APPENDIX A

REVIEW OF THE

2014 TEN-YEAR SITE PLANS

OF FLORIDA'S ELECTRIC UTILITIES



NOVEMBER 2014

Ten-Year Site Plan Comments

State Agencies

- Department of Economic Opportunity
- Department of Environmental Protection
- Fish and Wildlife Conservation Commission

Regional Planning Councils

- Central Florida Regional Planning Council
- East Central Florida Regional Planning Council
- Treasure Coast Regional Planning Council
- West Florida Regional Planning Council

Water Management Districts

- Northwest Florida Water Management District
- Southwest Florida Water Management District
- Suwannee River Water Management District

Local Governments

- Leon County
- Suwannee County

State Agencies

- Department of Economic Opportunity
- Department of Environmental Protection
- Fish and Wildlife Conservation Commission

Rick Scott



Jesse Panuccio

June 30, 2014

Mr. Phillip Ellis Engineering Specialist Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Dear Mr. Ellis:

At your request we have reviewed the 2014 Ten-Year Site Plans of the electric utilities. The Department of Economic Opportunity's review focused on potential sites for future power generation, and the compatibility of those sites with the applicable local comprehensive plan, including the adopted future land use map, adjacent land uses, and natural resources on or adjacent to the potential sites.

Our review of the 2014 Ten-Year Site Plans addressed eighteen potential power plant sites identified in the Ten-Year Site Plans of the following utilities: Duke Energy Florida, Florida Power & Light Company, Gulf Power Company, Seminole Electric Cooperative, City of Tallahassee, and Tampa Electric Company. Two of the potential sites were found to be incompatible with the applicable local comprehensive plan. Please see our enclosed comments.

Should you have any questions regarding these comments, please call Scott Rogers, Planning Analyst, at (850) 717-8510, or by email at scott.rogers@deo.myflorida.com.

Sincerely,

Ana Richmond, Chief

Bureau of Community Planning

AR/sr

2014 Ten-Year Site Plan Review

Six utilities, Gulf Power Company, Florida Power and Light Company, Seminole Electric Cooperative, Duke Energy Florida, City of Tallahassee, and Tampa Electric Company have identified a total of eighteen potential sites for future power generation. Potential sites are identified in Rule 25-22.070, F.A.C., as "sites within the state that an electric utility is considering for possible location of a power plant, a power plant alteration, or an addition resulting in an increase in generating capacity." These sites are discussed below.

1. Gulf Power Company

In its Ten-Year Site Plan, Gulf Power stated it will consider five properties as potential sites for future generating facilities. Three potential sites contain existing power plants: Plant Crist site in Escambia County, Plant Smith Site in Bay County, and Plant Scholz in Jackson County. Two potential sites are undeveloped: Caryville Site in Holmes County and Shoal River Site in Walton County.

A. <u>Plant Crist Site</u>. This site, located in Escambia County (approximately ten miles north of the City of Pensacola), is designated Industrial and Agriculture on the adopted Future Land Use Map (FLUM). Electric power generation facilities are an allowed use in the Industrial category and may be allowed as a conditional use in Agriculture through the Land Development Code. The site is located along the Escambia River, and the northern and eastern parts of the site are located in the coastal high hazard area and contain wetlands and 100-year floodplain. Adjacent land uses are Industrial, Conservation, Agriculture, and Mixed-Use Suburban. The existing Plant Crist facility consists of 924 megawatts of steam generation.

For information regarding wetland compatibility issues, Gulf Power should contact the Florida Department of Environmental Protection (DEP) Office of Submerged Lands and Environmental Resources at (850) 245-8474. For information on floodplain compatibility, contact the State of Florida Floodplain Management Office at (850) 413-9960.

B. <u>Plant Smith Site</u>. Located in Bay County, the Plant Smith site (approximately ten miles northwest of Panama City) is adjacent to the North Bay area of St. Andrews Bay. The site is designated Industrial and Conservation on the adopted FLUM. Public utilities are allowed uses in both Industrial and Conservation. Adjacent land uses are Agriculture-Timber and Conservation. The site is located in the Category 1, 2, 3 and 4 storm surge zones and wetlands and 100-year floodplains are also located onsite. The existing Plant Smith facility consists of 945 megawatts of generation capacity.

For assistance with wetland compatibility issues, Gulf Power should contact the DEP Office of Submerged Lands and Environmental Resources at (850) 245-8474. For information on floodplain compatibility, contact the State of Florida Floodplain Management Office at (850) 413-9960.

- C. <u>Plant Scholz Site</u>. Located in Jackson County, the Plant Scholz site (approximately three miles southeast of the Town of Sneads) is along the Apalachicola River, near U.S. Highway 90. The Jackson County Future Land Use Map designates the site as primarily Agricultural-1 and some Conservation (along the Apalachicola River). Electric power generating facilities are not identified as an allowable land use within the Agrcultural-1 and Conservation future land use categories. Gulf Power Company should contact the Jackson County Department of Community Development at (850) 482-9637 for information regarding consistency with the Jackson County Comprehensive Plan. The site contains some wetlands. The existing Plant Scholz facility consists of 92 megawatts of generation capacity.
- D. <u>Caryville Site</u>. The Caryville site is located in Holmes County, Washington County, and the City of Caryville, and it is adjacent to the Choctawhatchee River. The site is designated Agriculture in Holmes County, Agriculture/Silviculture in Washington County, and Agriculture and Conservation in Caryville. In all three jurisdictions, public utilities are allowed in areas designated Agriculture. The site is surrounded by agricultural land uses. Floodplain and wetland areas exist throughout the site.

