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COMMISSION
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April 27, 2011

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

Dear Ms. Cole:

RE: Docket No. 100304-EU

Enclosed for official filing are an original and fifteen copies of Gulf Power Company's Rebuttal Testimony and Exhibits of W. Mike Feazell and Theodore S. Spangenberg, Jr. in the above referenced docket.

Sincerely,

A handwritten signature in cursive script that reads "Terry A. Davis".

nbn

Enclosure

COM 5
APA
ECR 1
GCL 7
RAD
SSC
ADM
OPC
CLK CLRPR

cc: Beggs & Lane
Jeffrey A. Stone

DOCUMENT NUMBER-DATE
02900 APR 27 =
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Territorial Dispute Between)
Choctawhatchee Electric Cooperative, Inc.)
and Gulf Power Company)
_____)

Docket No. 100304-EU

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 27th day of April, 2011, on the following:

Ms. LEIGH V. GRANTHAM
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Attorneys for Gulf Power Company

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 100304-EU

REBUTTAL TESTIMONY AND EXHIBIT
OF
W. MIKE FEAZELL

COM 5
APA —
ECR —
GCL 1
RAD —
SSC —
ADM —
OPC —
CLK CFBAR



DOCUMENT NUMBER-DATE

02900 APR 27 =

FPSC-COMMISSION CLERK

1 GULF POWER COMPANY

2 Before the Florida Public Service Commission
3 Rebuttal Testimony of
4 W. Mike Feazell
5 Docket No. 100304-EU
6 Date of Filing: April 27, 2011

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

8 A. My name is W. Mike Feazell. My business address is 140 Hollywood
9 Boulevard, Fort Walton Beach, Florida, 32548. I am the District
10 Operations Manager in Fort Walton Beach for Gulf Power Company.

11 Q. Are you the same W. Mike Feazell that provided direct testimony on Gulf
12 Power's behalf in this docket?

13 A. Yes.

14
15 Q. Mr. Feazell, what is the purpose of your testimony?

16 A. My testimony is in rebuttal of Choctawhatchee Electric Cooperative, Inc.
17 ("CHELCO") witness Matthew Avery. Among other things, I will address
18 assertions that CHELCO will be required to remove some existing facilities
19 if Gulf Power is awarded the right to serve Freedom Walk; that CHELCO
20 will serve Freedom Walk using a "loop fed" system; that Gulf may need to
21 obtain additional franchise or easement rights to extend service to the
22 development; and that CHELCO is able to serve the Freedom Walk
23 development using its existing facilities and previously planned upgrades.

24

25

1 Q. Have you prepared an exhibit that contains information to which you will
2 refer in your testimony?

3 A. Yes. I have one exhibit which was prepared under my supervision and
4 direction.

5 Counsel: We ask that Mr. Feazell's Exhibit (WMF-5), be marked
6 as Exhibit No. ____.

7

8 Q. At page 3, lines 13-16, Mr. Avery testifies that CHELCO would be "forced
9 to remove" its existing facilities and "have our members taken from us" if
10 Gulf Power is awarded the right to serve the Freedom Walk development.
11 Do you take issue with this statement?

12 A. Yes. The facilities and members to which Mr. Avery is referring are
13 located on an approximately 5-acre portion of property which borders the
14 northern boundary of the development. This property is located outside of
15 the city of Crestview's corporate limits and, as discussed in more detail by
16 Witness Spangenberg in his rebuttal testimony, is not within the "disputed
17 area" as framed by CHELCO's own petition. However, even if these out-
18 parcels were included within the development, it is misleading to suggest
19 that removal of CHELCO's facilities would be necessitated if Gulf Power
20 prevails in this dispute. In fact, if the out-parcels were included in the
21 development, the facilities would be removed even if CHELCO is awarded
22 the right to serve the development. These are overhead, single phase
23 facilities and are not consistent with the developer's plans to utilize
24 underground service within the development.

25

1 Q. Is the same true for the single phase line depicted in Exhibit JMA-3 and
2 discussed by Mr. Avery at page 11, lines 20-21?

3 A. Yes. The single phase line depicted in JMA-3 will need to be removed
4 regardless of which utility serves Freedom Walk. This line was used to
5 serve a single family residence which is no longer in existence. Due to its
6 location and the fact that it is an overhead line, this line will need to be
7 removed.

8

9 Q. At page 9, line 1 of his testimony, Mr. Avery notes that CHELCO "will be
10 using a loop fed system" to serve the development. Is the Auburn Circuit
11 03 a "loop fed system?"

