ORIGINAL

LAKELAND ELECTRIC
Your Essential Link to a Quality Life

January 25, 2005

Florida Public Service Commission
Blanca S. Bayo, Director
Division of the Commission Clerk and Administrative Services
2540 Shumard *Oak* Blvd.
Tallahassee, Florida 32399-0870

Re: Rule 25-6.0185, Fuel Emergency Plan Review

Dear Ms. Bayo:

Pursuant to Rule 25-6.0185(2), Lakeland Electric is notifying the Florida Public Service Commission that it has reviewed Lakeland Electric's Fuel Emergency Plan. Lakeland Electric finds the existing plan as filed on January 14, 1999 to be adequate and meeting the intent of this Rule. In its review of the plan, Lakeland Electric did find several typographical errors and updated several reporting names due to changes in the organization of the utility. These changes have in no way changed the implementation or structure of the plan but for clarity, Lakeland is providing an original and 15 copies for filing. A clean copy is also being forwarded to the FRCC as per the Rule.

Should you have any questions please do not hesitate to contact us.

Respectfully,

Paul H. Elwing
Legislative & Regulatory Affairs

CMP
COM
CTR
ECR
GCL
OPC
MMS
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SEC 1
OTH

xc: James Stanfield w/o Attachment
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LAKELAND ELECTRIC

FUEL

LONG - TERM ENERGY EMERGENCY PLAN

November, 1998
Reviewed 412003
Reviewed 412004
Reviewed 112005

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LAKELAND ELECTRIC DEPARTMENT
LONG – TERM ENERGY EMERGENCY PLAN
FOR
FUEL SUPPLY SHORTAGE

I. INTRODUCTION

The uncertainty in fuel supply is beyond the control of prudent planning and has the potential for fuel shortages in both Lakeland Electric and the whole State. This could result in a long-term electrical energy deficiency, which would adversely affect all customers. Therefore, this emergency plan was developed which would enable Lakeland Electric to best cope with the energy shortage and thereby protect the health, safety and welfare of its customers during the period of deficiency.

II. PURPOSE

The purpose of this Plan is to establish a systematic and efficient means of anticipating, assessing and responding, in an appropriate manner, to a long – term energy emergency caused by a fuel supply shortage.

III. DEFINITION

An energy emergency exists when the utility has inadequate energy generating capability by reason of a fuel supply shortage and is thereby prevented from operating at required levels as established by its customers normal energy needs. An energy emergency differs from a short-term capacity emergency in that energy requirements cannot be met over an extended period. The period of advance warning and expected duration of an energy emergency is usually measured in terms of weeks or months, as opposed to hours or minutes for a short-term capacity deficiency.

IV. AUTHORITY

A. DECLARE EMERGENCY

1.	Regularly monitor fuel inventories and system load.	Fuels Manager
2.	Alert the General Manager to declare an energy emergency any time fuel supplies appear to be in jeopardy due to availability of and/or quality constraints and it is probable that inventory levels will drop below desirable levels, as defined in Section V Step A.	Fuels Manager
3.	After an energy emergency is declared, or at the direction of the Manager authorized to declare an energy emergency, the following procedure will be followed in determining the fuel supply situation.	Fuels Manager
a.	Monitor and prepare short-term forecast of system load.	Supervisor of System Control
b.	Monitor and forecast fuel inventories. Coordinate fuel plans with the members of the Florida Municipal Power Pool	Fuels Manager
c.	Using the above data, run the Generation modeling program and provide the amount of each type of fuel expected to be used to the Fuels consumption should be established on a daily basis for the first 30 days and then on a weekly basis for up to 75 days.	Supervisor of System Control
d.	Using the output of b and c above, prepare and distribute a daily or weekly report on the overall fuel supply situation	Fuels Manager

B. ENERGY EMERGENCY COORDINATOR

1.	After the emergency is declared the Energy Emergency Coordinator is required to Coordinate all activities involved in Implementing The Energy Emergency Plan.	Energy Supply Business Unit Director

C. IMPLEMENTATION PLAN

The persons listed below will assist the Energy Emergency Coordinator and be responsible for implementing the part of the plan listed by their title.

	Activity	**Person Responsible**
1.	Expedite fuel procurement and coal transportation. Coordinate all fuel activities with the Florida Municipal Power Pool	Fuels Manager
2.	Communicate with Department and City	General Manager
3.	Communicate with media and public	Public Information Officer
4.	Communicate with Governmental organizations	Public Information Officer
5.	Waive environmental restrictions	Manager of Environmental Compliance
6.	Curtail Utility & Municipal use	Energy Supply Business Unit Director
7.	Promote load conservation, voluntary and mandatory	Account Managers, Public Information Officer
8.	Curtail firm load	Supervisor of System Control
9.	Modify system operation	Manager Electric System Control

V, THE EMERGENCY PLAN

When a long-term Energy Emergency Plan is declared, the following steps and actions may be taken so as to minimize the effect of the fuel shortage upon our customers.