Gulf Power should contact the following DEP offices for further information: (1) for compatibility with Outstanding Florida Waters, contact the Standards and Assessment section at (850) 245-8064; and (2) for wetland compatibility issues, contact the Office of Submerged Lands and Environmental Resources at (850) 245-8474. For information on floodplain compatibility, contact the State of Florida Floodplain Management Office at (850) 413-9960.

- E. <u>Shoal River Site</u>. The site is located in Walton County (approximately three miles northwest of Mossy Head) along the Shoal River, near U.S. Highway 90. The Walton County Future Land Use Map designates the site as General Agriculture (approximately two-thirds of site) and Rural Residential (approximately one-third of site). Public utilities are allowed in areas designated General Agriculture or Rural Residential. The site is primarily wooded upland. The Shoal River is designated as an Outstanding Florida Water, and Gulf Power should contact FDEPs Standards and Assessment section at (850) 245-8064 for further information regarding compatibility with the Shoal River.
- 2. Florida Power and Light Company. Florida Power and Light (FPL) has identified four potential sites as described below.
- A. <u>Babcock Ranch, Charlotte County</u>. This site is designated Babcock Ranch Overlay District (BROD) on the FLUM. The Development Order for the Babcock Ranch Development of Regional Impact (DRI) identifies this site as a Primary Active Greenway approved for the placement of solar generating facilities. Adjacent land uses to the east, west and south are also BROD. Land north of the site is designated Resource Conservation. The BROD is being developed under a cohesive set of policies, guided by the County's comprehensive plan, through the Master Incremental DRI process. No environmental or other compatibility issues have been identified for this site.

- B. <u>DeSoto Solar Expansion</u>, <u>DeSoto County</u>. This site is designated Electrical Generating Facility on the County's adopted Future Land Use Map. The surrounding FLUM designations are Electrical Generating Facility and Rural/Agriculture. The site has been disturbed as a result of agricultural activities on the property. The site is adjacent to an existing transportation corridor with roadway capacity. Demands on water facilities have already been considered in the growth projections of the County's comprehensive plan. No environmental or other compatibility issues have been identified for this site.
- C. Manatee Plant site, Manatee County. This site (9,500 acres) is designated Public/Semipublic-2 on the adopted Manatee County FLUM. Power generating facilities are an allowed use in this FLUM category. Adjacent uses are Public/Semipublic-2 and Agricultural-Rural. The site is also adjacent to Lake Parrish, which provides water to the existing power facility. Much of the property is disturbed due to agricultural activities onsite. This site is a possible location for a future solar facility. No environmental or other compatibility issues have been identified for this site.
- D. <u>Martin County site</u>. FPL is currently evaluating potential sites in Martin County for a future solar facility. No specific locations have been selected. The County's adopted comprehensive plan contains provisions for siting power generating facilities which use renewable energy sources. Future Land Use Policy 4.8C.1 allows alternative energy facilities in appropriate zoning districts. The policy states that "As the technology for wind, solar and other forms of power generation advance, the Land Development Regulations shall be revised to permit different forms of power generation in appropriate zoning districts." Policy 4.13A.12, which addresses the Public Utilities future land use category, states that "electrical power facilities solely utilizing solar, wind or other renewable energy fuel or energy source may be permitted in any other Future Land Use Designation, consistent with the Land Development Regulations."

For assistance with wetland compatibility issues, FPL should contact the Office of Submerged Lands and Environmental Resources at (850) 245-8474. For information on floodplain compatibility, contact the State of Florida Floodplain Management Office at (850) 413-9960.

3. Seminole Electric Cooperative.

Seminole Electric has identified one site (Gilchrist Generating Station site), a 530-acre parcel located northeast of the City Bell in the central portion of Gilchrist County, as a potential power plant site for future power generation. Much of the site has been used for silviculture (pine plantation) and consists of large tracts of planted longleaf and slash pine community, and the site contains a limited amount of wetlands (10.1 acres). The site is designated Agriculture-2 on the adopted Future Land Use Map of the Gilchrist County Comprehensive Plan. Electric generating facilities are not identified as an allowable land use within the Agriculture-2 future land use category. Seminole Electric Cooperative should contact the Gilchrist County Community Development Department at (352) 463-3173 for information regarding consistency with the Gilchrist County Comprehensive Plan. The Gilchrist parcel is located near the Wacasassa Flats, a 50,000-acre high quality wetlands-to-uplands ecosystem located in the

middle of the County. Wacasassa Flats is a perched water table system that provides significant water storage, water filtering and wildlife habitat.

