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January 30, 2009

HAND DELIVERED

RECEIVED-FPSC
09 JAN 30 PM 4:23
COMMISSION
CLERK

Ms. Ann Cole, Director
Division of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: FPSC Rule 25-6.0185 – Electric utility Procedures for Long-Term Energy Emergencies

Dear Ms. Bayo:

In compliance with Rule 25-6.0185 enclosed are two copies of Tampa Electric Company's Long Term Energy Emergency Plan for Fuel Supply Shortage.

Also enclosed is one copy of the above document in type and strike format, indicating the changes.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,



James D. Beasley

COM _____
ECR _____
GCL _____
OPC _____
RCP _____
SSC _____
SGA _____
ADM JDB/pp
CLK Enclosures

cc: Stephen E. Garl (w/o encls.)

DOCUMENT NUMBER-DATE

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TAMPA ELECTRIC COMPANY

LONG-TERM
ENERGY EMERGENCY PLAN

FOR

FUEL SUPPLY SHORTAGE

DOCUMENT NUMBER-DATE

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Version 2009A – January 29, 2009

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ATTACHMENTS

- Attachment I - Long-term Energy Emergency Plan
- Attachment II - Environmental Petition Form

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**TAMPA ELECTRIC COMPANY
LONG-TERM ENERGY EMERGENCY PLAN
FOR FUEL SUPPLY SHORTAGE**

I. INTRODUCTION

The uncertainty in fuel supply (oil, coal and natural gas) is beyond the control of prudent planning and has the potential for fuel shortages for both Tampa Electric Company (TEC) and the entire state. This could result in a long-term electrical energy deficiency that would adversely affect all customers. This document, the *Tampa Electric Company Long-Term Energy Emergency Plan For Fuel Supply Shortage* (hereafter referred to as the "Fuel Shortage Plan"), contains the procedures the Company has established to enable it to best cope with the energy shortage, and protect the health, safety and welfare of its customers during the period of deficiency.

II. PURPOSE

The purpose of the Fuel Shortage Plan is to establish a systematic and effective means of anticipating, assessing and responding, in an appropriate and coordinated manner, to a long-term energy emergency caused by a fuel supply shortage that affects TEC. However, understanding that the Governor of the State of Florida has the authority to declare a fuel supply shortage for the entire state, TEC would also work with the applicable governmental agencies and/or organizations in an effort to comply with the Governor's declaration.

III. DEFINITIONS

A long-term energy emergency exists when utility fuel supplies are decreasing or are anticipated to decrease below a level adequate to provide for continuous service at required levels as established by customer's normal energy needs. A long-term 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 a long-term energy emergency is usually measured in terms of weeks or months, as opposed to a day, hours or minutes for a short-term capacity deficiency. The Fuel Shortage Plan addresses contingencies for fuel shortages with no clear resolution when total inventory levels drop below 10, 15, 25, 35 and 50 days of fuel remaining.

IV. AUTHORITY

This portion of the Fuel Shortage Plan identifies TEC personnel responsible for overseeing and implementing specific actions during a long-term energy emergency. However, during such times, the responsible personnel may delegate a specific task to

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other capable TEC personnel as necessary. The reasons for delegating responsibility include continuing the implementation of the plan during the absence of the responsible personnel and increasing the effectiveness and efficiency of plan implementation.

A. EMERGENCY DECLARATION

	<u>Activity</u>	<u>Person Responsible</u>
1.	Increase fuel inventory and system load monitoring (as appropriate) and make periodic fuel inventory projections available to applicable departments.	Director of Wholesale Marketing & Fuels
2.	Alert the Vice President of Fuels Management any time a key fuel supply appears to be in jeopardy due to fuel availability and/or quality constraints, and it is probable that inventory levels will drop below desirable levels. If a long-term energy emergency needs to be declared, this officer will notify the President of TEC to announce the declaration.	Director of Wholesale Marketing & Fuels
3.	After a long-term energy emergency is declared, or at the direction of the Vice President of Fuels Management, the following procedure will be followed in determining the fuel supply situation and inventory plan.	
a.	Monitor and prepare short-term forecast of system load.	Director of Energy Control Center
b.	Monitor and forecast fuel inventories (including reasonable delays or delivery problems).	Director of Wholesale Marketing & Fuels
c.	Using the above data, run	Director of Resource &

<u>Activity</u>	<u>Person Responsible</u>
<p>the company's resource commitment program and provide the amount of each type of fuel expected to be used to the Fuels Management Department. The estimated fuel consumption should be established on a daily basis for the first 30 days and then on a weekly basis for up to 75 days.</p>	<p>Operations Planning</p>
<p>d. Using the output of b and c above, prepare and distribute a daily or weekly report on the overall fuel supply situation to key departments, areas and personnel (e.g., Grid Operations, the plants, TEC officers).</p>	<p>Director of Wholesale Marketing & Fuels</p>

4. Declare a long-term energy emergency when necessary and notify the Chairman of the Florida Reliability Coordinating Council ("FRCC") Reliability Assessment Group about the energy emergency. Also,
- Declare when to move to each step in the Fuel Shortage Plan
 - Implement all or any part of the Fuel Shortage Plan in cooperation with the FRCC
 - Implement the Fuel Supply Shortage Element of the Florida Electrical Emergency Contingency Plan upon the declaration of an Emergency Alert by the Florida Public Service Commission or upon the declaration of any

President of TEC or by delegation to:

Vice President of Fuels Management

Vice President of Energy Delivery

Activity

long-term energy emergency by the Governor of the State of Florida

- Declare and notify the appropriate organizations and/or agencies (e.g., FRCC) when the long-term energy emergency is over

Person Responsible

B. ENERGY EMERGENCY COORDINATOR

Activity

1. After the long-term energy emergency is declared, the Energy Emergency Coordinator is required to coordinate all activities involved in implementing the Fuel Shortage Plan.

Person Responsible
Director of Energy Control Center

C. IMPLEMENTATION – ACTIVITIES AND RESPONSIBILITIES

The individuals below will assist the Energy Emergency Coordinator and be responsible for implementing the identified Fuel Shortage Plan activity.

	<u>Activity</u>	<u>Person Responsible</u>
1.	Expedite fuel procurement	Director of Wholesale Marketing & Fuels
1A	Expedite coal transportation	Director of Wholesale Marketing & Fuels
2.	Communicate with TEC employees	Director of Corporate Communication
3.	Communicate with media and public	TEC Public Information Officer
4.	Communicate with governmental organizations	Vice President of Governmental Affairs and Vice President of Regulatory Affairs

	<u>Activity</u>	<u>Person Responsible</u>
5.	Purchase power and control sales	Director of Wholesale Marketing & Fuels and Director of Customer Service
6.	Obtain approval to waive/modify environmental restrictions	Director of Environmental, Health & Safety
7.	Curtail TEC energy use	Vice President of Technology and Support Services, Vice President of Energy Supply Operations, and Vice President of Energy Delivery
8.	Promote load conservation (voluntary and mandatory)	Director, Customer Service
9.	Utilize load control	Director, Energy Control Center
10.	Curtail customer load	Director, Energy Control Center
11.	Modify system operations	Director, Energy Control Center

Also see Attachment I, *Long-Term Energy Emergency Plan Summary*

V. IMPLEMENTATION – SPECIFIC STEPS AND ACTIONS

When TEC declares a long-term energy emergency, the following steps and actions will be taken so as to minimize the effect of the fuel shortage upon customers.

A. STEP A

After a long-term energy emergency has been declared and the total fuel inventory has decreased to 50 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 TEC 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 - Procure additional gas supply from TEC suppliers and/or other utilities in the state. Request additional transportation from upstream pipelines and other pipeline customers if needed.
- d. Continue inventory tracking, forecasting, and reporting.

1A. Expedite coal transportation:

Establish priorities with transportation companies to ensure prompt delivery of TEC coal in adequate quantities. Also, when required, assist the transportation companies in obtaining ample supplies of diesel fuel and other petroleum products to operate ve

TAMPA ELECTRIC COMPANY

LONG-TERM
ENERGY EMERGENCY PLAN

FOR

FUEL SUPPLY SHORTAGE

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LONG-TERM ENERGY EMERGENCY PLAN
FOR FUEL SUPPLY SHORTAGE**

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<p>the company's resource commitment program and provide the amount of each type of fuel expected to be used to the Fuels Management Department. The estimated fuel consumption should be established on a daily basis for the first 30 days and then on a weekly basis for up to 75 days.</p>	Operations Planning
<p>d. Using the output of b and c above, prepare and distribute a daily or weekly report on the overall fuel supply situation to key departments, areas and personnel (e.g., Grid Operations, the plants, TEC officers).</p>	<p>Director of Wholesale Marketing & Fuels</p>

4. Declare a long-term energy emergency when necessary and notify the Chairman of the Florida Reliability Coordinating Council ("FRCC") Reliability Assessment Group about the energy emergency. Also,
- Declare when to move to each step in the Fuel Shortage Plan
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President of TEC or by delegation to:

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Vice President of Energy Delivery

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8.	Promote load conservation (voluntary and mandatory)	Director, Customer Service
9.	Utilize load control	Director, Energy Control Center
10.	Curtail customer load	Director, Energy Control Center
11.	Modify system operations	Director, Energy Control Center

Also see Attachment I, *Long-Term Energy Emergency Plan Summary*

V. IMPLEMENTATION – SPECIFIC STEPS AND ACTIONS

When TEC declares a long-term energy emergency, the following steps and actions will be taken so as to minimize the effect of the fuel shortage upon customers.

A. STEP A

After a long-term energy emergency has been declared and the total fuel inventory has decreased to 50 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 TEC 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 - Procure additional gas supply from TEC suppliers and/or other utilities in the state. Request additional transportation from upstream pipelines and other pipeline customers if needed.
- d. Continue inventory tracking, forecasting, and reporting.

1A. Expedite coal transportation:

Establish priorities with transportation companies to ensure prompt delivery of TEC coal in adequate quantities. Also, when required, assist the transportation companies in obtaining ample supplies of diesel fuel and other petroleum products to operate vessels, vehicles, and other equipment used in the process of delivering coal to TEC.

2. Communicate with TEC employees:

- a. Issue internal newsletter/bulletin that explains why the fuel shortage has occurred, provides an overview of the Fuel Shortage Plan and communicates details of Step A.
- b. Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.

3. Communicate with Public and Media

- a. Notify officers and key departments (e.g., Customer Service, Fuels Management, and Regulatory) that TEC will contact the public and media, if the total fuel supply decreases to 35 days and a continued downward trend is anticipated, the following additional measures if the fuel supply declines below 35 days will Begin to prepare.

4. Communicate with governmental organizations:

- a. Notify appropriate agencies.

5. Wholesale power sales and purchases:

- a. Discontinue non-firm sales.

6. Waive/Modify environmental restrictions:

Start procedures to obtain approval of the Florida Governor and the President of the United States to suspend/modify the State Implementation Plan (SIP) requirements of the Clean Air Act (CAA) so as to be able to burn available fuels that may not meet the environmental constraints. See Attachment II, *Environmental Petition Form*.

7. Curtail TEC energy use:

Curtail all non-essential uses of electrical energy at all utility owned facilities. This should reduce TEC energy usage by at least 10% at all offices and operation centers. Monitor usage of energy weekly.

8. Promote load conservation:

a. Voluntary:

- (1) Increase efforts to educate customers in the efficient use of electrical equipment and supplies.
- (2) Inform customers through advertising programs of specific ways to conserve electric energy.

b. Mandatory - No action required.

9. Utilize load control:

Utilize direct load control to reduce system demand on peak periods and optimize the use of TEC's base load generating units by increasing off times of heating and air conditioning to 2 to 4 hours per day. Water heating will be off 4 to 6 hours per day.

10. Curtail customer load - No action required.

11. Modify system operations:

- a. Maintain 75% of the Operating Margin as non-spinning reserve.
- b. Review the maintenance schedule to optimize use of obtainable fuels.

B. STEP B

If the total fuel supply has decreased to 35 days and a continued downward trend is anticipated, the following additional measures should be implemented.

1. Expedite fuel procurement:

- a. Oil – Contact suppliers to determine types of oil available for purchase as well as quantity and delivery time. Maximize

onsite inventory.

- b. Coal - Purchase any coal that is available and can be burned in the TEC power plants.
 - c. Natural Gas – Procure additional gas supply from TEC suppliers and/or other utilities in the state. Request additional transportation from upstream pipelines and other pipeline customers, if needed, and maximize natural gas storage capacity.
 - d. Develop plans for any physical transfers of fuel that would be practical.
 - e. Continue inventory tracking, forecasting and reporting.
- 1A. Expedite coal transportation:
- a. Review priorities to assure prompt delivery.
2. Communicate with TEC employees:
- a. Issue updated emergency information to employees.
3. Communicate with public and media:
- a. Issue news release to the news media, explaining why the fuel shortage has occurred, describing actions TEC is taking to deal with the problem, and providing specific conservation information the news media should convey to customers.
 - b. Provide daily briefings to media on status of emergency.
 - c. Promote load conservation by the public via advertisements that provide customers with specific information on 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 steps 6 -11.
 - b. Update appropriate governmental agencies.
5. Wholesale power sales and purchases:
- a. Contact power suppliers (e.g., cogenerators, utilities and power marketers) and arrange non-emergency power purchases to both serve load and operating reserves,

reserving applicable electric transmission service(s) and tagging transactions as necessary.

