

Eric Fryson

From: Bachmeier, Richard D [BachmeierRD@gru.com]
Sent: Tuesday, January 31, 2012 11:27 AM
To: Filings@psc.state.fl.us
Cc: Alford, Karen C; McNeill, Shayla L; Bachmeier, Richard D
Subject: Electronic Filing: Docket 110316-EM_REVISED
Attachments: GRU Long Term Energy Emergency Plan Jan2012_FINAL2.pdf

Ms. Cole,

Attached for filing in FPSC Docket 110316-EM is GRU's revised Long-Term Energy Emergency Plan along with a cover letter. The cover letter and revised Plan are combined into one Adobe .pdf file.

Please contact me if you have any questions.

Thank you,

Richard Bachmeier

Electric Reliability Compliance Officer
Gainesville Regional Utilities
P.O. Box 147117, Station A136
Gainesville, FL 32614-7117
Bus. (352) 393-1284
Cell. (352) 642-3841
Fax. (352) 334-3151

DOCUMENT NUMBER-DATE

00618 JAN 31 2012

FPSC-COMMISSION CLERK

1/31/2012



January 31, 2012

Ann Cole, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket 110316-EM

Dear Ms. Cole:

Pursuant to Rule 25-6.0185 FAC, Gainesville Regional Utilities (GRU) has reviewed and revised its Long-Term Energy Emergency Plan. Attached is GRU's final revised version of its Long-Term Energy Emergency Plan.

If you have any questions with regard to this filing, please contact me.

Sincerely,

s/ Richard D. Bachmeier

Richard D. Bachmeier
Electric Reliability Compliance Officer
(352) 323-1284
bachmeierrd@gru.com

cc: Karen C. Alford
Shayla L. McNeil

DOCUMENT NUMBER-DATE

GAINESVILLE REGIONAL UTILITIES
LONG-TERM ENERGY EMERGENCY PLAN
FUEL SUPPLY SHORTAGE

DECEMBER 1982

REVISED:

OCTOBER 1990

JUNE 2000

March 2003

January 18, 2012 KVCA: *Updated plan to reflect latest changes in departmental responsibilities and operations.*

GAINESVILLE REGIONAL UTILITIES

LONG-TERM EMERGENCY PLAN

FUEL SUPPLY SHORTAGE

TABLE OF CONTENTS

TABLE OF CONTENTS-----

ORGANIZATIONAL STRUCTURE-----3

INTRODUCTION-----4

PURPOSE-----4

DEFINITION-----4

OVERVIEW-----5

FUEL SUPPLY ALERT-----6

FUEL SUPPLY EMERGENCY-----7

 FUEL SUPPLY EMERGENCY SUMMARY-----8

 STEP A-----9

 STEP B-----9

 STEP C-----10

 STEP D-----11

 STEP E-----11

APPENDICES

1 COLLATERAL PLANS-----12

2 COMMUNICATIONS WITH FRCC-----13

3 ENERGY SUPPLY-----14

4 POWER PRODUCTION-----18

5 ENERGY SUPPLY/ENVIRONMENTAL/LEGAL-----19

6 GUIDELINES FOR DEFINING ESSENTIAL SERVICES-----20

7 EXISTING GENERATION FACILITIES-----21

FUEL SUPPLY EMERGENCY
ORGANIZATIONAL STRUCTURE

GENERAL MANAGER

FUEL SUPPLY
EMERGENCY
COMMITTEE

GENERAL MANAGER

CORPORATE COMMUNICATIONS

ASSISTANT GENERAL MANAGER – ENERGY SUPPLY

ASSISTANT GENERAL MANAGER – ENERGY DELIVERY

**GAINESVILLE REGIONAL UTILITIES
LONG-TERM ENERGY EMERGENCY PLAN
FUEL SUPPLY SHORTAGE**

INTRODUCTION

The coordination involved in transporting fuel over long distances, as well as, possible disruptions caused by political, natural, labor or other factors may result in establishing Gainesville Regional Utilities' (GRU) fuel supply strategies beyond normal operations. The objective is to mitigate any potential shortages by prudent and proactive planning and operating practices. The following Long-Term Energy Emergency Plan was developed by request of the Florida Public Service Commission (FPSC) and with guidance from the Florida Reliability Coordinating Council (FRCC) to facilitate an orderly procedure by which GRU could purchase available energy from other utilities or appropriately distribute GRU's available energy during a fuel supply shortage.