Step A – After the Energy Emergency has been declared and the total fuel supply* has decreased to 30 days and a continued downward trend is anticipated, the following measures should be implemented and continued for the duration of the emergency.

1. Expedite Fuel Procurement

   a. Oil – Request Lakeland Electric suppliers to locate and acquire any oil of the proper quality to meet both environmental and operational constraints.

   b. Coal - Attempt to purchase available coal from any sources that meet both environmental and operational constraints.

   c. Natural Gas – Request gas supplier to provide maximum amount of gas based on capacity of Lakeland Electric pipeline.

2. Communicate with Department and City

   a. Issue Newsletter bulletin that explains why the fuel shortage has occurred, provides an overview of the Emergency Plan and communicates details of Step A.

   b. Provide daily update on telephone hot line.

3. Communicate with Public and Media

   a. Issue news release to the news media. It will explain why the fuel shortage has occurred, communicate actions Lakeland Electric is taking to deal with the problem and will provide specific conservation information to customers.

   b. Provide daily briefings to media on status of emergency.

   c. Promote load conservation by the public via advertisements that will provide customers with specific information on how to conserve electricity.

4. Communicate with Governmental Organizations

   a. Coordinate with the Public Information Officer in notifying appropriate agencies.

   b. Assist Manager of Environmental Compliance with Environmental Restrictions Waiver.

* Refers to the fuel on the property and that already in the delivery "pipeline".

5. Waive Environmental Restrictions

Start procedures to obtain approval of the Governor and the President to suspend the State Implementation Plan (SIP) requirements of the Clean Air Act so as to be able to burn available fuels that may not meet the environmental constraints.

6. Curtail Utility & Municipal Use

a. Curtail all nonessential uses of electrical energy at all utility & municipal owned facilities. This should reduce Utility megawatt hour usage by at least 10%. Monitor usage of energy weekly.

b. Reduce on peak water pumping.

c. Reduce on peak consumption of pollution control facilities.

7. Promote Load Conservation

a. Voluntary

1) Increase efforts to educate customers in the efficient use of electrical equipment and supplies.

2) Encourage customer conservation by advertising program of specific ways to conserve electric energy,

b. Request all customers to reduce their kilowatt hour usage by at least 10%.

c. Mandatory – No action required.

8. Curtail Firm Load – No action required.

9. Modify System Operation

a. Discontinue non-firm sales to utilities not participating in the FRCC Long term energy plan.

b. Discontinue sales of economy interchange from units whose fuel is in short supply.

c. Review the maintenance schedule to optimize use of obtainable fuels.

d. Coordinate all activities with the Florida Municipal Power Pool

Step B – If the total fuel supply has decreased to the range of 30 to 20 days and a continued downward trend is anticipated, the following additional measures should be implemented.

1. Expedite Fuel Procurement

   a. Oil – Suppliers of oil would be solicited by phone to determine types of oil available for purchase as well as quantity and delivery time. Will maximize on-site inventory.

   b. Coal – Purchase any coal that is available and can be burned in Lakeland Electric Power Plants,

   c. Natural Gas – Request gas supplier to obtain additional quantities of gas up to maximum capacity of Lakeland Electric pipeline.

2. Communicate with Department & City

   a. Issue Newsletter bulletin that will update employees.

3. Communicate with Public and Media

   a. Issue update news statement.

   b. Continue advertisements telling customers how to conserve electricity.

4. Communicate with Governmental Organizations

   a. Request legal authority from the proper governmental organization for the actions to be taken in the following steps.

   b. Update appropriate governmental agencies.

5. Waive Environmental Restrictions – No new action required.

6, Curtail Utility & Municipal Use

   a. Reduce energy use by at least 20%.

   b. Discontinue the use of lunchroom kitchens, turn off 25% of exterior lights, turn off hot water heaters.

   c. Reset and lock air conditioning thermostats and heating thermostats to 80° degree and 65° respectively.

7. Promote Load Conservation

a. Voluntary

1) Request residential and commercial customers to cut back on nonessential usage and to adjust thermostat setting 5 degrees down from normal during a heating season and 4 degrees up from a normal setting during a cooling season.

2) Request customers to temporarily discontinue use of indoor advertising devices, outdoor displays and flood lighting except that essential for safety and security.

3) Request all customers to reduce their kilowatt hour usage by at least 15%.

a) Mandatory - Ban all nighttime sporting activities. Close all lighted parks, tennis courts, gulf courses, etc. Also, eliminate nonessential outdoor flood lighting and restrict the use of outdoor advertising lighting.