- b. Contact all firm wholesale customers and request voluntary 15% load reduction.
6. Waive/Modify environmental restrictions - No new action required.
7. Curtail TEC energy use:
- a. Reduce energy use by at least 20% at all offices and operation centers.
 - b. Discontinue the use of lunchroom kitchens, turn off 25% of exterior lights, and turn off hot water heaters.
 - c. Reset and lock heating and air conditioning thermostats to 65° and 80°, respectively.
8. Promote load conservation:
- a. Voluntary:
 - (1) Request that residential and commercial customers cut back on energy usage and adjust thermostat settings 5 degrees cooler than normal during a heating season and 5 degrees warmer than 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 energy usage by at least 15%. Provide specific examples of how this can be achieved.
 - b. Mandatory:
 - (1) Request a governmental ban on all nighttime sporting activities. Close all lighted parks, tennis courts, golf courses, etc. Also, eliminate nonessential outdoor flood lighting and restrict the use of outdoor advertising lighting.
9. Utilize load control:
- a. Increase off times of controlled space heating and air conditioners to 6 hours per day. Water heaters will be off 8 to 10 hours per day.

10. Curtail customer load - No action required.
11. Modify system operations:
 - a. Modify unit dispatch to load units with obtainable fuels first, and then load units that burn the fuel in short supply.
 - b. Where possible, cycle units fueled by short supply fuel off line and still allow the same demand and energy output.

C. STEP C

When the total fuel supply has decreased to 25 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 that would satisfactorily burn in TEC power plants.
 - b. Coal - Locate and purchase any usable coal.
 - c. Natural gas – Continue procuring additional gas supply from TEC suppliers and/or other utilities in the state, requesting additional transportation from upstream pipelines and other pipeline customers, if needed, and maximizing natural gas storage capacity..
 - d. Implement physical transfers of fuel that is necessary and practical.
 - e. Continue inventory tracking, forecasting and reporting.
- 1A. Expedite coal transportation:
 - a. Review priorities to assure prompt delivery.
2. Communicate with TEC employees:
 - a. Issue updated emergency information to 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 steps 6-11.

- b. Update governmental agencies.
5. Wholesale power sales and purchases:
- a. Purchase all available non-emergency power and operating reserves, reserving applicable electric transmission service(s) and tagging transaction(s) as necessary.
 - b. Contact other utilities regarding potential emergency power purchases.
 - c. Contact all firm wholesale customers and request voluntary 30% load reduction.
 - d. Reduce firm sales to minimums based on individual contracts.
6. Waive/Modify environmental restrictions - No new action required.
7. Curtail TEC energy use:
- a. Discontinue the use of heating and air conditioning units serving large areas with a small number of people (moving the people as necessary).
 - b. Turn off at least 50% of all exterior lights and discontinue the use of Atrium and TECO Hall facilities.
8. Promote load conservation:
- a. Voluntary:
 - (1) Request residential customers further reduce energy consumption by stopping use of certain electrical services such as air conditioning, heating, hot water heaters, clothes dryers, dishwashers and other convenience devices and equipment.
 - (2) Request conditioned offices and buildings (other than critical services such as hospitals) to lower thermostat settings to 65° during the heating season and raise thermostat settings to 80° during cooling season.
 - (3) Request commercial establishments, institutional facilities, public and private schools, office buildings and industrial plants 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 energy usage by at least 30%. Provide specific examples of how this can be achieved.
 - b. Mandatory:
 - (1) In commercial establishments, ban all non-essential use of hot water.
 - (2) Elimination of window and display lighting.
 - (3) Ban all heating and air conditioning during non-use hours and in unoccupied areas of commercial establishments.
9. Utilize load control:
 - a. Increase heating and air conditioning off time to 6 to 8 hours per day. Water heaters will be off 12 to 14 hours per day.
10. Curtail customer load - No action required.
11. Modify system operations:
 - a. Implement emergency line ratings so as to increase import capability.
 - b. Lower system distribution voltage 2 to 4 percent where it is expedient to do so.

D. STEP D

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

1. Expedite fuel procurement:
 - a. Investigate all possible fuel sources in search of any usable fuel.
 - b. Continue inventory tracking, forecasting and reporting.
2. Communicate with TEC employees:
 - a. Issue updated information to employees emphasizing that most customers will experience rotating blackouts and why.
3. Communicate with public and media:

- a. Issue updated news statement explaining that most customers will experience rotating blackouts and why.
4. Communicate with governmental organizations:
 - a. Request legal authority from the proper governmental agencies for the actions to be taken in steps 6-11.
 - b. Update appropriate governmental agencies. In particular, advise them of customer load curtailment and its impact on their activities.
 5. Wholesale power sales and purchases:
 - a. Purchase all available emergency and non-emergency power, reserving applicable electric transmission service(s) and tagging transaction(s) as necessary.
 - b. Request voluntary 50% load reduction from all firm wholesale customers.
 - c. Maintain firm sales minimums and notify firm wholesale customers of impending load curtailment.
 6. Waive/Modify environmental restrictions - No new action required.
 7. Curtail TEC energy use:
 - a. Eliminate all but critical heating and air conditioning such as that for microwaves and computer facilities.
 8. Promote load conservation:
 - a. Voluntary:
 - (1) Request all commercial and industrial customers to reduce their energy usage by at least 50%. Provide specific examples of how this can be achieved.
 - b. Mandatory:
 - (1) Reduce street and area lighting where possible.
 - (2) Discontinue service to interruptible customers as necessary.
 9. Utilize load control:
 - a. Increase heating and air conditioning off periods to at least 8 to 10 hours per day. Water heaters will be off 16 to 18 hours per day.

10. Curtail customer load:

The implementation of this step 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.

Whenever possible during such emergencies, the TEC will give priority for service to critical customers such as hospitals, vital parts of military installations and major airports, major TV stations, and water and sewer facilities where no emergency power source is available.

The TEC Firm-Load Curtailment Plan will be used in determining which circuits or loads should be curtailed for a long-term energy emergency. Application of load curtailments will be made by company personnel in the exercise of their judgment according to circumstances existing at the time of the emergency. The selection will be based upon giving minimal disruption of convenience and general social and economic well being of the TEC service area, considering practical implementation procedures and effectiveness as well as community and governmental response. These actions can result in some customer's service being interrupted more than others.

If the energy shortage is long enough and severe enough, it may become necessary to implement additional interruptions of service that result in moderate or even severe disruption to the community.

11. Modify system operations – No new action required.

E. STEP E

When the total fuel supply has decreased to the area of 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 TEC employees:
 - a. Issue updated emergency information to employee.
3. Communicate with public and media:
 - a. Issue updated news statement.

4. Communicate with governmental organizations:
 - a. Update appropriate governmental agencies.
5. Wholesale power sales and purchases:
 - a. Notify firm wholesale customers of their contribution to firm load curtailment. Firm wholesale customers will be notified of TEC's percentage of firm load curtailment and advised that their firm sales will be reduced by the same percentage.
 - b. Continue purchasing all available power, reserving applicable electric transmission service(s) and tagging transaction(s) as necessary.
6. Waive/Modify environmental restrictions - No new action required.
7. Curtail TEC energy use - No new action required.
8. Promote load conservation - No new action required.
9. Utilize load control - No new action required.
10. Curtail customer load - No new action required.
11. Modify system operations:
 - a. Implement plans to ensure the orderly shutdown of all units burning the fuel in short supply in the event the fuel is exhausted.
 - b. Implement plans to ensure power availability to all power plants and fuel handling facilities.

VI. DETAILED DEPARTMENT PLANS FOR EACH STEP OF EMERGENCY

A. FACILITY SERVICES

Upon declaration of a long-term energy emergency, the TEC Emergency Manager will work with Facility Services Department to implement the following:

1. Step A - Curtail all non-essential uses of electric energy at all utility owned facilities.

This should reduce TEC energy usage by at least 10% at all offices and operation centers. Some measures to be taken are:

- a. Turn off all unnecessary lights i.e., work areas, conference

rooms and hallways.

Each department head should inform their employees (e.g., via face-to-face meeting or in writing) to conserve electricity within the workplace. This is in addition to informational releases by Corporate Communications.

- b. Refrain from using any piece of equipment requiring electrical power that can be delayed for a long period of time.
 - c. The Meter Reading Department will take weekly readings at all TEC facilities and provide information for monitoring to the Facility Service Department.
 - d. The Facility Service Department will assist those departments not meeting their reduction goal by making additional recommendations.
 - e. The Facility Service Department will provide the Energy Emergency Coordinator the results of the weekly monitoring.
 - f. The Building Service Department will take such actions recommended by the Energy Emergency Coordinator.
2. Step B - Reduce TEC energy usage 20% at all offices and operation centers. Some additional measures to achieve this are:
- a. Discontinue the use of breakroom kitchens i.e., stoves, microwaves and refrigerators.
 - b. Turn off 25% of exterior lights. Each department head and/or building landlord will be responsible for doing this. The Facility Service Department will assist those departments who need help in achieving this goal.
 - c. The Facility Service Department will turn off all water heaters.
 - d. The Facility Service Department will reset and lock all heating and air conditioning thermostats to 65° and 80°, respectively.
3. Step C -
- a. Turn off at least 50% of all exterior lights.
 - b. Cancel the use of the TECO Plaza Hall or Atrium.
 - c. Discontinue the use of heating and air conditioning units

servicing large areas with a small number of people. This may involve relocating personnel.

4. Step D - Eliminate all heating and air conditioning except for critical systems such as microwave and computer facilities.

B. CUSTOMER SERVICE

Upon declaration of a long-term energy emergency, the Customer Service Department, with the cooperation of the Conservation and Load Management Department, will be responsible for the steps listed below. In working to implement these steps, each department will also take into consideration the general social and economic well being of the TEC service area, as well as community and governmental response.

1. Step A - Customer Service account managers will contact all assigned commercial and industrial customers (including interruptible load customers) and advise them of the fuel shortage and provide them information on potential ways to reduce their energy usage.
2. Step B - The Customer Service account managers will contact all assigned 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 of 15% of their load until further notice. Also, the account managers will advise customers of the specific conservation measures that should be taken as stated in Section VI. C.
3. Step C - The Customer Service account managers will contact all assigned 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 of 30% of their load until further notice. Also, the account managers will advise customers of the specific conservation measures that should be taken as stated in Section VI. C.
4. Step D - The Customer Service account managers will contact all assigned 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 of 50% of their load until further notice. Account managers advise interruptible load customers of impending curtailment of service. Commercial and industrial

customers are also advised of the specific conservation measures that should be taken as stated in Section VI .C.

5. Step E - The Customer Service account managers will contact all commercial and industrial customers (including interruptible load customers) and advise them of the continued need to maintain all load curtailment action until further notice.

Note: In all steps, the Business Marketing and Sales Department will:

- a. Maintain communications with each interruptible load customer for the purpose of providing status reports on the fuel shortage emergency and answering any questions.
- b. Be responsible for communicating with each interruptible load customer upon restoring partial load to each customer. The restoration process will follow the same steps as curtailment, however, in reverse.

C. ENERGY MANAGEMENT SERVICES

Upon the declaration of a long-term energy emergency, the Energy Management Services Department, with the cooperation of the Business Marketing and Sales Department, will be responsible for the steps listed below. In working to implement these steps, each department will also take into consideration the general social and economic well being of the TEC service area, as well as community and governmental response.

1. Step A - Promote load conservation:
 - a. Voluntary measures:
 - (1) Inform customers through advertising programs of specific ways to conserve electric energy.
 - (2) Educate customers in the efficient use of electrical equipment and appliances.
 - (3)
 - b. Mandatory measures - No action required.
2. Step B - Promote load conservation:
 - a. Voluntary measures:
 - (1) Announce to the public by newspaper, television and radio that an electric supply emergency exists and that the Company is requesting them to conserve

electricity.

- (2) Direct commercial customers to temporarily discontinue use of indoor advertising devices, outdoor displays and flood lighting, except those items that are essential for safety and security.
- (3) Request residential and commercial customers to do without all non-essential electrical services, cut back on essential usage and adjust thermostat setting 5° down from a normal setting during a heating season and 5° up from a normal setting during a cooling season.
- (4) Notify the public daily through news media as to the status of the Company's electric supply emergency and the extent to which the Fuel Shortage Plan is working.

b. Mandatory measures:

- (1) Initiate a governmental ban on all nighttime sporting activities, including closure of all lighted parks, tennis courts, golf courses, etc.
- (2) Eliminate non-essential outdoor flood lighting, and restrict the use of outdoor advertising lighting.

3. Step C - Promote load conservation:

a. Voluntary measures – Residential:

- (1) Announce to the public that TEC's electric energy emergency supply continues to worsen and that it is requesting its customers to control and cease use of certain electric energy consuming devices.
- (2) Direct residential customers to further reduce energy consumption by eliminating use of non-essential electrical services, such as electric hot water heaters, clothes dryers, dishwashers, air conditioning, heating and other convenience devices and equipment.
- (3) Notify customers daily through news media as to the status of the electric supply emergency and the extent to which the Fuel Shortage Plan is working.

b. Voluntary measures – Commercial:

- (1) Direct conditioned offices and buildings other than critical services such as hospitals to lower thermostat

settings to 65° during the heating season and raise thermostat to 80° during the cooling season.