The plan will be invoked by the General Manager based on Staff recommendation. The GRU plan will be coordinated with the FPSC and FRCC along with coordinating emergency plans of other utilities such that available energy will be appropriately distributed so as to protect the health, safety, and welfare of the people of Florida, consistent with good operating practices.

PURPOSE

The purpose of this 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 GRU fuel supply shortage and the lack of adequate purchased power and transmission from other utilities.

DEFINITION

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

OVERVIEW

The GRU Long-Term Energy Emergency Plan is one of several individual utility plans prepared by each Florida Utility which, when combined together, make up a statewide Long-Term Energy Plan which has been designed to provide a coordinated response to various communication, environmental, legal, political, and technical concerns which may arise on a statewide basis during an energy emergency. To address these issues, the GRU Long-Term Energy Emergency Plan has been divided into two basic sets of procedures:

1. Fuel Supply Alert
2. Fuel Supply Emergency

Each basic set of procedures involves a number of additional plans and procedures which form to coordinate the Long-Term Energy Emergency Plan. The following sections and the appendix describe these procedures and any collateral plans which may be implemented during a fuel supply shortage.

1. FUEL SUPPLY ALERT

DESIGNATION: The Energy Supply Department is responsible for fuel procurement, inventory management, and projecting fuel availability. If at any time:

Projected fuel supply receipts and the availability of purchased energy indicate that if no actions are taken, fuel inventories (including shipments in transit) will fall below adequate levels to provide continuous uninterrupted service to meet GRU load demands, and if there is no immediate apparent solution to replenishing the supply, the potential for a FUEL SUPPLY ALERT WILL BE EVALUATED. THE Assistant General Manager of Energy Supply will review the actions taken with the General Manager and his staff. . Following the inventory review, if fuel supply is projected to reach inadequate levels , the Assistant General Manager of Energy Supply will recommend to the General Manager initiating a FUEL SUPPLY ALERT.

RESPONSIBILITY: Upon the initiation of a FUEL SUPPLY ALERT, the General Manager or his/her designee will assume emergency responsibility for initiating all FUEL SUPPLY ALERT actions, either directly or through the FUEL SUPPLY EMERGENCY COMMITTEE. The members of the FUEL SUPPLY EMERGENCY COMMITTEE shall be appointed by General Manager of GRU.

FUEL SUPPLY ALERT

Upon the initiation of a Fuel Supply Alert, the following actions shall be taken as appropriate:

- Evaluate fuel switching on generating units with dual fuel capability
- Procure alternate sources of fuel in short supply.
- Monitor fuel consumption , receipts, and forecast future fuel inventory levels.
- Furnish fuel data and forecast to the General Manager, or his designee, as well as GRU's FRCC Operating Representative
- Provide the FRCC with estimated energy services requirements with expected fuel supply availability. Coordinate fuel supply actions with FRCC.
- Reduce non-essential lighting, as appropriate. Adjust heating and air conditioning thermostats to appropriate levels. Prepare to move generating plant systems into Step A of the Energy Emergency Plan.
- Purchase external energy to conserve fuel in short supply. Dispatch units to conserve fuel in short supply. Prepare to move into Step A of the Energy Emergency Plan.
- Provide news releases and summaries to Corporate Communications. Explain why the fuel shortage has occurred, what actions are to be taken under a Fuel Supply Alert situation, , what is being done to mitigate the problem and actions the customers and other utility and municipal departments can do to support the efforts.

2. FUEL SUPPLY EMERGENCY

DESIGNATION: If at any time following the designation of a FUEL SUPPLY ALERT:

Total fuel inventories fall below 80% of projected requirements (including deliveries in route) and no immediate recovery is apparent, , the General Manager shall DECLARE A FUEL SUPPLY EMERGENCY.