8. Curtail Firm Load – No action required.

9. Modify System Operation

a. Modify unit dispatch to load units with obtainable fuels (other than No. 2 oil) first, and then load units burning the fuel in short supply. Coordinate all activities with the Florida Municipal Pool

b. Where possible cycle units fueled by short supply fuel off line and still allow the same demand and energy output, but at a better heat rate and consume less station service power.

c. Purchase energy from the market to replace self generation when feasible.

Step C – When the total fuel supplies have decreased to the range of 20 to 15 days and a continued downward trend is anticipated, the following additional measures should be implemented:

1. Expedite Fuel Procurement

a. Oil – Locate and purchase any oil available which would satisfactorily burn in Lakeland Electric power plants.

b. Coal – Locate and purchase any usable coal.

c. Natural Gas - Request gas supplier to curtail deliveries to nonessential users to obtain additional quantities of gas up to maximum capacity of Lakeland Electric pipeline.

2. Communicate with Department & City

a. Issue Newsletter bulletin that will update employees.

3. Communicate with Public and Media

a. Issue updated news statement.

b. Continue advertising conservation.

4. Communicate with Governmental Organizations

a. Request legal authority from the proper governmental agency for the actions to be taken in the following steps.

b. Update governmental agencies.

5. Waive Environmental Restrictions -- No new action required.

6. Curtail Utility & Municipal Use

a. Discontinue the use of air conditioning units serving large areas with a small number of people by moving the people.

b. Turn off at least 50% of all exterior lights.

c. Fill power plant bunkers during off peak times.

d. Implement water usage ban on nonessential uses including lawn sprinkling and car washing.

7. Promote Load Conservation

a. Voluntary

1) Direct residential customers to further reduce energy consumption by stopping use of certain electrical services such as air conditioning, heating, hot water heaters, clothes dryers, dish washers, and other convenience devices and equipment.

2) Conditioned offices and buildings other than critical services such as hospitals will be directed to lower thermostat settings to 65° during the heating season and raise thermostat settings to 80° during cooling season.

3) Commercial establishments, institutional facilities, public and private schools, office buildings and industrial plants will be directed to further reduce their consumption which may require a reduction in their operating hours.

4) Encourage customer use of generation and alternate energy supplies,

5) Request all commercial and industrial customers to reduce their kilowatt hour usage by at least 30%.

b. Mandatory

1) In commercial establishments, ban all nonessential use of hot water.

2) Elimination of window and display lighting.

3) Ban all air conditioning and heating during non-use hours and in unoccupied areas of commercial establishments.

8. Curtail Firm Load – No action required.

9. Notify System Operations

a. Reduce firm sales to other utilities to a minimum.

b. Implement emergency line ratings so as to increase import capability.

c. Purchase economy power against peaker prices when it will extend the availability of the fuel in short supply.

d. Purchase short term firm energy from the market, other than peaker energy, when it will extend the availability of the fuel in short supply.

e. Lower system distribution voltage 5 percent where it is possible to do so.

Step D – When the total fuel supply has decreased to a 15 to 10 day supply and a continued downward trend is anticipated, the following additional measures should be implemented.

1. Expedite Fuel Procurement

2. Investigate all possible fuel sources in search of any usable fuel.

3, Communicate with Department & City of Lakeland

4. Issue Newsletter bulletin. Emphasize that firm load customers will experience rotating blackouts and why.

5. Communicate with Public and Media

6. Issue updated news statement explaining that firm load customers will experience rotating blackouts and why.

7. Communicate with Governmental Organizations

8. Request legal authority from the proper governmental agencies for the actions to be taken in the following steps.

9. Update appropriate governmental agencies. In particular, advise them of firm load Curtailment and its impact on their activities.

10. Waive Environmental Restrictions – No new action required.

11. Curtail Utility & municipal Use

12. Eliminate all but critical air conditioning and heating such as that for computer facilities.

13, Use waivers obtained in (5) to eliminate stack gas scrubbing loads.

14, Promote Load Conservation

a. Voluntary - Request all commercial and industrial customers to reduce their kilowatt hour usage by at least 50%.

b. Mandatory - Reduce street and area lighting where possible.

15. Curtail Firm Load

a. Place the Lakeland Electric firm load curtailment plan into operation. The implementation of this plan will result in the interruption of electrical service to our customers on a rotating basis. The periods of interruption to electrical service will be rotated among the service areas so that no one area will be without electricity for an unduly long period of time. Selection of the-areas to be interrupted will be made by company operating personnel in the exercise of their judgement according to circumstances existing at the time of the emergency.

16. Whenever possible during such emergencies, the company will give priority for service to hospitals, vital military installations major airports, police and fire, critical telephone exchanges, TV stations, and water and sewer facilities where no emergency power source is available,

17. Modify System Operation

a. Reduce firm sales to other utilities to zero.

b. Purchase any available energy that would extend the supply of the fuel in short supply.

