



October 17, 2024

Todd Brown, Chief of Safety
Division of Engineering
Florida Public Service Commission
via E-filing

Re: Seminole Electric Cooperative, Inc.'s 2024 Long-Term Fuel Emergency Plan

Dear Mr. Brown,

In accordance with Rule 25-6.0185, Florida Administrative Code, Seminole Electric Cooperative, Inc. hereby submits a revised copy of our Long-Term Fuel Emergency Plan. This revision is intended to 1) update the document to reflect the most accurate description of Seminole's procedures and processes and 2) reflect changes of titles within and references to Seminole's internal organization.

If you or others have questions related to this filing, please contact me at 813-739-1233 or at srybicki@seminole-electric.com.

Kind regards,

A handwritten signature in blue ink that reads "Steven Rybicki".

Steven Rybicki
Lead Regulatory and Energy Policy Analyst

Attachment

SEMINOLE ELECTRIC COOPERATIVE, INC.

AND

MEMBER COOPERATIVES

LONG-TERM FUEL EMERGENCY PLAN

REVISED

October 2024

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1. Purpose

The purpose of this plan is to provide an effective plan for responding to a long-term fuel supply shortage on the Seminole Electric Cooperative, Inc. (Seminole) system, or in the event of a Florida Fuel Supply Emergency. The fuels covered by this plan are coal, natural gas, and diesel fuel oil.

2. Scope

The scope of this plan covers Seminole’s fuel inventory plans and operating levels as well as associated actions to be taken in the event of a slowdown or interruption in fuel supply and serves to meet the FPSC’s requirements pursuant to Rule 25-6.0185, Florida Administrative Code, to have a long-term energy emergency plan to establish a systematic and effective means of anticipating, assessing, and responding to a long-term emergency caused by a fuel supply shortage.

3. Input Conditions

3.1. Job Title and Responsibility

Job Title	Responsibility
Commercial Operations	Responsible for fuel and purchased power coordination/optimization and fuel inventory evaluations.
System Operations	Responsible for forecasting impacts of potential fuel shortages, coordinating with Commercial Operations to secure alternate fuel sources and/or purchased power and working with Seminole’s Member Cooperatives to implement conservation efforts.
Seminole’s Member Cooperatives	Assist in coordination with the FRCC Fuel Supply Shortage Element and the FRCC Generating Capacity Shortage Plan in the event of a Florida Fuel Supply Emergency and to respond appropriately.
Regulatory Compliance	Research options for emergency permit revisions or permit the utilization of available off-specification fuel.
Communications	Communicates with the media, Seminole Member Cooperatives, and Local Government, if needed.

3.2. Abbreviations/Terms/Acronyms

Abbreviation	Definition
Operations staff	Operations staff consists of team members from System Operations, Commercial Operations and Seminole plant operations (SGS, SCCF and MGS).
Fuel supply shortage	A fuel supply shortage is deemed an energy emergency when anticipated fuel stocks are judged insufficient to meet existing energy obligations over an extended period of time, measured in terms of weeks or months.
SGS	Seminole Generating Station
MGS	Midulla Generating Station
SCCF	Seminole Combined Cycle Facility
Long-term	Long-term is measured in terms of weeks or months as defined by FPSC and FRCC
FRCC	Florida Reliability Coordinating Council
FRCC OE	Florida Reliability Coordinating Council Operating Entity (i.e., SEC, FPL, etc.)