- (2) Direct commercial establishments, institutional facilities, public and private schools, office buildings and industrial plants to further reduce their consumption, which may require a reduction in their operating hours.
 - (3) Encourage customer use of generation and alternate energy supplies.
 - (4) Ask all commercial and industrial customers to curtail their load by 30%.
- c. Mandatory measures – Residential: No new action required.
- d. Mandatory measures – Commercial:
- (1) Eliminate window and display lighting.
 - (2) Ban heating and air conditioning during non-use hours.
 - (3) Ban heating and air conditioning in unoccupied areas.
 - (4) Ban all non-essential hot water use. Exceptions: Medical facilities, educational facilities and food establishments.
4. Step D - Promote load conservation:
- a. Voluntary measures – Residential:
 - (1) Announce to the public that the electric supply continues to deteriorate and that TEC'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.
 - b. Voluntary measures – Commercial:
 - (1) Encourage strict temperature control of HVAC systems.
 - (2) Ask all commercial and industrial customers to curtail their load by 50%.

- c. Mandatory measures – Street and Area Lighting
 - (1) Reduce exterior TEC Street and Area Lighting Systems as practical within prudent guidelines.
5. Step E - Residential/Commercial/Industrial customer action:
- a. Voluntary measures:
 - (1) Continue observance of previous four steps.
 - b. Mandatory measures:
 - (1) Begin rotating blackouts.

D. ENVIRONMENTAL, HEALTH & SAFETY

Upon the declaration of a long-term energy emergency the Environmental, Health & Safety Department will be responsible for the following actions:

- 1. Step A – Initiate procedure to petition the Governor. To obtain the most expeditious relief, so as to be able to burn available fuels having a higher content of sulfur, TEC must petition the Governor of Florida. Following an open public meeting on the action, a Hearing Officer issues a recommended order to the Governor which forms the basis for his decision on whether to petition the President of the United States for authority to suspend/modify the State Implementation Plan (SIP) requirements of the Clean Air Act (CAA). See Attachment II, *Environmental Petition Form*.

At the public hearing, the following information will most likely be required by TEC:

- a. The nature and extent of the long-term energy emergency;
- b. Current and projected unemployment impacts associated with the long-term energy emergency;
- c. Current and projected loss of necessary energy supplies for residential use associated with the long-term energy emergency;
- d. Alternative strategies including conservation, alternative fuels and power wheeling for emergency and the consequences of these strategies on unemployment and on residential energy supply;
- e. Amount of energy savings expected to result from temporary suspension of portions of the implementation

plan.

- f. To the extent possible, pollutant emission levels both before and after the proposed temporary suspension of portions of the implementation plan; and

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.2. Provide copies of submitted petition to Florida Reliability Coordinating Council, Florida Public Service Commission, Florida Department of Environmental Protection (FDEP) Tallahassee, FDEP – Tampa, U.S. EPA – Washington, U.S. EPA – Region IV, and Environmental Protection Commission of Hillsborough County.

E. FIRM LOAD CURTAILMENT COORDINATOR

Upon declaration of a long-term energy emergency the Firm Load Curtailment Coordinator will be responsible for the following:

1. During steps A, B and C - Stay knowledgeable of actions taken and results obtained through these steps.
2. During Step D - Interrupt 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 customer region is without electricity for an unduly long period of time.

Whenever possible during energy emergencies, TEC will give priority for service to critical customers such as hospitals, emergency shelters, vital parts of military installations and major airports, major TV stations, and water and sewer facilities where no emergency power source is available.

The TEC Firm-Load Curtailment Plan will be used in determining which circuits or loads should be curtailed for a long-term energy emergency. Application of this curtailment plan will be made by company operating personnel in the exercise of their judgment according to circumstances existing at the time of the emergency. The selection will be based upon giving minimal disruption of convenience and general social and economic well being of the TEC service area, considering practical implementation procedures and effectiveness as well as community and governmental response. These actions can result in some customers' service being interrupted more than others.

If the energy shortage should be long enough and severe enough, it may become necessary to implement additional interruptions of service that can result in moderate or even severe disruption to the community.

For more detailed information, refer to the TEC Firm-Load Curtailment

Plan.

F. FUELS MANAGEMENT

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

1. During Steps A-E, Fuels Management will focus on the previously stated activities to expedite the procurement of coal, oil and natural gas. These activities require Fuels Management to:
 - a. Formulate emergency fuel procurement strategies, policies, and guidelines based upon analysis of internal and external variables impacting TEC's fuel operations and update them as emergency conditions change.
 - b. Monitor fuel market conditions and assess future trends. Report market information to management.
 - c. Assure a constant fuel supply to generation plants in accordance with environmental and performance standards as long as possible under the constraints caused by the fuel emergency.
 - d. Investigate alternate sources of supply, in accordance with the procurement arrangements set forth by the emergency strategy, to allow the company to respond to changes in regulation, operating requirements, or market conditions.
 - e. Manage existing fuel inventories in a way that assures the most efficient use of fuels under the constraints caused by the fuel emergency.
 - f. Provide fuel and transportation availability information for planning and control of operations under the fuel emergency conditions.
 - g. Investigate the feasibility of physical transfers of fuel. If during the emergency, a physical transfer of fuel should become practical and 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.
 - h. Develop information, reports, and testimony relating to TEC's fuel procurement activities during the long-term energy emergency, including documentation of instances where fuel stocks and/or deliveries were shared with other entities.

G. GOVERNMENTAL / REGULATORY AFFAIRS

Upon the declaration of a long-term energy emergency, Governmental Affairs Department and Regulatory Affairs Departments will be responsible for the following actions:

1. Step A
 - a. Coordinate with the Vice President of Corporate Communications those messages communicated to TEC 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.
 - b. Assist Vice President of Energy Supply with governmental contact to waive/modify environmental restrictions.
 - c. Notify selected public officials of the long-term energy emergency. Relate message developed in subpart 1a above. Advise of TEC Fuel Shortage Plan and steps to be taken.
2. Step B
 - a. Contact appropriate city and county official, including but not limited to school officials, and Tampa Sports Authority to implement Step 7.b., Mandatory Load Conservation, to prohibit nighttime sporting activities and to close lighted parks, tennis courts, golf courses, etc.
 - b. Update public officials.
3. Step C
 - a. Contact local state and federal agencies to implement Step 7.b. curtailment of heating and air conditioning, non-essential use of hot water and elimination of window and display lighting.
 - b. Update public officials.
4. Step D
 - a. Contact city and county to reduce street and area lighting in Section 7.b.
 - b. Advise public officials of customer load curtailment in Section 9 and its potential impact on their activities.
5. Step E

- a. Communicate all notices to governmental organizations.

H. ENERGY DELIVERY TRANSMISSION ENGINEERING & OPERATIONS

Upon the declaration of a long-term energy emergency, the Energy Delivery Transmission Engineering and Operations Department will be responsible for the following:

1. Step A
 - a. No action required
2. Step B
 - a. Develop emergency line ratings for the lines requested by Grid Operations so as to allow maximum power transfer capability to TEC.

I. ENERGY SUPPLY OPERATIONS

Upon the declaration of a long-term energy emergency, the Energy Supply Operations Department will be responsible for the following actions:

1. Step A
 - a. Eliminate or reduce convenience lighting except where required for safe work conditions.
 - b. Eliminate unnecessary heating and air conditioning of unoccupied areas.
 - c. Review plant operations to determine unnecessary uses of energy, eliminating or reducing uses where practical.
 - d. Identify areas where additional reductions can be made if worsening situations dictate.
2. Step B
 - a. With critical review of lighting and plant operations, continue elimination and reduction of unnecessary lighting, heating, and air conditioning.
 - b. Reset required heating and air conditioning thermostats to 65° and 80°, respectively.
 - c. Discontinue use of lunchroom kitchens.

- d. Turn off water heaters.
 - e. Turn off 25% of exterior lights.
 - f. Discontinue lighting during daylight hours where possible.
3. Step C
- a. Continued review of energy uses making reductions where possible.
 - b. Reduce all lighting, interior and exterior, to the minimum required for safety and business need.
 - c. Eliminate all non-essential heating and air conditioning load.
4. Step D
- a. Low load situation 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.
 - b. Review plants for orderly shutdown of units.
5. Step E
- a. Proceed with orderly shutdown of units as fuel supply is exhausted.

J. CORPORATE COMMUNICATIONS

Upon the declaration of a long-term energy emergency, the Corporate Communications Department will be responsible for the following actions:

1. Step A
- a. Communicate with TEC employees.
 - (1) Issue an internal newsletter or electronic message and/or bulletin that explain why the fuel shortage has occurred, provides an overview of the Fuel Shortage Plan and communicates details.
 - (2) Provide updated emergency information as needed.
 - b. Communicate with public and news media.
 - (1) Issue news release to the media to explain why the fuel shortage has occurred, communicate actions

TEC is taking to deal with the problem and provide specific conservation information to customers. This information will also be provided to Customer Inquiry representatives.

- (2) Provide daily briefings to media on status of emergency.
- (3) Promote load conservation by the public via advertisements that will provide customers with specific information on how to conserve electricity.

2. Step B

a. Communicate with TEC employees.

- (1) Provide updated emergency information as needed.

b. Communicate with public and news media.

- (1) Issue news statement about the continued downward trend in fuel supply. Statement will also explain Company actions to solve the problem and will communicate conservation information as outlined in this Step. This information will also be provided to Customer Inquiry representatives.
- (2) Continue advertisements that provide customers with specific information on how to conserve electricity.

3. Step C

a. Communicate with TEC employees.

- (1) Provide updated emergency information as needed.

b. Communicate with public and news media.

- (1) Issue news statement about the continued downward trend in fuel supply, communicate conservation information and steps company is taking to solve the problem. This information will also be provided to Customer Inquiry representatives.
- (2) Continue advertising that communicates conservation information.

4. Step D

a. Communicate with TEC employees.

- (1) Issue emergency information emphasizing that most customers will experience rotating blackouts and why they will occur.

b. Communicate with public and news media.

- (1) Issue news statement about the continued downward trend in fuel supply and need to conserve. As outlined in this Step, announce that most customers will experience rotating blackouts, why, they will occur, and what the company is doing to solve the problem. This information will also be provided to Customer Inquiry representatives.
- (2) In addition to conservation information, advertising will also explain why rotating blackouts are occurring. Ads will describe that the outages are being distributed evenly among all customers, except for hospitals, fire and police, etc., after consideration of disruption of convenience and general social and economic well being of the community.

5. Step E

a. Communicate with TEC employees.

- (1) Provide updated emergency information as needed.

b. Communicate with public and news media.

- (1) Issue news statement to explain the continued downward trend in fuel supply. Communicate company actions and the need for customer conservation. This information will also be provided to Customer Inquiry representatives.
- (2) Continue advertising that explains why rotating blackouts are occurring. Continue conservation ads.

K. WHOLESALE MARKETING

Upon declaration of a long-term energy emergency, Fuels Management Department will be responsible for the following actions:

1. Step A

- a. Cut all non-firm sales to wholesale customers.
2. Step B
 - a. Contact utilities and power marketers regarding firm and non-firm power purchases. Coordinate with Grid Operations and Operations Planning concerning power purchase needs. Make appropriate power purchases from resources available in the wholesale market, reserving the applicable transmission service(s) and tagging the transaction(s), as necessary.
 - b. Request all firm wholesale customers reduce their load by 15%.
3. Step C
 - a. Purchase all available non-emergency power. Coordinate purchases with Grid Operations and Operations Planning, reserving the applicable transmission service(s) and tagging the transaction(s) as necessary.
 - b. Reduce firm sales to minimums based on individual contracts.
 - c. Contact other utilities regarding potential emergency power purchases.
 - d. Request all firm wholesale customers voluntarily reduce their load by 30%.
4. Step D
 - a. Purchase all available emergency and non-emergency power. Coordinate purchases with Grid Operations and Operations Planning, reserving the applicable transmission service(s) and tagging the transaction(s) as necessary.
 - b. Request voluntary 50% load reduction from firm wholesale customers.
 - c. Maintain firm sales minimums and notify wholesale customers of impending load curtailment.
5. Step E
 - a. Notify firm wholesale customers of their contribution to firm load curtailment.
 - b. Continue purchasing all available power. Coordinate purchases with Grid Operations and Operations Planning. Reserve available transmission service(s) to bring those purchase(s) into the TEC system, and tag the transaction(s).

L. GRID OPERATIONS

Upon the declaration of a long-term energy emergency, the Grid Operations Department will be responsible for the following actions:

1. Step A
 - a. Utilize load control - In order to reduce generation peaks and intermediate loads and to conserve energy, increase off time of heating and air conditioning to 2 to 4 hours per day. Water heating will be off 4 to 6 hours per day.
 - b. Provide the Energy Emergency Coordinator with a short-term demand and energy forecast during the emergency.
 - c. Provide Operations Planning an hourly load profile for the first 30 days and weekly peaks up to 75 days.
 - d. Continue to maintain 75% of operating margin as non-spinning reserve.
 - e. Review maintenance schedule to optimize obtainable fuels.
2. Step B
 - a. Utilize load control - Increase off time of controlled heating and air conditioners to 6 hours per day. Water heaters will be shut off 8 to 10 hours per day.
 - b. Modify unit dispatch to add units with obtainable fuels first, and then load units which burn the fuel in short supply.
 - c. Identify circuits that need emergency line ratings to allow maximum import and power transfer capability. Request Transmission Engineering & Operations to furnish these ratings.
3. Step C
 - a. Utilize load control - Increase heating and air conditioning off time to 6 to 8 hours per day. Water heaters will be off 12 to 14 hours per day.
 - b. Implement emergency line ratings so as to increase import capability.
 - c. Lower system distribution voltage 2 to 4 percent where it is expedient to do so.
4. Step D

- a. Utilize load control - Further increase heating and air conditioning off time to 8 to 10 hours per day. Water heaters will be off 16 to 18 hours per day.
 - b. Curtail interruptible load customers as necessary.
 - c. Notify Firm Load Curtailment Coordinator to begin implementation of firm load curtailment.
 - d. Implement plans to ensure the orderly shutdown of all units burning the fuel in short supply in the event fuel is exhausted.
 - e. Implement plans to ensure power availability to all power plants and fuel handling facilities.
5. Step E
- a. Continue as Step D.