Step E – When the total fuel supply has decreased to the area of less than 10 days and a continued downward trend is expected the following additional measures should be implemented.

1. Expedite Fuel Procurement – No new action required.
2. Communicate with Department & City.
   a. Issue updated Newsletter bulleting.
3. Communicate with Public and Media
   a. Issue updated news statement.
4. Communicate with Governmental Organizations
   a, Update appropriate governmental agencies.
5. Waive Environmental Restrictions – No new action required.
6. Curtail Utility & Municipal Use – No new action required.
7. Promote Load Conservation – No new action required.
8. Curtail Firm Load – No new action required.
9. Modify System Operation
   a, Implement plans to insure the orderly shut down of all units burning the fuel in short supply in the event the fuel is exhausted.
   b. Implement plans to insure power availability to all power plants and fuel handling facilities.

LONG-TERM ENERGY EMERGENCY PLAN-SUMMARY

The following shows the additional measures to be taken for each step.

ACTION	30 Days' Emergency Declared STEP A	20 to 30 Days STEP B	15 to 20 Days STEP C	10 to 15 Days STEP D	Less than 10 Days STEP E
1. Expedite Fuel Oil Coal Gas	**Purchase** any proper oil. Purchase any proper coal. Purchase additional gas.	Determine **types** of oil Available. Purchase any satisfactory Burnable coal	Purchase any satisfactory Burnable oil. Purchase ***any*** **usable** coal Purchase maximum amount Of additional gas.	Search for and Purchase *any* usable fuel.	
2. Curtail Utility & Municipal Use: Buildings and Power Plants	**Curtail** nonessential uses. **Reduce KWH's by** 10%. Monitor usage weekly. Reduce water and **sewer**	Reduce KWH's by 20% Set thermostats to 65° to 80° Cut off 25% of exterior lights Cut off hot water heaters.	Further reduce A/C Cut off 50% of exterior lights. Fill bunkers at off peak time	Cut off **all but** critical A/C and heating.	
3. Promote load Conservation **Voluntary**	Request **5%** KWH reduction. Educate customers. Advertise conservation.	Request **15%** KWH reduction. Adjust thermostats ± 5%. Cut out indoor & outdoor adv. Cut out flood lighting as **Possible.**	C&I: Request 30% KW Reduction Set thermostats to 65° or 80° . Encourage alternate energy Usage. Reduce operating hours if necessary. Residential: Stop using A/C, Heating, H. W. H., **dryers,** dish Washers, etc.	C&I: Request 50% KWH reduction.	

ACTION	30 Days* Emergency Declared STEP A	20 to 30 Days STEP B	15 to 20 Days STEP C	10 to 15 Days STEPD	Less than 10 Days STEP E
Mandatory		Ban night sports. Close lighted parks, etc. Ban nonessential flood and O.D. advertising lighting	Ban displays &window lighting Ban in commercial establishments a. A/C and heating during non-use hours and in unoccupied areas. b. Nonessential use of hot water,	Reduce street and area lighting where possible.	
5. Modify System Operation	Stop non-firm sales to other utilities. Stop economy interch. sales		Reduce firm sales to a mim. Use emergency line ratings. Purchase economy power against peaker prices.	Reduce firm sales to zero.	Implement Orderly shut Down of units
	Review maintenance Schedule. Place 75% of Spin. Res. On Step "O".	Modify unit dispatch. Cycle units off-line. Purchase out of state energy.	Purchase short-term firm Energy except peaker.	Purchase any Available energy.	insure power avail, to Plants.

ACTION	30 Days* Emergency Declared STEP A	20 to 30 Days STEP B	15 to 20 Days STEP C	10 to 15 Days STEP D	Less than 10 Days STEP E
3. Curtail Firm Load				Implement "Firm Load Curtailment Plan".	
5. Waive Environmental Restrictions	Request Governor to suspend SIP of CAA.				
1. Comm. With Governmental Organizations	Coordinate with Public Affairs in notifying Appropriate agencies. Assist with request to Governor.	Request legal authority for actions to be taken In this step. Update governmental Agencies.	Same as Step B.	Same as Step B.	Update appropriate agencies.
2. Comm. With Dept. and City	Issue newsletter.	Issue updated newsletter.	Same as Step B.	Same as Step B.	Update appropriate agencies.
3. Comm. With Public and Media	Issue news release. Provide daily status Briefing. Promote load conservation.	Update news release.	Same as Step B.	Same as Step B.	Update appropriate

* Refers to total fuel supply in pipe line. Consideration is to be given to the "realistic days supply" which is defined as the "days supply calculated as though there would be no fuels receipts, but then adjusted for realistic, expected fuel deliveries

VI. Detailed Department Plans For Each Step Of Emergency

Step A. – Reduce Utility & Municipal megawatt usage 10% by curtailing all nonessential uses at all utility and City owned facilities. Some measures to be taken are:

1. - Building Services .-

   a. Upon the declaration of a long-term energy emergency, the Assistant City Manager in conjunction with the Administration Building & Facilities Supervisor will be responsible for the following actions,

   b. Turn off all unnecessary light i.e., work areas, conference rooms and hallways.

