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April 6, 2011

COMMISSION  
CLERK

**BY HAND DELIVERY**

Ms. Ann Cole, Director  
Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Docket No. 100304-EU

Dear Ms. Cole:

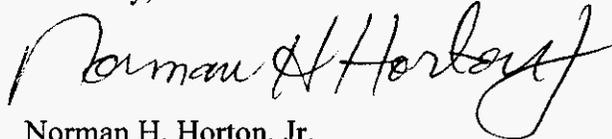
Enclosed for filing on behalf of Choctawhatchee Electric Cooperative, Inc. is an original fifteen copies of the following documents in the above referenced docket:

1. Supplemental Direct Testimony of Jonathan Matthew Avery; and
2. Direct Testimony and Exhibits of Jacquelyn Nicole Sullivan.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance.

Sincerely,



Norman H. Horton, Jr.

NHH/amb  
Enclosure

cc: Ms. Leigh V. Grantham  
Parties of Record

DOCUMENT NUMBER - DATE  
02307 APR -6  
FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE

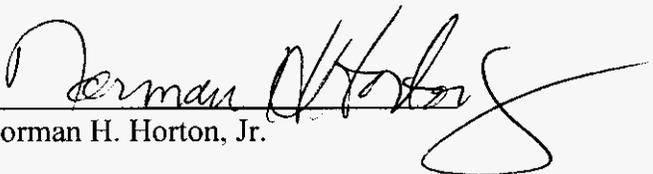
I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail and/or U. S. Mail this 6<sup>th</sup> day of April, 2011.

Ralph Jaeger, Esq.  
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Ms. Leigh V. Grantham  
Choctawhatchee Electric Cooperative, Inc.  
P.O. Box 512  
DeFuniak Springs, FL 32435-0512

  
Norman H. Horton, Jr.

DOCKET 100304-EU

SUPPLEMENTAL DIRECT TESTIMONY OF

JONATHAN MATTHEW AVERY

ON BEHALF OF CHOCTAWHATCHEE ELECTRIC COOPERATIVE, INC.

1 Q. PLEASE STATE YOUR NAME AND ADDRESS.

2 A. Jonathan Matthew Avery and my business address is 1350 West Baldwin  
3 Avenue, DeFuniak Springs, FL 32435.

4 Q. HAVE YOU PREFILED DIRECT TESTIMONY IN THIS DOCKET?

5 A. Yes.

6 Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT  
7 TESTIMONY?

8 A. The purpose of this testimony is to revise my prefiled direct testimony to  
9 reflect changes made necessary because parts of that prefiled direct were  
10 based on incorrect information.

11 Q. PLEASE EXPLAIN THE INCORRECT INFORMATION AND HOW  
12 IT WAS DISCOVERED.

13 A. Initially we projected a load of 3700 kW associated with the Freedom Walk  
14 development based on what we considered reasonable estimates based on the  
15 information we had at the time. I still think this is a reasonable assumption  
16 but when questions were raised about the load forecast I recalculated our  
17 projections with addition of more load and used that updated projection in my  
18 direct testimony.

COM 5  
APA \_\_\_\_\_  
ECR 1  
GCL 8  
RAD \_\_\_\_\_  
SSC \_\_\_\_\_  
ADM \_\_\_\_\_  
OPC \_\_\_\_\_  
CLK F.R.P.R.

1 **Q. WHAT WAS THE REVISED LOAD PROJECTION?**

2 A. 4700 kW upon full build out.

3 **Q. WHAT DID YOU DO WHEN YOU UPDATED YOUR**  
4 **PROJECTIONS?**

5 A. We asked our consulting engineers, Patterson & Dewar Engineers, Inc. to run  
6 a study similar to the one they performed for the 3700 kW load but using 4700  
7 kW. They did this and my testimony was prepared using the results of that  
8 study.

9 **Q. WHAT HAS CHANGED THAT NOW REQUIRES YOU TO FILE**  
10 **THIS SUPPLEMENTAL TESTIMONY?**

11 A. One of the components used in the study was that the Auburn substation was  
12 rated at 20 MVA and we subsequently learned the it was actually rated at 25  
13 MVA.

14 **Q. IS THAT SIGNIFICANT?**

15 A. It is.

16 **Q. HOW WAS THIS DISCOVERED?**

17 A. In preparing rebuttal testimony and for depositions I was in contact with  
18 Power South our generating and transmission provider and owner of the  
19 Auburn substation, and it came out as a result of conversation with them.

20 **Q. DO YOU KNOW HOW THIS MISTAKE HAPPENED?**

21 A. No. I do not but shortly after we learned of it we notified Gulf Power and our  
22 consulting engineers.

1 **Q. HAVE YOU VERIFIED THAT THE AUBURN SUBSTATION IS**  
2 **RATED AT 25 MVA?**

3 A. I have and a picture of the plat is attached as Exhibit JMA-7.

4 **Q. WHAT REVISIONS TO YOUR TESTIMONY ARE REQUIRED AS A**  
5 **RESULT OF THIS DISCOVERY?**

6 A. On page 4, line 22 and page 5, line 1, I said the maximum planning load the  
7 Auburn substation can currently handle was 20 MVA during the summer and  
8 24.8 MVA during the winter. It is actually 25 MVA in the summer and 31  
9 MVA in the winter.

10 Beginning on page 7, line 23, and continuing through line 15 on page  
11 8, I discuss what upgrades would need to be performed to serve Freedom  
12 Walk if the load is 4700 kW. Those lines should be stricken and the following  
13 inserted:

- 14 1) Complete CWP project 300-RU10-01 in 2011 instead of  
15 2014.
- 16 2) Complete CWP capacitor placement recommendations for  
17 Auburn circuit 03 in 2011.
- 18 3) On Auburn circuit 03, switch the single phase tap at Adams  
19 Rd & Hwy 85 to Auburn circuit 02.
- 20 4) The lowside buswork and recloser at the Auburn Substation  
21 should be monitored as load increases and at some point in the  
22 future it will be necessary to evaluate ways to reduce the  
23 loading on the lowside bus and recloser for Auburn circuit 03

1                   should Freedom Walk development reach the estimated load of  
2                   4,700 kW.

3                   5) Additional capacitors and/or voltage regulators may need to  
4                   be added, but can be evaluated later.

5                   Those additional steps are not unusual in the normal pattern of  
6                   planned system upgrades.

7                   On page 10, line 1; I say the Auburn substation potentially has to be upgraded.

8                   The substation will not need to be upgraded given the substation transformer  
9                   is a 25 MVA unit.

10    **Q.   DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT**  
11           **TESTIMONY?**

12    A.   Yes.