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June 21, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director
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Administrative Services
Florida Public Service Commission
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COMMISSION
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Re: Docket No. 020233-EI - Review of GridFlorida Regional Transmission
Organization (RTO) Proposal.

Dear Ms. Bayo:

Attached please find the original and fifteen copies of JEA's Post Workshop Comments to
be filed in the above-styled docket. Also attached is a copy to be stamped and returned to our office.

Should you have questions or need any additional information, please contact me.

Very truly yours,



Suzanne Brownless
Attorney for JEA

Com-5
Sec-1
/smh
Bayo-ltr.wpd

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of GridFlorida
Regional Transmission
Organization (RTO) Proposal.

DOCKET No. 020233-EI

JEA'S POST-WORKSHOP COMMENTS

Pursuant to Order No. PSC-02-0459-PCO-EI, issued on April 3, 2002, JEA, through its undersigned counsel, submits its Post-Workshop Comments in this docket and states as follows:

STRUCTURE AND GOVERNANCE

The Board Selection Committee (BSC) as currently proposed would have 9 members:

- a) 3 investor-owned utilities (IOUs);
- b) 1 non-IOU that distributes electricity at retail;
- c) 1 generation and transmission cooperative or joint action agency selling electricity at wholesale (Florida Municipal Power Association (FMPA) or Seminole Electric Cooperative (SEC))
- d) 1 entity that owns or is developing generation facilities (Exempt Wholesale Generator (EWG) or Independent Power Producer (IPP));
- e) 1 power marketer or broker;
- f) 1 governmental or non-profit organization representing consumers or environmental interests (Office of Public Counsel (OPC), Florida Public Service Commission (FPSC), FACT, Florida Industrial Power Users Group (FIPUG), AARP, LEAF);

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g) 1 member chosen by Advisory Committee (AC).

[RTO Formation Plan, Article III, s. 3.1.]

In our Comments JEA recommended reducing the size of the Board Selection Committee (BSC) to 8 and the number of IOU members to 1 in order to dilute the power of the IOUs. [JEA Comments at 2-3] FMPA would have the AC select the Board. [FMPA Comments at 7] FMG wants a member of the FPSC on the BSC. [FMG Comments at 10] The EWGs and power marketers don't seem to be concerned with the composition of the BSC, but are concerned that the initial Board of Directors will be selected entirely by the IOUs citing Section 3.5 of RTO Formation Plan¹. [Joint Commenters at 43]

Upon review of parties' filed comments and workshop discussions, JEA suggests that the BSC be composed as follows:

- a) A seven (7) member board consisting of the six (6) stakeholder groups identified in the current BSC

¹ Section 3.5, a newly added section, states in part: "As soon as practicable following the Board Selection Committee's declaration of its slate of candidates for election as initial directors of GridFlorida, Inc., **the Applicants shall cause the Board Selection Committee's slate of candidates to be elected or named as initial directors of GridFlorida, Inc., in such classes as are determined under Section 3.4 ...**" It is the reference to the Applicants in this language, along with its general ambiguity, that gives rise to the EWGs' conclusion that Applicants alone would select the initial members of the Board.

This is the same language that was used in the original proposal which FERC approved. 94 FERC ¶61,020 at 61,044. While not a paragon of clarity, FERC apparently believes that this language does not allow Applicants to deviate from the slate of candidates proposed by the BSC. Notwithstanding that fact, however, this language should be rewritten to make it clear that to the extent the Applicants are required to take action prior to the initial establishment of the Board, that the Applicants are required to appoint the candidates selected by the BSC.

proposal;

- b) Membership would be 2 IOUs; and 1 each from the remaining 5 stakeholder groups; and
- c) Action would require a super majority of 5 of 7 votes.

This structure does the following:

- a) Reduces the BSC to a manageable size;
- b) Lessens the control of the IOUs by 20%;² and
- c) Potentially dilutes IOU power by rotating one of them off after the first term is served.³

During the May 29th Workshop, it was stated several times that the Federal Energy Regulatory Commission (FERC) had already approved a BSC with 3 IOU members out of 8, thus, would have no problem with a BSC with 3 members out of 9. [T. 202, 205, 207]⁴ However, a close reading of FERC's Order on RTO Compliance Filing, 94 FERC ¶ 61,020, issued on January 10, 2001, does not support this contention.

² Under the current structure, the IOUs need only 2 more votes to adopt a provision. Under JEA's proposal, the IOUs would need 3 additional votes for approval of an item.

³ FPL, FPC and TECO, like all other stakeholder groups represented on the BSC, would be required to adopt a process within their group for the selection, replacement and term of service on the BSC. It is highly unlikely that the entity who "sits out" as a member of the initial BSC, will continue to do so for an extended period of time.

