand for conservation. The Commission directed its supply side regulated utilities to solve the **demand** side problem. This is a tough assignment for utilities which make their money by selling kilowatt hours. How do you sell less and still show a growth in earnings?

The solution lay in the nature of the business. To provide reliable service utilities had built new generation to meet growth in peak demands. Even the most efficient utilities have 40% more generating capacity than is needed during off peak periods. The answer was to refrain from building new capacity and sell more kwh from off peak capacity. Give customers a bill credit if they would agree to have their heating, cooling or commercial lights and machinery curtailed during peak periods. The credit is shown on the bill, but this credit is paid for by a hidden charge in the base rates. Load management has been a boon to utilities. Page 2 of the July 1998 FRCC Load & Resource Plan shows that the average kwh consumption by residential customers has grown 15% in the last ten years. Earlier reports show that residential consumption has grown by 34% since conservation programs began. Load management is far and away the most actively pursued program. Presently customers receive hidden charges of over \$300 million a year for utilities to promote these programs. The remarkable load management program has resulted in greater sales plus additional profits from the surcharge while avoiding the cost of additional capacity. Solar energy programs were abandoned and cogeneration is only paid lip service. These programs avoid the need for new generating plant, but don't sell kwh.

There is some question whether load management from residential customers who can rapidly revert to firm service will prove to be reliable reserve margin. It may create a serious problem if they decide to quit just when they are needed the most.

FP&L was particularly adept in employing load management. It has a comparatively small industrial base. FP&L resisted interruptible rates when they were recommended by the Commission. When the gas industry pushed competitive self generation using gas turbines, FP&L offered competitive interruptible rates to beat the gas competition, but it came up with a twist. It argued that the lower rates were not competitive rates they were conservation rates. By using this approach it was able to charge other customers for the price concessions made to keep industrial customers. FP&L was able to increase its industrial base by 150% from .5% of one percent of its total sales to 1.5%. FP&L didn't have to add new generating plant; competitive industry got rates than enabled it to stay competitive and the utility suffered no loss in revenue. Gas competition was cut off at the pass.

### 3. Increased risk of interruption.

The addition of interruptible load and large numbers of load management customers with little new plant construction increases the risk of interruption. In 1995 the Commission further significantly increased the risk of interruption by directing

utilities to interrupt native load customers to serve the firm customers of any other utility in the state. This increased statewide efficiency by reducing the reserve margin each utility formerly maintained for its native load. Larger plants and nuclear plants that didn't operate as well as expected likewise exacerbated the risk.

#### 4. The Perverse Impact of Wholesale Competition.

The electric utility capacity reserve has been further strained by the imperatives of the Energy Policy Act of 1992 (EPAct92). This law and its implementation by the Federal Energy Regulatory Commission opened the state's transmission grid to the wholesale market. When the opportunity to make a profit in the wholesale market was made available to Florida utilities, the brotherhood which created retail territorial boundaries began to disintegrate. TECo went after FP&L and FPC's wholesale customers. FP&L reacted by refusing to sell average cost power to TECo for the benefit of non firm customers who might be interrupted for the benefit of the new firm wholesale load.

When smaller utilities proposed new power plants the large companies offered guaranteed firm service contracts at a price less than the cost to build new. No self respecting political entity could refuse such an offer. These wholesale contracts to other utilities were given priority over the selling utility's firm customers, even though in power plant siting petitions the utility had testified that the plants were needed for the firm retail load. Plants approved under the power plant siting act were added to the retail rate base. The end result was that retail customers subsidize below cost wholesale sales. Most of the profit goes to the utility. No wonder utility executives say, "wholesale competition is good; retail competition is bad."

The problem with the wholesale contracts is that just when the need for new capacity will be the greatest these contracts are set to expire. This may have more than a modest impact on price.

#### 5. Highly Profitable Base Rates Discourage New Construction.

In the past when expensive new power plants were constructed it triggered a rate case and resulted in increased rates. Today power plants are less expensive and more efficient. Utility profits are so high and the cost of capital is so low that new power plants can be built without the need for rate increases. On the other hand if they are built the utilities return will go down. An unhappy prospect for utility managers.

There is another disincentive to more efficient new construction. The national holding companies of the 1920's have been replaced by the state based holding companies of the 1990's. Under this regimen affiliated companies sell fuel to the electric utility. There is little interest displacing the type of fuel or installing new technology that will result in less fuel consumption.

6. Industrial self help has served to ameliorate the problem.

The FRCC report at page 22 shows that since the enactment of the Public Utility Policy Reform Act in 1978 (PURPA) over three thousand megawatts of new capacity have been built in Peninsula Florida by *non utility* generators (NUG's). But for this new capacity the utilities' reserve margin would be gone today. Only 2/3rds of the NUG capacity is available to meet utility demand. The rest is dedicated to industrial use where industry found that self generation was less expensive than utility power. FP&L, FPC, TECO & Gulf each lost all or most of the load from their largest industrial customers to self generation. These customers sell low cost excess power to the utilities .

Industrial self generation was promoted actively by Florida's principal gas distribution company. TECO Energy like the holding companies of old eliminated this competition by buying the gas company at four times its book value.

A new form of commercial self generation known as distributive generation has come available for medium sized commercial applications. Advanced micro turbines can produce power at prices comparable to utility commercial rates. TECO Energy cured this potential competitive problem by becoming the exclusive statewide distributor for the major manufacturer of micro turbines.

Opposing economical self generation imposes greater pressure on the utilities' reserve margin.

Utilities say other customers will pay more if large industry leaves, but examination of the facts shows that base rates have not increased and reliability has been somewhat enhanced by the departure of industry which opted for lower cost self generation.

Much of the new power came from so called PURPA units. The entrepreneurs built these generating plants because PURPA obligated the utilities to buy their power. A precondition to the sale required these NUG's to conserve fuel by coupling the fuel

use with an industrial enterprise. The price of the power had to be less than utility created power, the "avoided cost". Without the mandate of PURPA there would be no market for the power even if it is less expensive. The unintended result of this law fostered a new industry composed of Independent Power Producers (IPP's) and Exempt Wholesale Generators (EWG's) Their plants based on a competitive model have developed new technology that reduces fuel consumption 30% or more even without cogeneration. They are an anathema to utilities which are seeking federal legislation to eliminate the requirement to buy their power.

FP&L and FPC are the largest purchasers of non utility power. They are able to acquire it without disturbing base rate profits. Whatever they pay for non utility power is passed through to customers directly through a capacity cost recovery charge. TECo liked the idea so much it built its own EWG, the Hardee Power station. That low cost plant was kept out of the rate base while the Polk Power plant that cost 400% more per kilowatt was put in the rate base. Time will tell whether TECo can include this addition to plant without increasing rates. One thing is certain the Polk plant power could not be sold in the competitive wholesale market.

The foregoing is the gasping canary's view. Hopefully it will trigger a response other than the silence of the tomb for the poor canary. If monopoly runs true to form it will abide to the law of supply and demand. It will hope for deregulation, large demand and limited supply. Limited capacity will be a win win circumstance for the monopoly. In the event of deregulation without competition prices can escalate without control. In the event regulation remains but reliability fails the monopoly will be ordered to provide new generation to resolve a reliability crisis without regard to cost.

Perhaps there are some things that can be done to avert a more serious supply crisis. Here are a few ideas from the consumers viewpoint.

1. Establish a policy that reserve margin should come from machines, not people.
2. Encourage merchant plants. They are a win win circumstance for consumers if utilities are required to use their power whenever it is the least expensive source.
3. Encourage a new interstate gas line into Florida
4. Open the operations of the FRCC to the public records law and sunshine



law for meetings as long as that agency has the responsibility for reliability.

5. Require FRCC to create a bulletin board accessible to the Internet to give all citizens an opportunity to be posted on the availability and cost of power.
6. Explore the adequacy of the state's transmission grid before the population gets much bigger.
7. Insure that the power plant siting act is not used to create a closed shop for Florida Utilities.
8. Don't load obsolescent high heat rate power plants with additional costly improvements that will create stranded investment.
9. Eliminate the utilities' authority to be the exclusive agency for purchasing power when they can't supply it.
10. Let industry engage in hedge contracts to guarantee power supplies during shortage periods.
11. Insure that economic interruptions don't occur. Any Florida utility which sells into the wholesale peak spot market at a time when its retail customers are curtailed should be required to disgorge all profits and pay consequential damages to the customers damaged by the transaction.
12. Promote local land use and zoning laws that will encourage distributive generation
13. Convene a series of forums of university, government, utility and consumer participants on public television to explore the reliability and cost issues in search of solutions that protect consumers and utility stockholders
14. **MOST IMPORTANTLY ACT NOW BEFORE THE CRISIS WORSENS AND THE OPTIONS FOR CONSUMER FAVORABLE SOLUTIONS ARE LIMITED.**



September 17, 1998

Mr. Joe Jenkins, Director  
Division of Electric and Gas  
Florida Public Service Commission  
Tallahassee, FL

SEP 18

RE: 1998 Ten Year Site Plans

Dear Mr. Jenkins:

LEAF offers the following comments on the 1998 Ten Year Site Plans filed by Florida's utilities. For the following reasons, LEAF believes the plans are unsuitable:

**1. *Utility plans are inconsistent with the State Comprehensive Plan.***

The Commission is to determine suitability in view of "the extent to which the plan is consistent with the state comprehensive plan." Section 186.802(2)(e), F.S.

- a. Utility plans are not consistent with the state comprehensive plan's goal that "Florida shall reduce its energy requirements through enhanced conservation and efficiency measures in all end-use sectors" and policy to "...reduce per capita energy consumption" Section 187(12)(a) and (b)1., F.S.

The DSM in the plans before you focuses almost entirely on reducing peak demand usage. Utilities should plan also to reduce per capita energy usage as directed by the state comprehensive plan. Focusing more on reducing per capita energy use would also help address reliability concerns stated by staff and industrial customers about the extent to which Florida's utilities may be unduly relying on load management and curtailables. More focus on energy use reduction would also be consistent with the Commission's DSM cost-effectiveness policy which encourages TRC-passing DSM when energy savings are high and rate impacts are low. Lowering energy consumption would help address both reliability concerns and conform to the state comprehensive plan.

- b. Utility plans are inconsistent with the state comprehensive plan's goal to promote "an increased use of renewable energy resources" and policies to promote "the development and application of solar energy..." and to promote "the use and development of renewable energy resources".

Florida's utilities' plans are inconsistent with these state plan goals and policies because they plan virtually no solar resources. Failing to plan for a transition to renewables equates to a plan to fail to make a timely transition to renewables. The Commission should take this opportunity to promote and encourage utility investments in solar energy.

**2. *Utility plans overstate the need for new power generation.***

The Commission is to determine suitability in view of "the need, including the need as determined by the commission, for electrical power in the area to be served." Section 186.802(2)(a), F.S. The plans propose adding about 8000 MW of new capacity over the next decade. Utility plans overstate the need for new capacity in that:

- a. All plans forego cost-effective energy-use reducing DSM investments that would reduce or postpone capacity needs. DSM efforts focus on peak reduction, leaving untapped the significant potential to reduce energy use at a cost less than power plants. In its 1994 conservation goals order the Commission encouraged utilities to begin to deliver that potential by investing in TRC passing DSM that offers high energy savings and low rate impacts (Order No. PSC-94-1313-FOF-EG issued 10/25/94, at p. 22).
- b. FPL and FPC plans assume no incremental DSM after 2003. This underestimates DSM contributions since both utilities must, under the Florida Energy Efficiency and Conservation Act, ("FEECA"), Chapter 366, F.S., implement DSM programs. The Commission should not allow FPL and FPC to assume DSM programs cease because post-2003 goals are not set yet.
- c. TECO's plan assumes Commission-set conservation goals will not be met. The Commission, in Order No. PSC-94-1313-FOF-EG, stated that its goals were minimum, pass-or-be-penalized goals. The Commission should not allow TECO to plan not to meet its conservation goals.

**3. *New capacity is being added without any apparent consideration of the aging fleet of existing plants, their potentially increased maintenance costs and their considerable current and future environmental costs.***

The Commission is to determine suitability after reviewing "possible alternatives to the proposed plan," the "anticipated environmental impact of each proposed electrical

power plant site" and "the plan with respect to the information of the state on energy availability and consumption." Section 186.201(2)(b) and (c), F.S.

As any machine ages, it typically requires more maintenance. Many of the plants built in the 1940's "50s, "60s and even "70s were originally designed for a 25 or 30 year life. As the attached chart shows, Florida has a significant amount of aging capacity, only a small fraction of which is proposed for retirement during the 10 year planning period. These plants will require more maintenance at a time when utilities are cutting costs, including plant and staffing levels. These plants are also among the most inefficient and most polluting in the fleet. They cost ratepayers inordinate amounts of money in being fuel-inefficient and they cost all Floridians in health and environmental damage. Some recognition of the need to retire these plants, or bring them up to current standards, is needed.

**4. Assumptions that the availability of all existing units is increasing are unsupported.**

The Commission is also to determine suitability after reviewing "the plan with respect to the information of the state on energy availability and consumption." Section 186.201(2)(f), F.S. Utility representatives claim that the availability of existing units is increasing. However, as detailed above, Florida is relying on a significant amount of aging capacity. Utility plans give no apparent consideration to the likely decreased availability of those aging units. Thus, claims that the availability of existing units is increasing are not supported.

LEAF appreciates your consideration of these comments.

Sincerely,

*Deb Swim*

Debra Swim  
Senior Attorney  
Energy Advocacy Project

cc: Leslie Paugh, Esq.

**FLORIDA'S FOSSIL FUEL POWER PLANTS  
CAPACITY, PLANT AGES AND PLANNED RETIREMENTS**

Statewide (Peninsula and Gulf)

Plant in-service date	summer MW capacity	planned MW retirements thru 2007	percentage of MW to be retired
1940s	84	32	+40%
1950s	1744	432	25%
1960s	8099	418	±5.2%
1970s	11686	157	.13%

Peninsular Florida

Plant in-service date	summer MW capacity	planned MW retirements thru 2007	percentage of MW to be retired
1940s	33	32	>99%
1950s	1520	432	±33%
1960s	7656	418	±6%
1970s	10571	125	>1%

Gulf Power

Plant in-service date	summer MW capacity	planned MW retirements thru 2007	percentage of MW to be retired
1940s	51	0	0
1950s	224	0	0
1960s	443	0	0
1970s	1115	32	<1%

## STATEMENT CONCERNING THE TEN-YEAR SITE PLANS

On behalf of the U. S. Generating Company, I would like to provide the following comments:

There has been much discussion recently regarding the State of Florida experiencing "a robust competitive wholesale market" for electric energy and capacity. Moreover, Gulf Power has recently indicated it intends to issue a Request for Proposals pursuant to PSC Rule 25-22.082 for competitive bids to meet its next planned generating requirements. Remarkably, it should be noted that this is the first time that this rule, commonly referred to as the "Competitive Bidding Rule," has been used since it was adopted by the Commission in 1994. A truly robust competitive market cannot be achieved unless all electric energy providers, investor-owned utilities, municipalities, cooperatives and independent power producers, can compete on a level playing field. This will not happen until and unless restructuring or re-regulation is implemented in Florida, that is until wholesale energy providers can compete head-to-head on a market price basis.

I would note that the Commission, by its adoption of the so-called "Competitive Bid Rule," has expressed support for competition in the

wholesale electric marketplace. This underscores my point: Allowing independent power producers, such as U. S. Generating, to competitively bid projects apparently not covered by the "Competitive Bid Rule", will further the goal of a competitive wholesale market in the State. For instance, it is unclear whether the present "Competitive Bidding Rule" applies to "repowering" projects that Florida Power & Light is proposing for its two existing steam units in Ft. Myers. FPL's ten-year site plan states that approximately "837 MW of new generating capacity will result from this project."<sup>1</sup> Rather than just accepting that their "repowering" projects will give ratepayers the best deal, until such time as competitive re-regulation comes to Florida, the "Competitive Bid Rule" should be employed as the already approved mechanism of assuring ratepayers the least cost alternative. U. S. Generating looks forward to discussing this and other related issues with you and the Commission so as to ensure the existence and furtherance of a truly robust competitive wholesale market in Florida.

---

<sup>1</sup> See FPL's ten-year site plan, p. 39.