M. OPERATIONS PLANNING

Upon the declaration of a long-term energy emergency, the Operations Planning Department will be responsible for the following actions:

1. Step A
 - a. Run the resource commitment program and provide the projected fuel burn (by fuel type) to the Fuels Management Department. 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.
 - b. Review maintenance schedule to optimize obtainable fuels.
2. Step B
 - a. Modify unit dispatch to add units with obtainable fuels first, and then load units which burn the fuel in short supply.
3. Step C
 - a. Continue as Step B.
4. Step D
 - a. Continue as Step C.

5. Step E
 - a. Continue as Step D.

Attachment I

LONG-TERM ENERGY EMERGENCY PLAN SUMMARY

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
1.	Expedite Fuel: Oil	Purchase any proper oil.	Determine types of oil available.	Purchase any satisfactory burnable oil.	Search for and purchase <u>any</u> usable fuel.
	Coal	Purchase any proper coal. Expedite coal transportation.	Purchase any satisfactory burnable coal. Plan fuel transfers.		
	Natural Gas	Purchase additional gas and transportation.	Purchase additional gas and transportation. Maximize gas storage.		
2.	Communicate With TEC Employees	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.			
3.	Communicate With Public and Media	Notify officers and key departments about plans to contact the public and media, if the total fuel supply continues to decrease in Step B.	Issue news release. Provide daily status briefing. Promote load conservation.		
4.	Communicate With Governmental Organizations	Coordinate with Corporate Communications in notifying appropriate	Request legal authority for actions such as waive/modify environmental		

Attachment I

LONG-TERM ENERGY EMERGENCY PLAN SUMMARY

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
	agencies.	restrictions, to be taken in this step. Update governmental agencies.			
5. Wholesale Market Power Sales and Purchases	Stop non-firm sales to wholesale customers.	<p>Arrange non-emergency power purchases, reserve transmission services and tag transaction(s).</p> <p>Request voluntary 15% MWH reduction from firm wholesale customers.</p>	<p>Reduce firm sales to a minimum.</p> <p>Purchase all available non-emergency power, reserve available transmission service, and tag transaction(s).</p> <p>Request 30% voluntary MWH reduction from firm wholesale customers.</p>	<p>Reduce firm sales to a minimum.</p> <p>Purchase all available emergency and non-emergency power, reserve available transmission service, and tag transaction(s).</p> <p>Request voluntary 50% MWH reduction from firm wholesale customers.</p>	<p>Notify firm wholesale customers of the percentage of firm load curtailment and advise that their firm sales will be reduced by the same percentage.</p> <p>Continue purchasing all available power.</p>
6. Waive/Modify Environmental Restrictions	Request to Governor to suspend SIP of CAA.				
7. Curtail TEC Energy Use:	Curtail non-essential energy uses.				
Offices and Operation Center	Reduce MWH's by 10%. Monitor usage weekly.	Reduce MWH's BY 20%. Set thermostats to 65° for heating and to 80° for cooling. Cut off 25% of exterior lights. Cut off hot water heaters.	Further reduce A/C. Cut off 50% of exterior lights. Cancel use of TECO Plaza Halls or atrium.	Cut off all but critical A/C and heating.	

Attachment I

LONG-TERM ENERGY EMERGENCY PLAN SUMMARY

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
8. Promote Load Conservation: Voluntary	Educate customers. Advertise conservation.	Request 15% MWH reduction. Adjust thermostat settings +/-5°, depending on the season. Cut out indoor & outdoor advertising lights. Cut out flood lighting as possible.	Commercial & Industrial: Request 30% MWH reduction. Set thermostats to 65° to 80°. Encourage alternate energy usage. Reduce operating hours if necessary. Residential: Stop using A/C, heating, H.W.H., dryers, dish washers, etc.	Commercial & Industrial: Request 50% KWH reduction.	
Mandatory		Ban night sports. Close lighted parks, etc. Ban non-essential flood and outdoor advertising lighting.	Ban displays & window lighting. Ban in commercial establishments: a) A/C and heating during nonuse hours and in unoccupied areas b) Non-essential use of hot water.	Reduce street and area lighting where possible. Discontinue service to interruptible customers as necessary.	
9. Utilize Load Control	Heat & A/C off 2-4 hrs. W.H. off 4-6 hrs.	Heat & A/C off 6 hrs. W.H. off 8-10 hrs.	Heat & A/C off 6-8 hrs. W.H. off 12-14 hrs.	Heat & A/C off 8-10 hrs. W.H. off 16-18 hrs.	
10. Curtail Customer Load				Implement TEC Firm-Load Curtailment Plan	

Attachment I

LONG-TERM ENERGY EMERGENCY PLAN SUMMARY

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
11. Modify System Operations	Review maintenance schedule Place 75% of Operating Margin on non-spin reserve.	Modify unit dispatch. Cycle units off-line.	Use emergency line ratings. Reduce voltage 2 to 4%.		Implement orderly shutdown of units as required. Ensure power available to plants.

*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.

**ATTACHMENT II
ENVIRONMENTAL PETITION FORM**

**BEFORE THE STATE OF FLORIDA
OFFICE OF GOVERNOR**

In The Matter of:)
Petition for Declaration)
of Energy Emergency and)
Other Relief;)

TAMPA ELECTRIC COMPANY

Petitioner)

Petitioner, TAMPA ELECTRIC COMPANY, pursuant to Chapters 120, 377 and 252, Florida Statutes, and Section 110(f) of the Clean Air Act, 42 U.S.C. § 7401 et seq., hereby requests that the Governor of the State of Florida petition the President of the United States to determine that a national or regional energy emergency exists of such severity that (1) a temporary suspension of portions of Chapter 62, Florida Administrative Code (FAC) is necessary and (2) other means of responding to the energy emergency may be inadequate. In support of this request, Petitioner states:

IDENTIFICATION OF PARTIES

1. The name and address of Petitioner is TAMPA ELECTRIC COMPANY, Post Office, Box 111, Tampa, Florida 33601.
2. (Identify any other known parties).

BACKGROUND

3. Petitioner is the owner and operator of various steam electric power plants located in Hillsborough County, Florida, that are subject to regulation by the Florida Department of Environmental Protection (FDEP) and the Environmental Protection Commission of Hillsborough County (EPCHC) and the provisions of the Florida State Implementation Plan (SIP) contained in Chapters 62-204,210,212,213,214,296, and 297, FAC, regulating sources of air pollution.
4. Electric generating units owned by Petitioner located at the Francis J. Gannon Generating Station and Big Bend Generating Station in Hillsborough County, Florida, currently utilize coal as a primary energy source. Additional electric generating unites owned by Petitioner located at the Big Bend Generating Station in Hillsborough County, Florida, currently utilize oil as a primary energy source. Electric generating units owned by Petitioner located at the Bayside Power Station in Hillsborough County, Florida, currently utilize natural gas as a primary energy

source. Electric generating units owned by Petitioner located at the Polk Power Station in Polk County, Florida, currently utilize gasified coal and natural gas as primary energy sources. Electric generating units owned by Petitioner located at the Phillips Power Station in Highland County, Florida currently utilize oil as a primary energy source.

5. Petitioner currently serves approximately _____ residential customers and a substantial number of industrial customers located both in Hillsborough County and portions of Pasco, Pinellas and Polk County, Florida.

FACTS SUPPORTING RELIEF

(Insert here the facts which support the Petition for Declaration of an Energy Emergency. The following is an example of how those facts could be presented).

6. Petitioner obtains its _____ sulfur content fuel supplies from _____. Petitioner has been advised that due to (insert here reasons for supply unavailability) a continuing supply of _____ sulfur content fuels will not be available and Petitioner will be required to supply its current fuel needs with fuel containing up to _____ sulfur content.
7. Petitioner's total net generating capability is _____ megawatts. Approximately _____ percent of that total is produced by _____ generating units which presently must burn _____ sulfur content fuel or below. On _____, 20_____, Petitioner had approximately _____ (barrels or tons) of _____ sulfur content fuel on hand. Projected burn rates predict that this inventory will be consumed within _____ days. Should Petitioner be unable to continue to replenish its _____ sulfur content fuel inventories, major curtailments of electric service would be required in the absence of permission to burn higher sulfur content fuel.
8. A low sulfur fuel shortage could significantly impact residential energy use of its _____ residential customers and its industrial customers on interruptible service arrangements.
9. Petitioner's ability to mitigate the impacts of a low sulfur fuel curtailment in the near term is limited by (insert here any discussion of seasonally high loads expected for the particular month and the inability to burn natural gas). It is not presently possible to determine the extent to which the expected shortfall can be mitigated through purchases of power and conservation.
10. Air quality modeling results for the Petitioner's units presently burning low sulfur fuels show that _____ percent sulfur content fuel could be burned at the _____ Stations without exceeding the State of Florida Ambient Air Quality Standards and the National Ambient Air Quality Standards. Increases in particulate matter emissions from the present limits of _____ pounds per million BTU's of heat

input would not cause significant impact levels for total suspended particulate matter to be exceeded in the Hillsborough County air quality maintenance.

REQUEST FOR RELIEF

Based upon the foregoing, Petitioner respectfully requests that the Governor:

- a) immediately designate a Hearing Officer to conduct any necessary informal public hearings;
- b) issue an Executive Order declaring the existence of an energy emergency pursuant to Chapters 377 and 252, Florida Statutes, and suspending the procedural requirements of Chapter 120, Florida Statutes and regulations thereunder, as they may apply to any of his further actions in the energy emergency;
- c) petition the President of the United States to determine that the shortage of _____ fuel has created a regional or national energy emergency and to authorize the Governor to suspend, as a matter of federal law, rules governing _____ emissions of the State Implementation Plan as may be necessary to allow _____ fired power plants owned by Petitioner to burn available fuels; and
- d) upon a subsequent satisfactory showing, suspend, as a matter of state and federal law, the applicability of any rules governing _____ emissions in Chapter 62-296, FAC, or any other rules, ordinances, or regulations of the State of Florida or its political subdivisions, as may be necessary to permit _____ fired electric power plants owned by Petitioner to burn available fuels.

TAMPA ELECTRIC COMPANY

By: _____

TAMPA ELECTRIC COMPANY

LONG-TERM

ENERGY EMERGENCY PLAN

FOR

FUEL SUPPLY SHORTAGE

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ATTACHMENTS

- Attachment I - Long-term Energy Emergency Plan
- Attachment II - Environmental Petition Form

**TAMPA ELECTRIC COMPANY
LONG-TERM ENERGY EMERGENCY PLAN
FOR FUEL SUPPLY SHORTAGE**

I. INTRODUCTION

The uncertainty in fuel supply (oil, coal and natural gas) is beyond the control of prudent planning and has the potential for fuel shortages for both Tampa Electric Company (TEC) and the entire state. This could result in a long-term electrical energy deficiency that would adversely affect all customers. ~~Therefore, this~~ This document, the Tampa Electric Company Long-Term Energy Emergency Plan For Fuel Supply Shortage (hereafter referred to as the "Fuel Shortage Plan") ~~was developed which will~~, contains the procedures the Company has established to enable TEC 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~~ the Fuel Shortage Plan is to establish a systematic and effective means of anticipating, assessing and responding, in an appropriate and coordinated manner, to a long-term energy emergency caused by a fuel supply shortage that affects TEC. However, understanding that the Governor of the State of Florida has the authority to declare a fuel supply shortage for the entire state, TEC would also work with the applicable governmental agencies and/or organizations in an effort to comply with the Governor's declaration.

III. DEFINITIONS

A long-term energy emergency exists when utility fuel supplies are decreasing or are anticipated to decrease below a level adequate to provide for continuous service at required levels as established by customer's normal energy needs. ~~AA~~ A long-term 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 a long-term energy emergency is usually measured in terms of weeks or months, as opposed to a day, hours or minutes for a short-term capacity deficiency. ~~This plan~~ The Fuel Shortage Plan addresses contingencies for fuel shortages with no clear resolution when total inventory levels drop below 10, 15, 25, 35, and 50-day days of fuel shortages remaining.

IV. AUTHORITY

This portion of the Fuel Shortage Plan identifies TEC personnel responsible for overseeing and implementing specific actions during a long-term energy emergency. However, during such times, the responsible personnel may delegate a specific task to other capable TEC personnel as necessary. The reasons for delegating responsibility include continuing the implementation of the plan during the absence of the responsible personnel and increasing the effectiveness and efficiency of plan implementation.

