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ORIGINAL

September 30, 1999

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
*Florida Public Service Commission*  
110 Betty Easley Conference Center  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 981890-EU

Dear Ms. Bayo:

Please find enclosed for filing in the above referenced docket on behalf of JEA the original and one copy of JEA's Notice of Filing Answers to LEAF's First Set of Interrogatories to JEA. Please acknowledge receipt of these documents by stamping the extra copy of this letter "Filed" and return it to me in the enclosed self addressed stamped envelope.

←  
RAR note:  
no enclosure

Very truly yours,

Michael B. Wedner  
Assistant General Counsel

FA \_\_\_\_\_  
APP \_\_\_\_\_  
JAF \_\_\_\_\_ MBW/dnp  
JMU \_\_\_\_\_  
JTR \_\_\_\_\_ Enclosures  
JAG \_\_\_\_\_  
JEG \_\_\_\_\_  
JAS \_\_\_\_\_  
JPC \_\_\_\_\_  
JAI \_\_\_\_\_  
JEC \_\_\_\_\_  
JAW \_\_\_\_\_  
JTH \_\_\_\_\_

DOCUMENT NUMBER - DATE  
11940 OCT -4 99  
FPSO-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic Investigation into the  
aggregate electric utility reserve margin  
planned for Peninsular Florida

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Docket No.: 981890-EU

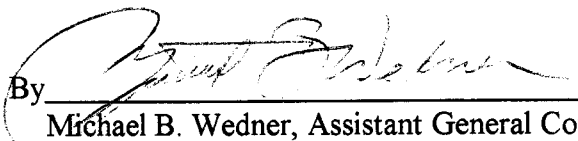
ORIGINAL

NOTICE OF FILING  
JEA'S ANSWERS TO LEAF'S  
FIRST SET OF INTERROGATORIES

Please take notice that JEA has filed with the Commission its Answers to LEAF'S First Set of Interrogatories to JEA, a copy of which are attached to this Notice.

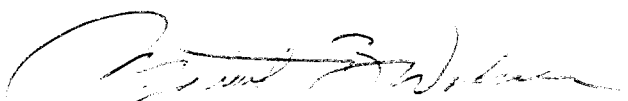
Respectfully submitted,

Richard A. Mullaney, General Counsel

By   
Michael B. Wedner, Assistant General Counsel  
Florida Bar No.: 287431  
117 West Duval Street  
Suite 480  
Jacksonville, Florida 32202  
(904) 630-1700  
Attorney for JEA

CERTIFICATE OF SERVICE

30th I HEREBY CERTIFY that a copy of the foregoing has been furnished via U.S. Mail this  
of September, 1999, to the following (see attached service list):

  
Attorney

**SERVICE LIST**

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
**Florida Public Service Commission**  
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Florida Reliability Coordinating Council  
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City of Lakeland  
Gary Lawrence  
501 East Lemon Street  
Lakeland, Florida 33801

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Lake Worth, Florida 33461

Florida Power Corporation  
Jim McGee  
Post Office Box 14042  
St. Petersburg, Florida 33733

Gainesville Regional Utilities  
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Gainesville, Florida 32614-7117

Kissimmee Utility Authority  
A.K. (Ben) Sharma  
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Kissimmee, Florida 34742

Florida Municipal Power Agency  
Frederick Bryant  
Post Office Box 3209  
Tallahassee, Florida 32315

Orlando Utilities Commission  
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Post Office Box 10109  
Tallahassee, Florida 32302

Kenneth A. Hoffman, Esquire  
Rutledge, Ecenia, Purnell & Hoffman, P.A.  
Post Office Box 551  
Tallahassee, Florida 32302

Mr. Robert C. Williams  
Florida Municipal Power Agency  
7201 Lake Ellenor Drive  
Suite 100  
Orlando, Florida 32809-5769

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: Generic Investigation into the  
Aggregate Electric Utility Reserve  
Margins Planned for Peninsular Florida

Docket Number: 981890-EU  
Filed: September 25, 1999

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**JEA'S RESPONSE TO LEAF'S FIRST SET OF INTERROGATORIES (NOS. 1-12)**

- 1. Does the Company assign an availability factor to a power generation plant that is available during peak 50% of the time?**

No, the JEA does not assign an availability factor to a power generation plant, as defined in this interrogatory, for the criteria "available during peak 50% of the time".

- 2. If the Company does assign an availability factor to a power generation plant that is available during peak 50% of the time, please specify that value and describe in detail how it is derived.**

JEA does not assign this factor, therefore no answer is required for this question.