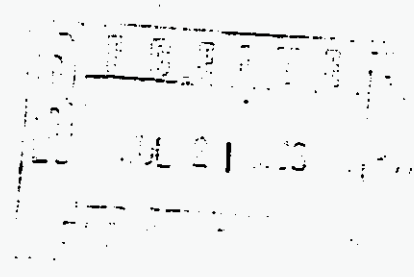


# Apalachee Regional Planning Council

Serving Calhoun, Franklin, Gadsden, Gulf, Jackson, Jefferson, Liberty, Leon, and Wakulla Counties and their municipalities

July 20, 1998

Mr. Michael Haff  
Bureau of Conservation, System Planning  
and Electric Safety  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850



Dear Mr. Haff:

The Apalachee Regional Planning Council staff has reviewed the Ten Year Site Plans (TYSP) for the City of Tallahassee, the Florida Power Corporation (FPC), the Gulf Power Company (GPC) (revised June, 1998), and the Florida Municipal Power Agency (FMPA) and has the following comments:

## A. City of Tallahassee

The City of Tallahassee is planning the addition of a 233 megawatt plant in St. Marks. The Site Certification Application was received by the Council in March 1997, and Council staff has provided comments. All issues of regional concern have been addressed.

## B. Gulf Power Company

In the 1997 Ten Year Site Plan, the Gulf Power Company planned the addition of two 100 megawatt plants near Sneads. These facilities are not mentioned in the 1998 Site Plan, so the status is unknown. The 1998 Site Plan instead proposes a new 532 megawatt plant in Bay County, with construction to begin next June. There is no other information provided concerning this plant.



Mr. Michael Haff

August 1, 1997

Page Two

Therefore, it cannot be determined whether there is the potential for significant impacts due to this facility. The significance of impacts to regional resources and facilities should be determined prior to final authorization, as well as any needed mitigation plan.

C. No other power plants are planned within or are likely to affect resources or facilities of this Region.

If you have any questions concerning this matter, please contact Mike Donovan at 488-6211 or (850) 674-4571.

Sincerely,



Charles D. Blume  
Executive Director

CDB/md

cc: Mr. Paul Darst, DCA

August 18, 1998

Mr. Michael S. Haff  
Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

1998  
AUG 17 10 53 AM  
FEDERAL BUREAU OF INVESTIGATION

**RE:** Electric Utility Ten-Year Site Plans

Dear Mr. Haff:

The staff of the Central Florida Regional Planning Council has completed its review of Ten-Year Site Plans provided by your office. Our review has considered such issues as:

- land use compatibility,
- consistency with the Strategic Regional Policy Plan,
- consistency with local plans and development regulations,
- potential impact on public facilities, and potential impact on air and water quality, endangered and threatened species, wetlands, and historical and archaeological resources.

The following plans were reviewed and comments are provided as appropriate:

**Florida Power Corporation:** Council staff has participated in, and continues to monitor, certification activities for the Hines Energy Complex. Concerns were addressed during that process. No further comment is necessary at this time.

**Florida Power & Light:** Development of the DeSoto Plant Site would be difficult due to water resource constraints within the region. Ground water availability is questionable due the designation of the Southern Water Use Caution Area by SWFWMD. Surface water resources are basically allocated to the Peace River Manisota Water Supply Authority. Other resource issues would need to be addressed during any certification activity. Air quality standards should be consistent with the requirements placed on the Hines Energy Complex and the TECO Polk facility.

**Tampa Electric Company:** Council staff has participated in, and continues to monitor, certification activities for the TECO Polk facility. Concerns were addressed during that process. No further comment is necessary at this time.

41



Michael S. Haff  
August 18, 1998  
Page Two

Florida Municipal Power Agency: No Comment

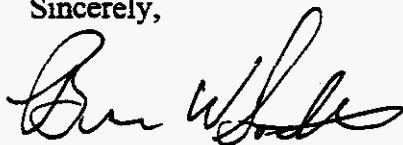
Kissimmee Utility Authority: No Comment

City of Lakeland: No Comment

Seminole Electric Cooperative: Council staff has participated in, and continues to monitor, certification activities for the Hardee facility. Concerns were addressed during that process. No further comment is necessary at this time.

The Department of Community Affairs has informed me that there is some question about our comments for the previous year. The review letter is attached for your files. Please call me if I can be of further assistance.

Sincerely,



Brian W. Sodt, AICP  
Regional Planning and Development Review Manager

BWS/bs

cc: DCA



August 27, 1997

Mr. Charles Pattison  
Department of Community Affairs  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399-2100

RE: Electric utility 1997 10-year site plans

Dear Charles:

Please be advised, the staff of the Central Florida Regional Planning Council has completed the review of the 10-year site plans for the Florida Municipal Power Agency, Florida Power Corporation, Lakeland Electric, Seminole Electric Cooperative and Tampa Electric Company. Given the requirements of section 186.801, Florida Statutes, and Rule 9J-25, Florida Administrative Code, council staff has no substantive comments regarding the suitability of the individual annual 10-year site plans as planning documents.

Council staff will continue to focus planning and review efforts upon proposals submitted through the site certification process.

Sincerely,

Brian W. Sadt, AICP  
Regional Planning Manager



East Central Florida  
**REGIONAL  
 PLANNING  
 COUNCIL**

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Acting  
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 Greg Golgowski, AICP

The Council's mission is to take a leadership role in representing identified regional resources and interests through a strategic planning program; develop and maintain a regional data system; provide coordination and assistance to governments at all levels; develop a shared vision of the region's future; and coordinate the region's resources and energies to achieve common goals.

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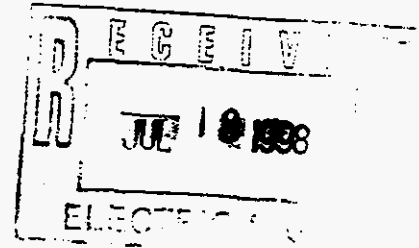
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July 7, 1998

Mr. Michael S. Haff  
 Division of Electric & Gas  
 Florida Public Service Commission  
 2540 Shumard Oak Blvd.  
 Tallahassee, Florida 32399-0850



**RE: Ten-Year Site Plan Reviews**  
 Florida Power Corporation  
 Florida Power & Light  
 Orlando Utilities Commission

Dear Mr. Haff:

The East Central Florida Regional Planning Council (ECFRPC) has reviewed the ten-year site plans for the following electric utilities: the Florida Municipal Power Agency, Florida Power & Light Company, the Orlando Utilities Commission, Florida Power Corporation, and Seminole Electric Cooperative, Inc. The Orlando Utilities Commission, Florida Power Corporation, and Seminole Electric Cooperative, Inc. either do not require additional facilities or have facilities located outside the jurisdiction of the ECFRPC. The remaining two -- the Florida Municipal Power Agency and Florida Power & Light Company were reviewed with the comments below.

**Florida Municipal Power Agency.** The agency plans to increase the capacity of the combined cycle unit at Kissimmee's Cane Island Power Park. This plan gives very little information concerning the environmental impact and mitigation measures; instead the section refers to the Kissimmee Utility Authority's 1998 Ten-Year Site Plan. In your initial letter dated May 12, 1998, the Council did not receive the Kissimmee plan. Please send us the copy of the Kissimmee plan so we may complete this review.

**Florida Power & Light Company.** FPL plans to increase the capacity of the Sanford Plant located in the southwestern section of Volusia County within the City of Debarry. FPL plans to increase the capacity by "repowering" two of the three existing generating units with six natural gas-fired units and six heat recovery steam generators (HRSGs).

According to the Debarry Comprehensive Plan, the plant site is designated as Industrial Utilities and is surrounded by primarily agriculture. Since the repowering of the plant with natural gas fired generators and HRSGs will represent a more efficient and cleaner technology, air pollution emissions will

Mr. Michael S. Haff  
Ten-Year Site Plan Reviews  
Page Two

lower than the replaced generators. Use of natural gas instead of oil will also reduce oil barge traffic on the St. John's River; however, these natural gas generators would require a larger natural gas supply line to be built to the facility. There are no other impacts of this planned expansion on adjacent land uses, local comprehensive plans, public facilities, or natural resources.

If you have any questions or if the ECFRPC can be of further assistance, please contact us.

Sincerely,



Jeffrey A. Jones  
Planning Director

JAJ:TJ:th

# North Central Florida Regional Planning Council

2009 NW 67 PLACE, SUITE A, GAINESVILLE, FLORIDA 32653-1603  
(352) 955-2200 SUNCOM 625-2200 FAX (352) 955-2209



May 29, 1998

Michael Haff  
Division of Electric & Gas  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: Regional Review of the Following Ten-year Site Plans:

Florida Municipal Power Agency, Florida Power Corporation, Florida Power and Light Company, Seminole Electric Cooperative, and Gainesville Regional Utilities

Dear Mr. Haff:

At its regularly scheduled meeting held May 28, 1998, the Council reviewed the above-referenced item. Subsequent to this review, the Council voted to adopt the attached report and recommendation for your consideration.

If you have any questions, please do not hesitate to call.

Sincerely,

Charles L. Kiestler  
Director of Regional Programs

Enclosure

xc: Paul Darst, DCA

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# NORTH CENTRAL FLORIDA REGIONAL PLANNING COUNCIL

May 28, 1998

**Clearinghouse Item #93 - Ten-year Site Plans: Florida Municipal Power Agency, Florida Power Corporation, Florida Power and Light Company, Seminole Electric Cooperative, and Gainesville Regional Utilities, 1998-2007**

## INTRODUCTION

In accordance with Chapter 186.801, F.S., all electrical generating companies over a certain size must develop ten-year site plans relating to the siting of new generating facilities and submit these plans to the Florida Public Service Commission and the regional planning council for review. The above-referenced plans cover the 1998-2007 planning period.

## BACKGROUND

Based on projected electrical demand for various parts of Florida, the plans identify anticipated new generating facilities needed over the next ten years. Once a need for additional capacity is identified, the ten-year site plans identify possible locations for new power plant sites. More than one site is usually listed as a possible alternative for each proposed electrical generating facility.

Before a plant can be constructed, an application must be filed with the Department of Environmental Protection (DEP) pursuant to the electrical power plant certification (permitting) process established by Chapter 403, F.S. While not as comprehensive as a Development of Regional Impact review, the focus of this process is on environmental impacts, including a special hearing on land use issues. The DEP must involve the Department of Community Affairs as well as the water management districts in the review process. Local governments and regional planning councils can intervene in the certification process.

## ANALYSIS AND RECOMMENDATION

### Florida Municipal Power Agency

The Florida Municipal Power Agency plans to construct a 120 MW generating plant by the year 2001 and an 80 MW plant in 2007 in Osceola County.



### Florida Power and Light Company

Florida Power and Light has identified a need for the construction of an additional (approximately) 2,950 MW electrical generation capacity by 2007. Potential sites for the additional capacity are located in Brevard, Broward, Lee, Manatee, Martin, Putnam, Volusia, and Lee counties as well as Monroe, Georgia.

### Seminole Electric Cooperative

Seminole Electric plans to construct an additional 440 MWs of electrical generating capacity by 2007 in Hardee County. Additionally, the cooperative proposes to build an additional 1,800 MW of electrical generating capacity in unspecified locations by the year 2007.

### Florida Power Corporation

Florida Power plans to construct several additional electrical generation plants by 2007 in Volusia County.

### Gainesville Regional Utilities

Gainesville Regional Utilities has no plans to construct new facilities during the next ten years.

No significant adverse impacts to north central Florida are anticipated as a result of the proposals from Florida Municipal Power Agency, Florida Power & Light Company, Florida Power Corporation, and Gainesville Regional Utilities. Therefore, these proposed site plans are consistent with the North Central Florida Strategic Regional Policy Plan. The impacts of the additional electrical generating capacity proposed by Seminole Electric Cooperative cannot be determined for proposed units one through ten as the location of these units is not identified in the ten-year site plan (see attached). It is recommended that the Seminole Electric ten-year site plan identify the locations of its proposed additional electrical generating units. It is recommended that these comments be forwarded to the Florida Public Service Commission as regional review.

**Council Action:** At its May 28th meeting, the Council voted to adopt this report.

**Schedule 8  
Planned and Prospective Generating Facility Additions and Changes 1998-2007**

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
<u>Plant Name</u>	<u>Unit No.</u>	<u>Location</u>	<u>Unit Type</u>	<u>Fuel</u>		<u>Fuel Transport</u>		<u>Const. Start Mo/Yr</u>	<u>Commercial In-Service Mo/Yr</u>	<u>Expected Retirement Mo/Yr</u>	<u>Gen. Max. Nameplate kW</u>	<u>Net Capability</u>		<u>Status</u>
				<u>Pri</u>	<u>Alt</u>	<u>Pri</u>	<u>Alt</u>					<u>Summer MW</u>	<u>Winter MW</u>	
Hardee Power Station	3	Hardee County SI,T33S,R24E	CC	NG	FO2	PL	TK	01/2000	01/2002	Unknown	612,112	451	527	T
Unknown	1-6	Unknown	GT	NG	FO2	PL	TK	01/2001	11/2002	Unknown	1,080,000	900	900	P
	7		GT	NG	FO2	PL	TK	06/2002	06/2004	Unknown	180,000	150	150	P
	8-9		GT	NG	FO2	PL	TK	01/2003	11/2004	Unknown	360,000	300	300	P
	10		GT	NG	FO2	PL	TK	01/2004	11/2005	Unknown	180,000	150	150	P
Total												1951	2027	

**T: Regulatory approval received. Not under construction.  
P: Planned, but not authorized by utility.**



*Seminole Electric  
Cooperative, Inc.*



# Northeast Florida Regional Planning Council

**Baker • Clay • Duval • Flagler • Nassau • Putnam • St. Johns**

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Web site: [www.nefrpc.org](http://www.nefrpc.org) E-mail: [nefrpc@nefrpc.org](mailto:nefrpc@nefrpc.org)

August 6, 1998

Mr. Michael Haff  
Bureau of Conservation, System Planning, and  
Electric Safety  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RE: Electric Utility Ten Year Site Plans 1997-2006

Dear Mr. Haff:

The Northeast Florida Regional Planning Council has reviewed the Ten Year Site Plans for the Jacksonville Electric Authority, Florida Power and Light, Florida Municipal Power Agency and Seminole Electric Cooperative, Inc. Pursuant to Section 186.801, Florida Statutes, comments regarding each plan are attached. They were unanimously approved by the Council at its regularly scheduled monthly meeting on August 6, 1998.

Thank you for the opportunity to comment on the Electric Utility Ten Year Site Plans. If you require further information, please contact me or Trish Dill of my staff.

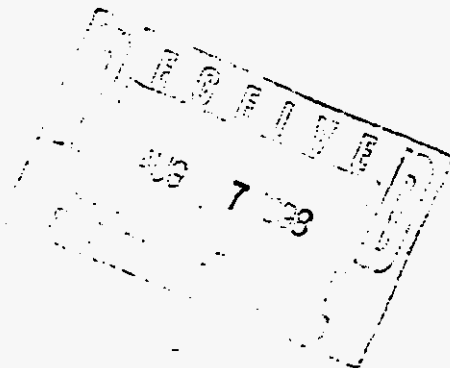
Sincerely,

Brian D. Teeple  
Executive Director

Attachments

BDT/td

cc: Paul Darst, DCA





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---

# Northeast Florida Regional Planning Council

**Baker • Clay • Duval • Flagler • Nassau • Putnam • St. Johns**

9143 Philips Highway, Suite 350, Jacksonville, Florida 32256

(904)363-6350 FAX (904) 363-6356

Suncom 874-6350 Suncom FAX 874-6356

Web site: [www.nefrpc.org](http://www.nefrpc.org) E-mail: [nefrpc@nefrpc.org](mailto:nefrpc@nefrpc.org)

---

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## MEMORANDUM

To: Northeast Florida Regional Planning Council

Thru: Nick Deonas, Chairman  
NEFRPC Comprehensive and Project Planning Committee

From: Patricia D. "Trish" Dill, Regional Planner

Date: July 28, 1998

Re: Electric Utility Ten-Year Site Plans

---

On May 14, 1998, the Northeast Florida Regional Planning Council received copies of the Ten-Year Site Plans for Jacksonville Electric Authority, Florida Power and Light, Florida Municipal Power Agency and Seminole Electric Cooperative, Inc. These plans were submitted pursuant to Section 186.801, Florida Statutes. Staff has reviewed the proposed plans, and with regard to each of the individual Ten-Year Site Plans offers the following comments.

### **Jacksonville Electric Authority (JEA)**

The Ten-Year Site Plan submitted by JEA includes the repowering of Northside Units 1 and 2 by April 2002. This program is at an existing facility and will not result in any new impacts on public facility capacities and is not inconsistent with the City of Jacksonville's Future Land Use Element.

In January 2000, the JEA is planning to begin using a simple cycle combustion turbine generating unit at the existing Kennedy Generating Station. This program is at an existing facility and will not result in any new impacts on public facility capacities and is not inconsistent with the City of Jacksonville's Future Land Use Element.

### **Florida Power and Light (FPL)**

According to Florida Power and Light's (FPL) Ten Year Power Plant Site Plan 1998-2007, FPL plans on supplying additional resources needed beginning in the year 2002 through the expansion and repowering of projects at both its existing Ft. Myers and Sanford Plant sites, followed by the addition of two (2) new combined cycle power plants at its existing Martin Plant site. However, no new sites or projects are planned for the Northeast Florida Area.