12 A. I would not characterize Auburn Circuit 03 as "loop fed." CHELCO's
13 Auburn Circuit 03 is not looped to another feeder out of the Auburn
14 substation or any other substation. Moreover, there are no tie points with
15 any other circuit out of the Auburn substation. Auburn Circuit 03 is in fact
16 radial for approximately the first two miles from the substation. As a
17 result, any faults or failures on this radial portion of the circuit will affect all
18 existing load along with the full 4,700 kW associated with Freedom Walk.

19

20 Q. Mr. Avery states in his direct testimony, page 9, lines 5-9, that a "loop fed
21 system" will provide greater system reliability than a radial system. Do
22 you agree with this assertion?

23 A. Only in part. I concur that a properly designed and fully-looped feeder
24 can, in some instances, provide greater reliability than a radial system.
25 However, to make that statement you have to be applying it to the same

1 circuit. It is improper to categorically claim greater reliability of one circuit
2 over an entirely different circuit simply because of a looped design.
3 Further, as I indicated earlier, the Auburn Circuit 03 which CHELCO would
4 use to serve Freedom Walk is not a true "loop system."
5

6 Q. At page 9, lines 12-15, CHELCO notes that it would not need to acquire
7 any additional easements or franchises to reach the Freedom Walk
8 development. Would Gulf Power need to acquire any additional
9 easements or franchises to extend its existing feeder on Old Bethel Road
10 to the development?

11 A. No. Gulf Power has an existing franchise agreement with the city of
12 Crestview. The line extension to the point of entrance to the development
13 lies within the rights of way of the city of Crestview. The easements
14 needed to supply service inside the Freedom Walk development would
15 have to be acquired by either utility.
16

17 Q. Have you reviewed Mr. Avery's supplemental direct testimony?

18 A. Yes, I have.
19

20 Q. Do you take issue with any of the assertions contained in that testimony?

21 A. Yes, I do. Specifically, I take issue with Mr. Avery's characterization at
22 page 3, lines 20-23 and page 4, lines 1-2 of the actions that will need to be
23 taken to address the low-side buswork and recloser at the Auburn
24 substation.
25

1 Mr. Avery states that the low-side buswork and recloser at the
2 Auburn substation should be “monitored” as load increases and that, at
3 some point, it will be necessary to evaluate ways to reduce the loading on
4 the low-side bus and recloser for Auburn Circuit 03. At no point in his
5 testimony does Mr. Avery acknowledge that significant upgrades to these
6 facilities will be needed in order for CHELCO to provide adequate and
7 reliable service to Freedom Walk.
8

9 Q. Why do you believe that these facilities will need to be upgraded in order
10 for CHELCO to provide adequate and reliable service to Freedom Walk?

11 A. CHELCO’s own consulting expert, Ms. Sullivan, clearly states in her
12 supplemental direct testimony, on page 2, beginning on line 8, that the
13 Auburn Circuit 03 recloser and low-side buswork “would approach their
14 maximum rating of 630 A and 600 A, respectively, in 2014. For CHELCO
15 to serve the 4700 kW load in 2014, this would need to be addressed.” On
16 lines 19-23 of page 3 and lines 1-2 of page 4, Ms. Sullivan provides two
17 options for CHELCO to address the loading problems with these facilities.

18 One option is to upgrade the low-side buswork and circuit recloser
19 for Auburn Circuit 03. The second option is to build approximately 1.5
20 miles of double circuit from the Auburn substation south to the intersection
21 of Hwy 85 & Houston Lane and transfer some of the load from the Auburn
22 Circuit 03 to the new circuit.
23
24
25

1 Q. Are you suggesting that there is an inconsistency between Mr. Avery and
2 Ms. Sullivan's testimony?

3 A. Yes, I am. Ms. Sullivan was correct that CHELCO needs to address the
4 loading issues on the low-side buswork and recloser. Mr. Avery appears
5 content to simply "monitor" the situation.

6

7 Q. Why is it unacceptable to simply "monitor" the situation?

8 A. When Freedom Walk's full load of 4700 kW is present on CHELCO's
9 system, as early as 2014 the loading on the recloser and low-side
10 buswork would reach 93% and 97%, respectively, of the operational rating
11 of the equipment. Additionally, the low-side bank breaker and its bypass
12 switches would reach 97% of its ratings. CHELCO's own System Design
13 and Operational Criteria ("SDOC") states that this equipment should not
14 be operated above 100% of its ratings. It would not be prudent
15 engineering practice to merely "monitor" this condition. At 97% of
16 operational rating, common weather events could easily cause a three
17 percent or greater shift in loading, thus overloading the low-side bank
18 breaker and bypass switches, as well as the recloser bypass switches,
19 beyond their ratings. Witness Spangenberg speaks more fully to this in
20 his rebuttal testimony.