RESPONSIBILITY: The General Manager will communicate impending circumstances with the City Manager and the City Commission of the declaration ,of a FUEL SUPPLY EMERGENCY and assume emergency responsibility for initiating all FUEL SUPPLY EMERGENCY actions, either directly or through the FUEL SUPPLY EMERGENCY COMMITTEE.

FUEL SUPPLY EMERGENCY SUMMARY

Upon the declaration of a FUEL SUPPLY ENERGY EMERGENCY, a series of steps within the Long-Term Emergency Plan shall be initiated. The criteria for initiating each step are shown below:

CRITERIA

STEP A	80% of projected fuel inventory requirements and the forecast of a continued downward trend.
STEP B	60% of projected fuel inventory requirements and the forecast of a continued downward trend.
STEP C	50% of projected fuel inventory requirements and the forecast of a continued downward trend.
STEP D	30% of projected fuel inventory requirements and the forecast of a continued downward trend.
STEP E	20% of projected fuel inventory requirements and the forecast of a continued downward trend.

The above steps are aligned with emergency actions as stated by the FPSC and the FRCC. The details of each step are outlined on the following pages. Should it become necessary in the implementation of this plan to by-pass any of the steps and immediately proceed with more severe measures, the actions under the by-passed steps shall be implemented, as appropriate.

When FRCC notifies GRU that the fuel supply shortage has eased, the General Manager will request the measures taken under this plan be relaxed to the appropriate step.

FUEL SUPPLY EMERGENCY DETAILS

STEP A

If total fuel inventories reach 80% of projected requirements, a continued downward trend is anticipated, and a FUEL SUPPLY EMERGENCY has been declared, then the following actions will be taken:

ACTIONS

- Expedite shipments of previously purchased fuel. Purchase additional fuel supply which meet regulatory criteria. Coordinate natural gas deliveries with suppliers and transporters as appropriate to utilize gas consumption on the most efficient generating unit. Report fuel inventory levels, consumption, shipments and planned purchases to GRU's representative to TAG and the General Manager or his designee.

- Provide FRCC Representative with GRU's projected fuel consumption, load and generation availability. Coordinate information between FRCC and GRU Staff.
- Curtail all non-essential uses of electrical energy. Continue reductions of non-essential plant lighting except in unsafe areas. Modify heating and air conditioning settings to low energy use settings except for temperature sensitive areas

STEP B

If total fuel inventories reach 60% of projected requirements and a continued downward trend is anticipated, previously implemented steps shall be continued and the following additional actions shall be implemented:

Purchase any available fuel supply meeting current regulatory criteria; expedite deliveries after purchase. Continue fuel supply situation reporting.

- Purchase energy if available.
- Continue reporting and coordination of activities with TAG.
- Close down all outer buildings.
- Reduce plant auxiliary loads as appropriate.
- Continue previous activities.
- Make public appeals and distribute "How To" information to all customers, both residential and commercial, and to other utility and municipal departments to minimize their consumption of electrical energy.
- Individually contact all large commercial and industrial customers, request reductions in consumption of electrical energy and warn of impending mandatory curtailments. Make public and individual appeals for the reduction of all outdoor lighting to the minimum necessary for life and property protection, and eliminate all advertisement lighting except for the minimum required to indicate commercial facilities open after dark. Request a ban on all after dark sporting activities and closing of all parks, tennis courts, golf courses, etc., after dark.
- Assist Energy Supply/Environmental/Legal in the preparation of specific mandatory reductions in electrical energy usage.
- Prepare the necessary requests to submit to the proper authorities for approval of mandatory reductions in electrical energy usage.