In 1997, FPL was granted permission by the Florida Public Service Commission to revise its Demand Side Management (DSM) program. The revised program began to be implemented in early 1998.

### **Florida Municipal Power Agency (FMPA)**

Jacksonville Beach and Green Cove Springs are the two municipalities within the northeast Florida region that are members of the Florida Municipal Power Agency (FMPA). The FMPA provides residential, commercial and industrial energy audits, provides education on energy conservation, and weatherizes low-income housing. These demand side management programs are consistent with regional policies. The FMPA is also participating in the Utility Photovoltaic Group which is a non-profit organization formed to accelerate the commercialization of photovoltaic systems for the benefit of electric utilities and their customers. Existing Conservation programs operated by FMPA include the following: Residential Energy Audits; High-Pressure Sodium Outdoor Lighting Conversion; Assistance for Commercial/Industrial Audits; Commercial time-of-use Program; Natural Gas Promotion; Residential Load Management Program; and a Fix-up Program for the Elderly and the Handicapped.

The FMPA Ten Year Site Plan does not contain proposals for future facilities within the northeast Florida region. Therefore, there are no comments regarding this issue.

**Seminole Electric Cooperative, Inc. (SECI)**

The Seminole Electric Cooperative, Inc. (SECI) distribution system members who provide electric power to the northeast Florida region are Clay Electric Cooperative, Inc. in Keystone Heights (serving portions of Clay, Duval, Baker, Flagler and Putnam Counties), and Okefenokee Rural Electric Membership Corporation, Inc. in Nahunta, Georgia (serving portions of Baker, Duval and Nassau Counties).

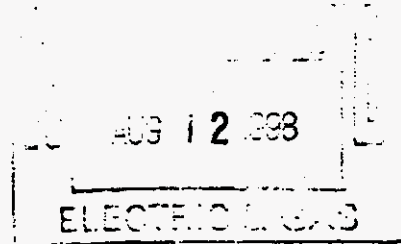
SECI serves its member system load with a combination of owned generation and purchased capacity resources. One of SECI's existing generating facilities located in the northeast Florida region is the coal-fired Seminole Plant in Palatka. SECI purchases partial and/or full requirements (PR/FR) power from Florida Power Corporation, the Jacksonville Electric Authority, the City of Gainesville, and Tampa Electric Company. In February 1998, Seminole made a decision to terminate its PR Agreement with FPL effective January 1, 1999.

SECI is participating in the University of South Florida's Electric Vehicle Solar Recharging project and monitors other solar energy research projects and the advances in fuel cell technology for possible inclusion in Seminole future resource options.

The NEFRPC has no comments regarding SECI's planned facilities since none of the new facilities are located within the northeast Florida region.

**Staff Recommendation**

Staff recommends that the Comprehensive and Project Planning Committee and the Council accept staff comments and transmit the comments to the Florida Public Service Commission.



August 10, 1998

Mr. Michael Haff  
Division of Electric and Gas  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Florida Power and Light - Ten Year Power Plant Site Plan 1998-2007.

Dear Mr. Haff:

We have reviewed the above-referenced plan and have the following comments:

- Additional transmission lines to be located in the South Florida region are limited to existing utility easements. They are necessary infrastructure for the economic growth of the region, and are not a subject of concern regarding the goals and policies of the *Strategic Regional Policy Plan for South Florida*.
- With regard to the policies of the utility which impact the resources and economy of the region, Florida Power and Light has carefully balanced conservation measures through its Demand Side Management programs with expansion of energy-generating facilities to simultaneously meet the energy needs of our expanding population while reducing the potential of that need for energy.
- The Ten Year Power Plan Site Plan is generally consistent with the goals and policies of the *Strategic Regional Policy Plan for South Florida*, specifically the following:

#### Strategic Regional Goal

- 2.3 Enhance the economic competitiveness of the region and ensure the adequacy of its public facilities and services by eliminating the existing backlog, meeting the need for growth in a timely manner, improving the quality of services provided and pursuing cost-effectiveness and equitability in their production, delivery and financing.

#### Regional Policies

- 2.3.22 Encourage the application of resource recovery, recycling, cogeneration, district cooling, water re-use systems, and other appropriate mechanisms where they are cost-effective and environmentally sound, as means of reducing the impacts of new development on existing public facilities and services, and the costs of providing new public facilities and services,

Mr. Michael Haff  
August 10, 1998  
Page 2

- 2.3.35 Allow flexibility in state, local, and private sector participation in funding public services and facilities.
- 2.3.36 Encourage the use of user fees which discourage excessive use of infrastructure and services in the region while considering social and economic equity standards.

Thank you for the opportunity to comment. If you require further information, please contact me.

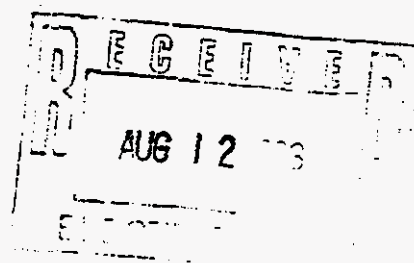
Sincerely,



John E. Hulsey, AICP  
Senior Planner

JEH/cp





August 10, 1998

Mr. Michael Haff  
Division of Electric and Gas  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Florida Municipal Power Agency - Ten Year Power Plant Site Plan 1998-2007.

Dear Mr. Haff:

We have reviewed the above-referenced plan and have the following comments:

- No new facilities are planned within or directly impacting the South Florida region. Therefore, our comments are limited to the policies of the utility which impact the resources and economy of the region. The Florida Municipal Power Agency, by continued implementation of its Demand Side Management programs, will contribute to energy conservation in the region and help to save money and resources for the region's citizens.
- The Ten Year Power Plant Site Plan is generally consistent with the goals and policies of the *Strategic Regional Policy Plan for South Florida*, specifically the following:

#### Strategic Regional Goal

- 2.3 Enhance the economic competitiveness of the region and ensure the adequacy of its public facilities and services by eliminating the existing backlog, meeting the need for growth in a timely manner, improving the quality of services provided and pursuing cost-effectiveness and equitability in their production, delivery and financing.

#### Regional Policies

- 2.3.22 Encourage the application of resource recovery, recycling, cogeneration, district cooling, water re-use systems, and other appropriate mechanisms where they are cost-effective and environmentally sound, as means of reducing the impacts of new development on existing public facilities and services, and the costs of providing new public facilities and services.
- 2.3.35 Allow flexibility in state, local, and private sector participation in funding public services and facilities.

Mr. Michael Haff  
August 10, 1998  
Page 2

2.3.36 Encourage the use of user fees which discourage excessive use of infrastructure and services in the region while considering social and economic equity standards.

Thank you for the opportunity to comment. If you require further information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Hulsey". The signature is fluid and cursive, with the first name "John" and last name "Hulsey" clearly distinguishable.

John E. Hulsey, AICP  
Senior Planner

JEH/cp



## Southwest Florida Regional Planning Council

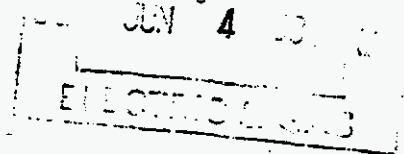
4980 Bayline Drive, 4th Floor, N. Ft. Myers, FL 33917-3909 (941) 656-7720

P.O. Box 3455, N. Ft. Myers, FL 33918-3455 SUNCOM 749-7720

FAX 941-656-7724

June 3, 1998

Mr. Michael S. Haff  
Bureau of Conservation, System Planning, and Electric Safety  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850



Dear Mr. Haff:

SWFRPC staff has reviewed the Ten-year Power Plant Site Plan—1998-2007 (April, 1998) of Florida Power and Light Company as requested by the Florida Public Service Commission.

### Expansion of the Fort Myers Facility

Florida Power and Light Company states that either new transmission capacity or about 400 megawatts of new generation capacity will be needed in Southwest Florida by the beginning of 2002 to address reliability problems that could be experienced during the winter peak season (pages 38, 39, and 64).

FPL has one generating plant (located at Fort Myers in Lee County) within Southwest Florida. FPL has proposed expansion and repowering of the two existing steam units at that facility, to be completed by January of 2002. This project will utilize the current steam capacity and existing turbine set at Fort Myers to increase generating capacity by about 837 megawatts.

Two existing oil-fired units will be replaced with six advanced combustion turbines to be fueled by natural gas and six heat recovery steam generators (referred to as "repowering"). The existing twelve combustion turbines at the site will not be part of the project.

This project is dependent upon obtaining a supply of natural gas that is "both sufficient for fueling the electrical capacity involved and economically attractive." If that fuel supply cannot be obtained, the expansion project at Fort Myers would be canceled. Another project to expand capacity would be chosen, but "such a replacement option would almost certainly not located in the Lee/Collier County area." (Underlining for emphasis by FPL.)

Letter to Mr. Haff  
Public Service Commission  
June 3, 1998  
Page 2 of 3 Pages

FPL prefers the above-described project over the construction of a new transmission line across the state. FPL has not proposed the construction of any new generating facilities within any other part of Southwest Florida.

Use of the Fort Myers site is preferred over the development of a new site for several reasons. The primary benefit is expected to be that development would occur at a site that is already partially developed and used by FPL for power generation. In addition, the general information from FPL states that the project will result in improved operating efficiencies and reduced environmental impacts at the Fort Myers facility. The elimination of the use of barges to transport fuel would be a definite benefit.

FPL states that no permit applications have been prepared for the repowering project at the Fort Myers facility (page 70).

#### Preferred and Potential Sites

FPL has developed a list of sites, both preferred and potential (pages 63-88). The number one preferred site is the Fort Myers facility. There are no other preferred sites in Southwest Florida. The preferred sites (listed in order of preference) are in Lee County (the Fort Myers facility), Volusia County, and Martin County.

FPL makes the following statement about the preferred sites [pages 63 and 64, Ten-year Power Plant Site Plan-1998-2007 (April, 1998), FPL]:

Identification of a site as a preferred site does not represent a firm commitment by FPL to construct a new power plant or add incremental generating capacity at that site.

The discussion of potential sites (beginning on page 84) includes no site in Southwest Florida. The listed potential sites (not in order of preference) are in DeSoto County, Brevard County, Palm Beach County, and Broward County.

#### SWERPC Review

While the Ten Year Power Plant Site Plan for 1998-2007 provides some information about the preferred sites, neither that information nor the information about the potential sites is adequate for review of a specific project. Additionally, that is not the function of this review as requested by the Public Service Commission.

Letter to Mr. Haff  
Public Service Commission  
June 3, 1998  
Page 3 of 3 Pages

SWFRPC is aware of the ongoing FPL siting effort as stated in the Ten Year Power Plant Site Plan for 1998-2007. If any of the sites noted above is elevated to the status of an actual project that requires SWFRPC review or if a new site is added to the list of sites for Southwest Florida, SWFRPC will participate as appropriate in review of such site(s).

DCA Request

SWFRPC has reviewed ten year site plans each year as requested by the Public Service Commission. The PSC has not asked SWFRPC to copy DCA. In response to a request from DCA (Ben Starrett), however, a copy of this review is being provided to DCA.

Sincerely,  
Southwest Florida Regional Planning Council



James E. Newton II  
Principal Planner

c. Ben Starrett, DCA.



**Southwest Florida Regional Planning Council**

4980 Bayline Drive, 4th Floor, N. Ft. Myers, FL 33917-3909 (941) 656-7720

P.O. Box 3455, N. Ft. Myers, FL 33918-3455 SUNCOM 749-7720

FAX 941-656-7724

June 5, 1998

8

Mr. Michael S. Haff  
Bureau of Conservation, System Planning, and Electric Safety  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Dear Mr. Haff:

SWFRPC staff has reviewed the 1998 Ten-year Site Plan (April 1998) of Seminole Electric Cooperative, Inc. as requested by the Florida Public Service Commission.

SECI has eleven members, with two in Southwest Florida (Glades Electric Cooperative, Inc. in Moore Haven and Lee County Electric Cooperative, Inc. in North Fort Myers). They distribute power purchased from SECI. Neither cooperative generates its own power. None of the generating facilities of SECI is within Southwest Florida.

For Southwest Florida, the nearest generating facility is Hardee Power Station in Hardee and Polk Counties. (The facility is owned by Hardee Power Partners, a subsidiary of SECI.) The site is nine miles northwest of Wauchula, sixteen miles south-southwest of Bartow, in northern Hardee County, on the border with Polk County.

According to the information in the ten-year site plan, SECI intends to expand generation capacity at that site in the future (page 72). The site, however, is outside the Southwest Florida region. As a result, no comments are offered on the SECI Ten-year Site Plan.

SWFRPC has reviewed ten year site plans each year as requested by the Public Service Commission. The PSC has not asked SWFRPC to copy DCA. In response to a request from DCA (Ben Starrett), however, a copy of this review is being provided to DCA.

Sincerely,  
Southwest Florida Regional Planning Council

James E. Newton II  
Principal Planner

c: Ben Starrett, DCA.

51



*Tampa Bay Regional Planning Council*

Chairman  
Commissioner Steven M. Seibert

Vice-Chairman  
Barbara Romano

Secretary/Treasurer  
Commissioner Chris Hart

Acting Executive Director/CFO  
Manny L. Pumariega

July 27, 1998

Mr. Michael S. Haff  
Public Service Commission  
Bureau of Conservation  
System Planning & Electric Safety  
Capitol Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Subject: Recommended for APPROVAL, IC&R #148-98, Florida Power  
Corporation Fiscal Year 1998-2007 Ten-Year Site Plan, Pinellas and  
Pasco Counties

ADMINISTRATIVE  
MAIL ROOM

JUL 29 8 29 AM '98

RECEIVED

Dear Mr. Haff:

The enclosed agenda item regarding the above-referenced matter was considered and staff comments approved by the Clearinghouse Review Committee of the Tampa Bay Regional Planning Council at its July 27, 1998 meeting.

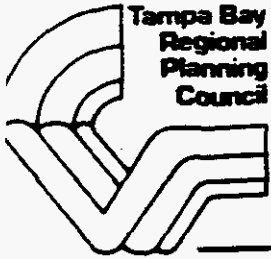
Please feel free to contact me if further information regarding this item is desired.

Sincerely,

John M. Meyer, Principal Planner  
Intergovernmental Coordination & Review

JMM/bj

Enclosure



# Clearinghouse Review

## FLORIDA POWER CORPORATION TEN-YEAR SITE PLAN, PINELLAS AND PASCO COUNTIES, IC&R #148-98.

The Florida Department of Community Affairs has requested review and comment on the Florida Power Corporation (FPC) Ten-Year Site Plan pursuant to Section 186.801, F.S. The Ten-Year Plan is required by Chapter 186, F.S. and 22E-2, F.A.C., and is prepared pursuant to the Florida Electrical Power Plant Siting Act, Part II, Chapter 403, F.S.

The Ten-Year Site Plan describes the utility's current power generating capacity and demand, forecasts future electrical power demand and estimates future facility needs. In the Tampa Bay region, FPC serves Pinellas and Pasco counties. Generating plants located in the region are the P.L. Bartow, Bayboro and Higgins facilities in Pinellas County and the Anclote site in Pasco County.

### Council Comments/Concerns

The FPC has identified a current electrical generating capacity of 9,003 megawatts (MW) and a projected demand in 2008 for 10,997 MW. To meet this demand FPC has identified a range of alternatives that includes: energy conservation programs, load management, purchases from traditional suppliers, cogeneration, adding units to existing plants and building new facilities.

The Ten-Year Site Plan indicates FPC has an extensive load management program with over 540,000 subscribers. The program includes load management and various energy conservation programs. During the winter peak demand period, a peak reduction of over 1,843 MW is currently available. This is projected to increase to 2,014 MW by 2008.

Purchases from traditional utility sources and non-utility sources (cogeneration) will meet a significant part of FPC's future requirements. FPC has committed to purchase 476 MW from the Southern Company and others through 2010, and has over 900 MW of cogeneration under contract.

To meet generation expansion needs, FPC is constructing a natural gas fueled 470 MW combined cycle unit at the Hines Energy Complex (FKA Polk County Site). This will be operational by November, 1998. Similar units at the same facility are planned to be completed by the end of 2004 and 2006.

The existing facilities at Anclote (in Pasco County) will be converted to burn natural gas starting in 1998, and Crystal River will receive capacity upgrades. The Bartow Plant in Pinellas County was converted to natural gas in June, 1997. The Higgins Plant, located in the City of Oldsmar, is planned to be retired in December 2003. FPC no longer plans to retire the Bayboro Plant, located in the City of St. Petersburg, in December 2004.