Florida Fuel Supply Emergency	Fuel supply emergency as defined in the FRCC Florida Electrical Emergency Contingency Plan Fuel Supply Shortage Element (FRCC-MS-OPRC-016)
EEA	Energy Emergency Alert as defined by NERC Reliability Standard EOP-011
Alert 1 (EEA 1)	<p>All available resources in use</p> <ul style="list-style-type: none"> • A FRCC OE foresees or is experiencing conditions where all available resources are committed to meet firm load, firm transactions, and reserve commitments, and is concerned about sustaining its required Contingency Reserves, and Non-firm wholesale energy sales (other than those that are recallable to meet reserve requirements have been curtailed, or • FRCC Operating margin is less than 1.5 times the current FRCC MSSC, or • Notification to the FRCC RC by a FRCC OE that their generation fuel supplies may be impacted and may decrease below a level adequate to provide for continuous, uninterrupted service to its firm customers.
Alert 2 (EEA 2)	<p>Balancing Authority, Reserve Sharing Group, or Load Serving Entity is no longer able to provide its customers' expected energy requirements and is designated an Energy Deficient Entity.</p> <ul style="list-style-type: none"> • Energy Deficient Entity foresees or has implemented procedures up to, but excluding, interruption of firm load commitments. When time permits, these procedures may include, but are not limited to: <ul style="list-style-type: none"> ○ Public appeals to reduce demand ○ Voltage reduction ○ Interruption of non-firm end use loads in accordance with applicable contracts ○ Demand-side management ○ Utility load conservation measures.
Alert 3 (EEA 3)	<p>Firm load interruption imminent or in progress</p> <ul style="list-style-type: none"> • Balancing Authority or Load Serving Entity foresees or has implemented firm load obligation interruption. The available energy to the Energy Deficient Entity, as determined from Alert 2, is only accessible with actions taken to increase transmission transfer capabilities.
Coal Inventory Days	Coal inventory days is defined as projected days burn based on short-term and long-term studies.
Demand Side Management (DSM)	DSM shall include, but not limited to, Voltage reduction at the distribution voltage levels, Implementation of distributed generation assets not under Seminole direct control, passive interruption of connected devices (i.e., smart thermostats) and interruption of other non-firm loads not under Seminole direct control.
FPSC	Florida Public Service Commission
Pipelines	FGT and Gulfstream

4. Safety and Other Precautions

None



5. Long-Term Fuel Emergency Plan

5.1. INTRODUCTION

- 5.1.1. Fuel shortages caused by factors beyond those recognized as prudent planning and operating practices may result in a long-term electrical energy deficiency. The following plan has been developed to provide a plan for responding to a fuel supply shortage on the Seminole system, or in the event of a Florida Fuel Supply Emergency.

To this end, the plan described herein will establish steps to be taken by Seminole and its Member Cooperatives (listed in Attachment 1) to respond to a fuel emergency. Furthermore, this plan documents the steps to be taken by Seminole and its Member Cooperatives in an effort to coordinate fully with the FRCC Fuel Supply Shortage Element (currently as adopted) and the FRCC Generating Capacity Shortage Plan (currently as adopted) in the event of a Florida Fuel Supply Emergency.

Seminole and its Member Distribution Cooperatives have a unique relationship in the development and implementation of this emergency plan. As the power supplier, Seminole has the responsibility of fuel supply, power generation, and wholesale purchases, while the Member Cooperatives maintain responsibility for serving retail customers. In subscribing to this plan, Seminole and its Member Cooperatives are committed to a joint, coordinated implementation program.

- 5.1.2. Pursuant to Rule 25-6.0185, Florida Administrative Code, each Florida electric utility must have a Long-Term Energy Emergency Plan on file with the Florida Public Service Commission (FPSC).

This plan was first required on January 31, 1999 and is to be reviewed every three (3) calendar years thereafter. If the plan does not need revising, Seminole must file a letter stating that the required review has been conducted and that the plan continues to be adequate. If a revised plan is necessary, such a plan shall be submitted to the FPSC for approval and to the FRCC for information purposes.

Seminole's most recent filing of the Long-Term Fuel Emergency plan with the Florida Public Service Commission occurred on April 27, 2023.

5.2. FUEL INVENTORY PLAN – COAL

Seminole's coal supply is sourced from various coal regions in Illinois and Kentucky. This plan references the total coal inventory located at SGS. The facility's transportation of coal is served by the CSX Railroad.

Coal is the primary fuel used by Seminole and its Member Cooperatives at the Seminole Generating Station (SGS) in Putnam County, Florida. Diesel fuel oil is used at this facility for startup and flame stabilization only.

