

ORIGINAL



BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 07 _____ -EI
IN RE: TAMPA ELECTRIC'S
PETITION TO DETERMINE NEED FOR
POLK POWER PLANT UNIT 6

TESTIMONY AND EXHIBIT
OF
MICHAEL R. RIVERS

DOCUMENT NUMBER-DATE

06175 JUL 20 5

FPSC-COMMISSION CLERK

ORIGINAL

TAMPA ELECTRIC COMPANY
DOCKET NO. 07 _____ -EI
FILED: 7/20/2007

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

PREPARED DIRECT TESTIMONY

OF

MICHAEL R. RIVERS

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6 Q. Please state your name, business address, occupation and
7 employer.

8
9 A. My name is Michael R. Rivers. My business address is
10 702 N. Franklin Street, Tampa, Florida 33602. I am
11 employed by Tampa Electric Company ("Tampa Electric" or
12 "company") as Director, Engineering and Construction.

13
14 Q. Please provide a brief outline of your educational
15 background and business experience.

16
17 A. I received a Bachelor of Science Degree in Civil
18 Engineering in 1977 from the University of Florida, and
19 I received a Masters of Business Administration in 1989
20 from the University of Tampa. I am a Registered
21 Professional Engineer in the state of Florida. In
22 December 1981, I joined Tampa Electric as an Associate
23 Engineer. Between 1981 and 1990 I held various
24 engineering and construction positions. In 1990 I was
25 promoted to Manager of Project Controls and, in 1993, I

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1 was promoted to Construction Manager for Tampa
2 Electric's Polk Unit 1, which is the company's 255 MW
3 integrated gasification combined cycle ("IGCC") unit.
4 In June 1997, I was promoted to Director, Engineering
5 and Technical Services, and in October 2002, I was
6 promoted to Director, Engineering and Construction. My
7 present responsibilities include the areas of
8 engineering and construction within Tampa Electric's
9 Energy Supply Department for major plant improvement
10 projects and additional generating capacity.

11
12 **Q.** What is the purpose of your testimony?

13
14 **A.** The purpose of my testimony is to describe the
15 engineering and construction of the proposed Polk Unit 6
16 Project. I will describe the proposed unit's operating
17 characteristics along with a description of the proposed
18 facilities. Additionally, I will discuss the schedule
19 for completing construction of Polk Unit 6 and Tampa
20 Electric's project execution plan. Finally, I will
21 describe the development of the reasonable and prudent
22 Project cost estimates.

23
24 **Q.** Have you prepared an exhibit to support your testimony?
25

1 **A.** Yes, Exhibit No. ____ (MRR-1) was prepared under my
2 direction and supervision. It consists of the following
3 documents:

4 Document No. 1 Process Diagram

5 Document No. 2 Project Schedule

6 Document No. 3 Cost Estimate

7 Document No. 4 Plot Plan

8

9 **Q.** Are you sponsoring any sections of Tampa Electric's
10 Determination of Need Study for Electrical Power: Polk
11 Unit 6 ("Need Study")?

12

13 **A.** Yes. I sponsor the section of the Need Study regarding
14 Tampa Electric's Proposed Unit. Specifically, I sponsor
15 sections VII.A "Overview," VII.B "Description," VII.E
16 "Cost" and VII.F "Schedule."

17

18 **Q.** Did you participate in Tampa Electric's evaluation of
19 supply alternatives?

20

21 **A.** Yes. In addition to IGCC technology, Tampa Electric
22 considered natural gas combined cycle and other coal
23 fired technologies including atmospheric fluidized bed
24 combustion and supercritical pulverized coal
25 technologies. I provided capital costs and construction

1 schedules for these alternatives. Witness William A.
2 Smotherman describes the company's evaluation of
3 alternative generating technologies, which demonstrates
4 that the proposed IGCC unit is the most cost-effective,
5 reliable option for Tampa Electric.
6

7 **PROJECT DESCRIPTION**

8 **Q.** Please describe the planned project.
9

10 **A.** Tampa Electric plans to make use of its extensive
11 experience with IGCC technology to construct Polk Unit 6
12 ("Project"), a second IGCC power plant at Polk Station,
13 the site of Tampa Electric's existing IGCC facility.
14 Polk Station occupies over 2,800 acres on State Road 37
15 in Polk County, Florida, approximately 40 miles
16 southeast of Tampa and about 60 miles southwest of
17 Orlando. The Project's feedstock will be bituminous
18 coal with the capability of gasifying up to 100 percent
19 petroleum coke ("pet coke"). The Project will also be
20 capable of gasifying renewable biomass as part of the
21 feedstock.
22

23 As described in the testimony of witness Chrys A.
24 Remmers, Tampa Electric was awarded Section 48A tax
25 credits for Polk Unit 6. To qualify for the tax

1 credits, Polk Unit 6 must burn at least 75 percent coal
2 for the first five years of service. After meeting the
3 tax credit requirements, the unit's fuel flexibility
4 will allow Tampa Electric to continue to burn the most
5 cost-effective fuel blends.

6
7 Polk Unit 6 is expected to generate a net 647 MW of
8 electricity in winter at 32 degrees Fahrenheit and 610
9 MW in the summer at 92 degrees Fahrenheit. The average
10 annual net heat rate, higher heating value, is expected
11 to be about 9,111 Btu/kWh, and the instantaneous heat
12 rate is expected to be 9,014 Btu/kWh at 75 degrees
13 Fahrenheit. The combustion turbines will have the
14 capability of firing natural gas as a backup fuel.

15
16 **Q.** Please briefly describe the power generation technology
17 that Polk Unit 6 will utilize.