STEP C

- If total fuel inventories reach 50% of projected requirements, and a continued downward trend is anticipated, previously implemented steps shall be continued and the following additional actions shall be implemented:
- Continue to locate, purchase, and expedite deliveries of any fuel supply ,meeting regulatory criteria. Continue reporting procedures.
- Continue previous activities.
- Shut Down all non-critical facilities and equipment
- Maximize usage of purchased energy so as to minimize the imbalance of energy supplies among all utilities according to directions from FRCC. Coordinate with Legal Services the request to that appropriate governmental agencies to voluntarily curtail roadway lighting systems. Implement voltage reduction procedures, as appropriate. Provide Customer Operations/Public Information/Energy Services with information which identifies industrial customers who maintain customer-owned industrial generation equipment.
- Continue to provide news releases, and energy reduction instructions to the Energy Services media, customers, and City employees. Assist local police and other agencies in the understanding and enforcement of mandatory electrical energy reduction regulations. Contact industrial customers who maintain customer-owned generation equipment to request that they utilize such equipment, if adequate fuel is available, to the maximum extent possible. Request residential customers to further reduce energy consumption by minimizing or discontinuing the use of air conditioning, heating, clothes dryers, and other convenience devices and equipment. Request users of conditioned offices and building, other than critical services such as hospitals, to lower thermostat settings to 60 degrees during the heating season and raise thermostat settings to 85 degrees during the cooling season. Request commercial establishments, institutional facilities, public and private schools, office buildings and industrial plants to further reduce consumption which may require a reduction in operating hours. Request commercial establishments to ban all non-essential use of hot water, eliminate window and display lighting and ban all air conditioning and heating during non-use hours and in unoccupied areas.
- Assist Energy Supply/Environmental /Legal in mandatory curtailments and rotating blackouts. Prepare appropriate information on mandatory curtailments and rotating blackouts.
- Prepare the necessary requests to submit to the proper authorities for approval of mandatory curtailments and rotating blackouts.

STEP D

- If total fuel inventories reach 30% of projected requirements and a continued downward trend is anticipated, previous steps shall be continued and the following additional actions shall be implemented:
- Continue previous activities.
- Curtail to minimum possible levels all to utilities not participating in this plan, if legal obligations permit. Implement mandatory curtailment of services to the degree necessary to protect public health, safety and welfare, as permitted by the proper legal authority and after notifying TAG. See Appendix 6 for the "Guidelines for Defining Essential Services."
- Implement rotating blackouts on selective feeders. Feeders serving customers classified as critical loads or essential services will be exempt from rolling blackouts. These will be classified according to the "Guidelines for Defining Essential Services" in Appendix 6. A list of these feeders will be maintained in the Systems Dispatch office and in the office of the General Manager or his designee.
- Continue previous activities.
- Release information on mandatory curtailments and rotating blackouts. Continue previous activities.

STEP E

- If total fuel inventories reach 20% of projected requirements and a continued downward trend in fuel supplies is anticipated, previously implemented steps shall be continued and the following additional actions shall be implemented
- Prepare to orderly shut down all units burning the fuel in short supply.
- Implement plans to insure power availability to all power plants and fuel handling facilities.
- Prepare Facilities for extended operation with minimal power consumption.
- Continue curtailments, rotating blackouts, and manual load shedding procedures, as necessary.

APPENDIX 1

COLLATERAL PLANS

Emergency conservation plans have been promulgated by various federal and state regulatory bodies and industry organizations. Following is a list of those collateral plans and other electric utility emergency plans having selected sections applicable to implementation of GRU's Long-Term Energy Emergency Plan.

- Standby Conservation Plan NO. 1
- Emergency Weekend Gasoline Sales Restrictions
DOE/ERA-0040
- Standby Conservation Plan No. 2
- Emergency Building Temperature Restrictions
, DOE/ERA-0047
- Standby Conservation Plan No. 3
- Emergency Advertising Lighting Restrictions
DOE/ERA-0050
- U.S. Department of Energy, Economic Regulatory Administration, Office
of Utility Systems
- Emergency Electric Power Administration (formerly Defense Electric
Power Administration of Department of the Interior) Emergency
Actions , DOE/ERA-0052
- State of Florida, Department of Administration, State Energy Office:
 - Florida's Energy Emergency Contingency Plan
- Florida Electric Power Coordinating Group, Inc.:
 - Operating Committee Handbook
 - Electric Utility Emergency Procedure for Long-Term Energy
Emergencies
- Florida Power Corporation:
 - Fuel Emergency Policy
- Florida Power & Light Company:
 - Emergency Operations Plan – Short-Term Capacity Shortage
 - Long-Term Energy Emergency Plan – Fuel Supply Shortage
- Gulf Power Company:
 - System Operations Emergency Procedures
- Tampa Electric Company:
 - Long Term Energy Management Plan

APPENDIX 2

COMMUNICATION PROCEDURES WITH FRCC

The following steps will be the responsibility of GRU's representative to FRCC. The representative will report requested information as developed by Strategic Planning and Energy Supply Division. Following steps will be taken at the direction of FRCC. Other actions which may be requested by FRCC will be performed as required.