For the purpose of this plan, the available fuel inventory is defined as the fuel on-hand. However, fuel in transit, which is unaffected by causes of the fuel shortage, will be considered in the assessment of any situation.

5.2.1. Normal Operating Inventory

To mitigate risks due to supply, transportation, and unloading interruptions, Seminole attempts to maintain an average of 50 days projected burn, or more, of coal in inventory.

5.2.2. Alternative Action Fuel Supply Level

Alternative actions may be considered when operating fuel inventory levels are projected to fall between 40- and 25-days projected burn. Seminole will assess the situation duration, escalate transportation and/or supplier interactions, identify alternate fuel or energy sources, and/or implement fuel inventory conservation measures.

5.2.3. Fuel Supply Alert

An alert-level inventory condition exists when operating levels are between 25 and 20 days of projected burn and are projected to continue to decline. More substantial steps to maintain or build adequate inventory levels will be taken.



5.2.4. Fuel Supply Emergency

An emergency-level inventory condition exists when operating levels are below 20 days of projected burn and are projected to continue to decline. All available methods may be used to reduce fuel consumption, including curtailment of firm load.

5.3. FUEL INVENTORY PLAN – DIESEL FUEL OIL

5.3.1. Fuel oil is used for several reasons by Seminole. At SGS, diesel fuel oil is used for flame stabilization and startup fuel. At MGS and three facilities under purchased power agreements, diesel fuel oil is available to be used as a backup fuel when natural gas is interrupted or constrained.

For the purpose of this plan, the available fuel inventory is defined as the fuel on-hand. However, fuel in transit, which is unaffected by causes of the fuel shortage, will be considered in the assessment of any situation

5.3.2. Normal Operating Inventory Level

The normal operating fuel inventory range for MGS will be 50 to 100 hours of burn for full load operation. For the purchased power facilities, Seminole directs oil inventory levels consistent with the target level at MGS.

5.3.3. Alternative Action Fuel Supply Level

Alternative actions may be considered when operating fuel inventory levels are projected to fall to less than 24 projected burn hours. Seminole will assess the situation duration, and facilitate transportation of fuel, locate alternate fuel or energy sources, and/or implement utility and customer conservation.

5.3.4. Fuel Supply Alert

An alert-level inventory condition exists when operating levels are between 24 and 18 projected burn hours and are projected to continue to decline. More substantial steps may be taken to significantly reduce fuel oil consumption to ensure adequate supply at the generating plant site for further emergency operation.

5.3.5. Fuel Supply Emergency

An emergency-level inventory condition exists when operating levels are below 18 projected burn hours and are projected to continue to decline. All available methods may be used to reduce fuel consumption, including curtailment of firm load.

5.4. NATURAL GAS INVENTORY, USE, AND STORAGE PLANS

5.4.1. Natural gas is the primary fuel type used by Seminole for MGS, SCCF, and three facilities under purchased power agreements sourced from two pipelines (FGT and Gulfstream). Seminole maintains firm transportation agreements on both pipelines to ensure adequate supply to meet generation requirements and firm demand projections. As described in 5.3, diesel fuel oil is available to be used as a backup fuel at MGS and three facilities under purchased power agreements when natural gas is interrupted or constrained.

5.4.2. Seminole also maintains firm storage service arrangements with rights to store and withdraw natural gas supply outside of Florida. In preparation of foreseeable events that could affect Florida's available gas supply, Seminole targets a sufficient amount of storage inventory, within the limits of its service agreement(s), to manage supply risk.

5.5. FORECASTING THE EXTENT OF A FUEL SHORTAGE

5.5.1. In the event of a slowdown or interruption in the fuel supply (coal, fuel oil, and/or natural gas), Seminole Operations staff will forecast the extent of the fuel supply shortage to determine if a long-term situation exists. If it is determined a long-term fuel situation is possible, Operations staff will report such findings to Seminole's Executive Management for further action.