4. Duke Energy Florida.

Duke Energy Florida has identified two potential sites (a site in Citrus County and another site in Suwannee County) to increase generating capacity within the Ten-Year Site Plan (TYSP) planning horizon and a third potential site (in Levy County) to increase capacity beyond the TYSP planning horizon.

- A. <u>Citrus County site</u>: The TYSP identifies a 400 acre property located east of the existing Crystal River Energy Center as a potential site for the addition of a natural gas powered electric generating facility. The potential site is designated as "Extractive" on the adopted Future Land Use Map of the Citrus County Comprehensive Plan. Electric generating facilities are not allowed in the Extractive future land use category, and Duke Energy Florida intends to request that Citrus County amend the future land use map to change the designation from Extractive to "Transportation, Communications and Utilities," which would allow the electric generating facility. The 400 acre potential site consists of timber lands, forested wetlands, and rangeland and is currently part of the Holcim mine.
- B. <u>Suwannee County site</u>: The TYSP identifies the existing Suwannee River Energy Center site in Suwannee County for the addition of a natural gas powered facility on 68 acres within the Energy Center. The 68 acres is designated as "Agriculture" on the adopted Future Land Use Map of the Suwannee County Comprehensive Plan. Electric generating facilities may be allowed as a special exception in the Agriculture future land use category. The 68 acre project area consists of a naturally occurring pine and oak vegetative community, does not contain any wetlands, and may potentially contain gopher tortoise (a wildlife species listed as Threatened and protected by Florida law). The TYSP states that a permit will be acquired from the Florida Fish and Wildlife Conservation Commission in order to relocate any gopher tortoise from the project area prior to construction.
- C. <u>Levy County site</u>: The TYSP identifies an approximately 3,100 acre property located in Levy County as a potential site for a nuclear powered generation facility beyond the ten-year planning horizon of the current TYSP. The Levy County site is located along the east side of U.S. Highway 19, approximately three miles north of the Withlacoochee River. The site is designated as Public Use on the adopted Future Land Use Map of the Levy County Comprehensive Plan. Power generating facilities are an allowed use within the Public Use future land use category at this potential site. The site is generally highly disturbed from past commercial silviculture activity and wetlands and floodplains constitute approximately 65% of the site.

5. City of Tallahassee.

The City of Tallahassee has identified one potential site, the existing Hopkins Plant, for the addition of a combustion turbine generator to increase generating capacity as other generating facilities are scheduled to be retired. The Hopkins Plant is located in Leon County, and the site is designated as "Government Operational" on the adopted Future Land Use Map of the Tallahassee-Leon County Comprehensive Plan. Electric generating facilities are an allowed use in the Government Operational future land use category. The site appears to contain available upland area that is already cleared/disturbed and does not appear to contain significant wetlands or floodplains.

6. Tampa Electric Company.

Tampa Electric Company has identified the existing Polk Power Station as the site for the addition of future generating capacity. According to the Ten-Year Site Plan, construction of the addition at the Polk Power Station began in January 2014 and all Federal permits have been received. In addition, Tampa Electric Company has identified the need for proposed generating facilities (combustion turbine, net capability of 190 megawatts summer and 220 megawatts winter) at an undetermined location with anticipated construction to begin in September 2019. The Ten-Year Site Plan states that the future generating capacity additions could occur at three existing power plant sites: (1) Polk Power Station; (2) H.L. Culbreath Bayside Power Station; and (3) Big Bend Power Station.

The Polk Power Station is located in southwest Polk County, and the site is designated as "Phosphate Mining" on the adopted Future Land Use Map of the Polk County Comprehensive Plan. Certified Electric-Power Generating Facilities may be allowed as a conditional use in the Phosphate Mining future land use category.

The H.L. Culbreath Bayside Power Station is located in unincorporated Hillsborough County, and the site is designated mostly as "Heavy Industrial" with a smaller area as "Light Industrial" on the adopted Future Land Use Map of the Hillsborough County Comprehensive Plan. Electric generation plants are an allowed use in the Heavy Industrial future land use category.

The Big Bend Power Station is located in unincorporated Hillsborough County, and the site is designated as "Heavy Industrial," "Light Industrial," and "Environmentally Sensitive Areas" on the adopted Future Land Use Map of the Hillsborough County Comprehensive Plan. Electric generation plants are an allowed use in the Heavy Industrial future land use category. The Environmentally Sensitive Areas protect wetlands and significant wildlife habitat along the southern portion of the site.

7. Utilities With No Potential Sites Identified in the TYSP: The following utilities identified no potential sites in their TYSPs: Gainesville Regional Utilities, Lakeland Electric, Florida Municipal Power Agency, JEA, and Orlando Utilities Commission.