18
19 **A.** While traditional pulverized coal plants grind and burn
20 coal, slurry-fed IGCC units grind coal and mix it with
21 water to create slurry that is then gasified. The
22 technology for Polk Unit 6 will be similar to what Tampa
23 Electric has successfully used at Polk Unit 1, namely
24 IGCC. The fuel feedstock will first be ground into
25 slurry. This fuel feedstock slurry will be transported

1 to two gasifier systems that will convert the fuel
2 slurry into a synthetic gas. This gas will then be
3 treated to remove pollutants such as sulfur, mercury and
4 particulate matter. The cleaned gas will then be used
5 to fire two 232 MW General Electric ("GE") 7FB
6 combustion turbines and generate electrical power. The
7 exhaust heat from the combustion turbines will be
8 utilized in a heat recovery steam generator ("HRSG") to
9 create steam for the steam turbine. This steam will
10 power the steam turbine and produce approximately 325 MW
11 of additional power. The total net output of Polk Unit
12 6 will be approximately 632 MW. IGCC technology is
13 called "clean coal technology" because it results in
14 lower emissions, compared to traditional pulverized coal
15 units. In fact, Polk Unit 1 has been named the cleanest
16 coal plant in North America.

17
18 **Q.** Please describe the various components and systems that
19 will make up Polk Unit 6.

20
21 **A.** Tampa Electric will use technology for Polk Unit 6 that
22 builds on the company's experiences with Polk Unit 1.
23 Tampa Electric will utilize GE's gasification and power
24 generation technologies. Coal, pet coke and biomass
25 will be received at Polk Station in trains and/or by

1 truck. The solid fuels will be stored on-site and then
2 blended in the desired ratio using weigh feeders as they
3 are reclaimed from storage for use.

4
5 Fuel and process water will be ground in rod mills to
6 produce slurry, which will be stored in tanks. A pump
7 will deliver the slurry to the gasifier's feed injector.
8 Main air compressors and extraction air from the two
9 combustion turbines will feed a distillation column,
10 which separates oxygen from nitrogen. Oxygen
11 compressors or pumps will transfer oxygen to the
12 gasifiers, and diluent nitrogen compressors will supply
13 the combustion turbines with nitrogen for nitrogen
14 oxides ("NO_x") suppression and power augmentation. Two
15 GE gasifiers of about the same size as Polk Unit 1 will
16 each operate at 650 psig. A radiant syngas cooler for
17 each gasifier will cool the syngas and make steam, while
18 removing most of the ash particles from the syngas. For
19 each gasifier train, a single water/gas scrubber with
20 multiple steps of water/gas contact will be installed to
21 remove the remaining ash particles.

22
23 Several stages of heat recovery followed by a final
24 cooler will be provided in low temperature syngas
25 cooling. An activated carbon bed will remove mercury

1 from the syngas. The system will include two carbonyl
2 sulfide ("COS") hydrolysis systems, one for each
3 gasification train, each consisting of one superheater
4 followed by a COS hydrolysis reactor. A Selexol acid
5 gas removal system will provide high sulfur removal
6 rates. A 700 to 800 ton per day sulfuric acid plant
7 will produce sulfuric acid for sale into the sulfuric
8 acid market. A single saturator column will add water
9 vapor to the syngas for supplemental NO_x suppression.
10 Two 232 MW GE 7FB combustion turbines, each with a HRSG,
11 and a single 325 MW steam turbine will produce
12 approximately 632 MW net output of electrical power.
13 Selective catalytic reduction equipment will be added to
14 each HRSG for additional NO_x control. Design provisions
15 will be made for the addition of carbon dioxide ("CO₂")
16 removal equipment.

17
18 Make-up water to the plant will be provided by on-site
19 wells. The existing 750 acre cooling reservoir, along
20 with a supplemental cooling tower will provide cooling
21 for the various heat exchangers in the system.

22
23 Polk Unit 6 facilities are described below, and a
24 Process Diagram is provided in Document No. 1 of my
25 Exhibit No. _____ (MRR-1).

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Coal Receiving and Storage

Most solid fuel will be delivered via rail, water or a combination of the two methods. Rail and rail unloading equipment will be added to site. Conveyors will transport fuel from the rail car unloader to an active fuel storage area. The active fuel storage area will have two sections: one for coal and the other for pet coke. This area will also have two reclaimers to transport fuel from the active storage area to fuel blending bins. The blending bins will allow the company to combine coal and pet coke in appropriate ratios for use in the gasifiers. Two conveyors will allow transport of the blended fuel to the slurry preparation building. The long term fuel storage area may contain up to 225,000 tons of solid fuel.

Slurry Preparation

The slurry preparation area will contain two rod mills which will grind the fuel and mix it with water to make slurry for injection into the gasifiers. Two slurry tanks will provide a few hours of storage of the slurry. Slurry pumps, one per gasifier, will pump the slurry to the feed injector in each gasifier.

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Air Separation Plant

An air separation plant will separate air into its primary components; nitrogen and oxygen. The air plant will include main air compressors, heat exchanger filters, and nitrogen and oxygen compressors or pumps.

Gasification

There will be two gasification trains. Each gasifier will sit on top of a radiant syngas cooler. The radiant syngas cooler will cool the syngas generated in the gasifier, produce steam in the process, and separate most of the ash (slag) from the syngas. Slag will be removed from each radiant syngas cooler through lock hoppers located at the bottom of each cooler.