5.6. ALTERNATE FUEL SOURCES

- 5.6.1. At the Alternative Action Fuel Supply Level, Operations staff will investigate availability of alternate sources of fuel supply and coordinate the findings with Seminole's Executive Management.
- 5.6.2. In the event of a need to transfer physical fuel stocks from Seminole to other utilities or vice versa, it is the intent of Seminole to ensure the supplying party is made whole in terms of all of the supplying utility's costs of replacing such fuel. These replacement costs will include, but are not limited to, the following components.
1. Fuel market
 2. Direct transportation
 3. Indirect transportation
 4. Sampling
 5. Insurance
 6. Applicable internal overhead

5.7. PURCHASED POWER

- 5.7.1. At the Alternative Action Fuel Supply Level, Operations staff will investigate availability of off-system purchased power and develop a conservation strategy using purchased power to optimize the fuel in short supply. Operations staff will notify Seminole's Executive Management of the developed strategy including an evaluation of the potential cumulative effect of all conservation measures described herein and a recommendation of measures that should be carried out immediately.

5.8. EXTERNAL NOTIFICATION

- 5.8.1. In the event that alternative fuel and energy sources and recommended conservation measures are determined to be insufficient to mitigate the fuel supply shortage, and after consultation with Seminole's Executive Management and the Member Distribution Cooperative Managers, Operations staff will notify the FRCC State Capacity Emergency Coordinator and the Chairman of the FRCC Operating Committee as required in accordance with the FRCC Generating Capacity Shortage and/or Florida Electrical Emergency Contingency Plan's, Fuel Supply Shortage Element for the purpose of requesting initiation of a Fuel Supply Alert. In addition, Operations staff will immediately initiate actions as described in the following section.

5.9. CHRONOLOGY OF CONSERVATION MEASURES

- 5.9.1. Operations staff will work with the Member Cooperative Managers to implement the following conservation measures to the extent that they are feasible, productive, and do not subject Seminole or its Member Cooperatives to significant liability.
1. Optimization of Fuel in Short Supply
 2. Reduction of Power Usage at Utility-Owned Facilities
 3. Implementation of Demand Side Management (DSM)
 4. Relaxation of Environmental Constraints
 5. Notice to Local Governments by Member Cooperatives
 6. Public Appeals to Conserve Energy
 7. Direct Customer Appeals

5.9.2. Step A- Alternative Action Level

If Seminole determines that the fuel inventory levels are projected to decline below normal operating levels and into the alternative action level, Seminole Operations staff will provide notification to Seminole Executive Management and initiate the following:



5.9.2.1. Optimization of Fuel in Short Supply

- Operations staff will develop a detailed assessment of fuel supply condition.
- Operations staff will develop and implement a dispatch strategy to optimize the fuel in short supply. It is understood that this may require operation of the generation system at less than optimum economic conditions. This measure may require suspension of normal economic dispatch or variations in normal unit commitment including energy purchases not normally considered prudent for economic reasons.

5.9.2.2. Evaluation of Alternate Fuel or Energy Supplies

- Operations staff will escalate coordination with transportation / suppliers to maximize deliveries.
- Operations staff will evaluate the availability of alternate fuel supplies and determine if fuel specifications are acceptable at the affected Seminole facilities or if relaxation of environmental constraints may be required.

5.9.2.3. Relaxation of Environmental Constraints

- Operations staff will notify and request Regulatory Compliance personnel to investigate options for emergency permit revisions that would significantly increase the efficiency of any generating unit and/or permit the utilization of available off-specification fuel.

5.9.3. Step B- Fuel Supply Alert

If Seminole determines that the fuel inventory levels are projected to drop within the alert inventory levels, Operations staff will provide notification to Seminole Executive Management and initiate the below steps.

5.9.3.1. Notification of FRCC staff of potential fuel shortage condition in accordance with section 6.2 of the FRCC Fuel Shortage Plan.

5.9.3.2. Optimization of Fuel in Short Supply

- Operations staff to continue to aggressively take necessary actions to optimize the fuel in short supply. This measure may require suspension of normal economic dispatch, utilization of off-specification fuel, supplemental firing of igniter fuels, variations in normal unit commitment, and energy purchases not normally considered prudent for economic reasons.