Phillip Ellis

From: Green, Justin B. <Justin.B.Green@dep.state.fl.us>

Sent: Wednesday, June 18, 2014 2:58 PM

To: Phillip Ellis
Cc: Bull, Robert

Subject: DEP Siting Coordination Office Ten-Year Site Plan Review

Mr. Ellis -

The Department of Environmental Protection's Siting Coordination Office has reviewed the 2014 Ten-Year Site Plans for Florida's Electric Utilities and found the documents to be adequate for planning purposes. Thank you for the opportunity to review and comment on the plans. If you have any questions for our office, feel free to contact me.



Justin B. Green
Program Administrator
Siting Coordination Office
Division of Air Resource Management
Florida Department of Environmental Protection
(850) 717-9024





Florida Fish and Wildlife Conservation Commission

Commissioners

Richard A. Corbett Chairman Tampa

Brian S. Yablonski Vice Chairman Tallahassee

Ronald M. Bergeron Fort Lauderdale

Aliese P. "Liesa" Priddy Immokalee

Bo Rivard Panama City

Charles W. Roberts III Tallahassee

Executive Staff

Nick Wiley Executive Director

Eric Sutton Assistant Executive Director

Karen Ventimiglia Chief of Staff

Office of the Executive Director

Nick Wiley Executive Director

(850) 487-3796 (850) 921-5786

Managing fish and wildlife resources for their long-term well-being and the benefit of people.

620 South Meridian Street Tallahassee, Florida 32399-1600 Voice: (850) 488-4676

Hearing/speech-impaired: (800) 955-8771 (T) (800) 955-8770 (V)

MyFWC.com

June 30, 2014

Mr. Phillip O. Ellis Division of Engineering Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 pellis@psc.state.fl.us

RE: Ten-Year Power Plant Site Plans

Dear Mr. Ellis:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed the 2014 Ten-Year Power Plant Site Plans submitted to the Public Service Commission (PSC).

Appendix A

We will be providing comments on the Duke Energy Florida (DEF) site plan in a subsequent letter. However, we are submitting this letter to notify you that we have reviewed the following plans and have no comments regarding fish and wildlife resources:

- Gainesville Regional Utilities (GRU)
- Jacksonville Energy Authority (JEA)
- Florida Power and Light (FPL)
- Gulf Power Company (GULF)
- Florida Municipal Power Agency (FMPA)
- City of Tallahassee Utilities (TAL)
- Seminole Electric Cooperative (SEC)
- Lakeland Electric (LAK)
- Tampa Electric Company (TECO)
- Orlando Utilities Commission (OUC)

The FWC appreciates the opportunity to review the Ten-Year Site Plans, as submitted by the PSC. If you need further assistance, please do not hesitate to contact Jane Chabre either by phone at (850)410-5367 or by email at FWCConservationPlanningServices@MyFWC.com.

Sincerely,

Junifu D Soft

Jenniter Gott

Land Use Planning Program Administrator Office of Conservation Planning Services

jg/jh ENV 1

Gainesville Regional Utilities 2014 Ten-year Site Plan_19085_06302014

JEA 2014 Ten Year Site Plan_19088_06262014 FPL 2014 Ten Year Site Plan_19084_06262014

Gulf Power Company 2014 Ten Year Site Plan_19087_06262014 Florida Municipal Power Agency 2014 Ten-Year Site Plan_06262014

City of Tallahassee 2014 Ten-Year Site Plan 06262014

Seminole Electric Cooperative 2014 Ten Year Site Plan_19091_06262014

Lakeland Electric 2014 Ten Year Site Plan_19089_06262014

Tampa Electric Company 2014 Ten Year Site Plan_19092_06262014

Orlando Utilities Commission 2014 Ten Year Site Plan_19090_06262014

Appendix A



Florida Fish and Wildlife Conservation Commission

Contralissioners

Richard A. Corbett Chairman Tampa

Brian Yabionski Vice Chairman Tailahassee

Ronald M. Bergeron Fort Lauderdale

Richard Hanas Oviedo

Aliese P. "Liesa" Priddy Immokalee

Bo Riverd Penema City

Charles W. Roberts III Tallahassee

Executive Staff

Nick Wiley Executive Director

Eric Sutton Assistant Executive Director

Jennifer Fitzwater Chief of Staff

Division of Hishitat and Species Conservation

Thomas Eason, Ph.D. Director

(850) 488-3831 (850) 921-7793 FAX

Managing fish and wildlife resources for their long-term well-being and the benefit of people.

620 South Meridian Street Tallahassee, Florida 32399-1600 Voice: (850) 488-4676

Hearing/speech-impaired: (800) 955-8771 (T) (800) 955-8770 (V)

MyFWC,com

June 30, 2014

Mr. Phillip Ellis
Division of Engineering
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
PEllis@psc.state.fl.us

RE: Duke Energy Florida, Inc., 2014–2023 Ten-Year Site Plan, Multiple Counties

FWC DES

Dear Mr. Ellis:

The Florida Fish and Wildlife Conservation Commission (FWC) has reviewed the 2014–2023 Ten-Year Site Plan (Plan) submitted by Duke Energy Florida, Inc., (DEF) and provides our comments pursuant to Rule 25-22.071, Florida Administrative Code.