Slag Removal and Handling

The slag exiting the lock hoppers will travel across screens where it is washed to remove fines which contain carbon that can be reused to enhance efficiency. The slag will continue along conveyors to bins where the material is tested before removal for sale to industrial users. Fines containing high amounts of carbon are returned to slurry preparation and combined with fuel to be re-gasified.

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Syngas Scrubbing (Particulate Removal)

The cooled syngas leaving the radiant syngas cooler will go to scrubbers which wash out any remaining particulate matter from the gas. The particulate matter, mixed with water, will be returned to the slurry preparation equipment to be regasified for recovery of the remaining carbon. The scrubbed gas continues on to low temperature gas cooling.

Low Temperature Gas Cooling

The low temperature gas cooling system is a series of heat exchangers that will cool the syngas further, recovering more of the heat from the syngas for use in other portions of the process to improve overall efficiency.

Mercury Removal

A sorbent bed will be included which will remove mercury from the syngas prior to going to the combustion turbines. Approximately 90 percent of the mercury is expected to be removed.

COS Hydrolysis

Equipment will be installed which will convert COS to hydrogen sulfide, which will increase the amount of

1 sulfur removed from the syngas prior to going to the
2 combustion turbines.

3

4 **Acid Gas Removal**

5 A Selexol acid gas removal system will be included.
6 This equipment will remove sulfur compounds from the
7 syngas prior to it going to the combustion turbines.
8 The resultant acid gas will go to a sulfuric acid plant.

9

10 **Sulfur Recovery**

11 Sulfur recovery equipment will take the acid gas from
12 the acid gas removal system and convert it to sulfuric
13 acid. The resultant sulfuric acid byproduct will be
14 sold into the sulfuric acid market.

15

16 **Syngas Saturator**

17 A syngas saturator will add moisture to the syngas prior
18 to its use in the combustion turbine. This saturation
19 step will help to lower NO_x emissions from the combustion
20 turbine/HRSG stacks.

21

22 **Power Block**

23 There will be two combustion turbines with connected
24 electric generators, two HRSG, and one steam turbine
25 with a connected generator. The combustion turbines

1 will burn the syngas to produce electricity. The hot
2 exhaust gas from the combustion turbines will flow
3 through the HRSG producing steam. The cooled exhaust
4 gas will exit through a stack on each HRSG. The steam
5 produced in the HRSG produces electricity in the steam
6 turbine.

7
8 **Water Use**

9 Water will be recycled to the maximum extent practical
10 to minimize groundwater use. For instance, the water
11 required for slurry preparation will be derived from
12 internal streams of water recycled from low-temperature
13 cooling. Water wells will draw water from the Upper
14 Floridian Aquifer. Tampa Electric expects any
15 additional water supplies that may be needed will be
16 drawn from wells in this region. This water will be
17 used for process water, potable water and service water.
18 In addition, water will be used for make-up to the
19 cooling reservoir to replace water evaporated from the
20 reservoir and cooling tower.

21
22 **Cooling Water**

23 Cooling water pumps will take water from the cooling
24 reservoir and route it to the steam turbine condensers.
25 The cooling water from the condensers will return to the

1 discharge portion of the reservoir. This heated water
2 will travel a very long route, cooling off in the
3 process, before arriving back at the intake structure
4 where it will be used again. Other pumps will also take
5 water from the reservoir and will provide make-up water
6 to the new cooling tower basin. This make-up water will
7 replace water evaporated from the cooling tower and
8 water that is discharged to the deep waste water wells.
9 Cooling water pumps will take water from the cooling
10 tower basin and route it to various heat exchangers
11 through out the plant.

12

13 Process Water Treatment

14 Water used throughout the gasification and gas clean up
15 systems will concentrate impurities due to the
16 evaporation or decomposition of water in these
17 processes. To keep these process waters from becoming
18 too concentrated, a stream from these systems will be
19 treated and injected into deep waste water wells located
20 on the site.

21

22 OPERATING CHARACTERISTICS

23 Q. What is the expected heat rate for the Polk Unit 6 IGCC
24 technology?

25

1 **A.** Polk Unit 6 is expected to have an average annual net
2 heat rate of 9,111 Btu/kWh, and an instantaneous net
3 heat rate of 9,014 Btu/kWh at 75 degrees Fahrenheit.
4 Net electric output is expected to be approximately 647
5 MW in the winter at 32 degrees Fahrenheit and 610 MW in
6 the summer at 92 degrees Fahrenheit.

7

8 **Q.** Please describe the expected availability for Polk Unit
9 6.

10

11 **A.** The expected Equivalent Availability Factor ("EAF") for
12 Polk Unit 6 is 95 percent, and the availability of the
13 unit is expected to be greater than that of Polk Unit 1.
14 Design changes, such as the elimination of the
15 convective syngas coolers, will contribute heavily to
16 this improvement. In addition, having two gasifiers and
17 two combustion turbines means that a single gasifier or
18 combustion turbine outage will not prevent the entire
19 unit from operating and the unit will still be capable
20 of producing about half of the rated output.
21 Additionally, the ability to utilize natural gas as the
22 backup fuel during gasifier outages will enhance the
23 availability of the unit. If the unit EAF was
24 calculated based upon firing syngas only and without the
25 backup fuel, the EAF would be 86 percent.

1 Q. What is your conclusion regarding the reasonableness of
2 these heat rate and availability expectations?

3
4 A. Based on my experience in engineering and constructing
5 power plants, the estimated heat rate and availability
6 factors are reasonable. Tampa Electric has developed
7 industry-leading knowledge and experience in operating
8 IGCC technology, which further supports the
9 reasonableness of the expected heat rate and
10 availability. In support of my conclusion, witness Mark
11 J. Hornick describes the company's successful experience
12 with operating IGCC technology.