The only future power lines discussed in the Plan are those associated with the Hines Energy Complex (HEC). The HEC-Ft. Meade Substation Line (230 KV) was put into service in early 1998. The HEC-Barcola Substation Line (230 KV) is projected to be in service in late 2003.

Construction of the HEC in Polk County, although not located in the Tampa Bay region, will impact this region. This facility, in conjunction with proposed construction by other power companies (Tampa Electric Company and Seminole Electric Cooperative) in the area, may produce unforeseen adverse environmental impacts. It is recommended that the Tampa Bay Regional Planning Council, Hillsborough County and Manatee County be notified by the Florida Department of Community Affairs of any future action related to the Hines Energy Complex.

#### Recommendation

It is recommended that the Florida Power Corporation's Ten-year site plan be approved.

Committee adopted July 27, 1998.

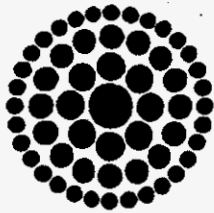


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Barbara Romano, Chair  
Clearinghouse Review Committee

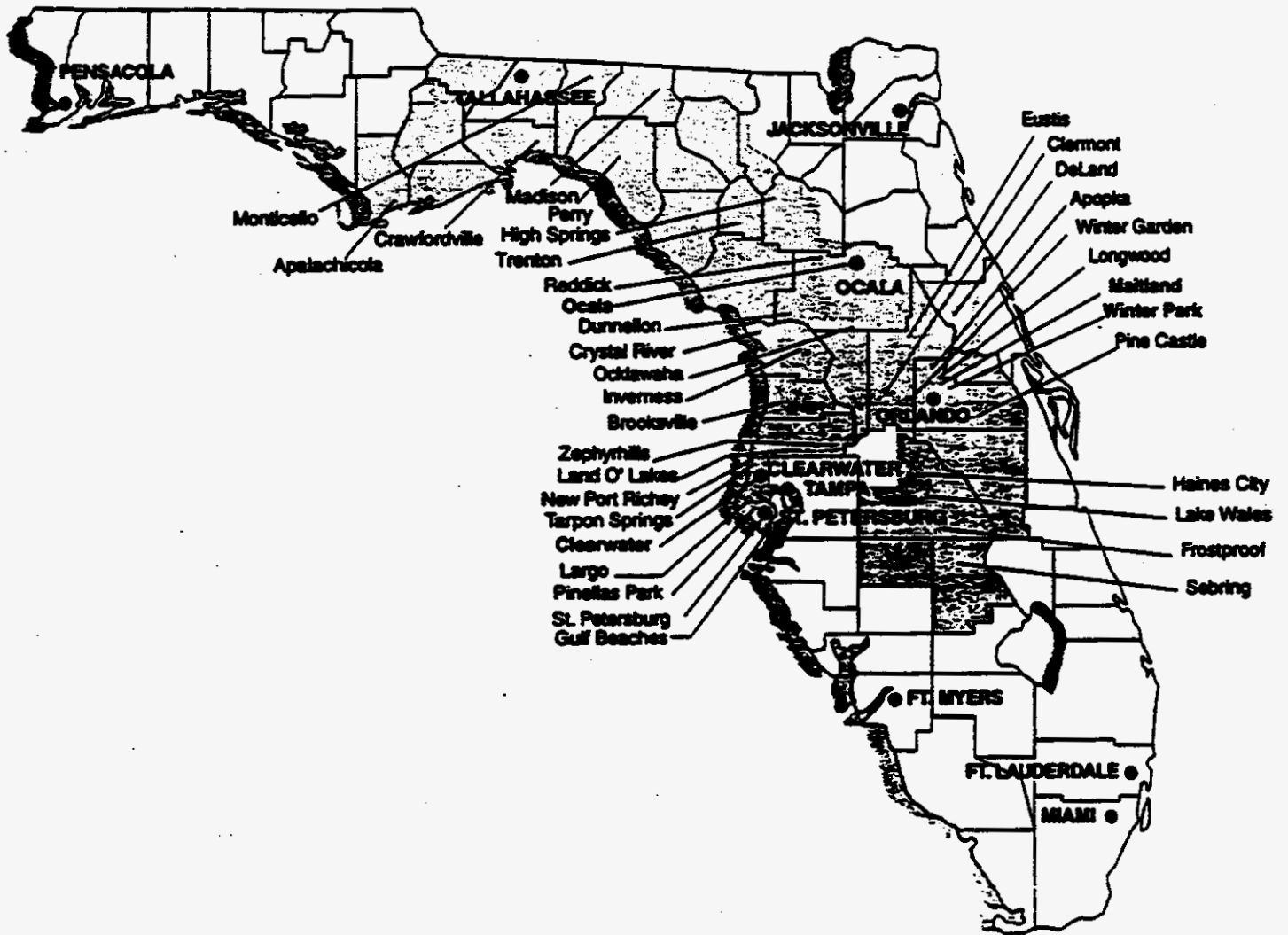
This project has been reviewed for consistency with the Council's adopted *Future of the Region: A Strategic Regional Policy Plan for the Tampa Bay Region*. It has been determined to be consistent with appropriate Council policies.

**PLEASE NOTE:** The Committee's comments constitute compliance with Florida's Intergovernmental Coordination and Review process only.



**Florida  
Power  
CORPORATION**

# Florida Power Corporation • Area of Service





*Tampa Bay Regional Planning Council*

Chairman  
Commissioner Steven M. Seibert

Vice-Chairman  
Barbara Romano

Secretary/Treasurer  
Commissioner Chris Hart

Acting Executive Director/CFO  
Manny L. Pumariega

July 27, 1998

Mr. Michael S. Haff  
Public Service Commission  
Bureau of Conservation  
System Planning & Electric Safety  
Capitol Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Subject: Recommended for APPROVAL, IC&R #149-98, Florida Power & Light Company Fiscal Year 1998-2007 Ten-Year Site Plan, Manatee County

Dear Mr. Haff:

The enclosed agenda item regarding the above-referenced matter was considered and staff comments approved by the Clearinghouse Review Committee of the Tampa Bay Regional Planning Council at its July 27, 1998 meeting.

Please feel free to contact me if further information regarding this item is desired.

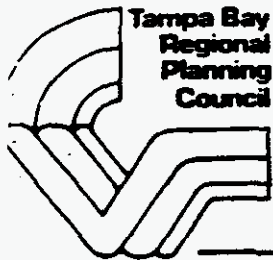
Sincerely,

John M. Meyer, Principal Planner  
Intergovernmental Coordination & Review

JMM/bj

Enclosure

66



# Clearinghouse Review

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**FLORIDA POWER AND LIGHT COMPANY TEN-YEAR SITE PLAN, MANATEE COUNTY, IC&R #149-98.**

The Florida Department of Community Affairs has requested review and comment on the Florida Power and Light Company (FPL) Ten-Year Site Plan pursuant to Section 186.801, F.S. The Ten-Year Plan is required by Chapter 186, F.S. and 22E-2, F.A.C., and is prepared pursuant to the Florida Electrical Power Plant Siting Act, Part II, Chapter 403, F.S.

The Ten-Year Site Plan describes the utility's current power generating capacity and demand, forecasts future electrical power demand and estimates future facility needs. In the Tampa Bay region, FPL serves Manatee County and its only generating plant in the region is located there.

### Council Comments/Concerns

The FPL has identified a current electrical generating capacity of 16,416 megawatts (MW) and a projected demand in 2007 of 19,901 MW. The need will be met by demand-side management, buying additional power from traditional sources and cogeneration, repowering existing units, and building new capacity.

Demand-side management (DSM) programs, by 2007, will generate the equivalence of 1,995 MW. FPL's DSM programs include residential load management, residential energy audits, commercial/industrial efficient lighting and load control, and efficient motors. This year FPL will begin implementation of "Green Pricing", a program that will allow customers to voluntarily participate in the purchase of photo-voltaic (AKA solar cell) facilities. These facilities would be installed at existing plants and the electricity generated by them would displace an equivalent amount of fossil-fuel generated electricity.

Part of FPL's proposed capacity increases are proposed to be met by existing unit upgrades (at the Manatee, Sanford and Ft. Myers plants), construction of new facilities at the Martin County Plant, purchases from other utilities and cogeneration. These increases will provide an additional 2,624 MW to the FPL system.

The Ten-Year Site Plan indicated FPL's proposal to modify Manatee County Units 1 and 2 (by 2000 and 2001, respectively) to burn orimulsion would decrease their total generating capacity by 198 MW. There was no other discussion of the use of orimulsion in the Plan.

Recommendation

It is recommended that the Florida Power and Light Company's Ten-year site plan be approved  
Committee adopted July 27, 1998.



Barbara Romano, Chair  
Clearinghouse Review Committee

This project has been reviewed for consistency with the Council's adopted *Future of the Region: A Strategic Regional Policy Plan for the Tampa Bay Region*. It has been determined to be consistent with appropriate Council policies.

**PLEASE NOTE:** The Committee's comments constitute compliance with Florida's Intergovernmental Coordination and Review process only.

# FPL Substation and Transmission System Configuration

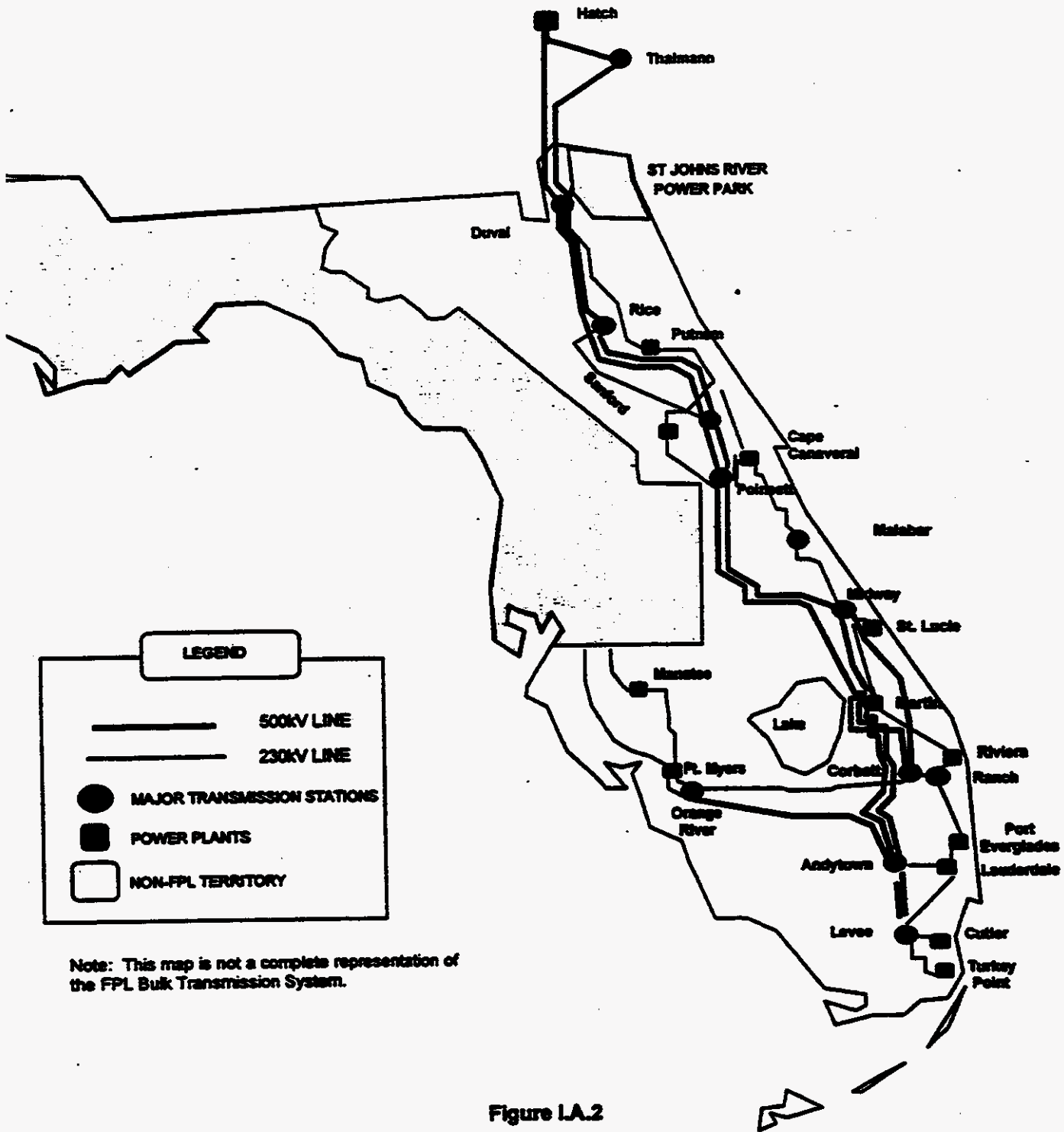


Figure I.A.2



*Tampa Bay Regional Planning Council*

Chairman  
Commissioner Steven M. Seibert

Vice-Chairman  
Barbara Romano

Secretary/Treasurer  
Commissioner Chris Hart

Acting Executive Director/CFO  
Manny L. Pumariega

July 27, 1998

Mr. Michael S. Haff  
Public Service Commission  
Bureau of Conservation  
System Planning & Electric Safety  
Capitol Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Subject: Recommended for APPROVAL, IC&R #150-98, Seminole Electric Cooperative, Inc. Fiscal Year 1998-2007 Ten-Year Site Plan, Pasco, Manatee and Hillsborough Counties

Dear Mr. Haff:

The enclosed agenda item regarding the above-referenced matter was considered and staff comments approved by the Clearinghouse Review Committee of the Tampa Bay Regional Planning Council at its July 27, 1998 meeting.

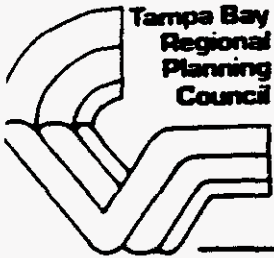
Please feel free to contact me if further information regarding this item is desired.

Sincerely,

  
John M. Meyer, Principal Planner  
Intergovernmental Coordination & Review

JMM/bj

Enclosure



# Clearinghouse Review

## **SEMINOLE ELECTRIC COOPERATIVE TEN-YEAR SITE PLAN, PASCO, MANATEE AND HILLSBOROUGH COUNTIES, IC&R #150-98.**

The Florida Department of Community Affairs has requested review and comment on the Seminole Electric Cooperative (SEC) Ten-Year Site Plan pursuant to Section 186.801, F.S. The Ten-Year Plan is required by Chapter 186, F.S. and 22E-2, F.A.C., and is prepared pursuant to the Florida Electrical Power Plant Siting Act, Part II, Chapter 403, F.S.

The Plan describes the utility's current power generating capacity and demand, forecasts future electrical power demand and estimates future facility needs. SEC is composed of 11 distribution system members, which includes Withlacoochee River Electrical Cooperative, which serves parts of Pasco County, and Peace River Electrical Cooperative, which serves parts of Manatee County and a small portion of Hillsborough County.

### Council Comments/Concerns

The SEC has identified a current demand for 2,893 megawatts (MW) of electricity and a projected demand in 2007 of 4,258 MW. Currently SEC generates 1,287 MW (winter peak) of power itself from facilities located in Palatka and Crystal River. The remainder of the demand from its member cooperatives is met by contractual purchases from other utilities.

SEC obtains a total of 440 MW of power from TECO Power Services (TPS). TPS supplies 145 MW from Big Bend Unit Four, in Hillsborough County, and 295 MW from the Hardee Power Station (HPS) which is located on the Polk-Hardee County line, five miles east of Hillsborough County. In 2003, the contract for the capacity of Big Bend Unit 4 will expire, but 145 MW of capacity will be available at SEC's option from the HPS (Unit #2). The 295 MW from HPS will continue to be available to SEC. SEC has decided to install a 440 MW gas-fired combined cycle unit in 2002 at the HPS (Unit #3). This is the only SEC owned facility proposed for construction that was identified in the Plan.

SEC has a contract with the Jacksonville Electric Authority for 53 MW through 2001. In addition, the Orlando Utilities Commission will supply between 75 and 125 MW through 2004. SEC has decided to purchase 450 MW from Florida Power Corporation between January 1, 1999 and January 1, 2001, with options through 2013.

For planning purposes only, SEC proposes to add 1,500 MW of generating capacity in 2003 through 2007 at unknown locations. This capacity is needed to replace expiring purchased power contracts and maintain SEC reliability criteria. The exact type of capacity and location will be determined through future studies and an all-source bidding process.




Construction of the HPS in Polk County, although not located in the Tampa Bay region, may impact this region. This facility, in conjunction with proposed or existing facilities of other power companies (Tampa Electric Company and Florida Power Corporation) in the area, may produce unforeseen adverse environmental impacts in the Tampa Bay region. It is recommended that the Tampa Bay Regional Planning Council, Hillsborough County and Manatee County be notified by the Florida Department of Community Affairs of any future action related to the Hines Energy Complex.