2. Each department head inform their employees (meeting/memo) to conserve electricity. This is in addition to informational releases by the Public Information Officer.

   a. Refrain from using any piece of equipment requiring electrical power that can be delayed for a long period of time.

   b. Arrange water system pumping schedules to maintain only minimum fire flow requirements during electric system peak hours.

3. Arrange water pollution control facilities pumping, re-circulating and aeration schedules to reduce consumption and demand during electric system peak hours.

4. The Administration Building & Facilities Supervisor will provide the Energy Emergency Coordinator the results of the weekly monitoring.

5. The Assistant City Manager and the Administration Building & Facilities Supervisor will take such actions recommended by the Energy Emergency Coordinator.

Step B. – Reduce Utility & Municipal megawatt hour usage 20%. Some additional measures to achieve this are:

1. Discontinue the use of lunchroom kitchens i.e., stoves, microwaves, and refrigerators.

2. Turn off 25% of exterior lights, Each department head and/or building attendant will be responsible for doing this. The Administration Building Facilities Supervisor will assist those departments who need help in achieving this goal.

3. Turn off all hot water heaters in City owned facilities.

4. Reset and lock all air conditioning thermostats to 80° and 65° respectively in City owned facilities,

Step C

1. Turn off at least 50% of all exterior lights.

2. Discontinue the use of air conditioning units servicing large areas with a small number of people. This will involve the moving of some personnel.

Step D Eliminate all but critical air conditioning and heating, i.e., communication and computer facilities.

A. COMMERCIAL/INDUSTRIAL POWER SERVICES

Upon the declaration of a long-term energy emergency, the Customer Service Division, will be responsible for the following:

Step A - Account Managers shall contact all commercial and industrial customers (including interruptible load customers) and advise them of the fuel shortage and the need to curtail their load by 5% until further notice. They will also be advised of the potential for further curtailment if the fuel supply continues to diminish.

Step B - Account Managers shall contact commercial/industrial customers (including interruptible load customers) and advise them the fuel supply has diminished to a point which makes it necessary to request a further curtailment of 10% for a total at this point of 15% load curtailment until further notice. Also advise them of the specific conservation measures which should be taken as stated in Section VI C.

Step C - Account Managers shall contact all commercial and industrial customers (including interruptible load customers) and advise them the fuel supply has diminished to a point which makes it necessary to request a further curtailment of 15% for a total at this point of 30% load curtailment until further notice, Also advise them of the specific conservation measures which should be taken as stated in Section VI C.

Step D - Account Managers shall contact all commercial and industrial customers (including interruptible load customers) and advise them the fuel supply has diminished to a point which makes it necessary to request a further curtailment of 20% for a total at this point of 50% load curtailment until further notice. Also advise them of the specific conservation measures which should be taken as stated in Section VI C.

Step E - Account Managers shall contact all commercial and industrial customers (including interruptible load customers) and advise them of the continued need to maintain all load curtailment actions until further notice.

Note: In all steps, the Account Managers shall:

1. Establish procedures to verify that all commercial and industrial customers are complying with the load curtailment plan in effect.

2. Maintain communications with each interruptible load customer for the purpose of providing status reports on the fuel shortage emergency and answering any questions.

3, Be responsible for communicating with each interruptible load customer upon restoring gradual load to each customer as he was removed for the curtailment process. The restoration process will follow basically the same steps as curtailment – however, in reverse.

B. CONSERVATION

Upon the declaration of a long-term energy emergency, the Public Information Officer–with the cooperation of the Energy Conservation Section, will be responsible for the following:

Step A – Promote toad Conservation

1. Voluntary Measures:

   a. Urge customers through advertising program of specific ways to conserve electric energy.

   b. Educate customers in the efficient and wise use of electrical equipment and appliances.

   c. Request all customers to curtail their load by 5%.

2. Mandatory Measures – No action required.

Step B – Promote Load Conservation

1. Voluntary Measures:

   a. Announce to the public by newspaper, television and radio that an electric supply emergency exists and that they are being requested by the Utility to implement Step B of Load Reduction Program,

   b. Direct commercial customers to temporarily discontinue use of indoor advertising devices, outdoor displays and flood lighting except that essential for safety and security.

   c. Request residential and commercial customers to do without all nonessential electrical services, cut back on essential usage and adjust thermostat setting 5 degrees down from normal during a heating season and 5 degrees up from a normal setting during a cooling season.

d. Notify public daily through news media as to the status of the Utilities electric supply emergency and the extent to which the emergency plan is working.

e. Request all customers to curtail their load by 15%.