A. EMERGENCY DECLARATION

<u>Activity</u>	<u>Person Responsible</u>
1. Regularly monitor <u>Increase fuel inventories inventory and system load monitoring (as appropriate) and publish weeklymake periodic fuel inventory projections available to applicable departments.</u>	<u>Director, of Wholesale Marketing & Fuels</u>
2. Alert the Vice President, Energy Supply Trading & Services, of Fuels Management <u>any time a key fuel supplies appears supply appears to be in jeopardy due to fuel availability of and/or quality constraints, and it is probable that inventoryinventory levels will drop below desirable levels.</u> If ana <u>a long-term</u> energy emergency needs to be declared, this Officer <u>officer</u> will notify the TEC <u>President of TEC</u> to announce the declaration.	<u>Director, of Wholesale Marketing & Fuels</u>
3. After ana <u>a long-term</u> energy emergency is declared, or at the direction of the Vice President, Energy Supply Trading & Services of Fuels Management , the following	

Activity	Person Responsible
<p>procedure will be followed in determining the fuel supply situation and inventory plan.</p>	<p>Director, <u>of</u> Energy Control Center</p>
<p>a. Monitor and prepare short-term forecast of system load.</p>	<p>Director, <u>of</u> Wholesale Marketing & Fuels</p>
<p>b. Monitor and forecast fuel inventories (including reasonable delays or delivery problems).</p>	<p>Director, <u>Asset Management of Resource & Operations Planning</u></p>
<p>c. Using the above data, run the "Commit" <u>Program</u> company's <u>resource commitment program</u> and provide the amount of each type of fuel expected to be used to the <u>Fuels Management Department</u>. The estimated fuel consumption should be established on a daily basis for the first 30 days and then on a weekly basis for up to 75 days.</p>	<p>Director, <u>of</u> Wholesale Marketing & Fuels</p>
<p>d. Using the output of b and c above, prepare and distribute a daily or weekly report on the overall fuel supply situation <u>to key departments, areas and personnel (e.g., Grid Operations, the plants, TEC officers).</u></p>	<p>TEC President <u>of</u> TEC or by delegation to: Vice President, <u>Energy Supply Trading & Services of</u></p>
<p>4. Declare a <u>long-term</u> energy emergency when necessary and notify the Chairman of the Florida Reliability Coordinating Council ("FRCC"), <u>Director of</u> Reliability of <u>Assessment</u></p>	

Activity
~~Group about the existence of a long-term energy emergency on the TEC system.~~ Also, declare

- Declare when to move to each step in the plan and declare when the energy emergency is over. Fuel Shortage Plan
- Implement all or any part of ~~this~~ the Fuel Shortage Plan, in cooperation with the FRCC.
- Implement the Fuel Supply Shortage Element of the Florida Electrical Emergency Contingency Plan upon the declaration of an Emergency Alert by the Florida Public Service Commission or upon the declaration of any Energy Emergency long-term energy emergency by the Governor of the State of Florida.
- Declare and notify the appropriate organizations and/or agencies (e.g., FRCC) when the long-term energy emergency is over

Person Responsible
Fuels Management

Vice President,
of Energy Delivery

B. ENERGY EMERGENCY COORDINATOR

- Activity
1. After the long-term energy emergency is declared, the Energy Emergency

Person Responsible
Director, of
Energy Control Center
Alternate: Emergency

Coordinator is required to coordinate all activities involved in implementing the Energy Emergency Fuel Shortage Plan.

Manager, Energy Delivery

C. IMPLEMENTATION PLAN— ACTIVITIES AND RESPONSIBILITIES

The individuals below will assist the Energy Emergency Coordinator and be responsible for implementing the ~~part of the plan listed by their title~~ identified Fuel Shortage Plan activity.

	<u>Activity</u>	<u>Person Responsible</u>
1.	Expedite fuel procurement	Director, of Wholesale Marketing & Fuels
1A	Expedite water borne coal transportation	Vice President, Energy Trading & Services Director of Wholesale Marketing & Fuels
2.	Communicate with TEC employees	Director, of Corporate Communication
3.	Communicate with media and public	TEC Public Information Officer
4.	Communicate with Governmental <u>governmental</u> organizations	Vice President, of Governmental Affairs and Vice President, of Regulatory Affairs
5.	Purchase power and control sales	Director, of Wholesale Marketing & Fuels and Director, Business Marketing and Sales of <u>Customer Service</u>
6.	Obtain approval to waive/modify environmental restrictions	Vice President, Energy Supply Trading & Services Director of <u>Environmental, Health & Safety</u>

	<u>Activity</u>	<u>Person Responsible</u>
7.	Facilitate the TEC energy use curtailment	TEC Emergency Manager
7A <u>7.</u>	Curtail TEC energy use	Vice President, of Technology and Support Services Vice President, of Energy Supply Operations, and Vice President, of Energy Delivery
8.	Promote load conservation (voluntary and mandatory)	Director, Energy & Market Planning Director, Business Marketing and Sales <u>Customer Service</u>
9.	Utilize load control	Director, Energy Control Center
10.	Curtail customer load	Director, Energy Control Center
11.	Modify system operations	Director, Energy Control Center

Also see Attachment I, "Long-Term Energy Emergency Plan Summary"

~~V.~~ EMERGENCY PLAN

V. IMPLEMENTATION – SPECIFIC STEPS AND ACTIONS

When TEC declares a long-term energy emergency ~~is declared~~, the following steps and actions ~~may~~will be taken so as to minimize the effect of the fuel shortage upon customers.

A. STEP A

After the ~~Energy Emergency~~a long-term energy emergency has been declared and the total fuel inventory has decreased to 50 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~~fuel procurement:
 - a. Oil - Request TEC 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 - Procure additional gas supply from TEC suppliers and/or other utilities in the state. Request additional transportation from upstream pipelines and other pipeline customers if needed.
 - d. Continue inventory tracking, forecasting, and reporting.

- 1A. ~~Expedite waterborne~~ coal transportation:

Establish priorities with transportation companies to ensure prompt delivery of TEC coal in adequate quantities. Also, when required, assist the transportation companies in obtaining ample supplies of diesel fuel and other petroleum products to operate ~~tugboats in transporting vessels, vehicles, and other equipment used in the process of delivering~~ coal to TEC.

2. Communicate with TEC ~~Employees~~employees:
 - a. Issue internal newsletter/bulletin that explains why the fuel shortage has occurred, provides an overview of the Emergency Fuel Shortage Plan and communicates details of Step A.
 - b. ~~Provide~~Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed ~~via GroupWise and/or Intranet to employees.~~

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 TEC 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.~~
 - e. ~~Promote load conservation by the public via advertisements that will provide customers with specific information on how to conserve electricity.~~
 - a. ~~Communicate with Governmental Organizations~~Notify officers and key departments (e.g., Customer Service, Fuels Management, and Regulatory) that TEC will contact the public and media, if the total fuel supply decreases to 35 days and a continued downward trend is anticipated, the following additional measures if the fuel supply declines below 35 days will Begin to prepare.
4. Communicate with governmental organizations:
 - a. Notify appropriate agencies.
 5. Wholesale Power Salespower sales and Purchasespurchases:
 - a. Discontinue non-firm sales.
 - b. ~~Contact firm wholesale customers and request voluntary 5% load reduction.~~
 6. Waive/Modify Environmental Restrictionsenvironmental restrictions:

Start procedures to obtain approval of the Florida Governor and the President of the United States to suspend/modify the State Implementation Plan (SIP) requirements of the Clean Air Act (CAA) so as to be able to burn available fuels that may not meet the environmental constraints. See Attachment II, "*Environmental Petition Form*".
 7. Curtail TEC Energy Useenergy use:

Curtail all non-essential uses of electrical energy at all utility owned facilities. This should reduce TEC energy usage by at least 10% at all offices and operation centers. Monitor usage of energy weekly.
 8. Promote Load Conservationload conservation:

a. Voluntary:

- (1) Increase efforts to educate customers in the efficient use of electrical equipment and supplies.
- (2) Inform customers through advertising programs of specific ways to conserve electric energy.
- ~~(3) Request all customers to reduce their energy usage by at least 5%. Provide examples of how this can be achieved.~~

b. Mandatory - No action required.

9. Utilize ~~Load Control~~load control:

Utilize direct load control to reduce system demand on peak periods and optimize the use of TEC's base load generating units by increasing off times of heating and air conditioning ~~and heating~~ to 2 to 4 hours per day. Water heating will be off 4 to 6 hours per day.

10. Curtail ~~Customer Load~~customer load - No action required.

11. Modify ~~System Operations~~system operations:

- a. Maintain 75% of the Operating Margin as non-spinning reserve.
- b. Review the maintenance schedule to optimize use of obtainable fuels.

B. STEP B

If the total fuel supply has decreased to 35 days and a continued downward trend is anticipated, the following additional measures should be implemented.

1. Expedite ~~Fuel Procurement~~fuel procurement:

- a. ~~Oil - Suppliers of oil should be solicited by telephone~~Oil - Contact suppliers to determine types of oil available for purchase as well as quantity and delivery time. Maximize ~~on-site~~onsite inventory.
- b. Coal - Purchase any coal that is available and can be burned in the TEC power plants.

- c. Natural Gas – Procure additional gas supply from TEC suppliers and/or other utilities in the state. Request additional transportation from upstream pipelines and other pipeline customers, if needed, and maximize natural gas storage capacity.
 - d. Develop plans for any physical transfers of fuel that would be practical.
 - e. Continue inventory tracking, forecasting and reporting.
- 1A. Expedite ~~waterborne~~-coal transportation:
- a. Review priorities to assure prompt delivery.
2. Communicate with TEC ~~Employees~~employees:
- a. Issue updated ~~GroupWise~~ and ~~Intranet announcements~~emergency information to employees.
3. Communicate with ~~Public~~public and ~~Media~~media:
- a. Issue news release to the news media, explaining why the fuel shortage has occurred, describing actions TEC is taking to deal with the problem, and providing specific conservation information the news media should convey to customers.
 - b. Provide daily briefings to media on status of emergency.
 - ~~a. Issue updated news statement.~~
 - c. ContinuePromote load conservation by the public via advertisements telling that provide customers with specific information on how to conserve electricity.
4. Communicate with ~~Governmental Organizations~~governmental organizations:
- a. Request legal authority from the proper governmental organization for the actions to be taken in steps 6 -11.
 - b. Update appropriate governmental agencies.

5. Wholesale ~~Power~~ Salespower sales and ~~Purchases~~purchases:
 - a. ~~Contact power suppliers (e.g., cogenerators, utilities and power marketers) and arrange non-emergency power purchases:~~
 - a. Identify to both serve load and reserve available operating reserves, reserving applicable electric transmission service(s) and tagging transactions as necessary.
 - b. Contact all firm wholesale customers and request voluntary 15% load reduction.
6. Waive/Modify ~~Environmental~~ Restrictions ~~environmental restrictions~~ - No new action required.
7. Curtail TEC Energy Use energy use:
 - a. Reduce energy use by at least 20% at all offices and operation centers.
 - b. Discontinue the use of lunchroom kitchens, turn off 25% of exterior lights, and turn off hot water heaters.
 - c. Reset and lock heating and air conditioning thermostats ~~and heating thermostats to 80~~65° and ~~65~~80°, respectively.
8. Promote ~~Load Conservation~~ load conservation:
 - a. Voluntary:
 - (1) Request that residential and commercial customers to cut back on essential energy usage and to adjust thermostat settings 5° down from degrees cooler than normal during a heating season and 5° up from degrees warmer than 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 energy

usage by at least 15%. Provide specific examples of how this can be achieved.

b. **Mandatory:**

- (1) ~~Ban~~Request a governmental ban on all nighttime sporting activities. Close all lighted parks, tennis courts, golf courses, etc. Also, eliminate nonessential outdoor flood lighting and restrict the use of outdoor advertising lighting.

9. Utilize ~~Load Control~~load control:

- a. Increase off times of controlled space heating and air conditioners to 6 hours per day. Water heaters will be off 8 to 10 hours per day.

10. Curtail ~~Customer Load~~customer load - No action required.

11. Modify ~~System Operations~~system operations:

- a. Modify unit dispatch to load units with obtainable fuels ~~(other than No. 2 oil)~~ first, and then load units that burn the fuel in short supply.
- b. Where possible, cycle units fueled by short supply fuel off line and still allow the same demand and energy output.

C. STEP C

When the total fuel supply has decreased to 25 days and a continued downward trend is anticipated, the following additional measures should be implemented:

1. Expedite ~~Fuel Procurement~~fuel procurement:

- a. Oil - Locate and purchase any oil available that would satisfactorily burn in TEC power plants.
- b. Coal - Locate and purchase any usable coal.
- c. Natural gas – ~~Procure~~Continue procuring additional gas supply from TEC suppliers and/or other utilities in the state. ~~Request,~~ requesting additional transportation from upstream pipelines and other

pipeline customers, if needed, and maximizing natural gas storage capacity.

- d. Implement physical transfers of fuel that is necessary and practical.
 - e. Continue inventory tracking, forecasting and reporting.
- 1A. Expedite ~~waterborne~~-coal transportation:
- a. Review priorities to assure prompt delivery.
2. Communicate with TEC ~~Employees~~employees:
- a. Issue updated ~~GroupWise~~ and ~~Intranet announcement~~emergency information to employees.
3. Communicate with ~~Public~~public and ~~Media~~media:
- a. Issue updated news statement.
 - b. Continue advertising conservation.
4. Communicate with ~~Governmental Organizations~~governmental organizations:
- a. Request legal authority from the proper governmental agency for the actions to be taken in steps 6-11.
 - b. Update governmental agencies.
5. Wholesale ~~Power~~ Sales~~power~~ sales and ~~Purchases~~purchases:
- a. Purchase all available non-emergency power, reserve available and operating reserves, reserving applicable electric transmission service(s) and tagging transaction(s) as necessary.
 - b. Contact other utilities regarding potential emergency power purchases.
 - c. Contact all firm wholesale customers and request voluntary 30% load reduction.
 - d. Reduce firm sales to minimums based on individual contracts.