Recommendation

It is recommended that Seminole Electric Cooperative's Ten-year site plan be approved.

Further, it is recommended that any additional comments addressing local concerns be considered prior to final action.

Committee adopted July 27, 1998.



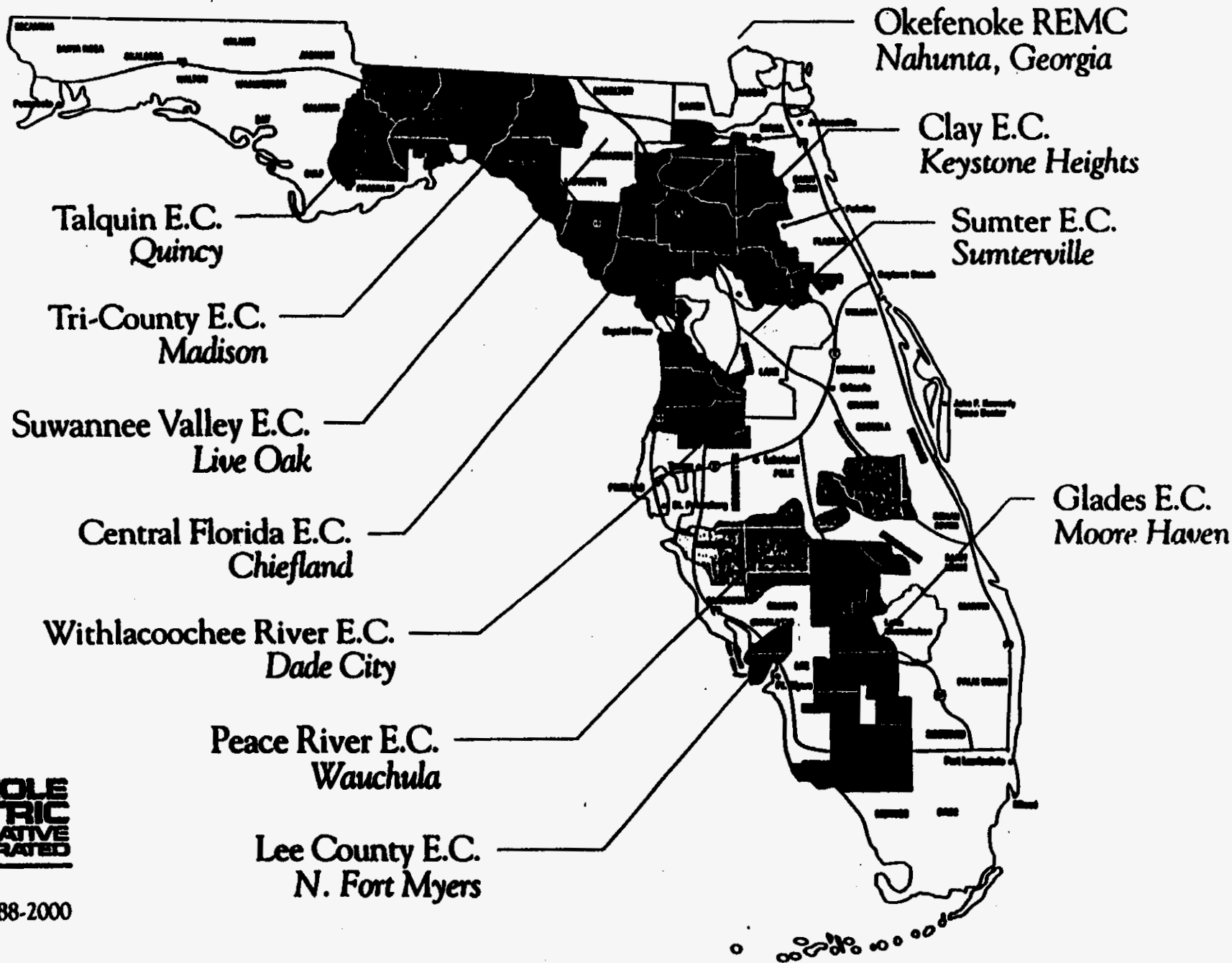
Barbara Romano, Chair  
Clearinghouse Review Committee

This project has been reviewed for consistency with the Council's adopted *Future of the Region: A Strategic Regional Policy Plan for the Tampa Bay Region*. It has been determined to be consistent with appropriate Council policies.

**PLEASE NOTE:** The Committee's comments constitute compliance with Florida's Intergovernmental Coordination and Review process only.

# Seminole's Eleven Member Distribution Cooperatives

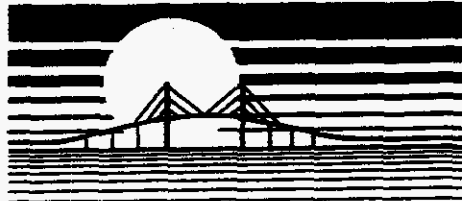
## FLORIDA



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SEMINOLE  
ELECTRIC  
COOPERATIVE  
INCORPORATED  
P.O. Box 272000  
Tampa, Florida 33688-2000  
(813) 963-0994



*Tampa Bay Regional Planning Council*

Chairman  
Commissioner Steven M. Seibert

Vice-Chairman  
Barbara Romano

Secretary/Treasurer  
Commissioner Chris Hart

Acting Executive Director/CFO  
Manny L. Pumariega

July 27, 1998

Mr. Michael S. Haff  
Public Service Commission  
Bureau of Conservation  
System Planning & Electric Safety  
Capitol Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Subject: Recommended for APPROVAL, IC&R #151-98, Tampa Electric Company Fiscal Year 1998-2007 Ten-Year Site Plan, Hillsborough and Pasco Counties and the City of Oldsmar

Dear Mr. Haff:

The enclosed agenda item regarding the above-referenced matter was considered and staff comments approved by the Clearinghouse Review Committee of the Tampa Bay Regional Planning Council at its July 27, 1998 meeting.

Please feel free to contact me if further information regarding this item is desired.

Sincerely,



John M. Meyer, Principal Planner  
Intergovernmental Coordination & Review

JMM/bj

Enclosure



# Clearinghouse Review

---

**TAMPA ELECTRIC COMPANY TEN-YEAR SITE PLAN, HILLSBOROUGH AND PASCO COUNTIES, AND THE CITY OF OLDSMAR, IC&R #151-98.**

The Florida Department of Community Affairs has requested review and comment on the Tampa Electric Company (TECO) Ten-Year Site Plan pursuant to Section 186.801, F.S. The Ten-Year Plan is required by Chapter 186, F.S. and 22E-2, F.A.C., and is prepared pursuant to the Florida Electrical Power Plant Siting Act, Part II, Chapter 403, F.S.

TECO's Ten-Year Site Plan describes the utility's current power generating capacity and demand, forecasts future electrical power demand and estimates future facility needs. In the Tampa Bay region, TECO serves Hillsborough County, portions of Pasco County and the City of Oldsmar located in Pinellas County. Three of TECO's generating plants are located in the region: Big Bend, Gannon, and Hookers Point.

## Council Comments/Concerns

TECO has a current generating capacity of 3,629 megawatts (MW) and projected demand of 4,476 MW in 2008. The need will be met by purchasing additional power from non-utility sources (cogeneration) and/or other utilities, TECO Power Services Corporation, and building new capacity.

Cogeneration, from non-utility sources, is expected to generate 444 megawatts (MW) in 1997. By 2007 the total cogeneration is expected to grow to 472 MW. TECO purchases 360 MW (winter) from the TECO Power Services Corporation that is produced at the Hardee Power Plant in Hardee County.

TECO's Demand Side Management plan (including conservation and Load Management), which received approval in early 1996, has a goal of reducing the winter peak demand by 1,377 MW. The plan includes Load Management, Energy Audits, Duct Repair and other programs to reduce electricity demand.

A combustion turbine, a heat recovery steam generator and a coal gasifier (total capacity of 250 MW) was completed in 1996, at TECO's Polk County site. Combustion turbines, of 180 MW each, will be added to this site in 2003, 2004 and 2006. No expansion is planned for TECO facilities in the Tampa Bay Region. The units at Hookers Point are planned to be retired in 2003.

In order to comply with the Clean Air Act Amendments of 1990, TECO will use low sulfur coal in Big Bend units 1-3, purchase sulphur-dioxide allowances and integrate Big Bend Unit 3 flue gases into the scrubber on Big Bend Unit 4. After 2000, TECO plans to continue to use low sulphur coal, sulphur dioxide allowances and flue gas scrubbing.

The Ten-Year Site Plan discussed the long term need for TECO to construct an 11-mile 230 KV transmission line between a new switching station in the Lithia area to an existing station in the Seffner area (Wheeler Road Substation) by 2005.

Expansion of the TECO Power Station in Polk County, although not located in the Tampa Bay region, may impact this region. This facility, in conjunction with proposed or existing facilities of other power companies (Florida Power Corporation and Seminole Electric Cooperative) in the area, may produce unforeseen adverse environmental impacts in the Tampa Bay region. It is recommended that the Tampa Bay Regional Planning Council, Hillsborough County and Manatee County be notified by the Florida Department of Community Affairs of any future action related to the TECO Power Station.

#### Recommendation

It is recommended that Tampa Electric Company's Ten-year site plan be approved.

Further, it is recommended that any additional comments addressing local concerns be considered prior to final action.

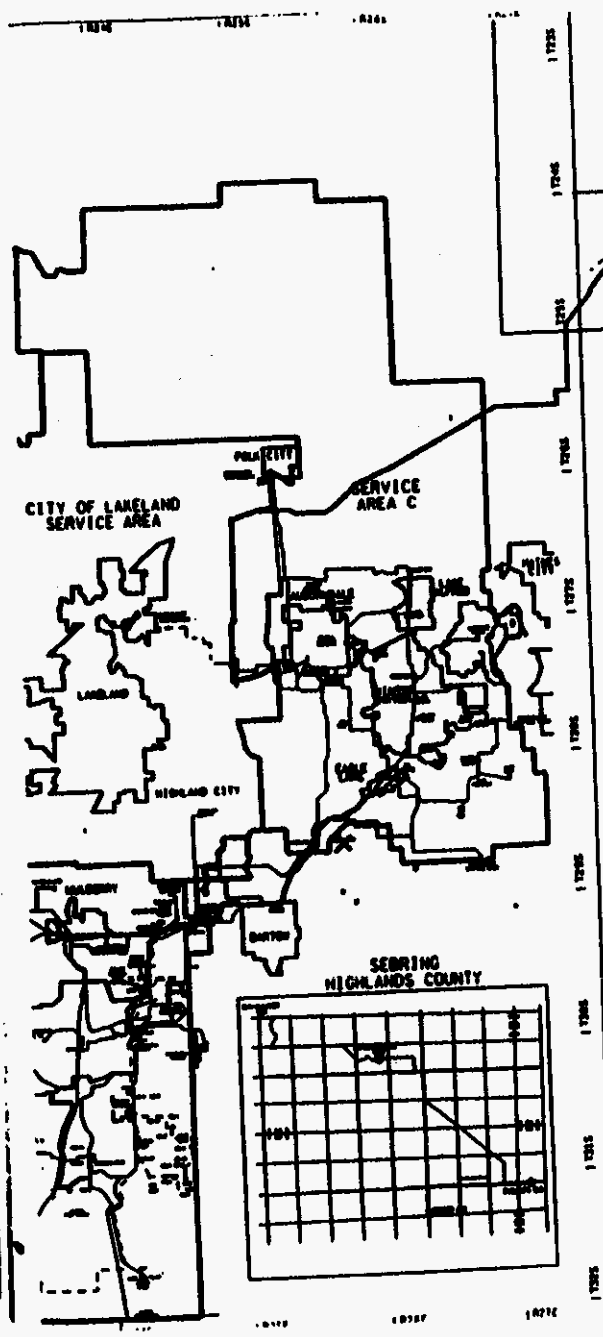
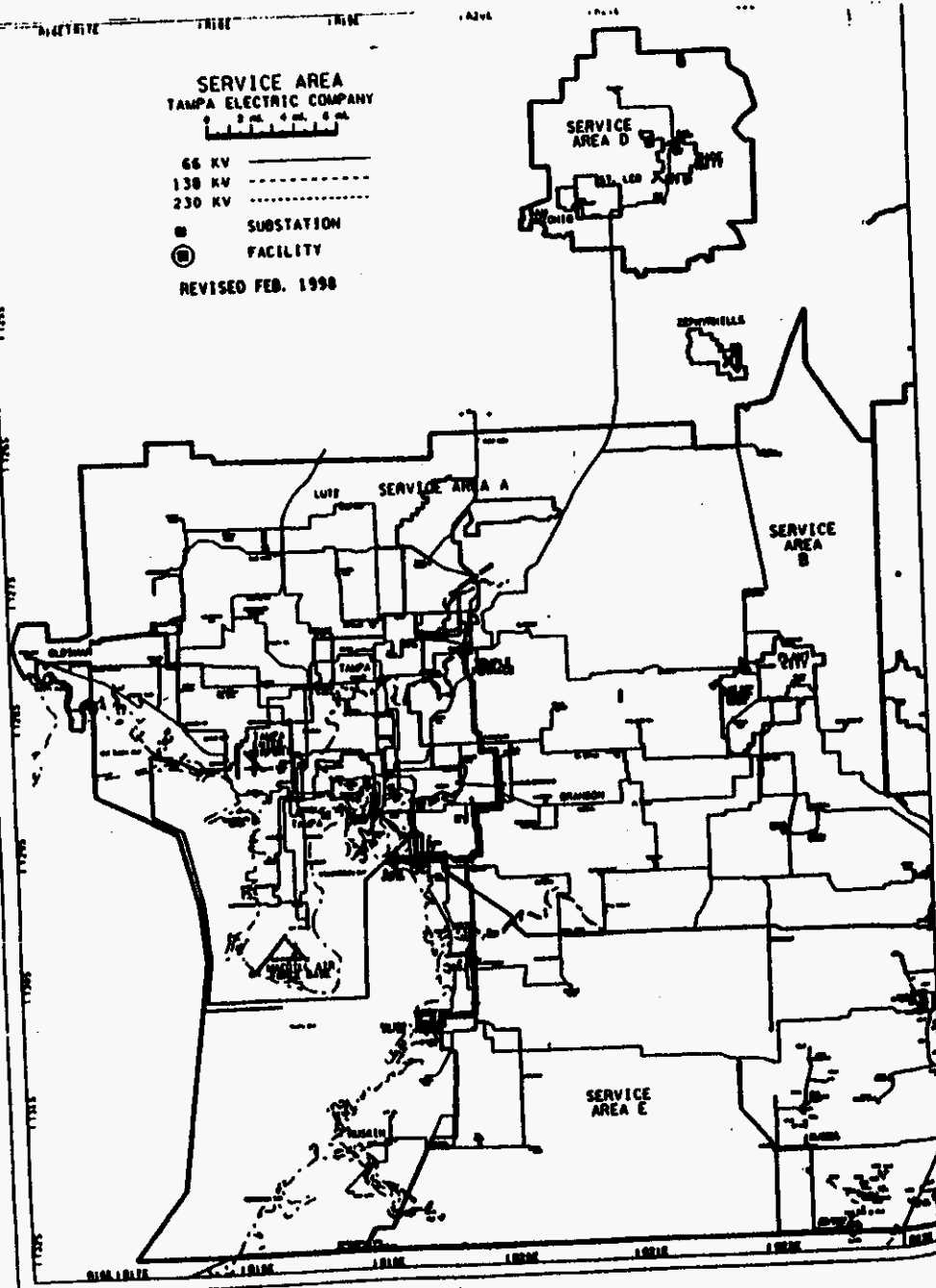
Committee adopted July 27, 1998.



Barbara Romano, Chair  
Clearinghouse Review Committee

This project has been reviewed for consistency with the Council's adopted *Future of the Region: A Strategic Regional Policy Plan for the Tampa Bay Region*. It has been determined to be consistent with appropriate Council policies.

**PLEASE NOTE:** The Committee's comments constitute compliance with Florida's Intergovernmental Coordination and Review process only.



**TAMPA ELECTRIC COMPANY**  
TEN YEAR SITE PLAN  
FOR ELECTRICAL GENERATING FACILITIES  
AND ASSOCIATED TRANSMISSION LINES

**FIGURE I-1**  
TAMPA ELECTRIC RETAIL CUSTOMER SERVICE AREA

indian river

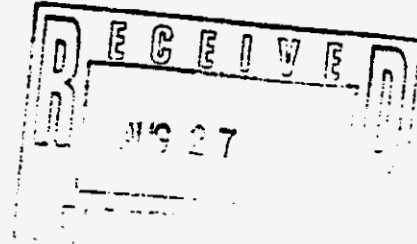
st. lude

palm beach

treasure  
coast  
regional  
planning  
council

August 26, 1998

Michael Haff  
Division of Electric & Gas  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850



Subject: Ten-Year Power Plant Site Plans

Dear Mr. Haff:

At its meeting on August 21, 1998, The Treasure Coast Regional Planning Council approved the attached reports concerning the Ten-Year Power Plant Site Plans prepared by Florida Power and Light Company and the Florida Municipal Power Agency.