Fuel Supply Alert Actions

1. GRU will provide an estimate of its energy source requirement by type of source for each of the next eight (8) calendar weeks following the request from FRCC.
2. GRU will determine the remaining days of fuel supply, expressed in terms of Days Burn, by fuel type for each of the next eight (8) calendar weeks following the request from FRCC.
3. Sufficient data will be provided to substantiate the previous calculations.

Fuel Supply Emergency Actions

The above steps will be continued. In addition, when Step B of the Energy Emergency Plan is reached, FRCC will establish a schedule for contact with each participating utility. GRU's representative will report the following information to the FRCC Coordinator each day.

1. An hourly forecast of system load for the next twenty-four (24) hours.
2. The peak demands forecast and Net Energy for Load (NEL) for the six (6) days following item (1) above.
3. Generation available and scheduled maintenance for the next seven (7) days.
4. Remaining average fuel supply inventory data.
5. Previous day's hourly system load and peak demand.

APPENDIX 3

Energy Supply

The following plan will be implemented by Fuels Department as appropriate.

ENERGY ALERT ACTIONS:

A. Fuel Situation Reporting Procedure

1. GRU-Forecasting staff will provide Fuel Supply Emergency Committee, as required, with estimates of GRU's Net Energy for Load (NEL) for successive eight (8), calendar week periods.
2. GRU staff will provide to Fuel Supply Emergency Committee calculations of projected total and individual fuels requirements on a system and generating unit basis.
3. GRU Fuels staff will will monitor fuel use on a daily and monthly basis. Inventory levels will be calculated by comparing daily ending inventories to a rolling average of daily burns.

When the system's average available Days Burn of inventoried fuel is forecasted to drop below a level adequate to provide continuous uninterrupted service to GRU customers, Energy Emergency actions will be implemented according to the Long-Term Energy Emergency Plan.

B. Steps to Augment Fuel Supplies and Transportation Options

- 1 Evaluate fuel switching on generating units with dual fuel capability
- 2 Seek alternative sources for fuel in short supply.
2. Increase supply of substitute or replacement fuels.
3. Secured needed fuels, as required, under the direction of the AGM for Energy Supply and/or General Manager.

ENERGY EMERGENCY ACTIONS:

- A. GRU-Forecasting staff will provide Fuel Supply Emergency Committee, as required, with estimates of GRU's Net Energy for Load (NEL) for successive eight (8), calendar week periods.
- B. GRU staff will provide to Fuel Supply Emergency Committee calculations of projected total and individual fuels requirements on a system and generating unit basis.
- C. Steps to Augment Fuel Supplies and Transportation Options.
 - 1. Manage existing fuel inventories to assure the most efficient use of fuels under the constraints imposed by the fuel emergency.
 - 2. Evaluate fuel switching for generating units with dual fuel capability.
 - 3. Assure a constant fuel supply to generating plants in accordance with environmental and performance standards, as long as possible, under the constraints imposed by the fuel emergency.
 - 4. Continuously monitor fuel market conditions in order to assess existing market conditions and future trends, and report market information to management.
 - 5. Formulate emergency fuel procurement strategies, policies, and guidelines based upon analysis of internal and external variables impacting GRU's fuel operations, and update as emergency conditions change conditions.
 - 6. Investigate alternate sources of supply, in accordance with procurement arrangements set forth by the emergency strategy, to allow the utility to respond to changes in regulation, operating requirements, or market conditions.
 - 7. Provide fuel and transportation availability information and forecasts to assist in the planning and control of operations under fuel emergency conditions.
 - 8. Develop information, reports and testimony relating to GRU's emergency fuel procurement activities for management, customers and governmental agencies.
- C. If, during the Emergency, a physical transfer of fuel should become practical or necessary due to some physical limitation of the electric system, bilateral transfers will be accomplished through mutual agreement between the utilities invoiced. The principle upon which these transfers will be based is that of full reimbursement by the utility receiving energy or fuel during the Energy Emergency. Full reimbursement shall consider all of the supplying utility's cost of replacing such energy or fuel with the same or alternate energy or fuel.
- D. The Fuel Supply Emergency Committee shall inform the Utility Budget, Finance and Accounting Group and Strategic Planning of any planned fuels purchases, calculate cash requirements and coordinate any information necessary to assist in evaluating financial impacts on the Utility System