13
14 **CONSTRUCTION**

15 Q. What is the expected construction schedule for Polk Unit
16 6?

17
18 A. Construction will begin in 2009, and Polk Unit 6 is
19 expected to enter commercial operation in January 2013.

20
21 Q. Please describe Tampa Electric's efforts to obtain the
22 required certifications and permits to begin
23 construction of Polk Unit 6.

24
25 A. Tampa Electric began developing design information to

1 support permit application preparation in November 2006.
2 The company entered into a contract with GE and Bechtel,
3 an architect/engineer ("A/E") firm, to prepare a
4 preliminary basis for design, block flow diagram, layout
5 drawing and performance and emissions data in support of
6 project development. Both companies continue to support
7 Tampa Electric in the preparation of permit application
8 documents. Tampa Electric has engaged the services of
9 an environmental consultant to prepare air modeling
10 studies and other evaluations, as well as prepare the
11 permit application documents. The permit activities are
12 described in the testimony of witness Paul L. Carpinone.

13
14 **Q.** What is the current schedule for the project?

15
16 **A.** Document No. 2 of my Exhibit No. ____ (MRR-1) outlines
17 the project schedule. Conceptual design began in 2006,
18 and the preliminary engineering package development
19 began in April 2007 and is expected to be completed in
20 April 2008. The Site Certification Application will be
21 filed with the Florida Department of Environmental
22 Protection in August 2007. The detailed design and
23 procurement will begin in January 2008, starting with
24 the engineering for the gasification process and the
25 combined cycle equipment. Detailed design and

1 procurement activities are expected to continue through
2 February 2011. Construction activities are expected to
3 begin in first quarter 2009 with general site work.
4 Major equipment erection includes the combustion
5 turbines, starting in July 2010, the gasification and
6 air separation equipment, starting in October 2010 and
7 the steam turbine and generator equipment, starting in
8 November 2010. Commissioning of the equipment is
9 expected to begin in March 2012. Finally, the unit is
10 expected to begin commercial operation in January 2013.

11
12 **Q.** What is Tampa Electric doing to mitigate the effects of
13 potential construction schedule uncertainty?

14
15 **A.** Tampa Electric is planning to use an approach similar to
16 that used for Polk Unit 1. The construction effort will
17 be managed by a Tampa Electric construction management
18 group that will use multiple prime contractors to
19 perform the construction. Due to the large number of
20 major projects currently planned in the utility
21 industry, the availability of skilled craft labor as
22 well as the ability to secure engineered equipment is a
23 concern in meeting the construction schedule for any
24 project of this magnitude. The use of multiple prime
25 contractors is expected to reduce the potential labor

1 constraints on any one contractor during this time
2 frame. The preliminary engineering work that is
3 currently ongoing will be used to develop a detailed
4 construction schedule that can be optimized to minimize
5 the required work force to construct the plant.

6
7 Tampa Electric may also take a phased approach to the
8 construction of the plant. This phased approach will
9 stagger the construction of various portions of the
10 plant. Manpower for each craft will be spread out,
11 minimizing the peak manpower requirements for a given
12 craft at any given time.

13
14 Tampa Electric has initiated contract negotiations with
15 critical equipment suppliers to ensure delivery of key
16 equipment such as combustion turbines, steam turbines,
17 and gasification vessels. The balance of plant
18 equipment and material supply packages will be developed
19 and sent out for proposals to qualified suppliers. The
20 supply contracts will include requirements for delivery
21 of design information and materials to support the
22 construction schedule needs. Assuring design
23 information is available in a timely manner, along with
24 assurances on material delivery schedules, will allow
25 the company to manage the constructors efficiently and

1 minimize schedule or cost impacts. Major construction
2 packages will be prepared with complete detailed
3 engineering. These packages will be sent out for
4 proposal to several qualified constructors. This
5 process will result in competitive pricing and minimize
6 change orders once the contracts are in place.

7
8 **INSTALLED COST**

9 **Q.** What is Tampa Electric's estimate of the overnight
10 construction costs for Polk Unit 6?

11
12 **A.** The overnight construction cost estimate is \$1.614
13 billion in January 2007 dollars. The primary components
14 are the gasification components with an estimated cost
15 of [REDACTED] and the balance of plant and power
16 block at an estimated cost of [REDACTED].

17
18 **Q.** Please explain what is included in the cost estimate.

19
20 **A.** Document No. 3 of my Exhibit No. ____ (MRR-1) provides
21 the details of the cost estimate. The \$1.614 billion
22 cost estimate represents overnight construction costs
23 for all direct work at Polk Unit 6. This includes all
24 engineering, procurement, construction, startup and
25 commissioning costs. The project estimate does not

1 include owner's costs, related transmission additions or
2 modifications, or contingency.

3

4 **Q.** What is Tampa Electric's estimate of the total in-
5 service costs for Polk Unit 6?

6

7 **A.** The total in-service cost estimate for Polk Unit 6 is
8 \$2.013 billion, which includes the aforementioned
9 overnight construction costs as well as owner's costs,
10 contingency, escalation, and transmission costs.
11 Owner's costs include project development costs such as
12 technology development and environmental permitting;
13 project management and operational support and training;
14 legal and other professional services costs; and
15 insurance. Tampa Electric estimated the owner's costs
16 for Polk Unit 6 based on its experience developing and
17 constructing generating units in Florida, including
18 Tampa Electric's existing IGCC unit, Polk Unit 1.