DEF provides service to approximately 20,000 square miles in west-central Florida, ranging from Bay County in the west to Highlands County in the south, including 19 counties in north-central and central Florida. Within this area, DEF currently has three steam-generated power plants, three combined-cycle power plants, and ten combustion turbine power plants. DEF also maintains approximately 5,000 circuit miles of transmission lines, 18,000 circuit miles of overhead distribution lines, and 13,000 miles of underground distribution lines; these form part of a nationwide system of transmitting electricity. According to the Plan's overview of the existing facilities, DEF has Demand-Side Management programs consisting of "six residential programs, eight commercial and industrial programs, one research and development program, and six solar pilot programs" (p. 1-1).

The Plan projects that there will be three new or expanded facilities during the ten-year planning horizon: a new combined-cycle facility near its Crystal River Energy Center in western Citrus County in 2021, two additional combustion turbines at DEF's facility in northwestern Suwannee County in 2016, and a seven-mile 240-kV bulk transmission line between Orange City and DeBary in 2015. The plan also mentions adding additional capacity to the Hines Energy Center by installing a combined-cycle facility in 2018; however, since the Plan states that the bids have already closed for that addition, we are not evaluating this as a "proposed" new facility.

FWC staff reviewed our geographic information system data layers for an initial identification of fish and wildlife resource issues that may need to be addressed during site certification, and offers the following information.

New power plant in Citrus County

We met with representatives of DEF in early May 2014 to discuss potential issues that may be encountered in certifying the new plant in Citrus County. This site lies within the secondary range of the Chassahowitzka subpopulation of the Florida black bear (*Ursus americanus floridanus*) and is near an eagle (*Haliaeetus leucocephalus*) nest that DEF has identified, but which has not yet been assigned an FWC identifier number. While both species are no longer listed, the FWC's Black Bear Management Plan (http://myfwc.com/media/2612908/bear-management-plan.pdf) provides measures to avoid negative human-bear interactions during construction and operation of the facility. The bald eagle is protected under the Bald and Golden Eagle Protection Act (http://www.fws.gov/midwest/midwestbird/eaglepermits/bagepa.html), Florida's Bald Eagle rule (section 68A-16.002), and the Florida Bald Eagle Management Plan (http://myfwc.com/media/427567/Eagle_Plan_April_2008.pdf). We are coordinating with DEF's representatives on recommendations with respect to black bears, and it appears that the eagle nest is over 660 fect away from any planned activities. Nests occurring further than 660 feet from any

Appendix A

Mr. Philip Ellis Page 2 June 30, 2014

project activities will not require an FWC eagle permit; however, not all eagle nests in Florida have been documented by FWC, and undocumented nests receive the same level of protection as documented nests. Please keep in mind that cagle nests may become reactivated at any time or eagles may establish a new nest, at which point the FWC Bald Eagle Management Plan (http://myfwc.com/media/427567/Eagle_Plan_April_2008.pdf) guidelines, found in the Section entitled "Permitting Framework April 2008," would apply.

FWC OES

It is also unclear whether the outflows from the new plant would add to the impacts on the nearshore environment from the Crystal River Energy Complex. The potential for additional nearshore impacts would depend on if any of the existing plants are decommissioned. The potential for impacts should be considered as part of the assessments completed for this site.

Addition to the Suwannee power plant

Our initial review identified potential habitat at the site of the proposed addition to the Suwannee power plant for the gopher tortoise (Gopherus polyphemus, State-Threatened), which indicates that listed commensal burrow species [e.g., the Florida mouse (Podomys floridanus, State Species of Special Concern) and the eastern indigo snake (Drymarchon corais couperi, Federally Threatened)] may also be present. The Plan mentions the potential for there being gopher tortoises on site, and commits to working with the FWC to ensure that they will be adequately addressed. The FWC's Gopher Tortoise Permitting Guidelines (http://myfwc.com/license/wildlife/gopher-tortoise-permits/) provides recommended survey methodologies, permitting options, and guidelines for commensal species. In addition, there is the potential for Sherman's fox squirrels (Sciurus niger shermani, State Species of Special Concern) to be identified during site-specific surveys.

New bulk transmission line

Our initial review identified records of the Florida scrub-jay (Aphelocoma caerulescens, Federally Threatened) between Orange City and DeBary. Should more site-specific surveys identify the presence of Florida scrub-jays, the DEF may need to consult with the U.S. Fish and Wildlife Service to determine the potential for impacts.

We appreciate the opportunity to provide input on this ten-year plan. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or by email at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Mary Ann Poole at (850) 488-8783 or by email at maryann.poole@myfwc.com.