6. Waive/Modify ~~Environmental Restrictions~~environmental restrictions - No new action required.
7. Curtail TEC Energy Useenergy use:
 - a. Discontinue the use of heating and air conditioning units serving large areas with a small number of people (moving the people as necessary).
 - b. Turn off at least 50% of all exterior lights and discontinue the use of Atrium and TECO Hall facilities.
8. Promote ~~Lead Conservation~~load conservation:
 - a. Voluntary:
 - (1) ~~Direct~~Request residential customers ~~to~~ further reduce energy consumption by stopping use of certain electrical services such as air conditioning, heating, hot water heaters, clothes dryers, dishwashers and other convenience devices and equipment.
 - (2) ~~Conditioned~~Request 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~~Request 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 energy usage by at least 30%. Provide specific examples of how this can be achieved.
 - b. Mandatory:

- (1) In commercial establishments, ban all non-essential use of hot water.
 - (2) Elimination of window and display lighting.
 - (3) Ban all heating and air conditioning and heating—during non-use hours and in unoccupied areas of commercial establishments.
9. Utilize ~~Load Control~~load control:
 - a. Increase heating and air conditioning and heating—off time to 6 to 8 hours per day. Water heaters will be off 12 to 14 hours per day.
 10. Curtail ~~Customer Load~~customer load - No action required.
 11. Modify ~~System Operations~~system operations:
 - a. Implement emergency line ratings so as to increase import capability.
 - b. Lower system distribution voltage 2 to 4 percent where it is expedient to do so.

D. STEP D

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

1. Expedite ~~Fuel Procurement~~fuel procurement:
 - a. Investigate all possible fuel sources in search of any usable fuel.
 - b. Continue inventory tracking, forecasting and reporting.
2. Communicate with TEC ~~Employees~~employees:
 - a. Issue ~~GroupWise and Intranet announcement~~. Emphasize updated information to employees emphasizing that most customers will experience rotating blackouts and why.
3. Communicate with ~~Public~~public and ~~Media~~media:

- a. Issue updated news statement explaining that most customers will experience rotating blackouts and why.
4. ~~Communicate~~ with ~~Governmental Organizations~~governmental organizations:
- a. Request legal authority from the proper governmental agencies for the actions to be taken in steps 6-11.
 - b. Update appropriate governmental agencies. In particular, advise them of customer load curtailment and its impact on their activities.
5. ~~Wholesale Power~~Sales~~power sales~~ and ~~Purchases~~purchases:
- a. Purchase all available emergency and non-emergency power, ~~reserve~~available~~reserving applicable~~ electric transmission service(s) and ~~tag~~tagging transaction(s-.) as necessary.
 - b. Request voluntary 50% load reduction from all firm wholesale customers.
 - c. Maintain firm sales minimums and notify firm wholesale customers of impending load curtailment.
6. ~~Waive/Modify Environmental~~Restrictions~~environmental restrictions~~ - No new action required.
7. Curtail TEC ~~Energy Use~~energy use:
- a. Eliminate all but critical heating and air conditioning ~~and heating~~ such as that for microwaves and computer facilities.
8. ~~Promote Load Conservation~~load conservation:
- a. Voluntary:
 - (1) Request all commercial and industrial customers to reduce their energy usage by at least 50%. Provide specific examples of how this can be achieved.
 - b. Mandatory:

- (1) Reduce street and area lighting where possible.
- (2) Discontinue service to interruptible customers as necessary.

9. Utilize ~~Load Control~~load control:

- a. Increase heating and air conditioning ~~and heating~~ off periods to at least 8 to 10 hours per day. Water heaters will be off 16 to 18 hours per day.

10. Curtail ~~Customer Load~~customer load:

The implementation of this step 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.

Whenever possible during such emergencies, the ~~Company~~TEC will give priority for service to critical customers such as hospitals, vital parts of military installations and major airports, major TV stations, and water and sewer facilities where no emergency power source is available.

The TEC ~~Firm~~Load Curtailment Plan will be used in determining which circuits or loads should be curtailed for a ~~Long Term Energy Emergency~~long-term energy emergency. Application of this ~~Plan~~load curtailments will be made by company personnel in the exercise of their judgment according to circumstances existing at the time of the emergency. The selection will be based upon giving minimal disruption of convenience and general social and economic well being of the TEC service area, considering practical implementation procedures and effectiveness as well as community and governmental response. These actions can result in some customer's service being interrupted more than others.

If the energy shortage is long enough and severe enough, it may become necessary to implement additional interruptions of service that result in moderate or even severe disruption to the community.

11. Modify system operations – No new action required.

E. STEP E

When the total fuel supply has decreased to the area of 10 days and a continued downward trend is expected, the following additional measures should be implemented:

1. Expedite ~~Fuel Procurement~~ fuel procurement - No new action required.
2. Communicate with TEC ~~Employees~~ employees:
 - a. Issue updated ~~GroupWise and Intranet announcement~~ emergency information to employee.
3. Communicate with ~~Public~~ public and ~~Media~~ media:
 - a. Issue updated news statement.
4. Communicate with ~~Governmental Organizations~~ governmental organizations:
 - a. Update appropriate governmental agencies.
5. Wholesale ~~Power Sales~~ power sales and ~~Purchases~~ purchases:
 - a. Notify firm wholesale customers of their contribution to firm load curtailment. Firm wholesale customers will be notified of TEC's percentage of firm load curtailment and advised that their firm sales will be reduced by the same percentage.
 - b. Continue purchasing all available power, ~~reserve available~~ reserving applicable electric transmission service(s) and ~~tagging~~ transaction(s) as necessary.
6. Waive/Modify ~~Environmental~~ environmental restrictions - No new action required.
7. Curtail TEC ~~Energy Use~~ energy use - No new action required.
8. Promote ~~Load Conservation~~ load conservation - No new action required.
9. Utilize ~~Load Control~~ load control - No new action required.

10. Curtail ~~Customer Load~~customer load - No new action required.
11. Modify ~~System Operations~~system operations:
 - a. Implement plans to ensure the orderly ~~shut down~~shutdown of all units burning the fuel in short supply in the event the fuel is exhausted.
 - b. Implement plans to ensure power availability to all power plants and fuel handling facilities.

VI. DETAILED DEPARTMENT PLANS FOR EACH STEP OF EMERGENCY

A. FACILITY SERVICES

Upon declaration of a long-term energy emergency, the TEC Emergency Manager will work with Facility Services Department to implement the following:

1. Step A - Curtail all non-essential uses of electric energy at all utility owned facilities.

This should reduce TEC energy usage by at least 10% at all offices and operation centers. Some measures to be taken are:

- a. Turn off all unnecessary lights i.e., work areas, conference rooms and hallways.

Each department head should inform their employees (e.g., via face-to-face meeting/memo or in writing) to conserve electricity within the workplace. This is in addition to informational releases by Corporate Communications.

- b. Refrain from using any piece of equipment requiring electrical power that can be delayed for a long period of time.
- c. The Meter Reading Department will take weekly readings at all TEC facilities and provide information for monitoring to the Facility Service Department.
- d. The Facility Service Department will assist those departments not meeting their reduction goal by making additional recommendations.

- e. The Facility Service Department will provide the Energy Emergency Coordinator the results of the weekly monitoring.
 - f. The Building Service Department will take such actions recommended by the Energy Emergency Coordinator.
2. Step B - Reduce TEC energy usage 20% at all offices and operation centers. Some additional measures to achieve this are:
- a. Discontinue the use of breakroom kitchens i.e., stoves, microwaves and refrigerators.
 - b. Turn off 25% of exterior lights. Each department head and/or building landlord will be responsible for doing this. The Facility Service Department will assist those departments who need help in achieving this goal.
 - c. The Facility Service Department will turn off all hot water heaters.
 - d. The Facility Service Department will reset and lock all heating and air conditioning thermostats to ~~80~~65° and ~~65~~80°, respectively.
3. Step C -
- a. Turn off at least 50% of all exterior lights.
 - b. Cancel the use of the TECO Plaza Hall or Atrium.
 - c. Discontinue the use of heating and air conditioning units servicing large areas with a small number of people. This may involve relocating personnel.
4. Step D - Eliminate all heating and air conditioning ~~and heating~~ except for critical systems such as microwave and computer facilities.

~~B. BUSINESS MARKETING AND SALES~~

B. CUSTOMER SERVICE

Upon declaration of a long-term energy emergency, the ~~Business Marketing and Sales~~Customer Service Department, with the cooperation of the Conservation and Load Management Department, will be responsible for the steps listed below. ~~These goals~~In working to implement these steps, each department will generally be achievable; however, also take into consideration must be given to the general social and economic well being of the TEC service area, as well as community and governmental response.

1. ~~Step A - Business Marketing and Sales~~Customer Service account managers will contact all assigned 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~~provide them information on potential for further curtailment if the fuel supply continues to diminish~~ways to reduce their energy usage.~~
2. ~~Step B - The Business Marketing and Sales~~Customer Service account managers will contact all assigned 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 of 15% of their load until further notice. Also, the account managers will advise them~~customers~~ of the specific conservation measures that should be taken as stated in Section VI. C.
3. ~~Step C - The Business Marketing and Sales~~Customer Service account managers will contact all assigned 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 of 30% of their load until further notice. Also, the account managers will advise them~~customers~~ of the specific conservation measures that should be taken as stated in Section VI. C.
4. ~~Step D - The Business Marketing and Sales~~Customer Service account managers will contact all assigned 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 of 50% of their load until further notice. ~~Also, advise them~~ Account managers advise

interruptible load customers of impending curtailment of service. Commercial and industrial customers are also advised of the specific conservation measures that should be taken as stated in Section VI .C.

5. Step E - The ~~Business Marketing and Sales~~Customer Service account managers will contact all commercial and industrial customers (including interruptible load customers) and advise them of the continued need to maintain all load curtailment action until further notice.

Note: In all steps, the Business Marketing and Sales Department will:

- a. Maintain communications with each interruptible load customer for the purpose of providing status reports on the fuel shortage emergency and answering any questions.
- b. Be responsible for communicating with each interruptible load customer upon restoring partial load to each customer. The restoration process will follow the same steps as curtailment, however, in reverse.

C. ENERGY MANAGEMENT SERVICES

Upon the declaration of a long-term energy emergency, the Energy Management Services Department, with the cooperation of the Business Marketing and Sales Department, will be responsible for the steps listed below. ~~(These goals will generally be achievable; however, considerations must be given to~~ In working to implement these steps, each department will also take into consideration the general social and economic well being of the TEC service area, as well as community and governmental response.

1. Step A - Promote ~~Load Conservation~~load conservation:
 - a. Voluntary ~~Measures~~measures:
 - (1) Inform customers through advertising programs of specific ways to conserve electric energy.
 - (2) Educate customers in the efficient use of electrical equipment and appliances.

- (3) ~~Request all customers to curtail their load by 5%.~~
 - b. ~~Mandatory Measures~~measures - No action required.
- 2. ~~Step B - Promote Load Conservation~~load conservation:
 - a. ~~Voluntary Measures~~measures:
 - (1) Announce to the public by newspaper, television and radio that an electric supply emergency exists and that the Company is requesting them to conserve electricity.
 - (2) Direct commercial customers to temporarily discontinue use of indoor advertising devices, outdoor displays and flood lighting, except those items that which isare essential for safety and security.
 - (3) Request residential and commercial customers to do without all non-essential electrical services, cut back on essential usage and adjust thermostat setting 5° down from a normal setting during a heating season and 5° up from a normal setting during a cooling season.
 - (4) Notify the public daily through news media as to the status of the Company's electric supply emergency and the extent to which the ~~emergency plan~~Fuel Shortage Plan is working.
 - b. ~~Mandatory Measures~~measures:
 - (1) Initiate a governmental ban on all nighttime sporting activities, including closure of all lighted parks, tennis courts, golf courses, etc.
 - (2) Eliminate non-essential outdoor flood lighting, and restrict the use of outdoor advertising lighting.
- 3. ~~Step C - Promote Load Conservation~~load conservation:
 - a. ~~Voluntary Measures~~measures – Residential:
 - (1) Announce to the public that the

Company's STEC's electric energy emergency supply continues to worsen and that it is requesting its customers to control and cease use of certain electric energy consuming devices.

- (2) Direct residential customers to further reduce energy consumption by eliminating use of non-essential electrical services, such as electric hot water heaters, clothes dryers, dishwashers, air conditioning, heating and other convenience devices and equipment.
- (3) Notify customers daily through news media as to the status of the electric supply emergency and the extent to which the ~~plan~~ Fuel Shortage Plan is working.

b. Voluntary Measures: measures – Commercial:

- (1) Direct conditioned offices and buildings other than critical services such as hospitals to lower thermostat settings to 65° during the heating season and raise thermostat to 80° during the cooling season.
- (2) Direct commercial establishments, institutional facilities, public and private schools, office buildings and industrial plants to further reduce their consumption, which may require a reduction in their operating hours.
- (3) Encourage customer use of generation and alternate energy supplies.
- (4) Ask all commercial and industrial customers to curtail their load by 30%.

c. Mandatory Measures: measures – Residential—; No new action required.

d. Mandatory Measures: measures – Commercial:

- (1) Eliminate window and display lighting.
- (2) Ban heating and air conditioning and ~~heating~~ during non-use hours.