⁴ Contrary to the Applicants' contention, the addition of one extra person to an 8 member Board does not dilute the power of the IOUs. The IOUs still only need 2 more votes to get a majority as the proposal is currently structured. Further, since these 2 votes can be secured from 6 rather than 5 others the IOUs have actually increased their influence.

At the time that FERC approved the 8 member BSC, only Florida Power and Light Company (FPL) had committed to divesting its assets to the RTO. Florida Power Corporation (FPC) represented that it would not and Tampa Electric Company (TECO) was undecided. 94 FERC ¶ 61,020 at 61,042.

In the original BSC proposal, IOUs owning transmission facilities that divested ownership to the RTO got 1 representative each and IOUs owning transmission facilities that did not divest ownership to the RTO got 1 representative for that class of stakeholders. 94 FERC ¶ 61,020 at 61,044. Thus, while it was possible for the IOUs to have a maximum of 3 members out of 8 (FPL and TECO divesting, FPC not divesting), it was also equally possible that the IOUs would have only 2 members on the BSC (FPL divesting and TECO and FPC having to select one of them to represent non-divesting IOUs). While it turned out that the IOUs ended up with 3 members on the BSC, since TECO ultimately did decide to divest its assets, this was not a given at the time FERC issued its order.

The significant difference between the original and current BSC proposal is that **non-divesting owners were only given one vote**. The particular significance of divestiture was cited by Applicants as the rationale for each divesting owner having a vote since

passive owners that have divested their assets to GridFlorida will have a unique interest in ensuring that GF Inc. will have a highly qualified Board that will be accepted by financial markets.

94 FERC ¶ 61,020 at 61,046.

Each IOU is now a non-divesting owner. There are no "passive owners" with Class B non-voting stock who must be concerned that the Board of the RTO be "accepted by financial markets". Under the current Planning Protocol, Attachment N, which JEA agrees appropriately balances the interests of transmission customers with those of transmission owners, GridFlorida has ultimate authority over maintaining the transmission grid. [OATT, Attachment N, s.I] GridFlorida will develop a GridFlorida Plan, however, in the interim, the RTO will "adopt and incorporate into its transmission expansion plan the most recent ten (10) year plans of all POs associated with facilities that are considered part of the Transmission System" [OATT, Attachment N, s.VI at 204] Further, GridFlorida will adopt the maintenance schedules prepared by IOUs for their transmission assets. These provisions, at least in the initial period of the RTO's operation, place the IOUs in virtually the same position via control of their transmission assets as they are now.

Thus, contrary to the Applicants' assertion, 94 FERC ¶ 61,020 does not support the "one IOU, one vote" position being advocated. On the contrary, a close reading of FERC's order clearly indicates that the stakeholder group composed of all non-divesting IOUs should be given only one vote. Since each IOU is now a non-divesting owner, it is this provision of FERC's order that is applicable, not that cited by the Applicants.

As additional support for the "one IOU, one vote" approach, Applicants argue that votes should be based upon number of

customers and amount of transmission investment, i.e., proportionate to investment "risk". [T. 206-7] However, assuming that this is the correct approach, what level of investment is sufficient to guarantee a vote?

The amount of transmission investment for Florida utilities⁵ for the year 2001 is as follows:

<u>Utility</u>	<u>Transmission Investment</u>
FPL	\$ 2,389,229,518
FPC	\$ 918,269,471
TECO	\$ 310,643,928
JEA	\$ 255,070,394
SEC	\$ 170,000,000 ⁶
FMPA	\$ 188,000,000

Thus, JEA's investment is only 18% less than that of TECO. This compares to the 62% difference between the level of investment of FPL and FPC and the 87% difference between the level of investment of FPL and TECO. Further, JEA's investment is 26% larger than that of FMPA and 33.4% larger than that of SEC, either of which may be a voting member of the BSC as a representative of the generation and transmission cooperative and joint action agency stakeholder group. Using an investment criterion, JEA could also justify having a guaranteed vote.

JEA would suggest that transmission investment and its associated risk are not the criteria used to determine how many

⁵ FERC Form 1, Florida Gross 2001 Transmission Investment; 2002 Ten Year Site Plans.

⁶ Estimate based on the revenue requirements submitted by SEC to GridFlorida.

votes are granted to a particular stakeholder group, the real rationale is that each Applicant wishes have a vote. However, merely being an Applicant is not, in an of itself, sufficient justification for being granted a vote.

In sum, JEA's recommendation that the IOUs be given 2 votes on the BSC, rather than having only one vote consistent with FERC's order, is recognition that the IOUs have made the largest transmission investments in the state's transmission grid. Nothing more is required.