Sincerely,

Jennifer D. Goff

Land Use Planning Program Administrator Office of Conservation Planning Services

Jerrife Q-Saff

jdg/map

ENV I-11-2/3

Duke Energy Florida 2014 Ten-Year Site Plan_19082 06302014

Regional Planning Councils

- Central Florida Regional Planning Council
- East Central Florida Regional Planning Council
- Treasure Coast Regional Planning Council
- West Florida Regional Planning Council



July 1, 2014

Phillip Ellis State of Florida Public Service Commission Capital Circle Office Center 2540 Shumard Oak Blvd Tallahassee, FL 32399

Dear Mr. Ellis,

RE: Review of 2014 Ten-Year Site Plans for Florida's Electric Utilities

The CFRPC reviewed ten-year site plans from Duke Energy Florida, Lakeland Electric, Orlando Utilities Commission, Seminole Electric Cooperative, and Tampa Electric Company as requested in the letter dated April 22, 2014, and included on the Public Service Commission's website. As requested, comments on the plans and a brief summary related to the suitability of the above mentioned plans as planning documents is below.

Duke Energy Florida:

According to the plan, Duke Energy anticipates additional summer capacity at the Hines Energy Center (Polk County) through the installation of Inlet Chilling by March 2017 and the retirement of the Avon Park facility (Highlands County) in 2016.

This document is suitable for a planning document at a regional level because it provides information as to the proposed locations of planned new facilities. It is somewhat less suitable as a planning document at providing insight on the development through current demand and forecast demand because it cannot be extrapolated to a regional or county level because Progress Energy's boundaries cover so much of the State of Florida. It is helpful to know what energy conservation and management programs are being utilized as well as the environmental and land impacts are predicted to occur for the overall planning of the region's growth and development and protection.

Lakeland Electric:

The plan states that there are no planned facilities for the 10-year planning reporting period. There are also no upgrades of existing facilities planned. As of December 2013, there are no long-term firm power sales or purchase contracts in place.

Phillip Ellis State of Florida Public Service Commission July 1, 2014 Page 2 of 3

This document is suitable for a planning document at a regional level because it provides insight on the development of areas within a portion of the region through current demand and forecast demand. It also is helpful to know what energy conservation and management programs are being utilized as well as the environmental and land impacts are predicted to occur for the overall planning of the region's growth and development and protection.

This document is also written in a manner that makes it easy for non-utility planners to understand. However, due to the scanning or production process, the figures included in the document are blurry and very hard to read.

Orlando Utilities Commission:

According to the plan, no facilities are planned for development or retirement within the Central Florida Regional Planning Council Region for the 10-year planning reporting period. OUC has a contract to provide power to Bartow for the 2011 through 2017 period. Bartow purchases the power from OUC, and then distributes it to its customers through its existing infrastructure. The plan discusses upgrades of existing facilities. Unfortunately, since there is not a map included to show where these facilities are located, it is not possible to determine which of them may be in the region.

This document is suitable for a planning document at a regional level because it provides information as to facilities located within the region. It is somewhat less suitable as a planning document at providing insight on the development through current demand and forecast demand because it cannot be extrapolated to a regional or county level the document does not provide clear information on the areas. This document would also be more helpful as a planning document with the inclusion of a service area map.

Seminole Electric Cooperative:

According to the plan, no facilities are planned within the Central Florida Regional Planning Council Region for the 10-year planning reporting period. There are also no upgrades of existing facilities or retirement of existing facilities planned in these areas.

This document is suitable for a planning document at a regional level because it provides information as to facilities located within the region. It is somewhat less suitable as a planning document at providing insight on the development through current demand and forecast demand because it cannot be extrapolated to a regional or county level because Seminole Electric Cooperative services so much of the State of Florida.

Phillip Ellis State of Florida Public Service Commission July 1, 2014 Page 3 of 3

Tampa Electric Company:

According to the plan, no additional facilities are planned within the Central Florida Regional Planning Council Region for the 10-year planning reporting period. However, to meet the expected system demand and energy requirements over the next ten years, both peaking and intermediate resources are needed. The peaking capacity need will be met by purchased power agreements for peaking capacity secured through 2016. In 2017, Tampa Electric currently expects to meet its intermediate load needs by converting Polk Power Station's simple cycle combustion turbines (Polk Units 2-5) to a natural gas combined cycle (NGCC) unit to be in service January 2017. Beyond 2017, the company foresees the future needs being that of additional peaking capacity, which it will meet by combustion turbine additions and/or future purchased power agreements. Associated Transmission Lines right-of-way issues are under review for Polk 2 CC with an anticipated in-service date of January 2017.

This document is suitable for a planning document at a regional level because it provides information as to the proposed locations of planned new expansions and because it provides insight on the development of areas within a portion of the region through current demand and forecast demand. It also is helpful to know what energy conservation and management programs are being utilized as well as the environmental and land impacts are predicted to occur for the overall planning of the region's growth and development and protection.

The proposed expansions/potential sitings as identified in the ten-year power plant site plans as submitted are consistent with the Central Florida Regional Planning Council Strategic Regional Policy Plan (SRPP). Thank you for the opportunity to review these electric utility ten-year site plans.