- 3. If the Company does not assign an availability factor to a power generation plant that is available during peak 50% of the time, please explain why not.**

JEA assigns availability factors based on the percentage of time that a power generation plant is available over a period of one year, as availability factor is defined in this interrogatory.

- 4. If a power generation plant is available 50% of the time, does the company consider it dispatchable?**

"Availability", as defined in this interrogatory as availability factor, and "dispatchable", as defined by industry standards, are independent criteria that are not directly related to one another. Therefore, this question can not be answered.

- 5. Does the Company calculate the capacity value of energy service facilities for resource planning purposes?**

JEA assigns capacity values to its capacity resources and those values are used in the Ten Year Site Plan for resource planning purposes. The 1999 JEA Ten Year Site Plan is currently on file with the FPSC.

- 6. If the Company does not calculate the capacity value of energy service facilities for resource planning purposes, please explain why.**

JEA does calculate the capacity value of energy service facilities, therefore, no answer is required for this question.

- 7. If the Company calculates the capacity value of energy service facilities for resource planning purposes, please state whether said calculation includes the effective load carrying capacity of solar and demand-side resources.**

At this time, JEA has no solar resources, and therefore no solar resources are included as capacity. Demand-side resources are used in determining the JEA's total capacity available when determining the capacity requirements for the Ten Year Site Plan capacity resource planning study.

- 8. If the Company does include effective load carrying capacity of solar and demand-side management resource options in its calculation of the capacity value of its energy service facilities for resource planning purposes, please describe in detail how that inclusion occurs, including but not limited to a) which resources options are included; and b) how effective load carrying capacity is calculated.**

Demand-side resources are included in the Ten Year Site Plan to the extent they are identified in JEA's current Demand-side Resource Plan, 1998 Annual Report, filed with the FPSC. The following is taken from the JEA's 1999 Ten Year Site Plan. "The demand-side management plan for JEA is instrumental in the determination of the overall least-cost resource plan. The demand-side management plan for JEA was approved by the FPSC on December 11, 1995, and continues to be integrated with supply options to evaluate overall resource plans."

- 9. If the Company does not include effective load carrying capacity in its calculation of capacity value of its energy service facilities for resource planning purposes, please explain.**

JEA does include this in its capacity value, therefore, no answer is required for this question.

- 10. Please state the lowest, the mean, and the highest price (in dollars per MW or dollars per MWH) the Company has paid for wholesale capacity and energy purchased other than pursuant to a contract with an Independent Power Producer under the Public Utility Regulatory Policy Act (PURPA) over the past three years.**



**Energy**

Low - \$8.00/MWH  
Mean - \$16.60/MWH  
High - \$3,000.00/MWH

**Capacity**

Low - \$0.73/kW-mo  
Mean - Not Available  
High - \$21.75/kW-mo

**NOTE:** Capacity and Energy prices shown above are independent of each other and there is no relationship between the high and low energy and high and low capacity pricing. The high energy price was paid by JEA for energy purchased specifically for resale to another utility.


**11. Please identify all individuals who prepared, or assisted in the preparation of, the answers to these interrogatories and state which answers each such individual prepared or assisted in the preparation of.**

Chuck Bond, Manager Capacity Planning	Question(s) 1-9, 11, 12
Nanette Rund, Senior Administration Assistant	Question 10

**12. Please identify all documents relied upon to support or used to develop the Company's response to these interrogatories, stating which responses each such document was so used or relied upon.**

JEA 1999 Ten Year Site Plan	Questions 5,7,8
JEA Demand Side Management Plan, 1998 Annual Report	Question 8
JEA Fuel & Purchased Power Reports (8/96 – 7/99)	Question 10

I HEREBY CERTIFY that I am authorized to answer these interrogatories on behalf of JEA, and that the answers to the interrogatories are true and correct.

BY Chuck Bond   
TITLE Manager, Capacity Planning

STATE OF FLORIDA  
COUNTY OF DUVAL

BEFORE ME THE UNDERSIGNED AUTHORITY, personally appeared Chuck Bond who, being first duly sworn, deposes and says that he has read the foregoing answers and that they are true.

SWORN AND SUSCRIBED BEFORE ME this 23rd day of September, 1999.

Cathy L. Barnwell  
NOTARY PUBLIC, STATE OF FLORIDA AT LARGE



CATHY L. BARNWELL  
Notary Public, State of Florida  
My comm. expires Sept. 24, 2002  
Comm. No. CC 777997