2. Mandatory Measures:

a. A governmental ban on all nighttime sporting activities. Closure of all lighted parks, tennis courts, golf courses, etc.

b. Elimination of nonessential outdoor flood lighting, and restriction on the use of outdoor advertising lighting.

Step C - Promote Load Conservation

1. Voluntary Measures: Residential

a. Announce to the public that the Utility's electric emergency supply continues to worsen and that it is requesting its customers to control and cease use of certain electric energy consuming devices.

b. Direct residential customers to further reduce energy consumption by eliminating use of nonessential electrical services, such as electric hot water heaters, clothes dryers, dishwashers, air conditioning, heating and other convenience devices and equipment.

c. Notify customers daily through news media as to the status of the electric supply emergency and the extent to which the plan is working.

2. Voluntary Measures: Commercial

a. Conditioned offices and buildings other than critical services such as hospitals will be directed to lower thermostat settings up to 65 degrees during the heating season and raise thermostat to 80 degrees during the cooling season.

b. Commercial establishments, institutional facilities, public and private schools, office buildings and industrial plants will be directed to further reduce their consumption which may require a reduction in their operating hours.

c. Encourage customer use of generation and alternate energy supplies,

d. Ask all commercial and industrial customers to curtail their load by 30%.

3. Mandatory Measures: Residential – No new action required.

4. Mandatory Measures: Commercial

a. Eiimination of window and display lighting.

b. A ban on air conditioning and heating during non-use hours.

c. A ban on air conditioning and heating in unoccupied areas.

d. Ban on all nonessential hot water use. Exceptions: Medical facilities, educational facilities, and food establishments.

Step D – Promote Load Conservation

1. Voluntary Measures: Residential

a. Announce to the public that the electric supply continues to deteriorate and that the Utility's rotating feeder disconnect plan, which will interrupt electrical service, mainly to residential and small commercial customers for specified periods of time, will be implemented to achieve capacity and energy reduction as dictated by the electric supply emergency. This plan will allow for feeder disconnect as often as required to achieve desired results.

2. Voluntary Measures: Commercial

a. Strict temperature control of HVAC systems.

b. Ask all commercial and industrial customers to curtail their load by 50%.

3. Mandatory Measures: Street and Area Lighting

a. Reduce exterior Municipal Street and Area Lighting Systems as practical within prudent guidelines.

Step E – Residential/Commercial/Industrial Customer Action

1. Voluntary Measures - Continued observance of previous four steps.

2. Mandatory Measures - Rotating blackouts.

C. Environmental Planning

Upon the declaration of an energy emergency the Manager of Environmentat Affairs will be responsible for the following actions:

Step A – To obtain the most expeditious relief, so as to be able to burn available fuels having a higher content of sulfur, Lakeland Electric would petition the Governor of Florida. Following an open public meeting on the action, a Hearing Officer would issue a recommended order to the Governor which would form the basis for his decision on whether to petition the President for authority to suspend the State Implementation Plan (SIP) requirements of the Clean Air Act.

At the public hearing, the following information will most likely be required from Lakeland Electric.

1. The nature and extent of the energy emergency;
2. Current and projected unemployment impacts associated with the energy emergency;
3. Current and projected loss of necessary energy supplies for residential use associated with the energy emergency;
4. Alternative strategies including conservation, alternative fuels and power wheeling for emergency and the consequences of these strategies on unemployment and on residential energy supply;
5. Amount of energy savings expected to result from temporary suspension of portions of the implementation plan.
6. To the extent possible, pollutant emission levels both before and after the proposed temporary suspension of portions of the implementation plan; and
7. To the extent possible, preliminary assessment of the air quality and health effect impacts of the proposed temporary suspension of portions of the implementation plan.

D, Firm Load Curtailment Coordinator

Upon declaration of a long-term energy emergency the Supervisor of System Control will be responsible for the following:

Steps A, B, and C – Stay knowledgeable of actions taken and results obtained by Steps A, B, and C.

Step D – Place the Lakeland Electric firm load curtailment plan into operation. The implementation of this plan will result in the interruption of electrical service to our customers on a rotating basis. The periods of interruption to electrical service will be rotated among the service areas so that no one area will be without electricity for an unduly long period of time. Selection of the areas to be interrupted will be made by company operating personnel in the exercise of their judgement according to circumstances existing at the time of the emergency.