Sincerely,

Marisa M. Barmby, AICP

ma Mily

Senior Planner



East Central Florida Regional Planning Council

309 Cranes Roost Blvd. Suite 2000, Altamonte Springs, FL 32701 Phone 407.262.7772 • Fax 407.262.7788 • www.ecfrpc.org

Hugh W. Harling, Jr. P.E. Executive Director

MEMORANDUM

To: Phillip Ellis, Florida Public Service Commission

From: Hugh W. Harling, Jr., Executive Director

Tara M. McCue, AICP, Director of Planning and Community Design

Date: July 30, 2014

Subject: 2014 Ten-Year Site Plans Review

- Florida Power and Light

- Orlando Utilities Commission

- Duke Energy Florida

The East Central Florida Regional Planning Council staff has no comments concerning the 10-Year Site Plans for utility companies within the east central region at this time. The ECFRPC will conduct a detailed review of any new facilities or upgraded facilities requiring an agency review when a proposal is submitted.

If you require any further information or comments, please contact Tara McCue, AICP at <u>tara@ecfrpc.org</u> or by phone at (407) 262-7772, ext. 327.

June 24, 2014

Mr. Phillip Ellis Division of Engineering Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Subject: 2014 Ten Year Power Plant Site Plans

Dear Mr. Ellis:

Treasure Coast Regional Planning Council has reviewed the ten year power plant site plan prepared by Florida Power and Light Company. Council approved the comments in the attached report at a board meeting on June 20, 2014. The report concludes that the FPL Ten Year Power Plant Site Plan, 2014-2023 is inconsistent with **Strategic Regional Policy Plan Goal 9.1**, decreased vulnerability of the region to fuel price increases and supply interruptions. Council urges FPL and the State of Florida to continue developing new programs to: 1) reduce the reliance on fossil fuels as future energy sources; 2) increase conservation activities to offset the need to construct new power plants; and 3) increase the reliance on renewable energy sources to produce electricity.

Please contact me if you have any questions.

Sincerely,

Peter G. Merritt, Ph.D.

Assistant Director

Attachment

cc: Nick Blount, FPL

TREASURE COAST REGIONAL PLANNING COUNCIL

Report on the

Florida Power & Light Company Ten Year Power Plant Site Plan 2014-2023

June 20, 2014

Introduction

Each year every electric utility in the State of Florida produces a ten year site plan that includes an estimate of future electric power generating needs, a projection of how those needs will be met, and disclosure of information pertaining to the utility's preferred and potential power plant sites. The Florida Public Service Commission (FPSC) has requested that Council review the most recent ten year site plan prepared by Florida Power & Light Company (FPL). The purpose of this report is to summarize FPL's plans for future power generation and provide comments for transmittal to the FPSC.

Summary of the Plan

The plan indicates that total summer peak demand is expected to grow by 16.5 percent from 22,768 megawatts (MW) in 2014 to 26,525 MW in 2023. During the same period, FPL is expecting to reduce electrical use through demand side management programs, which include a number of conservation, energy efficiency, and load management initiatives. FPL's demand side management programs are expected to grow by 15.1 percent from 1,992 MW in 2014 to 2,292 MW in 2023. After FPL's demand side management efforts are factored in, FPL will still require additional capacity from conventional power plants to meet future electrical demand (Exhibit 1). FPL is proposing to add a total of about 2,731 MW of summer capacity to its system from 2014 to 2023. FPL plans to obtain additional electricity through: 1) power purchases from qualifying facilities, utilities, and other entities; 2) upgrades to existing facilities; 3) addition of an existing municipal facility; 4) modernization of existing FPL facilities; and 5) construction of new generating units. Major additions of new generating capacity are as follows:

- 2014 place in service the Riviera Beach Next Generation Clean Energy Center (1,212 MW) in the City of Riviera Beach;
- 2016 place in service the Port Everglades Next Generation Clean Energy Center (1,237 MW) in the City of Hollywood;
- 2019 place in service new combined cycle power plant (not sited);
- 2022 place in service Turkey Point Nuclear Unit 6 (1,100 MW) in Miami-Dade County; and
- 2023 place in service Turkey Point Nuclear Unit 7 (1,100 MW) in Miami-Dade County.

Based on the projection of future resource needs, FPL has identified the following six preferred sites for future power generating facilities:

1. Port Everglades Plant in Broward County

- 2. Lauderdale Plant in Broward County
- 3. Hendry County
- 4. Northeast Okeechobee County
- 5. Putnam County
- 6. Turkey Point Plant in Miami-Dade County

Also, FPL has identified 4 potential sites for new or expanded power generating facilities. The identification of potential sites does not represent a commitment by FPL to construct new power generating facilities at these sites. The potential sites include:

- 1. Babcock Ranch in Charlotte County
- 2. DeSoto Solar Expansion in DeSoto County
- 3. Manatee Plant Site in Manatee County
- 4. Martin County unidentified location for a photovoltaic (PV) facility

The ten year site plan describes eight factors that are influencing FPL's resource planning work. These factors include:

- 1. Maintaining/enhancing fuel diversity in the FPL system.
- 2. Maintaining a balance between load and generating capacity in southeastern Florida, particularly in Miami-Dade and Broward counties.
- 3. Updated projections of federal and state energy efficiency codes and standards.
- 4. Decline in the projected cost-effectiveness of demand side management measures and programs.
- 5. FPL's growing dependence upon demand side management resources to maintain system reliability.
- 6. The schedule for the Turkey Point Nuclear Units 6 and 7.
- 7. Potential changes in environmental regulations and/or legislation.
- 8. Possible establishment of a Florida standard for renewable energy or clean energy.