21

22 Q. Would similar concerns apply to the recloser?

23 A. Yes. An operating margin of only seven percent is clearly inadequate due
24 simply to the probability of peak weather events.

25

1 Ms. Sullivan indicates an understanding of the ramifications of
2 having no plan in place and of operating substation equipment this close
3 to overload conditions.

4

5 Q. Mr. Feazell, what upgrades or replacements would be necessary to
6 CHELCO'S Auburn substation for CHELCO to safely and reliably serve
7 the Freedom Walk development?

8 A. In order to remediate the substation loading problems that Ms. Sullivan
9 highlights, CHELCO would, at a minimum, need to perform the following
10 upgrades:

- 11 1. Change out the Auburn substation low-side Bank Breaker;
- 12 2. Change out the Auburn Bank Breaker bypass switches; and
- 13 3. Change out the Auburn Circuit 03 recloser & bypass switches.

14

15 Q. What distribution circuit upgrades do you believe would be needed by
16 CHELCO in order to adequately and reliably serve Freedom Walk given its
17 normal load growth in the general area?

18 A. In his supplemental direct testimony Mr. Avery (page 3, line 14 and
19 following) lists several upgrades that would be needed. I concur that his
20 items (1), (2) and (3) would all be needed in order for CHELCO to
21 adequately and reliably serve Freedom Walk. Further, due to the reactive
22 load that would be associated with Freedom Walk, his item (5) would most
23 certainly be needed as well.

24 However, I take issue with Mr. Avery's assertion that item (1), the
25 reconductor of a 1.3 mile section of 394 AAAC feeder, would be

1 performed by CHELCO in 2014, even if CHELCO is not awarded the right
2 to serve Freedom Walk, as it was already in CHELCO's Construction
3 Work Plan. That need is marginal, as it is based on only a 63% loading of
4 that conductor section. Further, that need is speculative as it is based on
5 CHELCO's projections for normal load growth absent Freedom Walk.
6 Witness Spangenberg provides a succinct explanation of why that
7 associated load growth is improbable if Gulf prevails and serves the
8 Freedom Walk development.

9
10 Q. Have you tabulated all the needed work by CHELCO including the
11 associated cost estimates?

12 A. Yes. My Exhibit WMF-5 to this rebuttal testimony is a tabulation of both
13 the needed substation improvements and distribution improvements
14 should CHELCO serve the Freedom Walk development. The total
15 estimated cost for these improvements is over \$377,000. This is a
16 conservative estimate of what CHELCO would have to spend to provide
17 service to the development, but would otherwise have no need to spend.

18
19 Q. Did you include Ms. Sullivan's second option involving the construction of
20 a double circuit to relieve the Circuit 03 recloser and bypass switch
21 loading in your exhibit?

22 A. No, I did not. Because of the complexity of estimating the cost for that
23 option and my general evaluation of both options, I did not include it. I
24 believe that the cost to build the double circuit for 1.5 miles would result in

1 a higher cost than the first option of substation upgrades. I attempted to
2 keep all of my cost estimates as conservative as practical.

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Q. Does this conclude your testimony?
A. Yes. This concludes my testimony.

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

Docket No. 100304-EU

BEFORE me, the undersigned authority, personally appeared W. Mike Feazell, who being first duly sworn, deposes and says that he is the District Operations Manager for Gulf Power Company, a Florida corporation, that the foregoing is true and correct to the best of his knowledge, information and belief. He is personally known to me.



W. Mike Feazell
District Operations Manager

Sworn to and subscribed before me
this 20th day of April, 2011.



Notary Public, State of Florida at Large

(SEAL)



Upgrades needed for CHELCO to provide adequate and reliable service to Freedom Walk development while continuing to serve normal load growth in the general area

Line No.	Components	Estimated Cost
1	Auburn sub Low-side Bank Breaker	\$26,000
2	Auburn sub Bank Breaker bypass switches	\$3,700
3	Auburn Circuit 03 recloser & bypass switches	\$41,081
4	Feeder switched capacitor addition	\$10,137
5	Feeder fixed capacitor addition	\$3,663
6	Feeder voltage regulator addition	\$30,283
7	394 AAAC conductor upgrade	\$227,404
8	750 mcm UG upgrade	\$35,518
9	TOTAL	<hr/> \$377,786