Whenever possible during such emergencies, the company will give priority for service to hospitals, vital military installations, major airports, police and fire, critical telephone exchanges, TV stations and water and sewer facilities where no emergency power source is available.

For more detailed information, refer to the Lakeland Electric Load Curtailment Procedures.

E. Fuels

Upon declaration of a long-term energy emergency the Fuels Manager will be responsible for the following:

1. Formulate emergency fuel procurement strategies, policies, and guidelines based upon analysis of internal and external variables impacting on Lakeland Electric's fuel operations; and update them as emergency conditions change.

2. Continuously monitor fuel market conditions in order to access current market conditions and future trends; and report market information to management.

3. Assure constant fuels supply to generation plants in accordance with environmental and performance standards as long as possible under the constraints caused by the fuel emergency.

4. Investigate alternate sources of supply, in accordance with the procurement arrangements set forth by the emergency strategy, to allow the Utility to respond to changes in regulation, operating requirements, or market conditions.

5. Manage existing fuel inventories in a way that assures the most efficient use of fuels under the constraints caused by the fuel emergency.

6. Provide fuel and transportation availability information and forecast for planning and control of operations under the fuel emergency conditions.

7. Develop information, reports, and testimony relating to Lakeland Electric's emergency fuel procurement activities for management, customers, and governmental agencies.

8. If, during the emergency, a physical transfer of fuel should become practical or necessary due to some physical limitation of the electrical system, the bilateral transfers will be accomplished through mutual agreement between the utilities involved. The principle upon which these transfers will be based is that the original owner or procurer of the fuel shall be made whole in terms *of* the cost, quantity, and quality of fuel transferred as soon after the emergency as practicable.

F. Governmental Affairs

Upon the declaration of long-term energy emergency, Public Information Officer will be responsible for the following actions:

Step A

1. Coordinate with the General Manager, those messages communicated to the Department & City and with media and public prior to the release of such communications to provide public officials with sufficient advance time to prepare proper responses for public inquiry.

2. Assist Manager of Environmental Affairs with governmental contact to waive Environmental Restrictions.

3. Notify selected public officials (see attached) of Energy Emergency. Relate message developed in 1) above. Advise of Utility Emergency Plan and Steps to be taken.

Step B

1. Contract appropriate city and county officials (including but not limited to school officials) to implement 7.b. (Mandatory Load Conservation) to prohibit nighttime sporting activities and to close lighted parks, tennis courts, golf courses, etc.

2. Update officials on public communications,

Step C

1. Contact local (city and county), state and federal agencies to implement 7.b curtailment of air conditioning and heating, nonessential use of hot water and elimination of window and display lighting.

2. Update public officials.

Step D.

1. Contact city and county to reduce street and area lighting (7. b.)

2. Advise public officials of firm load curtailment (9,) and its potential impact on their activities.

Step E.

I. Communicate all notices to governmental organizations on continuing basis.

G. Engineering Division and Marketing Group

Upon the declaration of long-term energy emergency, Engineering Division and Marketing Group will be responsible for the following:

Step A – No action required.

Step B

1. Develop emergency line ratings for the lines requested by System Operations so as to allow maximum power transfer capability to Lakeland.

2. The Marketing Group will work with System Operations in negotiating a reduction of any long-term firm power sales to other utilities to a minimum when Step C is implemented.

Step C – Work with System Operations in negotiating a reduction of any long-term power sales to other utilities to zero when Step D is implemented.

H. Energy Supply / Power Production Group

Upon the declaration of a long-term energy emergency, the Power Production Division will be responsible for the following actions:

Step A

1. Eliminate or reduce convenience lighting except where required for safe work conditions,
2. Eliminate unnecessary air conditioning of unoccupied areas.
3. Review plant operations to determine unnecessary uses of energy, eliminating or reducing uses where practical.
4. Identify areas where additional reductions can be made if worsening situations dictate.

Step B

1. With critical review of lighting and plant operations, continue elimination and reduction of unnecessary lighting and air conditioning,
2. Reset required air conditioning and heating thermostats to 80° and 65° respectively.
3. Discontinue use of lunchroom kitchens.
4. Turn off water heaters.
5. Discontinue lighting during daylight hours where possible.

Step C

1. Continue review of energy uses making reductions where possible.
2. Reduce all lighting, interior and exterior, to the minimum required for safety.
3. Eliminate all nonessential air conditioning and heating load.
4. Reschedule bunkering of coal bunkers to coincide if possible with off peak hours.
5. Curtail or eliminate scrubbing and ash removal operations as allowed by environmental waivers.

Step D

1. Low ioad situations should allow removing units from service resulting in a reduction in associated station service. An attempt should be made to accomplish as much reduction as possible,
2. Review plans for orderly shutdown of units.

Step E

Proceed with orderly shutdown of units as fuel is exhausted.