- (3) Ban heating and air conditioning and heating in unoccupied areas.
 - (4) Ban all non-essential hot water use. Exceptions: Medical facilities, educational facilities and food establishments.
4. Step D - Promote ~~Lead Conservation~~load conservation:
- a. Voluntary ~~Measures~~measures – Residential:
 - (1) Announce to the public that the electric supply continues to deteriorate and that the ~~Company's~~TEC'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.
 - b. Voluntary ~~Measures~~measures – Commercial:
 - (1) Encourage strict temperature control of HVAC systems.
 - (2) Ask all commercial and industrial customers to curtail their load by 50%.
 - c. Mandatory ~~Measures~~measures – Street and Area Lighting
 - (1) Reduce exterior TEC Street and Area Lighting Systems as practical within prudent guidelines.
5. Step E - Residential/Commercial/Industrial Customer ~~Action~~customer action:
- a. Voluntary ~~Measures~~measures:
 - (1) Continue observance of previous four steps.
 - b. Mandatory ~~Measures~~measures:
 - (1) Begin rotating blackouts.

D. ENVIRONMENTAL AFFAIRS, HEALTH & SAFETY

Upon the declaration of a long-term energy emergency the Environmental Affairs, Health & Safety Department will be responsible for the following actions ~~in support of the Vice President Energy Supply Trading & Services:~~

1. Step A — Initiate procedure to petition the Governor. To obtain the most expeditious relief, so as to be able to burn available fuels having a higher content of sulfur, TEC must petition the Governor of Florida. Following an open public meeting on the action, a Hearing Officer issues a recommended order to the Governor which forms the basis for his decision on whether to petition the President of the United States for authority to suspend/modify the State Implementation Plan (SIP) requirements of the Clean Air Act (CAA). See Attachment II, "*Environmental Petition Form*".

At the public hearing, the following information will most likely be required by TEC:

- a. The nature and extent of the long-term energy emergency;
- b. Current and projected unemployment impacts associated with the long-term energy emergency;
- c. Current and projected loss of necessary energy supplies for residential use associated with the long-term energy emergency;
- d. Alternative strategies including conservation, alternative fuels and power wheeling for emergency and the consequences of these strategies on unemployment and on residential energy supply;
- e. Amount of energy savings expected to result from temporary suspension of portions of the implementation plan.
- f. To the extent possible, pollutant emission levels both before and after the proposed temporary suspension of portions of the implementation plan; and
- g. 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.

2. Provide copies of submitted petition to Florida Reliability Coordinating Council, Florida Public Service Commission, Florida Department of Environmental Protection (FDEP) Tallahassee, FDEP – Tampa, U.S. EPA – Washington, U.S. EPA – Region IV, and Environmental Protection Commission of Hillsborough County.

E. FIRM LOAD CURTAILMENT COORDINATOR

Upon declaration of a long-term energy emergency the Firm Load Curtailment Coordinator will be responsible for the following:

1. During steps A, B and C - Stay knowledgeable of actions taken and results obtained through these steps.
2. During Step D - Interrupt 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 areacustomer region is without electricity for an unduly long period of time.

Whenever possible during ~~such~~energy emergencies, the ~~Company~~TEC will give priority for service to critical customers such as hospitals, emergency shelters, vital parts of military installations and major airports, major TV stations, and water and sewer facilities where no emergency power source is available.

The TEC Firm-Load Curtailment Plan will be used in determining which circuits or loads should be curtailed for a ~~Long-Term Energy Emergency~~long-term energy emergency. Application of this Plancurtailment plan will be made by company operating personnel in the exercise of their judgment according to circumstances existing at the time of the emergency. The selection will be based upon giving minimal disruption of convenience and general social and economic well being of the TEC service area, considering practical implementation procedures and effectiveness as well as community and governmental response. These actions can result in some customers' service being interrupted more than others.

If the energy shortage should be long enough and severe enough, it may become necessary to implement additional interruptions of service that can result in moderate or even severe disruption to the community.

For more detailed information, refer to the TEC Firm-Load Curtailment Handbook Plan.

F. FUELS MANAGEMENT

Upon declaration of a long-term energy emergency the ~~Wholesale Marketing & Fuels~~ Management Department will be responsible for the following:

1. During Steps A-E, Fuels Management will focus on the previously stated activities to expedite the procurement of coal, oil and natural gas. These activities require Fuels Management to:
 - a. Formulate emergency fuel procurement strategies, policies, and guidelines based upon analysis of internal and external variables impacting TEC's fuel operations and update them as emergency conditions change.
 - b. Monitor fuel market conditions and assess future trends. Report market information to management.
 - c. Assure a constant fuel supply to generation plants in accordance with environmental and performance standards as long as possible under the constraints caused by the fuel emergency.
 - d. Investigate alternate sources of supply, in accordance with the procurement arrangements set forth by the emergency strategy, to allow the company to respond to changes in regulation, operating requirements, or market conditions.
 - e. Manage existing fuel inventories in a way that assures the most efficient use of fuels under the constraints caused by the fuel emergency.
 - f. Provide fuel and transportation availability information for planning and control of operations under the fuel emergency conditions.
 - g. ~~The actions taken by TEC (except for the Wholesale Marketing & Fuels Department) under the Long Term Energy Emergency Plan are primarily oriented toward causing demand side reductions in energy use and coordinating the exchange of available energy with other utilities through existing interchange agreements. However, the Wholesale~~

~~Marketing & Fuels Department will investigate the feasibility of physical transfers of fuel. Then, if~~investigate the feasibility of physical transfers of fuel. If during the emergency, a physical transfer of fuel should become practical and 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.

- h. Develop information, reports, and testimony relating to TEC's ~~emergency~~fuel procurement activities for management, customers, during the long-term energy emergency, including documentation of instances where fuel stocks and governmental agencies/or deliveries were shared with other entities.

G. GOVERNMENTAL / REGULATORY AFFAIRS

Upon the declaration of a long-term energy emergency, Governmental Affairs Department and Regulatory Affairs Departments will be responsible for the following actions:

1. Step A
 - a. Coordinate with the Vice President of Corporate Communications those messages communicated to TEC 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.
 - b. Assist Vice President, of Energy Supply Trading & Services with governmental contact to waive/modify environmental restrictions.
 - c. Notify selected public officials of the long-term energy emergency. Relate message developed in subpart 1a above. Advise of TEC emergency plan Fuel Shortage Plan and steps to be taken.
2. Step B
 - a. Contact appropriate city and county official, including

but not limited to school officials, and Tampa Sports Authority to implement Step 7.b., Mandatory Load Conservation, to prohibit nighttime sporting activities and to close lighted parks, tennis courts, golf courses, etc.

b. Update public officials.

3. Step C

a. Contact local state and federal agencies to implement Step 7.b. curtailment of heating and air conditioning ~~and heating~~, non-essential use of hot water and elimination of window and display lighting.

b. Update public officials.

4. Step D

a. Contact city and county to reduce street and area lighting in Section 7.b.

b. Advise public officials of customer load curtailment in Section 9 and its potential impact on their activities.

5. Step E

a. Communicate all notices to governmental organizations.

H. ENERGY DELIVERY TRANSMISSION ENGINEERING & OPERATIONS

Upon the declaration of a long-term energy emergency, the Energy Delivery Transmission Engineering and Construction~~Operations~~ Department will be responsible for the following:

1. Step A

a. No action required

2. Step B

a. Develop emergency line ratings for the lines requested by Grid Operations so as to allow maximum power transfer capability to TEC.

I. ENERGY SUPPLY OPERATIONS

Upon the declaration of a long-term energy emergency, the Energy Supply Operations Department will be responsible for the following actions:

1. Step A

- a. Eliminate or reduce convenience lighting except where required for safe work conditions.
- b. Eliminate unnecessary heating and air conditioning of unoccupied areas.
- c. Review plant operations to determine unnecessary uses of energy, eliminating or reducing uses where practical.
- d. Identify areas where additional reductions can ~~by~~be made if worsening situations dictate.

2. Step B

- a. With critical review of lighting and plant operations, continue elimination and reduction of unnecessary lighting, heating, and air conditioning.
- b. Reset required heating and air conditioning ~~and heating~~—thermostats to 80~~65~~⁶⁵° and 65~~80~~⁸⁰°, respectively.
- c. Discontinue use of lunchroom kitchens.
- d. Turn off water heaters.
- e. Turn off 25% of exterior lights.
- f. Discontinue lighting during daylight hours where possible.

3. Step C

- a. Continued review of energy uses making reductions where possible.
- b. Reduce all lighting, interior and exterior, to the minimum required for safety and business need.

- c. Eliminate all non-essential heating and air conditioning ~~and heating~~ load.
- 4. Step D
 - a. Low load situation 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.
 - b. Review plants for orderly shutdown of units.
- 5. Step E
 - a. Proceed with orderly shutdown of units as fuel supply is exhausted.

J. CORPORATE COMMUNICATIONS

Upon the declaration of a long-term energy emergency, the Corporate Communications Department will be responsible for the following actions:

- 1. Step A
 - a. Communicate with TEC employees.
 - (1) Issue ~~Newsletter~~ an internal newsletter or ~~GroupWise~~ electronic message and/or bulletin that ~~explains~~ explain why the fuel shortage has occurred, provides an overview of the Emergency Fuel Shortage Plan and communicates details.
 - (2) Provide ~~updates~~ updated ~~and~~ emergency information ~~contact~~ as needed ~~via~~ GroupWise and/or Intranet ~~to employees.~~
 - b. Communicate with public and news media.
 - (1) Issue news release to the media to explain why the fuel shortage has occurred, communicate actions TEC is taking to deal with the problem and provide specific conservation information to customers. This information will also be provided to Customer Inquiry representatives.

- (2) Provide daily briefings to media on status of emergency.
- (3) Promote load conservation by the public via advertisements that will provide customers with specific information on how to conserve electricity.

2. Step B

a. Communicate with TEC employees.

- ~~(1) Issue Newsletter or GroupWise bulletin that will update employees on actions taken to date.~~
- (1) Provide updated GroupWise and Intranet communicationsemergency information as needed.

b. Communicate with public and news media.

- (1) Issue news statement about the continued downward trend in fuel supply. Statement will also explain Company actions to solve the problem and will communicate conservation information as outlined in this Step. This information will also be provided to Customer Inquiry representatives.
- (2) Continue advertisements that provide customers with specific information on how to conserve electricity.

3. Step C

a. Communicate with TEC employees.

- ~~(1) Issue Newsletter or GroupWise bulletin to communicate.~~
- (1) Provide updated GroupWise and Intranet communicationsemergency information as needed.

- b. Communicate with public and news media.
 - (1) Issue news statement about the continued downward trend in fuel supply, communicate conservation information and steps company is taking to solve the problem. This information will also be provided to Customer Inquiry representatives.
 - (2) Continue advertising that communicates conservation information.

4. Step D

- a. Communicate with TEC employees.
 - (1) ~~Issue Newsletter or GroupWise bulletin to communicate.~~ Emphasize issue emergency information emphasizing that most customers will experience rotating blackouts and why they will occur.
- b. Communicate with public and news media.
 - (1) Issue news statement about the continued downward trend in fuel supply and need to conserve. As outlined in this Step, announce that most customers will experience rotating blackouts, why, they will occur, and what the company is doing to solve the problem. This information will also be provided to Customer Inquiry representatives.
 - (2) In addition to conservation information, advertising will also explain why rotating blackouts are occurring. Ads will describe that the outages are being distributed evenly among all customers, except for hospitals, fire and police, etc., after consideration of disruption of convenience and general social and economic well-being of the community.

5. Step E

- a. Communicate with TEC employees.
 - (1) ~~Issue Newsletter or GroupWise bulletin to communicate.~~

(1) Provide updated emergency information as needed.

b. Communicate with public and news media.

(1) Issue news statement to explain the continued downward trend in fuel supply. Communicate company actions and the need for customer conservation. This information will also be provided to Customer Inquiry representatives.

(2) Continue advertising that explains why rotating blackouts are occurring. Continue conservation ads.

K. ~~WHOLESALE MARKETING & FUELS~~

Upon declaration of a long-term energy emergency, ~~Wholesale Marketing & Fuels Management Department~~ will be responsible for the following actions:

1. Step A

a. Cut all non-firm sales to wholesale customers.

~~b. Contact all firm wholesale customers, request 5% voluntary load reduction.~~

2. Step B

a. Contact utilities and power marketers regarding firm and non-firm power purchases. Coordinate with Grid Operations and ~~Asset Management~~Operations Planning concerning power purchase needs. Make appropriate power purchases from resources available in the wholesale market. ~~Reserve available,~~ reserving the applicable transmission service(s) to bring those purchase(s) into the TEG system, and tagging the transaction(s), as necessary.

b. Request all firm wholesale customers reduce their load by 15%.