19

20 The estimate also includes contingency and escalation.
21 Contingency is based on Tampa Electric's experience with
22 power plant construction projects. The \$25 million
23 costs of required transmission facilities to integrate
24 and interconnect Polk Unit 6 with Tampa Electric's
25 system are separately identified and are described in

1 the testimony of witness Thomas J. Szelistowski.

2

3 **Q.** Will subsequent engineering work result in changes to
4 the installed cost estimate for Polk Unit 6?

5

6 **A.** Perhaps. The cost estimate represents the best estimate
7 Tampa Electric has to date for the planned project
8 configuration. The estimate does not include
9 contingency for changes in the scope of the project or
10 significant modifications of the planned configuration.
11 Such changes will be evaluated and justified based on
12 the impact to the cost and performance of the project.
13 Approved changes could result in increases or decreases
14 to the cost estimate.

15

16 **Q.** What contracting strategy and competitive pricing
17 options will Tampa Electric pursue to manage the cost
18 and schedule of Polk Unit 6?

19

20 **A.** Tampa Electric is planning to competitively bid the use
21 of multiple prime contractors to execute the
22 construction of Polk Unit 6. A construction management
23 team will oversee and coordinate the multiple prime
24 contractors. Tampa Electric believes this approach is
25 more cost-effective than an Engineer, Procure and

1 Construct ("EPC") contract, considering the size of the
2 project as well as the current market conditions. Very
3 few EPC contractors have the ability to handle a project
4 of this scope and dollar value. In addition, the
5 technology is specific to GE, the process licensor. The
6 process is highly integrated between the gasifier's
7 syngas cooler, low temperature gas cooling, combustion
8 turbines, HRSG and steam turbine. GE primarily uses
9 Bechtel as its A/E for IGCC projects, and both companies
10 have vast experience in the design and engineering of
11 IGCC projects, including their 10-year partnership with
12 Tampa Electric in refining the technology at Polk Unit
13 1. The expertise of GE and Bechtel will enable Tampa
14 Electric to develop Requests for Proposals ("RFP") for
15 equipment and labor for the project and will result in a
16 wide variety of participants. This process will provide
17 opportunities to control costs and reduce schedule
18 risks.

19
20 **Q.** What scope of services will Bechtel be providing?

21
22 **A.** Under Tampa Electric's direction, Bechtel will provide
23 design coordination between the various suppliers of
24 technology, equipment and materials required to build
25 the plant. They will also provide the required

1 technical specifications, design basis documents,
2 process flow diagrams, drawings and procurement
3 services.

4
5 **Q.** What gasification technology is Tampa Electric planning
6 to use?

7
8 **A.** Tampa Electric is using the same gasification technology
9 as Polk Unit 1, and some major equipment will be
10 provided by the technology provider, GE, such as
11 gasifiers, radiant syngas coolers and combustion
12 turbines. Other major equipment will be competitively
13 bid to qualified suppliers. Some equipment, such as the
14 air separation plant, may be bid to multiple suppliers
15 on a lump sum turnkey basis. Others will be grouped
16 into compatible equipment types such as horizontal pumps
17 or high pressure valves and bid to multiple suppliers of
18 the particular type of equipment.

19
20 **Q.** How has this contracting strategy influenced the
21 estimated installed cost for Polk Unit 6?

22
23 **A.** Tampa Electric believes that using multiple prime
24 contractors overseen by the company's construction
25 management team is the most cost-effective approach. An

1 EPC contract approach would require a contractor to add
2 a significant risk premium to the price. EPC
3 contractors would not have firm pricing or quantities
4 for materials or labor prior to supplying a lump sum
5 proposal. Both the material and labor costs may have
6 significant variability during the progress of the
7 project. These factors would result in the EPC
8 contractor adding a significant risk premium to their
9 proposal price. Tampa Electric's experience with
10 managing large power plant projects demonstrates the
11 company's ability to manage the projects within the
12 planned cost, schedule and performance without incurring
13 these additional risk premiums. Tampa Electric has not
14 added any risk premium to the cost estimate.

15
16 **Q.** What is the current status of Polk Unit 6?

17
18 **A.** Tampa Electric is currently engaged in preliminary
19 engineering to develop permit data. Additional
20 engineering efforts are also ongoing to define the major
21 aspects of the plant design. This information will be
22 used to manage the detailed engineering effort and
23 refine cost estimates and the project schedule.

24
25 **Q.** Does Tampa Electric's cost estimate include indexed

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components?

A. No. The current cost estimate is based on preliminary estimates by various equipment suppliers, factored quantities from other projects and overnight construction costs. However, it is possible that suppliers may utilize established cost indices in their bid offerings due to the current volatility in prices of construction materials and raw products. Tampa Electric's bid evaluation process will consider indexed bids on a case by case basis.

Q. How has Tampa Electric considered the effects of carbon capture and sequestration ("CCS") on the Project, given the potential for future environmental regulations?

A. As shown in Document No. 4 of my exhibit, the Project plot plan allows for the space to include carbon capture equipment to be installed once the regulations are developed, and Tampa Electric will continue to consider the effects of CCS on the design of the Project. Tampa Electric has reviewed numerous studies regarding CCS. As described in greater detail in the testimony of witness Mark J. Hornick, these studies have generally concluded that both capital costs and the cost of

1 electricity are lower for IGCC technology with CO₂
2 capture than for any other coal-based generating
3 technology. Tampa Electric, using cost estimates
4 published by the DOE, performed sensitivity analysis of
5 the effects of possible future CCS regulations on the
6 total installed cost of Polk Unit 6 as compared to other
7 fossil fuel fired generating technologies. This is
8 further described in the testimony of witness William A.
9 Smotherman.