If you have any questions concerning our comments, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Peter G. Merritt". The signature is written in dark ink and is positioned above the typed name.

Peter G. Merritt, Ph.D.  
Regional Ecologist

PGM:sk

Attachment

301 east ocean boulevard  
suite 300  
stuart, florida 34994  
phone (561) 221-4060

RECEIVED  
AUG 28 8 41 AM '98  
ADMINISTRATION  
MAIL ROOM

## **Treasure Coast Regional Planning Council**

### **Report on the**

### **Florida Power & Light Company Ten Year Power Plant Site Plan, 1998-2007**

#### **Introduction**

Each year every electric utility in the State of Florida produces a ten year plan that includes an estimate of electric power generating needs and the disclosure of the general location of proposed power plant sites. Section 186.801, Florida Statutes, gives the responsibility of reviewing the electric utility ten year plans to the Florida Public Service Commission (FPSC). The FPSC is required to make a preliminary study of each ten year plan and classify it as "suitable" or "unsuitable" as a planning document. In conducting its review, the FPSC is to consider the views of appropriate local, state and federal agencies. The FPSC has requested Council comment on the Florida Power and Light (FPL) ten year site plan. The ten year site plan serves to disclose the general location of proposed power plant sites and facilitate coordinated planning efforts. The FPSC has suggested that Council comments should focus on potential conflicts with natural resources and growth management.

#### **Summary of the Plan**

In 1997, FPL served an average of 3,615,485 customer accounts in 35 counties. The existing FPL generating capability is located at thirteen generating sites distributed geographically around its service territory and partial ownership of one unit located in Georgia and two located in Jacksonville. The current generating facilities consist of four nuclear steam units, five diesel units, twenty-one fossil steam units, forty-eight gas turbines, six combined cycle units, and three coal units. In addition to generating electricity from these power plants, FPL purchases electricity (i.e., energy interchange) from the Southern Companies in Georgia and from non-utility generators, which includes cogeneration and small power production facilities (e.g., solid waste resource recovery facilities and U.S. Sugar Corporation facilities) within its service area.

FPL uses models to forecast changes in electrical demand in future years. The models indicate that total energy demand is expected to grow at an average rate of about 2.1 percent per year over the next ten years. After taking into account energy savings through demand side management programs designed to reduce peak demand for electricity and various conservation programs, FPL will need an additional 2,624 megawatts (MW) of capacity during the summer and 2,944 MW during the winter. FPL plans to supply these additional resources through expansion and repowering projects at both its Fort Myers and Stanford plant sites, followed by the addition of two new combined cycle power plants at its existing Martin plant site.



FPL currently relies on several fuel sources to produce electricity. A comparison of the percentage of each energy source used in 1997 and projected for future use is shown below:

Energy Interchange	11.7	11.6
Nuclear	25.3	21.3
Coal	7.9	4.8
Oil	17.9	5.8
Natural Gas	29.4	40.7
Other	7.8	5.7
Orimulsion	0	10.1

The "energy interchange" values represent coal-generated electricity purchased from the Jacksonville Electric Authority and from the Southern Companies in Georgia. The "other" values represent electricity purchased from non-utilities; about 80 percent of these values are derived from coal. "Orimulsion" is a liquid fossil fuel extracted from mines in South America. Orimulsion is expected to be used at the Manatee plant pending completion of the permitting process and conversion of this facility from its use of oil.

Based on the projection of future resource needs, FPL has identified preferred and potential sites for future generation additions. FPL has identified three preferred sites: the existing Fort Myers plant site in Lee County, the existing Sanford plant site in Volusia County, and the existing Martin plant site, which is located in western Martin County. The Martin plant site was identified in 1987 as a preferred location for development of coal gasification combined cycle electric generator facilities. In 1991, the Governor and Cabinet approved the construction and operation of natural gas-fired combined cycle units 3 and 4. They also determined that the Martin site has ultimate capacity to accommodate up to 1600 MW of combined cycle units fueled by natural gas, fuel oil, or coal gas produced at the site.

Two additional combined cycle units, units 5 and 6, are currently potential additions to the Martin site. These units are planned to be natural gas-fired with distillate oil available as a limited back-up fuel. Unit 5 is currently projected to begin operation in 2006. Unit 6 may go into operation in 2007. Ultimately, coal gasification facilities may be constructed and operated to supply coal gas to units 3 and 4 and/or units 5 and 6 when economically justified.

FPL has identified four potential sites for new or expanded power generating facilities. Identification of potential sites does not represent a commitment by FPL to construct new power generator facilities at these sites. The only potential site located in the region is the FPL Riviera plant property in Palm Beach County. This site is currently occupied by the Riviera plant, which is located on Lake Worth Lagoon, adjacent to the Port of Palm Beach. The facility currently houses two operational 300 MW steam boiler operating units and one retired 50 MW generating unit. Expansion at this site would require

additional industrial processing water from the municipal water supply, and cooling water from Lake Worth Lagoon.

### Evaluation

One of the main purposes of preparing the ten year site plan is to disclose the general location of proposed power plant sites. The most significant change in the plan from the previous year is that the new plan no longer projects the construction of a new unsited power plant within the ten year time frame. In the current plan this proposal has been replaced by a proposal to add capacity through expansion and repowering projects at the existing Ft. Myers and Sanford plant sites. This will be followed by the addition of two combined cycle units at the existing Martin plant site. Expansion of the Martin plant, which is located just west of Indiantown in Martin County, is the only site where expansion is currently proposed in the Treasure Coast Region. Previously, Council has reviewed FPL plans to expand the Martin plant and found that the expansion was not in conflict with the regional policies, provided that it is done in compliance with the conditions of certification approved by the state.

The identification of the Riviera plant as a site where power generating facilities may be expanded is of concern because of possible impacts to: 1) nearby residential communities; 2) Lake Worth Lagoon; 3) the municipal water supply; and 4) air quality. Any plans to expand the Riviera plant may conflict with the downtown revitalization efforts currently underway in the City of Riviera Beach and the City of West Palm Beach.

**Regarding other aspects of the plan, Council has three main recommendations: 1) the plan should begin to project a decrease in the use of coal and other fossil fuels for power generation; 2) the plan should continue to project a greater reliance on energy conservation to offset the need to construct new power plants; and 3) the plan should start to project a greater reliance on clean technologies such as solar energy, to produce electricity. These items are discussed in greater detail in the following paragraphs.**

**Fossil Fuels.** In 1997, approximately 73.1 percent of the electricity was derived from burning fossil fuels. The plan projects that in ten years 77.6 percent of the electricity will be derived from burning fossil fuels. About 27 percent of this will be from coal. The plan should project a decrease in the reliance on coal and other fossil fuel-derived electricity, because the potential for environmental degradation from air emissions is large when fossil fuels are used.

Considering the Martin plant as an example, combined cycle units 3 and 4 have been constructed, unit 5 is planned for 2006, and unit 6 may come on line in 2007. The primary fuel for these units is natural gas with distillate oil available as a limited back-up fuel. However, coal gasification facilities may be constructed and operated to supply coal-derived gas to some or all of these units when economically justified. Given this possibility, all four combined cycle units combusting coal-derived gas could emit assumed worst case annual emission levels of approximately 29,223 tons sulfur dioxide,

13,735 tons nitrogen dioxide, 7,092 tons carbon monoxide, 750 tons volatile organic compounds, 10.6 tons lead, and 0.84 tons mercury (emission levels derived from the Martin coal gasification combined cycle project site certification application). Even though these emissions are within the legal limits set by the U.S. Environmental Protection Agency and the State of Florida, these emissions will degrade the environment and affect the health of the citizens of the region, state and country. These emissions may also contribute to acid rain, water pollution, and global warming. Furthermore, fossil fuel burning facilities also require large amounts of water for cooling purposes. By shifting to clean technologies such as solar energy to replace the reliance on fossil fuel burning facilities, more water can become available for other competing sectors.

**Conservation.** FPL's Plan describes many existing and proposed demand side management programs that have been designed to conserve energy and reduce the demand for electricity. FPL also has a number of research and development programs that should enhance energy conservation in the future. It is recognized that FPL's demand side management programs have resulted in significant energy savings. However, within the regulatory framework established by the state, only those conservation programs found to be cost-effective can be implemented. The regulatory framework should be modified to make more conservation programs cost-effective. The state can possibly promote additional conservation programs by providing incentives to the power producers to earn a profit on investments in new conservation programs that are currently not available. In so doing, additional energy conservation may be achieved.

The State of Florida should provide more assistance to the utilities to develop new and innovative energy conservation programs, and allow the utilities to make a profit on their conservation investments. The utility should be able to purchase energy efficiency from its customers just like it buys energy from a power plant. The utility's profit return should be related to the amount of energy saved, rather than to the amount of money invested. This would allow the utility to earn a higher profit, and provide an incentive to choose effective conservation measures over investments in new generating facilities.

**Solar Energy.** The use of solar energy has the advantage of producing electricity without polluting the environment. The efficiency at which photovoltaic (PV) cells operate is improving, and the cost to produce the equipment is decreasing as technological advances occur. The ten year site plan indicates that FPL has been involved in testing several solar PV systems in Florida. FPL is also implementing a program called "Green Pricing," which allows customers to make voluntary contributions for FPL to purchase PV systems in bulk quantities. These systems will then be installed at one or more central sites and deliver PV-generated electricity directly into the FPL power grid. When sunlight is available, the PV-generated electricity will displace an equivalent amount of fossil fuel-generated electricity.

An alternate approach to the Green Pricing program would be to install PV systems on rooftops of existing buildings, rather than at a central location. The advantages are that additional land area is not required to generate electricity, and it reduces the need for additional transmission lines. Also, because the source of electricity would be closer to the user, there should be less loss of energy through the line during transmission. Issues regarding access control and liability for the equipment need to be resolved before this approach can be employed. **The State of Florida should assist the utilities in addressing these issues and provide incentives for the power producers to achieve a greater reliance on solar and other renewable energy resources.**

### Conclusions

The identification of the Riviera plant as a site where power generating facilities may be expanded is of concern because of possible impacts to: 1) nearby residential communities; 2) Lake Worth Lagoon; 3) the municipal water supply; and 4) air quality. Any plans to expand the Riviera plant may conflict with the downtown revitalization efforts currently underway in the City of Riviera Beach and the City of West Palm Beach.

Council continues to urge FPL and the State of Florida to develop new programs to: 1) reduce the reliance on coal and other fossil fuels as future energy sources; 2) increase conservation activities to offset the need to construct new power plants; and 3) increase the reliance of PV systems to produce electricity. The complete costs of burning fossil fuels, such as the costs to prevent environmental pollution and costs to the health of the citizens need to be considered in evaluating these systems. The state should amend the regulatory framework to provide financial incentives for the power providers and the customers to increase conservation measures and to rely to a greater extent on solar energy. The phasing in of PV and other locally available energy sources will help Florida to achieve a sustainable future.



RECEIVED

JUN 18 1998

TREASURE COAST REGIONAL  
PLANNING COUNCIL

June 16, 1998

Peter Merritt  
Regional Ecologist  
Treasure Coast Regional  
Planning Council  
301 E. Ocean Blvd., Suite 300  
Stuart, FL 34994

Dear Peter:

Thanks to you and the Energy Task Force for inviting me to speak at your recent meeting. I would be glad to serve as a resource in the future if that would be helpful.

I'm taking advantage of having received a copy of an agenda item I wasn't able to stay to hear discussed - FPL's Ten-Year Site Plan. I wanted to provide you some additional information and views for your consideration, especially concerning the Riviera Beach plant.

Your memo to the Energy Task Force notes that FPL has identified the existing Martin plant site as a preferred location for coal gasification or natural gas combined cycle facilities and the existing Riviera Beach plant site as a potential site. In your evaluation, you express concerns about the Riviera plant site.

The Riviera plant is one of the 1997 "dirty dozen" power plants, emitting 5338 tons of nitrogen oxides (NOx) and 23,638 tons of sulfur dioxide (SO2), as well as 2.2 million tons of carbon dioxide (CO2). The excess emissions over those of a new source equivalent are as follows: NOx - 4256; SO2 - 19,310; CO2 - 1.23 mill. If gas-fired combined cycle units substituted for existing oil-fired ones, impacts would very likely be significantly reduced; simply adding new, cleaner facilities to the existing plant would probably not be a net environmental benefit. Gas combined cycle plants have far less emissions and use significantly less water than oil or coal steam plants.

The Martin plant is substantially cleaner than Riviera. Its 1997 emissions were: NOx - 4886 tons; SO2 - 9847 tons; CO2 - 6.4 million tons; excess emissions were: NOx - 3017; SO2 - 2355; CO2 - 4.57 million. As you note, coal gasification could substantially increase emissions; again, gas combined cycle facilities are cleaner and more efficient.

We support your recommendations regarding FPL's plan. We note that FPL's DSM programs reduce electric demand to a much greater extent than they actually save energy. We agree with you that regulatory incentives must allow more programs to be considered cost-effective. Unfortunately, the cost-effectiveness test preferred by Florida's utilities and by FPSC staff discourages energy savings and limits DSM programs severely. The five-year review of utility conservation goals has begun; utility filings are currently scheduled for February 1999. LEAF will challenge the use of the Rate Impact Measure test and expects to raise other issues in that case.

I hope that these comments are useful to you.

With best regards,



Gail Kamaras, Director  
Energy Advocacy Program

## **Treasure Coast Regional Planning Council**

### **Report on the**

### **Florida Municipal Power Agency Ten Year Power Plant Site Plan, 1998-2007**

#### **Introduction**

Each year every electric utility in the State of Florida produces a ten year plan that includes an estimate of electric power generating needs and disclosure of the general location of proposed power plant sites. Section 186.801, Florida Statutes, gives the responsibility of reviewing the electric utility ten year site plans to the Florida Public Service Commission (FPSC). The FPSC is required to make a preliminary study of each ten year plan and classify it as "suitable" or "unsuitable" as a planning document. In conducting its review, the FPSC is to consider the views of appropriate local, state and federal agencies. The FPSC has requested Council comment on the Florida Municipal Power Agency (FMPA) ten year site plan. The ten year site plan serves to disclose the general location of proposed power plant sites and facilitate coordinated planning efforts. The FPSC has suggested that Council comments should focus on potential conflicts with natural resources and growth management.

#### **Summary of the Plan**

FMPA was created in 1978 to allow its 27 member municipal electric utilities and local governments to jointly own, operate, and manage electric power plants. The FMPA has three members in the Treasure Coast Region, which are the Fort Pierce Utilities Authority, the City of Lake Worth, and the City of Vero Beach.

The FMPA currently has five major power supply projects in operation. Only one of these, the St. Lucie Project, lies within the region. In 1983, the FMPA purchased an 8.8 percent ownership interest in St. Lucie Unit No. 2 (the St. Lucie Project), a nuclear generating unit. Fifteen of the FMPA members, including the three members in the Treasure Coast Region, are participants in the St. Lucie Project.

The total generating capacity of the FMPA facilities amounts to 478 megawatts (MW). Over the next ten years, the annual average growth in demand for electricity is expected to be about 2 percent. To meet this increase in demand, the FMPA plans to obtain an additional 120 MW of capacity from the Kissimmee Utility Authority's Cane Island Power Park in 2001. The Cane Island facilities will run on natural gas. In addition, the FMPA is planning to obtain another 80 MW of capacity from a combustion turbine facility in 2007. The location of this combustion turbine plant is currently not known, but Cane Island is listed as a possible site.