3. Step C

- a. Purchase all available non-emergency power. Coordinate purchases with Grid Operations and ~~Asset Management.~~ Reserve available Operations Planning, reserving the applicable transmission service(s) to bring these purchase(s) into the TEC system, and tagging the transaction(s) as necessary.
 - b. Reduce firm sales to minimums based on individual contracts.
 - c. Contact other utilities regarding potential emergency power purchases.
 - d. Request all firm wholesale customers voluntarily reduce their load by 30%.
4. Step D
- a. Purchase all available emergency and non-emergency power. Coordinate purchases with Grid Operations and ~~Asset Management.~~ Reserve available Operations Planning, reserving the applicable transmission service(s) to bring these purchase(s) into the TEC system, and tagging the transaction(s) as necessary.
 - b. Request voluntary 50% load reduction from firm wholesale customers.
 - c. Maintain firm sales minimums and notify wholesale customers of impending load curtailment.
5. Step E
- a. Notify firm wholesale customers of their contribution to firm load curtailment.
 - b. Continue purchasing all available power. Coordinate purchases with Grid Operations and ~~Asset Management.~~ Operations Planning. Reserve available transmission service(s) to bring those purchase(s) into the TEC system, and tag the transaction(s).

L. GRID OPERATIONS

Upon the declaration of a long-term energy emergency, the Grid Operations Department will be responsible for the following actions:

1. Step A

- a. Utilize ~~Lead Control~~load control - In order to reduce generation peaks and intermediate loads and to conserve energy, increase off time of heating and air conditioning to 2 to 4 hours per day. Water heating will be off 4 to 6 hours per day.
- b. Provide the Energy Emergency Coordinator with a short-term demand and energy forecast during the emergency.
- c. Provide ~~Asset Management~~Operations Planning an hourly load profile for the first 30 days and weekly peaks up to 75 days.
- d. Continue to maintain 75% of operating margin as non-spinning reserve.
- e. Review maintenance schedule to optimize obtainable fuels.

2. Step B

- a. Utilize ~~Lead Control~~load control - Increase off time of controlled heating and air conditioners to 6 hours per day. Water heaters will be shut off 8 to 10 hours per day.
- b. Modify unit dispatch to add units with obtainable fuels (~~other than #2 oil~~) first, and then load units which burn the fuel in short supply.
- c. Identify circuits that need emergency line ratings to allow maximum import and power transfer capability. Request Transmission Engineering & Operations to furnish these ratings.

3. Step C

- a. Utilize ~~Lead Control~~load control - Increase heating and air conditioning off time to 6 to 8 hours per day. Water heaters will be off 12 to 14 hours per day.
- b. Implement emergency line ratings so as to increase import capability.
- c. Lower system distribution voltage 2 to 4 percent where it is expedient to do so.

4. Step D

- a. Utilize ~~Load Control~~load control - Further increase heating and air conditioning off time to 8 to 10 hours per day. Water heaters will be off 16 to 18 hours per day.
- b. Curtail interruptible load customers as necessary.
- c. Notify Firm Load Curtailment Coordinator to begin implementation of firm load curtailment.
- d. Implement plans to ensure the orderly shutdown of all units burning the fuel in short supply in the event fuel is exhausted.
- e. Implement plans to ensure power availability to all power plants and fuel handling facilities.

5. Step E

- a. Continue as Step D.

~~M. ASSET MANAGEMENT~~

M. OPERATIONS PLANNING

Upon the declaration of a long-term energy emergency, the ~~Asset Management~~Operations Planning Department will be responsible for the following actions:

1. Step A

- a. Run the "~~Commit~~"Program~~resource commitment program~~ and provide the ~~amount of each type of projected fuel to be used~~burn (by fuel type) to the ~~Wholesale Marketing & Fuels~~ Management Department. 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.
- b. Review maintenance schedule to optimize obtainable fuels.

2. Step B
 - a. Modify unit dispatch to add units with obtainable fuels (~~other than #2 oil~~) first, and then load units which burn the fuel in short supply.
3. Step C
 - a. Continue as Step B.
4. Step D
 - a. Continue as Step C.
5. Step E
 - a. Continue as Step D.

Attachment I

LONG-TERM ENERGY EMERGENCY PLAN SUMMARY

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
1. Expedite Fuel:					
Oil	Purchase any proper oil.	Determine types of oil available.	Purchase any satisfactory burnable oil.	Search for and purchase <u>any</u> usable fuel.	
Coal	Purchase any proper coal. Expedite coal transportation.	Purchase any satisfactory burnable coal. Plan fuel transfers.			
Natural Gas	Purchase additional gas and transportation.	Purchase additional gas and transportation. <u>Maximize gas storage.</u>	Purchase additional gas and transportation.	Purchase additional gas and transportation.	Purchase additional gas and transportation.
2. Communicate With TEC Employees	Issue Groupwise and Intranet announcements. Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.				
3. Communicate With Public and Media	Issue news release. Provide daily status briefing. Promote load conservation. Notify officers and key departments about plans to contact the public and				
		<u>Issue news release. Provide daily status briefing. Promote load conservation.</u>			

Attachment I

LONG-TERM ENERGY EMERGENCY PLAN SUMMARY

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
	<u>media, if the total fuel supply continues to decrease in Step B.</u>				
4. Communicate With Governmental Organizations	Coordinate with Corporate Communications in notifying appropriate agencies. Request Governor to waive regulations.	Request legal authority for actions such as, waive/modify environmental restrictions, to be taken in this step. Update governmental agencies.			
5. Wholesale Market Power Sales and Purchases	Stop non-firm sales to wholesale customers. Request voluntary 5% MWH reduction from firm wholesale customers.	Arrange non-emergency power purchases, reserve transmission services and tag transaction(s). Request voluntary 15% MWH reduction from firm wholesale customers.	Reduce firm sales to a minimum. Purchase all available non-emergency power, reserve available transmission service, and tag transaction(s). Request 30% voluntary MWH reduction from firm wholesale customers.	Reduce firm sales to a minimum. Purchase all available emergency and non-emergency power, reserve available transmission service, and tag transaction(s). Request voluntary 50% MWH reduction from firm wholesale customers.	Notify firm wholesale customers of the percentage of firm load curtailment and advise that their firm sales will be reduced by the same percentage. Continue purchasing all available power.
6. Waive/Modify Environmental Restrictions	Requests Request to Governor to suspend SIP of CAA.				
7. Curtail TEC Energy	Curtail non-essential				

Attachment I

LONG-TERM ENERGY EMERGENCY PLAN SUMMARY

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
Use:	energy uses.				
Offices and Operation Center	Reduce MWH's by 10%. Monitor usage weekly.	Reduce MWH's BY 20%. Set thermostats to 65° for heating and -to 80° for cooling. Cut off 25% of exterior lights. Cut off hot water heaters.	Further reduce A/C. Cut off 50% of exterior lights. Cancel use of TECO Plaza Halls or atrium.	Cut off all but critical A/C and heating.	
8. Promote Load Conservation: Voluntary	Request 5% MWH reduction. Educate customers. Advertise conservation.	Request 15% MWH reduction. <u>Adjust thermostats – thermostat settings +/- 5%°, depending on the season.</u> Cut out indoor & outdoor advertising lights. Cut out flood lighting as possible.	Commercial & Industrial: Request 30% MWH reduction. Set thermostats to 65° to 80°. Encourage alternate energy usage. Reduce operating hours if necessary. Residential: Stop using A/C, heating, H.W.H., dryers, dish washers, etc.	Commercial & Industrial: Request 50% KWH reduction.	
Mandatory		Ban night sports. Close lighted parks, etc. Ban non-essential flood and outdoor advertising lighting.	Ban displays & window lighting. Ban in commercial establishments: a) A/C and heating during nonuse hours and in unoccupied areas	Reduce street and area lighting where possible. <u>Discontinue service to interruptible customers as necessary.</u>	

Attachment I

LONG-TERM ENERGY EMERGENCY PLAN SUMMARY

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
			b) Non-essential use of hot water.		
9. Utilize Load Control	Heat & A/C off 2-4 hrs. W.H. off 4-6 hrs.	Heat & A/C off 6 hrs. W.H. off 8-10 hrs.	Heat & A/C off 6-8 hrs. W.H. off 12-14 hrs.	Heat & A/C off 8-10 hrs. W.H. off 16-18 hrs.	
10. Curtail Customer Load				<u>Implement TEC Firm-Load Curtailment Plan</u>	<u>Implement "Load Curtailment Plan."</u>
11. Modify System Operations	Review maintenance schedule Place 75% of Operating Margin on non-spin reserve.	Modify unit dispatch. Cycle units off-line.	Use emergency line ratings. Reduce voltage 2 to 4%.		Implement orderly shutdown of units as required. Ensure power available to plants.

*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.

**ATTACHMENT II
ENVIRONMENTAL PETITION FORM**

**BEFORE THE STATE OF FLORIDA
OFFICE OF GOVERNOR**

In The Matter of:)
Petition for Declaration)
of Energy Emergency and)
Other Relief;)

TAMPA ELECTRIC COMPANY

Petitioner)

Petitioner, TAMPA ELECTRIC COMPANY, pursuant to Chapters 120, 377 and 252, Florida Statutes, and Section 110(f) of the Clean Air Act, 42 U.S.C. § 7401 et seq., hereby requests that the Governor of the State of Florida petition the President of the United States to determine that a national or regional energy emergency exists of such severity that (1) a temporary suspension of portions of Chapter 62, Florida Administrative Code (FAC) is necessary and (2) other means of responding to the energy emergency may be inadequate. In support of this request, Petitioner states:

IDENTIFICATION OF PARTIES

1. The name and address of Petitioner is TAMPA ELECTRIC COMPANY, Post Office, Box 111, Tampa, Florida 33601.
2. (Identify any other known parties).

BACKGROUND

3. Petitioner is the owner and operator of various steam electric power plants located in Hillsborough County, Florida, that are subject to regulation by the Florida Department of Environmental Protection (FDEP) and the Environmental Protection Commission of Hillsborough County (EPCHC) and the provisions of the Florida State Implementation Plan (SIP) contained in Chapters 62-204,210,212,213,214,296, and 297, FAC, regulating sources of air pollution.
4. Electric generating units owned by Petitioner located at the Francis J. Gannon Generating Station and Big Bend Generating Station in Hillsborough County, Florida, currently utilize coal as a primary energy source. Additional electric generating unites owned by Petitioner located at the Big Bend Generating Station in Hillsborough County, Florida, currently utilize oil as a primary energy source. Electric generating units owned by Petitioner located at the Bayside Power Station in Hillsborough County, Florida, currently utilize natural gas as a primary energy

source. Electric generating units owned by Petitioner located at the Polk Power Station in Polk County, Florida, currently utilize gasified coal and natural gas as primary energy sources. Electric generating units owned by Petitioner located at the Phillips Power Station in Highland County, Florida currently utilize oil as a primary energy source.

5. Petitioner currently serves approximately _____ residential customers and a substantial number of industrial customers located both in Hillsborough County and portions of Pasco, Pinellas and Polk County, Florida.

FACTS SUPPORTING RELIEF

(Insert here the facts which support the Petition for Declaration of an Energy Emergency. The following is an example of how those facts could be presented).

6. Petitioner obtains its _____ sulfur content fuel supplies from _____. Petitioner has been advised that due to (insert here reasons for supply unavailability) a continuing supply of _____ sulfur content fuels will not be available and Petitioner will be required to supply its current fuel needs with fuel containing up to _____ sulfur content.
7. Petitioner's total net generating capability is _____ megawatts. Approximately _____ percent of that total is produced by _____ generating units which presently must burn _____ sulfur content fuel or below. On _____, 20____, Petitioner had approximately _____ (barrels or tons) of _____ sulfur content fuel on hand. Projected burn rates predict that this inventory will be consumed within _____ days. Should Petitioner be unable to continue to replenish its _____ sulfur content fuel inventories, major curtailments of electric service would be required in the absence of permission to burn higher sulfur content fuel.
8. A low sulfur fuel shortage could significantly impact residential energy use of its _____ residential customers and its industrial customers on interruptible service arrangements.
9. Petitioner's ability to mitigate the impacts of a low sulfur fuel curtailment in the near term is limited by (insert here any discussion of seasonally high loads expected for the particular month and the inability to burn natural gas). It is not presently possible to determine the extent to which the expected shortfall can be mitigated through purchases of power and conservation.
10. Air quality modeling results for the Petitioner's units presently burning low sulfur fuels show that _____ percent sulfur content fuel could be burned at the _____ Stations without exceeding the State of Florida Ambient Air Quality Standards and the National Ambient Air Quality Standards. Increases in particulate matter emissions from the present limits of _____ pounds per million BTU's of heat

input would not cause significant impact levels for total suspended particulate matter to be exceeded in the Hillsborough County air quality maintenance.

REQUEST FOR RELIEF

Based upon the foregoing, Petitioner respectfully requests that the Governor:

- a) immediately designate a Hearing Officer to conduct any necessary informal public hearings;
- b) issue an Executive Order declaring the existence of an energy emergency pursuant to Chapters 377 and 252, Florida Statutes, and suspending the procedural requirements of Chapter 120, Florida Statutes and regulations thereunder, as they may apply to any of his further actions in the energy emergency;
- c) petition the President of the United States to determine that the shortage of _____ fuel has created a regional or national energy emergency and to authorize the Governor to suspend, as a matter of federal law, rules governing _____ emissions of the State Implementation Plan as may be necessary to allow _____ fired power plants owned by Petitioner to burn available fuels; and
- d) upon a subsequent satisfactory showing, suspend, as a matter of state and federal law, the applicability of any rules governing _____ emissions in Chapter 62-296, FAC, or any other rules, ordinances, or regulations of the State of Florida or its political subdivisions, as may be necessary to permit _____ fired electric power plants owned by Petitioner to burn available fuels.

TAMPA ELECTRIC COMPANY

By: _____