Finally, in response to questions asked by the Commissioners, Applicants have offered the Commission a seat on both the BSC and AC. [T. 203-4] JEA is strongly opposed to allowing a member of the Commission or its staff to sit on either the BSC or the AC.

It is an inherent conflict of interest for a Commission member to sit on either committee. The Commission is statutorily required to rule on the need for any proposed GridFlorida projects and the prudence of the IOUs' requests for cost recovery for those projects. To the extent that as a member of the AC a Commissioner, or a Commission staffer, was instrumental in developing the recommendations for grid expansion to be presented to the Board, neither the Commissioner nor staffer can be said to be unbiased with regard to those recommendations. The permanent exclusion of that Commissioner, and any staff who assisted the Commissioner in committee duties, from any docket involving GridFlorida projects would be necessary in order to maintain the integrity of the Commission's actions.

Participation by a Commissioner on the BSC likewise creates a conflict of interest. As a member of the BSC, the Commissioner would not only participate in the initial selection of Board members but in any decision to replace or remove Board members. As a regulatory authority reviewing, either solely or in conjunction with FERC, virtually every action taken by the Board, the ability to participate in the selection and retention process of its members creates an inherent conflict. In that situation it would be reasonable for any party to conclude that the Commission was supportive of Board action since one of its members directly participated in the selection of its members. Again, any staffer who assisted a Commissioner in performing BSC duties would likewise be tainted. Again, both the Commissioner and any staffer who assisted the Commissioner in his/her duties would have to be excluded from any docket involving GridFlorida projects in order to maintain the integrity of the proceeding.

On balance, JEA does not believe that is in the state's overall best interests to permanently exclude a Commissioner or Commission staffers from participation in dockets involving GridFlorida projects, an action which would be necessary due to their participation on the BSC or AC. For these reasons JEA urges the Commission not to accept Applicants' offer of a seat on the BSC or AC.

Pricing Protocols and Rate Design

CBM

In order to maintain the reliability of JEA's system JEA must

receive Physical Transmission Rights (PTRs) for the designated Capacity Benefit Margin (CBM) associated with its portion of the two 500 kV lines adjusted in accord with the scheduling procedures set forth in Attachment P of the OATT.

Under the current proposal, GridFlorida will determine the Total Transfer Capability (TCC) and Available Transfer Capability (ATC) of all the state's transmission facilities pursuant to the terms of Attachments C and O. [OATT, s.15.2] GridFlorida is required to use FRCC ATC Coordination Procedures and NERC standards to calculate the TTC and ATC of each transmission facility. [OATT, Attachment O, s.II(1)] PTRs across Flowgates (the 500 kV intertie is classified as a Flowgate at the Georgia/FL interface and JEA/FPL interface) must equal the NFC of the Flowgate. [OATT, Attachment P, s.3.2.3] The NFC is the "TTC of the Flowgate minus the number of MW across the Flowgate made available due to counterflows resulting from long-term firm transactions." [OATT, Attachment P, s.3.2.3.1] TTC is the "maximum amount of power that can be transferred across a Flowgate in a reliable manner consistent with NERC and FRCC criteria."⁷

There is no definition of ATC in the GridFlorida documents. However, the FRCC definition of ATC is "the measure of the transfer capability remaining in the physical transmission network for further commercial activity, over and above already committed

⁷ JEA believes that this definition is intended to track the FRCC definition of TTC, "total (first contingency) transfer capability between two control areas or zones using the "control area to control area" method detailed in NERC's 1996 document."

uses." The FRCC defines **non-recallable ATC**, also referred to as NATC, as "TTC-TRM-EC-FRES-CBM". **Recallable ATC** also deducts CBM in order to reach the recallable ATC (RATC).⁸ Based on these definitions it appears to be the intent of GridFlorida that CBM be taken into account in calculating the ATC used by GridFlorida and, therefore in calculating the amount of capacity available for distribution to network transmission customers.

In order to clarify the treatment of CBM in the calculation of ATC and TTC, Attachment O,s.II(1) of the OATT should be revised to read:

The Transmission Provider shall have the sole authority to determine the ATC and TTC of all commercially viable pathways for the Transmission System facilities, taking into account transmission reservations, capacity benefit margins, and scheduled maintenance of generation and transmission facilities, and in accordance with the FRCC ATC Coordination Procedures and NERC standards.

In order to ensure that JEA gets PTRs for its designated CBM it is also necessary to revise Attachment P,s.3.3.1.1(f) of the OATT as follows:

(f) Participating Owners that will be taking Network Transmission Service from the Transmission Provider shall be allocated PTRs necessary to preserve their existing and planned uses, including Capacity Benefit Margin (CBM) designated by the Participating Owners.