10
11 **Q.** Why, when considering CCS, does IGCC technology have an
12 advantage?

13
14 **A.** IGCC's advantage arises from the fact that the CO₂ is
15 captured prior to combustion. This allows the CO₂ to be
16 removed while the synthesis gas is still under high
17 pressure and absent the large quantity of nitrogen
18 associated with combustion air. This means that there
19 is a small volume of gas to be processed relative to
20 post-combustion flue gas volumes. This results in the
21 equipment necessary for CO₂ removal being much smaller
22 and less costly. Another advantage is that some of the
23 physical sorbents presently used in IGCC technology for
24 sulfur removal are also effective for removal of CO₂.
25 This advantage results in equipment modifications to an

1 IGCC system for carbon capture which are less extensive
2 than for other coal based technologies. Finally, IGCC
3 technology is highly efficient, producing less CO₂ per
4 megawatt hour of electricity produced than existing
5 solid fuel units.

6
7 Natural gas combined cycle ("NGCC") units produce
8 significantly less CO₂ than coal fired units. However,
9 the fuel price savings for the IGCC unit as compared to
10 the NGCC unit results in the selection of the IGCC unit
11 since there are no current requirements to capture and
12 sequester carbon. Furthermore, studies by the U.S.
13 Department of Energy and others comparing these two
14 generating technologies with carbon capture demonstrate
15 that IGCC remains the lowest cost option for carbon
16 control equipment. This is primarily due to the
17 significantly lower cost per ton of carbon capture
18 commercially available to IGCC as compared to the high
19 cost of commercially available carbon capture from the
20 flue gas of a NGCC unit. Therefore, an IGCC unit is
21 more cost-effective than an NGCC unit in the case of
22 potential future carbon control requirements. Witnesses
23 Paul L. Carpinone, Mark J. Hornick and William A.
24 Smotherman discuss potential future CO₂ regulation,
25 technology capabilities for carbon controls and the

1 company's carbon control sensitivity analysis,
2 respectively.

3

4 The costs of carbon storage or sequestration are
5 unaffected by the process used to capture CO₂; therefore,
6 sequestration costs are essentially the same for all
7 coal based technologies.

8

9 **Q.** Please summarize Tampa Electric's efforts to ensure the
10 reasonableness of the Polk Unit 6 total estimated
11 installed cost.

12

13 **A.** Tampa Electric has constructed many large capital
14 projects using a similar approach to the Polk Unit 6
15 approach. Tampa Electric employs several strategies to
16 monitor and manage all phases of these projects
17 including: (1) establishing project contracts that will
18 provide the best value; (2) monitoring the work of the
19 engineering company to ensure that work is done in an
20 efficient manner; and (3) assigning full time project
21 controls personnel to manage the costs and the schedule
22 throughout the project execution. Dedicated Tampa
23 Electric personnel lead the project management
24 throughout construction and are integrally involved in
25 each phase of its development. The company's track

1 record using this approach is excellent.

2

3 **Q.** Is the total installed cost estimate reasonable?

4

5 **A.** Yes. The total estimated cost represents the best
6 efforts of the companies with the most experience in
7 IGCC in the United States: Tampa Electric; GE, the
8 technology supplier; and the A/E, Bechtel.

9

10 **Q.** Please summarize your testimony.

11

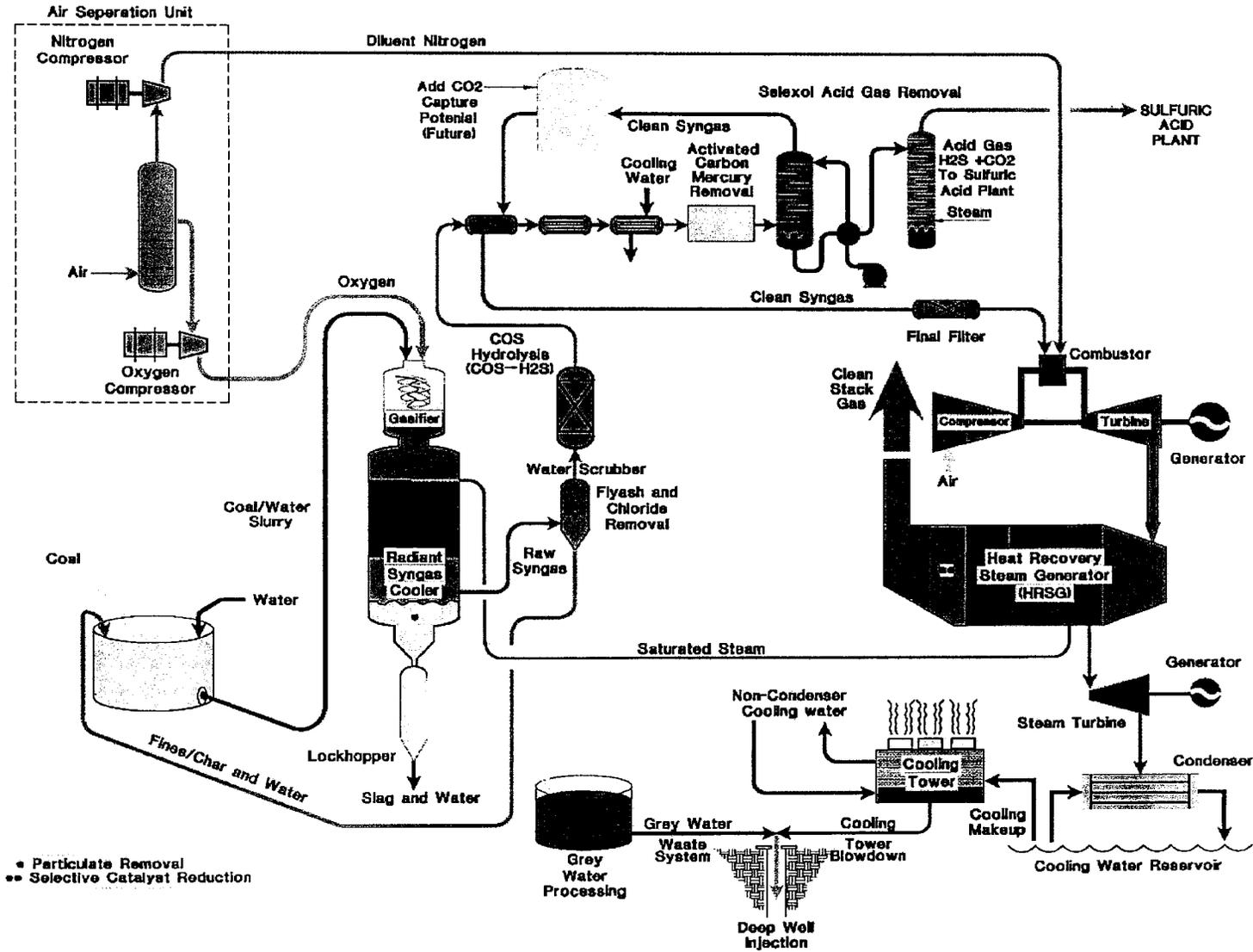
12 **A.** Polk Unit 6 will be designed and installed for \$2.013
13 billion in a cost-efficient manner in accordance with
14 the project schedule to provide cost-effective, clean
15 power for Tampa Electric's customers. Tampa Electric
16 has operated Polk Unit 1 successfully for over 10 years
17 and will apply that knowledge and experience to the
18 design, construction and operation of Polk Unit 6. The
19 design of Polk Unit 6 will include proven technologies
20 as well as known improvements. Polk Unit 1 experience
21 has led to the addition of COS hydrolysis, syngas
22 saturation, combustion turbine air extraction and carbon
23 rich fine slag re-injection to the Polk Unit 6 design.
24 The Polk Unit 6 design does not include the convective
25 syngas coolers used at Polk Unit 1, which will improve