## Evaluation

One of the main purposes of preparing the ten year site plan is to disclose the general location of proposed power plant sites. The FMPA is not proposing to expand, create, or invest in any new power generating facilities within the Treasure Coast Region. However, actions of the FMPA may contribute to the promotion and construction of fossil fuel-burning power plants within the state. **Because of this, Council has three main concerns: 1) the plan should begin to project a decrease in the use of coal and other fossil fuels for power generation; 2) the plan should continue to project a greater reliance on energy conservation to offset the need to construct new power plants; and 3) the plan should start to project a greater reliance on clean technologies such as solar energy, to produce electricity. These items are discussed in greater detail in the following paragraphs.**

**Fossil Fuels.** The plan should project a decrease in the reliance on coal and other fossil fuel-derived electricity, because the potential for environmental degradation from air emissions is large when fossil fuels are used. Considering the Martin Power Plant as an example, combined cycle units 3 and 4 have been constructed, and units 5 and 6 are planned to come on line in future years. The primary fuel for these units is natural gas with distillate oil available as a limited back-up fuel. However, coal gasification facilities may be constructed and operated to supply coal-derived gas to some or all of these units when economically justified. Given this possibility, all four combined cycle units combusting coal-derived gas could emit assumed worst case annual emission levels of approximately 29,223 tons of sulfur dioxide, 13,735 tons of nitrogen dioxide, 7,092 tons of carbon monoxide, 750 tons of volatile organic compounds, 10.6 tons of lead, and 0.84 tons of mercury (Martin Coal Gasification Combined Cycle Project Site Certification Application). **Even though these emissions are within the legal limits set by the U.S. Environmental Protection Agency and the State of Florida, these emissions will degrade the environment and affect the health of the citizens of the region, state and country. These emissions may also contribute to acid rain, water pollution, and global warming. Furthermore, fossil fuel burning facilities also require large amounts of water for cooling purposes. By shifting to clean technologies such as solar energy to replace the reliance on fossil fuel burning facilities, more water can become available for other competing sectors.**

**Conservation.** FMPA's Plan describes many existing programs that have been designed to conserve energy and reduce the demand for electricity. It is recognized that FMPA's conservation programs have resulted in significant energy savings. However, within the regulatory framework established by the state, only those conservation programs found to be cost-effective can be implemented. **The regulatory framework should be modified to make more conservation programs cost-effective. The state can possibly promote additional conservation programs by providing incentives to the power producers to earn a profit on investments in new conservation programs that are currently not available. In so doing, additional energy conservation may be achieved.**



The State of Florida should provide more assistance to the utilities to develop new and innovative energy conservation programs, and allow the utilities to make a profit on their conservation investments. The utility should be able to purchase energy efficiency from its customers just like it buys energy from a power plant. The utility's profit return should be related to the amount of energy saved, rather than to the amount of money invested. This would allow the utility to earn a higher profit, and provide an incentive to choose effective conservation measures over investments in new generating facilities.

**Solar Energy.** The use of solar energy has the advantage of producing electricity without polluting the environment. The efficiency at which photovoltaic (PV) cells operate is improving, and the cost to produce the equipment is decreasing as technological discoveries occur. The ten year site plan indicates that FMPA is also assisting in the development of renewable energy resources by participating in the Utility Photovoltaic Group. This is a non-profit organization formed to accelerate the commercialization of PV systems for the benefit of electric utilities and their customers. **The State of Florida should provide additional incentives for the power producers to achieve a greater reliance on solar and other renewable energy resources.**

### Conclusions

Council continues to urge FMPA and the State of Florida to develop new programs to: 1) reduce the reliance on coal and other fossil fuels as future energy sources; 2) increase conservation activities to offset the need to construct new power plants; and 3) increase the reliance of PV systems to produce electricity. The complete costs of burning fossil fuels, such as the costs to prevent environmental pollution and costs to the health of the citizens need to be considered in evaluating these systems. The state should amend the regulatory framework to provide financial incentives for the power providers and the customers to increase conservation measures and to rely to a greater extent on solar energy. The phasing in of PV and other locally available energy sources will help Florida to achieve a sustainable future.

# WEST FLORIDA REGIONAL PLANNING COUNCIL

Post Office Box 486 • 3435 North 12<sup>TH</sup> Avenue • Pensacola, Florida 32593-0486  
Phone (904) 444-8910 • S/C 693-8910 • (800) 226-8914 • Fax (904) 444-8967  
E-mail: postmaster@wfrpc.dst.fl.us

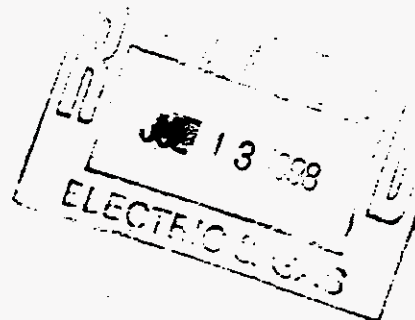
Daniel F. Krumel  
Executive Director

Garnett M. Breding, Jr.  
Chairman

Charles D. Covey, III  
Vice-Chairman

## MEMORANDUM

DATE: June 11, 1997  
TO: Florida Public Service Commission  
FROM: Terry A. Joseph - Clearinghouse Coordinator  
RE: MJ383-05-2997 - Gulf Power Ten Year Site Plan



The staff of the West Florida Regional Planning Council has reviewed the above referenced proposal under the Intergovernmental Coordination & Review Process (IC&RP). Based upon review of the information submitted, the Planning Council staff finds the proposal in accord with plans, goals and objectives of the Council. This project is consistent with the Strategic Regional Policy Plan (SRPP), 29A-4, FAC, adopted August 7, 1996.

Approval of the above referenced project by the West Florida Regional Planning Council does not obligate funding by local governments.

STATE OF FLORIDA

Commissioners:  
JULIA L. JOHNSON, CHAIRMAN  
SUSAN F. CLARK  
J. TERRY DEASON  
JOE GARCIA  
DIANE K. KIESLING



DIVISION OF ELECTRIC & GAS  
JOSEPH D. JENKINS  
DIRECTOR  
(904) 413-6700

**Public Service Commission**

May 19, 1997

Mr. Daniel F. Krumel  
West Florida RPC  
P.O. Box 486  
Pensacola, Florida 32593-0486

Dear Mr. Krumel:

Pursuant to Section 186.801, Florida Statutes, the Florida Public Service Commission (Commission) is responsible for reviewing the electric utility Ten-Year Site Plans. The Commission is required to make a preliminary study of each Ten-Year Site Plan and classify it as "suitable" or "unsuitable". In conducting its review, the Commission considers the views of appropriate local, state, and federal agencies. Accordingly, we are enclosing copies of the 1997 Ten-Year Site Plans that fall within your area of interest or jurisdiction. The following plans are attached for your review:

- Florida Power Corporation
- Florida Power & Light Company
- Gulf Power Company
- Tampa Electric Company
- Florida Municipal Power Agency
- Gainesville Regional Utilities
- Jacksonville Electric Authority
- City of Lakeland
- City of Tallahassee
- Seminole Electric Cooperative

Please review these plans and provide us with comments regarding their suitability as planning documents, keeping in mind that these documents primarily serve to facilitate

coordinated planning efforts. Reporting utilities are not required to divulge information about proposed facilities in such detail as would, for example, be required for a development permit. Your comments should therefore focus on potential conflicts with natural resources and growth management.

In developing your comments, you may wish to consider the following issues:

- compatibility of the proposed power plant site with adjacent land uses;
- consistency of the plan with local plans and land development regulations;
- potential impact of the plan on public facility capacities, such as those for water, sewer, stormwater drainage, and roadways; and
- potential impact of the plan on air and water quality, endangered and threatened species, wetlands, and historical and archaeological resources.

Please forward your comments by Monday, August 4, 1997 to:

Michael Haff  
Division of Electric and Gas  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Thank you very much for your assistance.

Sincerely,

  
Joseph D. Jenkins  
Director

JDJ/MSH:kt  
Attachments

cc: William D. Talbott  
Mary Bane  
Robert Vandiver  
Robert Elias  
Robert Trapp

# WEST FLORIDA REGIONAL PLANNING COUNCIL

Post Office Box 486 • 3435 North 12<sup>TH</sup> Avenue • Pensacola, Florida 32593-0486  
Phone (850) 595-8910 • S/C 695-8910 • (800) 226-8914 • Fax (850) 595-8967  
E-mail: postmaster@wfrpc.dst.fl.us • http://www.wfrpc.dst.fl.us

Daniel F. Krumel  
Executive Director

AUG 27 8 35 AM '98  
RECEIVED  
Garnett M. Breeding, Jr.  
Chairman  
Charles E. Covey, III  
Vice-Chairman

## MEMORANDUM

DATE: August 25, 1998  
TO: Michael S. Haff  
State of Florida Public Service Commission  
FROM: Terry A. Joseph - Clearinghouse Coordinator  
RE: MJ415-07-1398 - Gulf Power 10 Year Site Plan

The staff of the West Florida Regional Planning Council have reviewed the above referenced proposed project under the Intergovernmental Coordination & Review Process (IC&RP). Based upon review of the information submitted, the Planning Council staff finds the proposal in accord with plans, goals and objectives of the Council. This project is consistent with the Strategic Regional Policy Plan (SRPP), 29A-4, FAC, adopted August 7, 1996.

Approval of the above referenced project by the West Florida Regional Planning Council does not obligate funding by local governments.

TAJ:lc

cc: Paul Darst, DCA

STATE OF FLORIDA

Commissioners:  
JULIA L. JOHNSON, CHAIRMAN  
J. TERRY DEASON  
SUSAN F. CLARK  
JOE GARCIA  
E. LEON JACOBS, JR.



DIVISION OF ELECTRIC & GAS  
JOSEPH D. JENKINS  
DIRECTOR  
(850) 413-6700

## Public Service Commission

July 1, 1998

Mr. Daniel F. Krumel  
West Florida RPC  
P.O. Box 486  
Pensacola, Florida 32593-0486

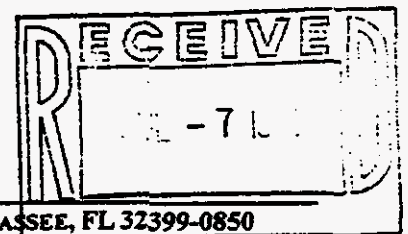
Dear Mr. Krumel:

Previously, the Florida Public Service Commission requested your agency's comments on Gulf Power Company's 1998 Ten-Year Site Plan. Subsequent to forwarding you Gulf's Ten-Year Site Plan, as originally filed with us in April of 1998, the Commission received a revised 1998 Ten-Year Site Plan.

Please review this revised plan and provide us with comments regarding its suitability as a planning document, keeping in mind that the Ten-Year Site Plan primarily serves to facilitate coordinated planning efforts. Gulf is not required to divulge information about proposed facilities in such detail as would, for example, be required for a development permit. Your comments should therefore focus on potential conflicts with natural resources and growth management.

In developing your comments, you may wish to consider the following issues:

- compatibility of the proposed power plant site with adjacent land uses;
- consistency of the plan with local plans and land development regulations;
- potential impact of the plan on public facility capacities, such as those for water, sewer, stormwater drainage, and roadways; and
- potential impact of the plan on air and water quality, endangered and threatened species, wetlands, and historical and archaeological resources.



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Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)

Mr. Daniel F. Krumel  
Page 2  
July 1, 1998

Please forward your comments to me by Thursday, August 20, 1998. Thank you for your assistance.

Sincerely,



Michael S. Haff  
Bureau of Conservation, System Planning, and  
Electric Safety

MSH:kt  
Attachments

cc: William D. Talbott, Executive Director  
Mary Bane, Deputy Executive Director / Technical  
Robert Vandiver, General Counsel  
Leslie Paugh, Division of Legal Services  
Joseph Jenkins, Director, Division of Electric and Gas  
Robert Trapp, Assistant Director, Division of Electric and Gas

LINDA S. SLOAN, A.I.C.P.  
EXECUTIVE DIRECTOR

1241 S.W. 10th Street  
OCALA, FLORIDA 34474-2798

Telephone 352/732-1315  
Suncom 667-1315  
FAX 732-1319  
email: wrpc@atlantic.net

**BY CERTIFIED MAIL**

August 6, 1998

Michael Haff  
Division of Electric and Gas  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**SUBJECT:** Consistency Review/1998-2007 Ten-Year Site Plans  
Florida Municipal Power Agency  
Seminole Electric Cooperative, Inc.  
Florida Power Corporation

Dear Mr. Haff:

Withlacoochee Regional Planning Council staff reviewed the above-referenced ten-year site plans as they relate to the Withlacoochee region consisting of Marion, Sumter, Levy, Citrus and Hernando counties.

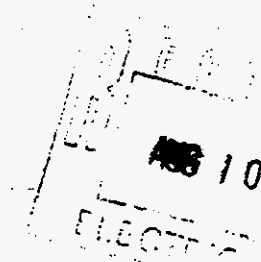
The Florida Municipal Power Agency (FMPA) Plan does not include any proposed power plant or transmission line improvements within the Withlacoochee region and isn't likely to have a significant impact on the region.

The Seminole Electric Cooperative, Inc. (SECI) Plan proposes the development of 10 new generating plants between 2002 and 2005. However, the Plan provides no location information for the proposed plants or their associated transmission facilities. Seminole Electric is a major provider in the Withlacoochee Region. Citrus, Hernando, Levy, Marion, and Sumter counties, (all the counties in the region), receive a substantial portion of their power from one of three Seminole Electric Co-ops. It is likely that there will be impacts associated with the development of the proposed facilities within the Withlacoochee Region. WRPC finds this plan unsuitable due to insufficient information regarding the location of proposed facilities.

The Florida Power Corporation (FPC) Plan includes changes in the Withlacoochee region that involve increases to the capacity of Crystal River Power Plant Units 1-5 with no associated construction. This reflects a greater degree of efficiency in serving the growing needs if this



98 AUG 10 10 10 AM  
MAIL ROOM  
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CHAIRMAN  
EUGENE A. POOLE  
VICE-CHAIRMAN  
EUNICE NEVILLE  
SECRETARY





Region. The siting of bulk transmission lines associated with the Silver Springs and Silver Springs North terminals remain of interest to the WRPC, especially in and around the Cross Florida Greenway which is a regionally significant resource. Comments and concerns regarding the development of these facilities made by local governments and reviewing agencies were included in WRPC's 1997 review of FPC's Ten Year Site Plan. The Strategic Regional Policy Plan (SRPP) for the Withlacoochee Region and the Marion County Comprehensive Plan include several provisions that guide development in the Cross Florida Greenway. The Marion County Conservation Element polices read as follows:

- Policy 2.5: Marion County shall notify the Department of Environmental Protection (DEP) when an application for development approval, such as an application for a land use change, zoning change, special use permit, preliminary plat, or development master plan, is made for projects that lie wholly or partially within designated DEP Greenline Areas and those lands that are within and adjacent to the planning boundary for the Cross Florida Greenway so that DEP may comment upon the application. Timely comments and concerns raised by DEP shall be addressed during the development review process. Land development regulations shall be adopted that require this notification as part of the development review process.
- Policy 2.20: Land development regulations shall be adopted that require public land managers to be formally notified and invited to participate in all phases of the development review process including staff-developer pre-application conferences and permit negotiations for projects in the areas described above. Comments from public land managers concerning ways to minimize or mitigate potential negative effects of development on the Greenway and other public lands shall be incorporated to the greatest extent practical into decisions concerning platting, permits, and development orders.
- Policy 2.25: Marion County shall minimize adverse impacts to the Cross Florida Greenway by implementing the following procedure and actions:
- a. The County shall coordinate with the State in minimizing the effects of County roads crossing the Greenway which may include reducing speed limits, and constructing caution and informational road signs. This policy does not mandate any financial obligation for the County.
  - b. The County shall coordinate with the State in minimizing the effects of utility lines crossing the Greenway which may include mitigation for crossing the Greenway, and if possible, burying all new utility lines and co-locating with existing utility rights-of-way. If burial and co-location are not possible, new utility line crossings shall be constructed as narrow as possible, and cross the Greenway in a manner consistent with the Greenway management plan.
  - c. The County shall enact standards for limiting noise and restricting night-time lighting for land uses adjacent to the Greenway. Nighttime lighting will be directed away from the Greenway except where a demonstrated public need exists. Land development regulations shall be adopted that implement this policy.

SRPP policy 4.12.9 requires that public ownership and control of the Cross Florida Greenway be retained and that the Greenway be used for recreation and wildlife habitat and for public purposes compatible with recreation and wildlife habitat. Other SRPP policies that should be noted include 4.11.5 and 4.8.6. SRPP policy 4.11.5 indicates development adjacent to preservation and conservation areas should be compatible with the purposes of those areas and more recent development should provide buffers where needed for previously existing land uses.

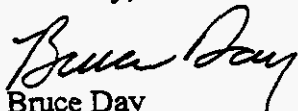
SRPP policy 4.8.6 requires that new transportation and utility facilities be designed to avoid interference with the natural operation of wetlands and in sufficient size and height to accommodate the movement and migration of wildlife through the area.

The Ocala/Marion County Metropolitan Planning Organization noted the two FPC transmission line corridors in Marion County slated for improvements are identified in the MPO's Bicycle/Pedestrian Master Plan as off-road corridors and requested that consideration be given to allowing use of the transmission line corridors for potential bicycle/pedestrian trails. SRPP policy 4.12.8 requires consideration of utility line rights-of-way and abandoned railroad rights-of-way for nature trails, bicycle paths and wildlife passageways.

The Florida Power Corporation plan is consistent with SRPP goals and policies relating to energy use, air quality, economic development and efficient movement of goods and services within and through the Withlacoochee region. With regard to FPC's proposed development within the Region the ~~Plan appears suitable.~~

If you have any questions about this review, please give me a call.