These changes will allow JEA to meet its load demands in

⁸ These definitions are found in the FRCC ATC Calculation and Coordination Procedures, approved November 8, 2000, at Section III.A., B.,K. and L.; Section IV.A.6, 7, and 8.

emergency situations and to maintain its share of the state's operating reserves. Without these changes, JEA's system integrity and its ability to meet its own emergency needs will be placed in great jeopardy and its ability to join GridFlorida foreclosed.

Contracts with AES Cedar Bay and FPL

In JEA's Comments, potential revenue shortfalls associated with the AES Cedar Bay and FPL SJRPP Units 1 and 2 contracts were discussed. [Comments at 6] Upon further review of Attachment T of the OATT and these documents, JEA is now of the opinion that neither falls within the definition of Existing Transmission Agreement (ETA) found in Attachment T, s.2.0 and thus each is outside of the scope of GridFlorida.

Short-term transmission revenues

Under the GridFlorida proposal, short-term wheeling revenues⁹ realized by POs will terminate immediately on the commercial operation date of the RTO.¹⁰ Applicants estimate that they will lose a total of \$8.1 million per year, or less than \$.06/mwh. [Id.] However, JEA will lose approximately \$10 million per year, or more than \$.90/mwh.¹¹ Under the GridFlorida proposal, revenues from short-term wheeling will be calculated for a base year, the year

⁹ "Short-term transmission service shall mean any service with a term of one year or less." [OATT, Attachment T, s.8.2]

¹⁰ Responses to April 22, 2002 Staff Informal Data Requests, No.28.

¹¹ These are revenues generated by the sale of short-term transmission over JEA's portion of the two 500 kV lines under JEA's Open Access Transmission Tariff.

beginning January 1 of the year that the RTO begins commercial operation. [OATT, Attachment T,s.7.2] These base-year revenues are remitted to the PO in 20% declining increments over the first 5 years of GridFlorida operations, i.e, the first year the PO receives 80% of the revenues, the second year 60%, the third year 40%, etc. [Id.] Thus, in the sixth year after the RTO's commercial operation, the PO receives no revenues from short-term wheeling over its transmission facilities.

JEA urges the Commission to reject this methodology and treat short-term wheeling revenues like the revenues generated by existing long-term transmission agreements (ETAs). Under GridFlorida's proposal, the revenues associated with ETAs are retained by the PO for the first 5 years the RTO is in commercial operation and phased out at 20% per year in years 6-10. [OATT, Attachment T, s.7.1(a)] While under this methodology JEA still incurs substantial long-term revenue losses, JEA will be better able to mitigate the impact of this revenue shortfall.

In the instance of both ETAs and short-term wheeling, POs lose revenues that are transferred dollar-for-dollar to other retail ratepayers on the GridFlorida network on the commercial operation date of the RTO. Both the financing of JEA's investment in the 500 kV lines and the terms and conditions of every transmission contract in the state are the result of analysis and negotiation. There is no logical reason to treat ETAs differently than short-term wheeling revenues. If POs should get the full benefit of their negotiated bargain for a period of 5 years, then JEA should

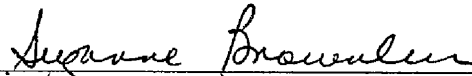
also get the full benefit of its negotiated financing for the same 5 years. To do otherwise is discriminatory and highly prejudicial given the exceptionally large impact loss of these revenues will have on JEA.

In order to implement this suggestion, the language of OATT, Attachment T, s.7.2 should be deleted and the following language inserted:

7.2 Participating Owners that lose short-term wheeling revenue due to the elimination of pancaked rates shall be compensated for such loss pursuant to this section. A base year amount of revenue for each Participating Owner shall be calculated using revenues from the year prior to January 1 of the year the Transmission Owner begins commercial operations. The Participating Owner shall retain all such revenues during Tariff Years 1-5 of Transmission Provider operations. During Tariff Years 6-10 of Transmission Provider operation, the base year revenue amount shall be phased out in equal increments (20% per year). If such revenues are insufficient in any Tariff Year to make such payments, the unfunded amounts shall be carried over and paid out of revenues in subsequent Tariff Years until all such revenues are recovered by the Participating Owner.

Again, JEA cannot state too strongly that JEA's participation in GridFlorida is contingent upon the adoption of this or some other mechanism to reasonably mitigate the significant cost shift which would result from the loss of JEA's short-term wheeling revenues.

Respectfully submitted this 21st day of June, 2002 by:



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**CERTIFICATE OF SERVICE
DOCKET 020233**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Hand-delivery(*) or U.S. Mail, to the following parties on this 21st day of June, 2002.

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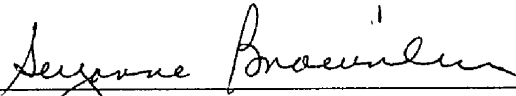
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