1 reliability. Tampa Electric's expertise in managing
2 large power plant projects, even with new technologies,
3 will allow the company to keep costs and schedule under
4 control while also assuring the unit will perform within
5 expected parameters. Polk Unit 6 will be capable of
6 burning a variety of fuels that will provide low cost
7 energy for many years. Finally, the company's plan
8 considers CO₂ capture and sequestration in the future
9 should regulations change.

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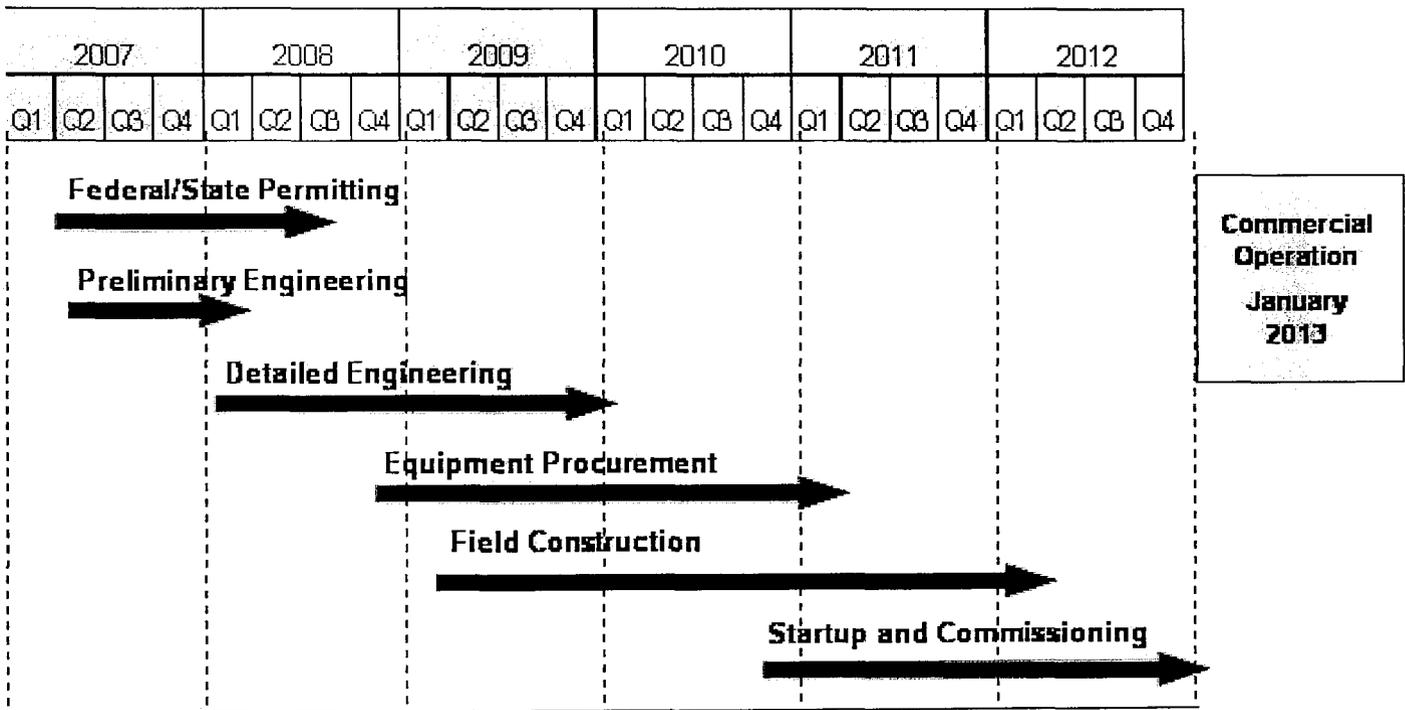
Q. Does this conclude your testimony?