APPENDIX 4

POWER PRODUCTION

DESCRIPTION OF FACILITIES

See Appendix 7 – Existing Generating Facilities

Electric generation requires a wide range of equipment which is continually utilized in the most efficient manner (reduction of this equipment's usage would minimally reduce power). Support systems consist of office space with its associated heating, ventilation, air conditioning (HVAC) and lighting, as well as warehouses, fuel receiving and processing equipment, and other necessary buildings with their respective uses. A noteworthy amount of in-station energy usage at the Deerhaven Generating Station is required for operating the water processing plant and combustion effluent (particulate) removal systems. Both stations operate additional important but non-critical auxiliary power plant equipment.

REDUCTION OF ENERGY CONSUMPTION

Principle areas which have been identified to facilitate reductions in station consumption include: HVAC systems, lighting, and combustion effluent removal equipment, remote buildings, water processing facility equipment and some important but non-critical auxiliary equipment. Some of the above alternatives have environmental consequence and would require special operating permits or modifications to existing permits.

RESPONSIBILITIES

The Energy Supply Department is responsible for any modifications to generating station operations as directed by the Assistant General Manager of Energy Supply and/or the General Manager or his designee. Environmental Department is responsible for obtaining supplementary environmental permits or modifications to existing permits. Power Production will modify generating station operations as follows under FUEL ALERT AND FUEL SUPPLY EMERGENCY and conditions.

FUEL SUPPLY ALERT

1. Reduce roadway and non-essential plant, lighting,
2. Adjust heating and air conditioning thermostats to appropriate levels.
3. Prepare to move plant systems into Step A of the Energy Emergency Plan.

FUEL SUPPLY EMERGENCY

STEP A

Curtail all non-essential uses of electrical energy.
Continue the reduction of all non-essential lighting by turning off power except in unsafe areas.
Modify heating and air conditioning settings to low energy use settings except for temperature sensitive areas as shown below

Electrical Equipment Rooms
Computer Rooms
Control Rooms
Motor Control Rooms

STEP B

1. Close down outer buildings.
Warehouses
Vehicle Maintenance Building
Track Hopper (when not in use)
2. Partial shutdown of plant water processing facilities. The Brine Concentrator and Spray Dryer shall be shut down as long as no environmental limits will be exceeded.
3. Reduce electrostatic precipitator power usage by turning off transformer rectifiers sets in the last row if regulatory criteria allows. (Providing no other Plant equipment will be effected in a detrimental manner).
4. Reduce cooling tower fan speed if plant efficiency can be maintained.

STEP C

1. Complete shutdown of plant water processing facilities, if appropriate environmental permits have been obtained.
2. Continued reduction of precipitator power usage, if appropriate environmental permits have obtained.
3. Further reduce cooling tower fan speed if plant efficiency can be maintained.
4. Shut off gas recirculation fans if plant efficiency can be maintained.

STEP D

Continue previous actions.

STEP E

1. Prepare to orderly shut down all units burning the fuel in short supply.
2. Implement plans to insure power availability to all power plants and fuel handling facilities.

APPENDIX 5

Energy Supply//ENVIRONMENTAL/LEGAL

Prepare an outline of fuel and environmental requirements and the necessary processes for changing the following requirements:

GRU purchases fuel with qualities that enable compliance with Federal and State pollutant emissions standards. During a long-term energy emergency GRU will require Federal and State permission to burn fuels that may result in noncompliance with normal emission standards. Environmental Planning will coordinate activities with the City Attorney toward obtaining necessary Federal and State regulatory variance.