Sincerely,



Bruce Day  
Principal Planner

xc:

Chris Rison, Marion County Planning Department  
Carleen Flynn, Ocala/Marion County Metropolitan Planning Organization  
Fred Ayer, Office of Greenways and Trails, Department of Environmental Protection  
Pete O'Neill, Florida Power Corporation



# South Florida Water Management District

3301 Gun Club Road, West Palm Beach, Florida 33406 • (561) 686-8800 FL WATS 1-800-432-2045  
TDD (561) 697-2574

GOV 04-04-34

September 11, 1998

Mr. Michael Half  
Division of Electric and Gas  
Florida Public Service Commission  
2540 Shumand Oak Boulevard  
Tallahassee, FL 32399-0850

Dear Mr. Half:

**Subject: Electric Utility 1998 Ten Year Site Plans**

The South Florida Water Management District (SFWMD) has completed its review of the 1998 Ten Year Site Plan for the Florida Power and Light Company (FPL), the Florida Municipal Power Agency (FMPA), the Seminole Electric Cooperative (SEC), and the Kissimmee Utility Authority (KUA).

While staff has identified some site-specific issues associated with expansions of existing sites, it is more appropriate that these issues be addressed during the Site Certification review process rather than the Site Plan review process. Applications for Site Certification for proposed repowering/expansion are pending for the FPL Ft. Myers and FMPA Cane Island facilities. The issues that we have identified for these sites will be addressed in the review of the Site Certification applications.

That being the case, and, given that there are no new power plan facilities proposed within SFWMD boundaries, the SFWMD has no comments on the Ten Year Site Plans.

Sincerely,

John Higgins, AICP  
Plan Review Coordinator  
Policy Economics and Business Division  
Planning Department

JH/ng

ADMINISTRATION MAIL ROOM

SEP 16 8 53 AM '98

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# Southwest Florida Water Management District

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Tampa, Florida 33637-6759  
1-800-836-0797 or (813) 985-7481  
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SUNCOM 572-6200

115 Corporation Way  
Venice, Florida 34292-3524  
1-800-320-3503 or (941) 486-1212  
SUNCOM 526-6900

2303 Highway 44 West  
Inverness, Florida 34453-3809  
(352) 637-1360  
SUNCOM 667-3271

August 7, 1998

Mr. Mike Haff  
Florida Public Service Commission  
Division of Electric and Gas  
2540 Shumard Oak Boulevard, Room 200  
Tallahassee, Florida 32399-0850

Subject: 1998 Electric Utility 10-Year Site Plans Including Florida Power Corporation, Florida Power and Light (FP&L), Tampa Electric, Lakeland Electric & Water, and Orlando Utilities.

Dear Mr. Haff:

The staff of the Southwest Florida Water Management District (District) has reviewed the Environmental and Land Use Information sections of the above referenced plans. The Lakeland Electric and Water (LE&W) and FP&L plans include one preferred expansion site and one potential site respectively. The other site plans do not have either preferred or potential sites because they have adequate power supplies for the 10-Year planning horizon. The LE&W plan includes expansion of the McIntosh Unit 5 at the existing McIntosh Plant in the City of Lakeland, and FP&L's potential site, which encompasses approximately 13,468 acres, is located in north central DeSoto County near the Peace River.

Our primary concern with these two proposals is the availability of water. Both sites are located within the Southern Water Use Caution Area (SWUCA). The SWUCA is an area within the District in which the Floridan aquifer has been severely stressed from excessive withdrawals. Both power companies have acknowledged this concern. LE&W plans to use reclaimed water for cooling purposes and FP&L will evaluate the use of various alternative water supply sources in close coordination with District permitting staff.

While the District appreciates the opportunity to review these plans, it should be noted that the Public Service Commission's request to evaluate the compatibility of these proposed sites with adjacent land uses, water supply, sewer, stormwater drainage, and the potential impacts to water quality, wetland systems, and endangered and threatened species cannot be fulfilled completely because the information requirements of 10-Year site plans are severely limited in scope. If more information can be obtained, we would be glad to provide a more detailed assessment.

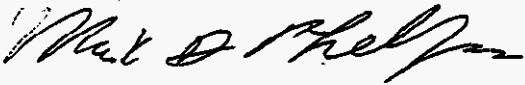
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Tampa
- E. D. "Sonny" Vergara  
Executive Director
- Gene A. Heath  
Assistant Executive Director
- Edward B. Helvenston  
General Counsel

Mr. Mike Haff  
August 7, 1998  
Page 2

If you have any questions or if I can be of further assistance, please contact me in the District's Planning Department at Extension 4417.

Sincerely,

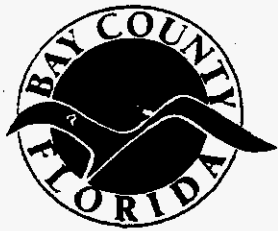


Mark D. Phelps, AICP  
Government Planning Coordinator, *Central Region*

MDP

cc: Bob Viertel  
Richard Owen  
Joanne McClellan

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Development Services Department  
Planning and Zoning Division  
225 McKenzie Avenue  
Panama City, Florida 32401  
(850) 784-4024 FAX (850) 784-6151

BOARD OF COUNTY  
COMMISSIONERS

August 14, 1998

Mr. Michael S. Haff

Bureau of Conservation, System Planning, and  
Electrical Safety  
State of Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Dear Mr. Haff:

The Planning and Zoning Division has reviewed Gulf Power Company's 1998 Ten-Year Site Plan as you requested. According to this Plan, Gulf Power will be utilizing power purchases to meet its generating capacity needs until a next generation addition is constructed at the existing Lansing Smith Electric Generating Plant in 2002. The next electric generating resource addition to be constructed at a virgin site is not scheduled until after the year 2005. The Division has no comment concerning the expansion of the existing Lansing Smith Plant.

Thank you for giving us the opportunity to review this plan and any future plans provided by Gulf Power.

Sincerely,

Terry Jernigan, Manager  
Planning and Zoning Division

TJ/ka

POST OFFICE BOX 1818  
PANAMA CITY, FLORIDA 32402

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DISTRICT V

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COUNTY MANAGER



**Department of Strategic Planning  
and Growth Management**

115 S. Andrews Avenue, Room 329B  
Fort Lauderdale, FL 33301  
(954) 357-6605 • FAX (954) 357-8655

August 10, 1998

Mr. Michael S. Haff  
Division of Electric & Gas  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Dear Mr. Haff:

Subject: FPL Electric Utility Ten-Year Site Plan, 1998-2007

Thank you for the opportunity to review and comment on the FPL Ten Year Power Plant Site Plan, 1998-2007 (Plan). As you know, the Plan primarily addresses how FPL intends to meet its projected incremental resource needs over the ten year planning horizon. The Plan identifies three (3) preferred sites and four (4) potential sites to meet this need. Of these sites, only the Port Everglades Plant is within Broward County and that site has been identified as a potential site. The Port Everglades Plant site was listed as a potential site in last year's Plan.

With regard to land use compatibility and consistency with the Comprehensive Plan, please note that the Port Everglades site is located within the jurisdiction of the City of Hollywood. Consequently, comments on land use compatibility and consistency with the Comprehensive Plan should be directed to the City of Hollywood.

Finally, our Department of Natural Resource Protection reviewed the Plan and had questions on water quantities and supply sources. Their comments are attached.

Again, thank you for the opportunity to review and comment on the Plan.

Sincerely,

Michael D. Wanchick  
Director

MDW:BT  
Attachment



**Department of Natural Resource Protection**

Water Resources Division  
218 S.W. 1st Avenue  
Fort Lauderdale, FL 33301

(954) 519-1270 • FAX (954) 519-1496

**MEMORANDUM**

To: Rosemarie Fallon  
From: John Crouse  
Date: August 7, 1998  
Subject: FPL Ten-Year Power Plant Site Plan

Page 88 of the revised report discusses water quantities and supply sources for potential site #4 at the Port Everglades Plant. FPL should verify that the following quality and quantity issues are addressed:

If the new plant requires high quality water (city water further treated at the FPL plant reverse osmosis WTP) in addition to the amount of water currently being produced for the existing units, will the additional reject water from the RO process negatively impact the quality of the water in the receiving canal?

Will additional runoff be created with the construction of the new plant? Is the existing surface water management system capable of treating and managing any additional runoff? Can the existing SWM system be modified, if necessary, to treat and manage the additional runoff?

Will the demand for once-through cooling water and auxiliary cooling water be increased? Will the maximum DNRP-licensed flows of these waters be exceeded?



**PLANNING AND DEVELOPMENT DEPARTMENT**

Comprehensive Planning Division



October 12, 1998

15  
Mr. Michael S. Haff  
Bureau of Conservation, System  
Planning, and Electric Safety  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Dear Mr. Haff:

On behalf of the Planning and Development Department, please accept our apologies for the delay in responding to your request for review of the JEA Ten Year Site Plan.

It should be pointed out that the City of Jacksonville is undertaking a Master Plan for the future use of its Central Business District. This project may have impact on the Southside Generating Station and adjacent properties which are currently designated Central Business District (CBD) on the Future Land Use Map series of the 2010 Comprehensive Plan. Their current underlying zoning designation is Recreation and Open Space (ROS).

The Department of Planning and Development has no concerns regarding the other facilities.

Sincerely,

  
John H. Crofts, AICP  
Chief, Comprehensive Planning Division

JHC:ers

**HARDEE COUNTY**  
**BUILDING AND ZONING DEPARTMENT**  
**CODE ENFORCEMENT DEPARTMENT**

Telephone: (941) 773-3236

401 West Main Street — Wauchula, FL 33873

Fax: (941) 773-6284

August 04, 1998

Michael S. Haff  
Bureau of Conservations, Systems Planning/Electric Safety  
Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Dear Mr. Haff:

I have reviewed the 1998 Ten-Year Site Plan, dated April, 1998 for Seminole Electric Cooperative's forecast of facilities requirements and find them in substantial compliance with Hardee County Unified Land Development Code and site locations.

Sincerely,



Malcolm Green  
Building/Zoning Official

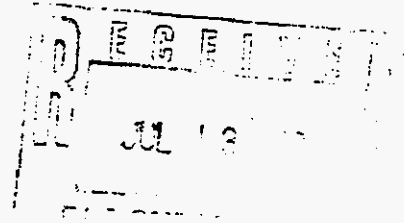
MG/bjh



# MANATEE COUNTY GOVERNMENT

PLANNING DEPARTMENT  
"TO SERVE WITH EXCELLENCE"

July 8, 1998



Mr. Michael S. Haff  
Bureau of Conservation, System Planning, and Electric Safety  
Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Review Comments - Florida Power & Light Ten Year Power Plant Site Plan 1998-2007.

Dear Mr. Haff:

We have reviewed the above referenced report and offer the following comments for your consideration.

1. The report indicates the conversion of the Manatee units to orimulsion as a fuel for power generation. In view of the recent decision by the Florida Power Plant Siting Board not to allow the burning of orimulsion as a fuel at the Manatee plant, the report needs to be revised throughout to indicate the fuel proposed to be used and the resultant development impacts upon time frame, resource utilization, and adjacent land uses and areas.
2. Table III.B.1, Page 40, shows that the Manatee units are anticipated to be converted to orimulsion fuel in 2000 and 2001 which is not consistent with the Florida Power Plant Siting Board decision. The same table shows that the Ft. Myers, Sanford, and Martin plants are anticipated to be expanded in years 2002, 2004, and 2006-07. Section IV.F.1, Page 63 goes into considerable detail of future generation additions for the three plants to be expanded in the years after the proposed conversion of the Manatee plant to orimulsion, however, the text of Section III.B. is silent about the Manatee plant conversion to occur in earlier years.
3. It is noted that the repowering and expansion contemplated at the Ft. Myers, Sanford, and Martin plants are proposed to be fired with natural gas. Page 66 indicates that the expansion and repowering of the Ft. Myers plant is dependant upon securing a firm natural gas supply to the site. Presumably the gas supply would come from a pipeline across north Florida and extend southward through the peninsula, or, branching southward from existing supply lines east of the Tampa urban area, bypassing the Manatee plant.

Pages 72 and 82 indicate that major upgrades would be required of the natural gas service to the Sanford and Martin plants. On Pages 69,75,79, and 82, natural gas firing is described as one of the cleanest, most efficient technologies currently available. It is also noted on Page 84 that a natural gas fired combined cycle unit would be the technology of choice for any capacity additions to potential sites identified for future power generation. Please explain how and why the Manatee plant cannot be converted to natural gas firing for power generation.

4. We understand that the potential sites described in Section IV.F.2. are to be considered for development after the preferred sites are utilized for future power generation plants. Manatee County wishes to be notified immediately of any change in status of preferred sites that would elevate the potential sites in DeSoto County and Hardee County to a preferred site status..

Thank you for the opportunity to comment on the FPL Ten Year Power Plant Site Plan 1998-2007. Should you have any questions, please contact Leon Kotecki on my staff at 941.749.3070.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carol B. Clarke', with a stylized flourish at the end.

Carol B. Clarke, AICP  
Director

CBC:MRW:LK:fl

cc: Ernie Padgett, County Administrator



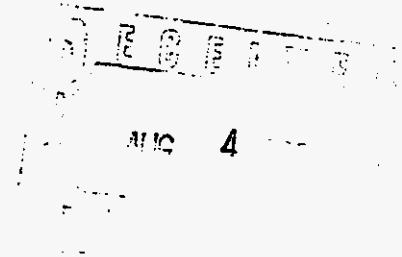
330 W. Church St.  
Drawer CS06  
P.O. Box 9005  
Bartow, FL 33831-9005  
(941) 534-6084  
SUNCOM 569-6084  
FAX (941) 534-6021

Planning Division

Board of County Commissioners

July 20, 1998

Mr. Michael S. Haff  
Bureau of Conservation, System Planning, and Electric Safety  
Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850



Re: Ten-Year Site Plans of local Power Plant Facilities.


Dear Mr. Haff:

In response to your letter of May 12, 1998 regarding the review of the electric utility Ten-Year Plans, I offer the following comments.

Based on the three electric utility Ten-Year Site Plans you provided with your letter on May 12, 1998. These documents primarily address issues that deal with the general operation of the Power Plants. The site plans are very forth coming with facts and back-up data that support the need for these projects. They deal with the history, current conditions and forecasting for the Power facilities. Aerials and location maps were provided. However, as a planning document these Ten-Year Site Plans fall short of meeting the needs and criteria as a planning reference. The plans do mention land use and some environmental issues but not to the detail that a Planning Department would require. The issues of compatibility, consistency, potential impacts on public facilities and environmental concerns were not covered adequately enough for a planning document. Compliance with the Land Use Elements, Infrastructure Elements and the Conservation Elements of the local Comprehensive Plans and Land Development Regulations should be represented in much more detail. There are no other elements of the Comprehensive Plans that would require this much attention to detail.

I hope this provides you with the necessary information for the Public Service Commissions preliminary study on the suitability or unsuitability of the local Power Plant facilities. Please call me with any questions at 941-534-6084.

Sincerely,

  
Merle Bishop, AICP  
Planning Director

xc: Bob Wright, AICP, Principal Planner  
Jerry Rodriguez, Planner I  
Chron

P:\DEVREV\LETTERS\SPSCPPR.LTR

108



# County of Volusia

## Growth Management and Environmental Services Center

Growth Management/Planning  
123 West Indiana Avenue • DeLand, Florida 32720-4253  
Telephone (904) 736-5959

June 4, 1998

Mr. Michael Haff  
Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: 1988 Ten Year Site Plans for Florida Power and Florida Power & Light

Dear Mr. Haff:

As requested, this office has reviewed the 1998 Ten Year Site Plans for Florida Power and Florida Power & Light (FPL).

According to the documents Florida Power is planning no new power plants or expansions/repowering of existing power plants within Volusia County. However, according to the information submitted, FPL is planning to repower the Sanford Power Plant located in southwest Volusia County. The intent of the FPL repowering of the Sanford Plant is to increase the energy supply and to utilize natural gas in lieu of fuel oil. This office supports the alternative use of natural gas, to reduce air pollution.

As part of the Sanford repowering, a 230 KV power line is planned to be strung from the Sanford Plant to the Poinsett junction. (The Poinsett junction is located in southeastern Orange County.) The subject power line addition will be reviewed consistent with the Transmission Line Siting Act.

Finally, depending on the scope of the proposed power plant repowering, development permits from Volusia County may be needed.

If you have any questions concerning this information, please feel free to contact Ron Paradise, at SUNCOM 377-5959, ext. 2010.

Sincerely,

Don Sikorski  
Director of Growth Management

DS:RP:ps:cn

c: Ben L. Dyer, Planning Director  
Palmer M. Panton, Land Development Manager



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109