A. Yes, it does.



POLK 6 PROCESS

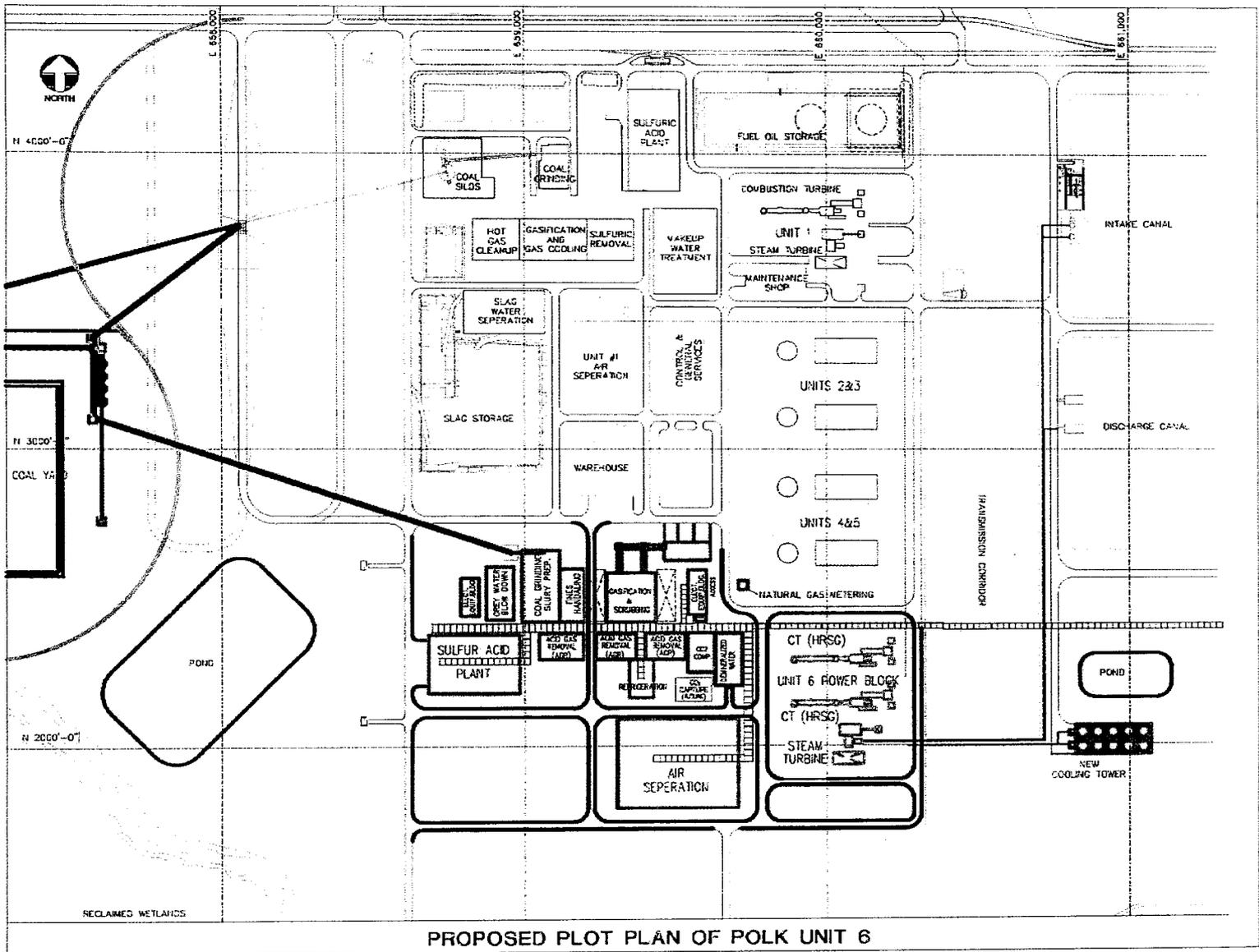
Polk Unit 6 Project Execution Plan



Polk Unit 6 Cost Estimate

	(\$000)
Gasification	
Coal Grinding & Slurry Feed	
Gasification (LTGC, Black Water Flash and Slag Handling)	
Fine Slag Handling	
Acid Gas Removal (Ammonia Strippers)	
CO ₂ Recycle	
Sulfuric Acid Plant	
Syngas Saturation	
Grey Water Blowdown Pretreatment	
Air Separation Unit	
Zero Process Water Discharge	
Gasification Subtotal	
Power Block & Balance of Plant	
Power Block	
Balance of Plant	
Coal Handling Addition	
Power Block and BOP Subtotal	
Overnight Direct Engineering, Procurement, Construction & Startup Costs¹	\$ 1,614,150
Transmission ¹	25,000
Owner's Costs ¹	100,000
Contingency and Escalation	273,658
Total In-Service Costs	\$ 2,012,808

¹ Costs are in 2007 dollars.



PROPOSED PLOT PLAN OF POLK UNIT 6

35

DOCKET NO. 07 ___-EI
 PLOT PLAN
 EXHIBIT NO. ___ (MRR-1)
 DOCUMENT NO. 4
 PAGE 1 OF 1