5.9.3.3. Conservation at Utility-Owned Facilities (Seminole and Member Cooperatives)

- Evaluate and implement, if practical, reductions in energy use at Seminole facilities. Areas for consideration include auxiliary loads at Seminole generating facilities, facility air conditioning set no lower than 80 degrees F, heating no higher than 65 degrees F and non-essential hot water heating discontinued.

5.9.3.4. Relaxation of Environmental Constraints (Seminole)

- Based on the results of consultation and analysis with Regulatory Compliance personnel regarding relaxed environmental constraints, Operations staff and Regulatory Compliance personnel will recommend a plan of action to Seminole Executive Management for approval.
- Regulatory Compliance personnel will be responsible for initiating actions to notify appropriate agencies to begin process to obtain necessary variances as approved by Seminole Executive Management.



5.9.4. Step C- Fuel Supply Emergency

If Seminole determines that the fuel inventory levels have dropped below critical levels and are anticipated to continue an uncontrolled decline, Operations Staff shall take the below actions as applicable.

5.9.4.1. Provide notification to FRCC staff of continuing Fuel Supply Emergency condition. FRCC OC will evaluate and make determination if a FRCC Fuel Supply Alert or Emergency should be issued.

5.9.4.2. Optimization of Fuel in Short Supply

- Continue aggressive measures to optimize the fuel in short supply.
 - Suspend economic dispatch
 - Maximize off system interchange purchases
 - Maximize use of Load Management to reduce peak demand periods.
 - To the extent practical, distribution voltage will be reduced in an effort to reduce demand and energy by customers. The following criteria shall be considered by the Member Cooperative Manager in the implementation of this measure:
 - a. A suitable means of controlling voltage is available to the cooperative.
 - b. The extent of the voltage reduction does not, in the opinion of the cooperative manager, subject customer or cooperative equipment to damage or present a significant safety hazard.
 - c. The voltage reduction is not counter-productive in reducing energy and/or demand.
 - d. The acceptable percent voltage reduction will be left to the judgment of the cooperative manager.
 - Continue efforts associated with relaxation of environmental constraints
- Forecast fuel supply restrictions to the impact to available generating capacity to meet project daily peak demands.
 - Request applicable EEA condition be implemented as defined in Seminole' Capacity and Energy Emergency plan (TPA-SCO-SOP-CCO-OP-004)

5.9.4.3. Conservation at Utility-Owned Facilities (Seminole and Member Cooperatives)

- Reduce energy consumption to minimum possible levels. Set air conditioning to highest manageable levels and heating to lowest manageable levels. Reduce lighting levels to a minimum. Reduce office hours and occupied work spaces.

5.9.4.4. Notice to local governments (Member Cooperatives)

- Member Cooperatives will appeal to local government officials to mandate restrictions on energy consumption for street lighting and other public services or events which may result in large energy consumption (sporting events, concerts, etc.).
- Appeals should encourage partial shutdown of public institutions and other large facilities as judged feasible.
- In the event of a statewide energy emergency, which has been officially designated as such by the Governor of the State of Florida, all public appeals may be made uniformly under the direction of the Florida Reliability Coordinating Council.

5.9.4.5. Issue Public Appeals (Member Cooperatives)

- All ongoing advertising by Member Cooperatives will encourage conservation. All Member Cooperatives will make public appeals through the local media and other available communication portals for a general conservation effort pursuant to their respective electrical capacity shortage plans.
- Levels of the percentage of reduction in energy consumption within the public appeals shall be coordinated with Seminole Operations Staff.
- In the event of a statewide energy emergency, which has been officially designated as such by the Governor of the State of Florida, all public appeals may be made uniformly under the direction of the Florida Reliability Coordinating Council.



5.9.4.6. Direct Customer Appeals (Member Cooperatives)

- Direct appeals will be made by Member Cooperatives to large industrial and commercial customers to reduce consumption and operate all customer-owned generation equipment that uses fuels not in short supply. Such appeals shall be disseminated by each individual Member Cooperative. Levels of appeal percent reduction in energy consumption to all large industrial and commercial customers shall be coordinated with Operations Staff. Appeals should warn customers of possible upcoming power curtailments and explain procedures to be employed during rotating blackouts.