I, ~~Public Affairs~~

Upon the declaration of a long-term energy emergency, the Public Information Officer will be responsible for the following actions:

Step A

1. Communicate with Utility and Municipal employees.

   a. Issue news release to the media, It will explain why the fuel shortage has occurred, communicate actions Lakeland Electric is taking to deal with the problem and will provide specific conservation information to customers.

   b. Provide daily briefings to media on status of emergency.

   c. Promote load conservation by the public via advertisements that will provide customers with specific information on how to conserve electricity.

Step B

1. Communicate with Utility and Municipal employees.

   a. Issue Newsletter bulleting that will update employees on actions taken to date, the results and that communicates details in Step B.

2, Communicate with public and news media.

   a. Issue news statement about the continued downward trend in fuel supply. Statement will also explain Utility actions to solve the problem and will communicate conservation information as outlined in this Step.

   b. Continue advertisements that provide customers with specific information on how to conserve electricity.

Step C

1. Communicate with Utility and Municipal employees.

   a. Issue Newsletter bulleting to communicate details of Step C.
   Continue hotline.

2. Communicate with public and news media.

   a. Issue news statement about the continued downward trend in fuel supply as outlined in this Step, communicate conservation information and steps Utility is taking to solve the problem.

b. Continue advertising that communicates conservation information listed in this Step.

Step D

1. Communicate with Utility and Municipal employees.

a. Issue news statement about the continued downward trend in fuel supply and need to conserve. As outlined in this Step, announce that firm-load customers will experience rotating blackouts, why, and what the Utility is doing to solve this problem.

b. In addition to conservation information, advertising will also explain why rotating blackouts are occurring, Ads will point out that the outages are being distributed evenly among all customers, except for hospitals, fire, and police, etc.

Step E

1. Communicate with Utility and Municipal employees.

a. Issue Newsletter bulleting that communicates details in Step E.

2. Communicate with public and news medial

3. Issue news statement to explain the continued downward trend in fuel supply. Communicate Utility actions as outlined in this Step, and the need for customer conservation.

a. Continue advertising that explains why rotating blackouts are occurring. Continue conservation ads.

J. System Operation

Upon the declaration of a long-term energy emergency, the Engineering and Operations Division will be responsible for the following actions:

Step A

1. Provide the Energy Emergency Coordinator with a short-term demand and energy forecast during the emergency,

2. Run the generation modeling program and provide the amount of each type of fuel to be used to the Fuels Manager. The estimated fuel consumption should be on a daily basis for the first 30 days and then on a weekly basis for up to 75 days. Update the estimate as required.

3. Discontinue non-firm sales to utilities not participating in the FRCC Long-term Energy Emergency Plan,

4. Discontinue sales of Economy Interchange from units whose fuel is in short supply.

5. Review Maintenance Schedule to optimize obtainable fuels.

Step B

1. Modify unit dispatch philosophy to load units with obtainable fuels (other than #2 oil) first, and then load units which burn the fuel in short supply.

Step C

1. Implement plans to insure the orderly shutdown of all units burning the fuel in short supply in the event fuels is exhausted.

2. Implement plans to insure power availability to all Power Plants and fuel handling facilities.

ENERGY EMERGENCY CONTACT LIST

NAME	TITLE	ENTITY	CONTACTS	NOTES
	State Warning Point	DCA Division of Emergency Management	Office 850-413-9900 850-413-9910 850-413-9911 Fax 850-488-7841	24 Hour Emergency Contact
Ken Wiley	General Manager	Florida Regional Coordinating Council	Office 813-877-5301 Fax 813-289-5646 Home 813-831-0280 Mobile 813-690-8344 Email kwiley@frcc.com	
Linda Campbell	Director of Reliability	Florida Regional Coordinating Council	Office 813-289-5644 Fax 813-289-5646 Home 727-593-0796 Mobile 727-415-7695 Email fcampbell@frcc.com	
Marty Mennes	Chair FRCC Operating Committee	Florida Power and Liaht	Office 305-422-5246 Fax 305-422-5022	
Chuck Harper	State Capacity emergency Coordinator	Florida Power Corporation	Office 727-384-7819 Fax 727-284-7865 Home 727-584-4906 Mobile 727-460-4426 Email charles.j.harper@fpc.com	
	Polk Countv Administrator	Polk countv	Office 941-533-1161	
	Polk County Commission, Chairman	Polk County	Office 941-533-1161	
	Dept. of Environmental Regulation	State of Florida	Office 904-488-2986	
	Mayor	Polk city	Office 941-984-1375	
David Crurn	Emergency Coordinator	Florida Public Service Commission	Office 850-413-6696 Fax 850-413-6697 Home 850-668-9350 Pager 800-226-7243 ID# 2742004 Email dcrum@psc.state.fl.us	