Permission to burn fuels that may result in noncompliance will be required from the Governor of Florida. Only after receiving authorization from the President of the United States may the Governor temporarily suspend necessary portions of the Florida State Implementation Plan (SIP). The SIP is a plan which Florida initiated to implement requirements of the Clean Air ACT Included in the SIP is 17-2 FAC, Florida's air pollution rules.

The permission process follows:

1. GRU will petition the Governor of Florida to petition the President of the United States to authorize the Governor to temporarily suspend appropriate sections of Florida's SIP. In addition, GRU will, if necessary, request the Governor to suspend appropriate requirements of chapter 120 FAC.
2. The Governor will schedule a public hearing and assign a hearing officer. The hearing officer will issue findings based upon testimony from GRU as well as other interested parties.
3. Based upon the findings of the hearing officer, the Governor will either act upon GRU's petition or reject it. If the Governor acts to petition the President, the President will either authorize the Governor to temporarily suspend sections of Florida's SIP or reject the Governor's petition.
4. The President may authorize the Governor to temporarily suspend sections of Florida's SIP for a particular boiler for a maximum of four months. Not more than one such suspension may be issued for any source on the basis of the same set of circumstances or on the basis of the same emergency.

During the public hearing, GRU will likely have to provide at minimum the following:

1. The nature, extent and expected duration of the energy emergency.
2. The reasons leading up to GRU's energy emergency.
3. Current and projected high levels of unemployment associated with the energy emergency.
4. Current and projected loss of necessary energy supplies for residential dwellings.
5. Demonstration that an emergency suspension can totally or partially alleviate high levels of unemployment or loss of energy supplies for residential dwellings.
6. Demonstration that alternative strategies including conservation, imported power or other fuels will not obviate the need for an emergency suspension.
7. Characteristics and amounts of fuels that will be burned that may require a temporary suspension of the SIP.
8. An estimate of what numerical emission standard, in pounds per million BTU, would be appropriate in place of the current standard.
9. A strategy to limit pollutant emissions.
10. The expected increase in pollutant emissions and the total pollutant emissions released per unit of time.
11. An estimate of effects upon air quality, environment and health.

APPENDIX 6

GUIDELINES FOR DEFINING ESSENTIAL SERVICES

Customers essential to the health, safety, or welfare of the community should be considered and, insofar as the situation makes it practical, their special needs addressed.

Although not an exclusive list, the following types of installations may be included in this category:

1. Hospitals and similar medical facilities.
2. Police and Fire stations.
3. Operation, guidance control, and navigation services for public transportation and shipping, including rail, mass transit, licensed commercial air transportation, and other forms of transportation.
4. Communication services, including telephone and telegraph systems, television, and radio stations.
5. Water supply and sanitation services, including waterworks, pumping and sewage disposal activities which cannot be reduced without seriously affecting public health.
6. Central cold storage facilities and mass distribution centers required for the preservation of medical and/or food supplies essential to the community. Federal activities essential
7. Federal activities essential for national defense and state and local activities essential for providing emergency services.
8. Installations essential for the production, refining, transmission, or distribution of fuel required to provide essential services to the community.
9. Essential construction, operation, and maintenance activities for production and supply of energy required to provide essential services to the community.

Although these types of customers may be given special consideration from the curtailment provisions of this plan, they should be advised to install emergency generation equipment if continuity of service is essential. In the case of customers supplied from multiple sources, only one source will typically be given special consideration. Other customers who, in their opinion, have critical equipment, should be advised to install emergency or portable generating equipment.

Although not within the definition of essential services, the special situation of life sustaining medical equipment may be considered. Life sustaining medical equipment is defined as equipment:

1. Which is necessary to sustain the life of the user,
2. Which has been prescribed by the user's physician, and
3. Where any interruption of electricity to such equipment poses an immediate threat to the user.

Customers in this category should fully understand the need for sufficient and proper backup power sources. In addition, during emergency conditions, to the maximum extent possible, cooperation and coordination will be provided to community service agencies and other governmental units which make special provisions for the needs of those with life sustaining medical equipment.

APPENDIX 7

EXISTING GENERATING FACILITIES SCHEDULE

GRU 10 YEAR SITE PLAN