6. Follow-On Action Required

#	Item
1	Log all applicable information in iTOA throughout the course of the event.
2	Complete all applicable event check sheets and retain.

7. References

#	Item
1	FRCC Generating Capacity Shortage Plan (FRCC-MS-OPRC-015)
2	FRCC Fuel Shortage Plan (FRCC-MS-OPRC-016)
3	Capacity and Energy Emergency (TPA-SCO-SOP-CCO-OP-004)
4	Activating Load Management and Customer-Based Generation for Capacity (TPA-SCO-SOP-CCO-OI-022)

8. Revision History

Version	Date	Description	Revised By
1.0	11/08/2021	Conversion and modification of Seminole Cooperative and Member Cooperatives Long-term Fuel Emergency Plan dated June 2018.	Charles Wubbena
3.0	01/30/2023	Added Tim Parsons, Dan Buckner, and Ryan Hart to the review team and made minor edits based upon the review.	Steven Rybicki
4.0	08/13/2024	Made changes to key dates in the introduction. Reviewed with comment regarding MGS CC not available on fuel oil. Made minor edits to include 3rd PPA site to use NG and fuel oil back up (SH CTs).	Steven Rybicki

9. List of Attachments

#	Title
1	Responsible Member Personnel
2	Guidelines for Defining Essential Services



9.1. Attachment 1: Responsible Member Personnel

It is the intent of Seminole and its Member Cooperatives to cooperate fully with the FRCC Fuel Shortage Plan (FRCC-MS-OPRC-016), in the event that activities under this plan are triggered by a Fuel Supply Emergency on the system of any participating utility. In such cases, the individual steps outlined in this will be implemented under the direction of the FRCC through Seminole's VP of Operations. The Representatives responsible for the actions in this plan are listed below:

Representative	Member
GM & CEO	Central Florida Electric Cooperative, Inc.
GM & CEO	Clay Electric Cooperative, Inc.
CEO	Glades Electric Cooperative, Inc.
GM & CEO	Peace River Electric Cooperative, Inc.
CEO	Sumter Electric Cooperative, Inc., d/b/a SECO Energy
Executive VP / GM	Suwannee Valley Electric Cooperative, Inc.
GM	Talquin Electric Cooperative, Inc.
CEO	Tri-County Electric Cooperative, Inc.
Executive VP / GM	Withlacoochee River Electric Cooperative, Inc.



9.2. Attachment 2: Guidelines for Defining Essential Services

Energy usage by certain consumers that is essential to the health, safety, or welfare of the community should be considered and, insofar as the situation makes it practical, their special requirements should be allowed to continue. Such continuation applies only to energy requirements for essential services and not to the entire customer service.

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

- A. Hospitals and similar medical services.
- B. Police and fire protection.
- C. Operation, guidance control, and navigation services for public transportation and shipping, including rail, mass transit, licensed commercial air transportation, and other forms of transportation.
- D. Communication services, including telephone and Cellular, television, and radio broadcasts.
- E. Water supply and sanitation services, including waterworks, pumping, and sewage disposal activities, which cannot be reduced without seriously affecting public health.
- F. Central cold storage and mass distribution services required to preserve medical and/or food supplies essential to the community.
- G. Federal activities essential for national defense and state and local activities essential for providing emergency services.
- H. Operations for the production, refining, transmission, or distribution of fuel required to provide essential services to the community.
- I. Construction, operation, and maintenance activities to produce and supply of energy required to provide essential services to the community.

Although customers providing these types of services may be given special consideration from the curtailment provisions of this plan, they should participate in all energy reductions involving non-essential services and should be encouraged to install emergency generation equipment, if continuity of service is essential. In cases where customers are supplied from multiple sources, only one source will typically be given special consideration.

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:

- which is necessary to sustain the life of the user,
- which has been prescribed by the user's physician, and
- 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, cooperation and coordination should be provided to community service agencies and other governmental units that make special provisions for the needs of those with life-sustaining medical equipment.