Evaluation

One of the main purposes of preparing the ten year site plan is to disclose the general location of proposed power plant sites. The FPL ten year site plan identifies no preferred sites and one potential site for future power generating facilities in the Treasure Coast Region (Exhibit 2). The only potential site identified in the Treasure Coast Region is in Martin County. The plan indicates FPL is currently evaluating potential sites in Martin County for a future PV facility. No specific locations have been selected at this time.

The ten year site plan indicates FPL will begin serving the City of Vero Beach's electrical load beginning in January 2015. In early 2013, FPL came to an agreement with the City of Vero Beach to purchase the City's electric utility system. FPL is expected to begin providing electric service to more than 34,000 customers formerly served by the City of Vero Beach. As part of FPL's acquisition of Vero Beach's electric utility system, FPL is projected to take ownership of Vero Beach's five existing generating units starting January 2015. The current plan is to immediately retire three of these older generating units and operate the remaining two, which

supply approximately 46 MW of combined cycle summer capacity, for a maximum of three years.

The ten year site plan indicates that fossil fuels will be the primary source of energy used to generate electricity by FPL during the next 10 years (Exhibit 3). The plan indicates fossil fuels will account for 71.8 percent (5.1 percent from coal, 0.4 percent from oil, and 66.3 percent from natural gas) of FPL's electric generation in 2014. The plan predicts fossil fuels will account for 62.9 percent (5.1 percent from coal, 0.1 percent from oil, and 57.7 percent from natural gas) of FPL's electric generation in 2023. During the same period, nuclear sources are predicted to change from 23.6 percent in 2014 to 32.4 percent in 2023. Solar sources are predicted to decline from 0.2 percent in 2014 to 0.1 percent in 2023.

Regarding solar energy, FPL has three solar generating facilities: 1) a 75 MW steam generation solar thermal facility in Martin County (the Martin Next Generation Solar Energy Center); 2) a 25 MW PV electric generation facility in DeSoto County (the DeSoto Next Generation Solar Energy Center); and 3) a 10 MW PV electric generation facility in Brevard County at NASA's Kennedy Space Center (the Space Coast Next Generation Solar Energy Center). These three projects were completed in response to the 2008 Energy Bill, which was enacted to enable the development of clean, zero greenhouse gas emitting renewable generation in the State of Florida. Specifically, the bill authorized cost recovery for the first 110 MW of eligible renewable projects that had the proper land use, zoning, and transmission rights in place.

In addition to the three solar facilities noted above, the plan indicates that FPL is currently in the process of identifying other potential sites in the state for PV facilities. FPL is evaluating existing generation sites along with other sites within FPL's service territory. FPL is also planning to establish a voluntary community based solar partnership pilot program to provide customers with the opportunity to support the use of solar energy at the community scale. In addition, FPL is planning to establish a commercial and industrial solar partnership program in order to examine the effect of rooftop PV facilities on FPL's distribution system. Council continues to support FPL's existing solar projects and encourages FPL to develop additional projects based on renewable resources.

Other Comments

As part of the review of the ten year site plan, Council solicited comments from jurisdictions that may be affected by or are neighboring FPL's existing and proposed power generating facilities in the region. Council received correspondence from the Indian River County planning staff concerning a 2,800 acre site in northeast Okeechobee County (Exhibit 4). The county staff noted that the site, which is proposed as a potential combined cycle or PV plant location, is located adjacent to Indian River County. The comments indicate that if the Okeechobee site is developed and is to be accessed from Indian River County, then FPL will need to coordinate with Indian River County to evaluate and address any traffic impacts.

Conclusion

The FPL ten year site plan is inconsistent with **Strategic Regional Policy Plan Goal 9.1**, decreased vulnerability of the region to fuel price increases and supply interruptions, because the plan predicts continued heavy reliance on only two primary fuel types, natural gas and nuclear fuel. The plan predicts a decrease in the reliance on fossil fuels and an increase in the reliance on nuclear energy during the next ten years. This outcome is a step toward consistency with **Strategy 9.1.1**, reduce the Region's reliance on fossil fuels. However, this shift in fuel supply is not sufficient to decrease vulnerability of the region to fuel price increases and supply interruptions. Council recommends that FPL adopt a more balanced portfolio of fuels that includes a significant component of renewable energy sources. Council remains concerned that the ten year site plan does not predict an increase in the use of renewable energy during the next decade. Council continues to encourage the Florida Legislature to adopt a Renewable Portfolio Standard in order to provide a mechanism to expand the use of renewable energy in Florida.

Council recommends that FPL consider new strategies to expand reliance on renewable sources. FPL should consider expanding its solar rebate programs for customers who install PV and solar water heating systems on their homes and businesses. This program is part of a five-year pilot program authorized by the FPSC to promote clean solar power and reduce energy consumption. The program should be expanded, because demand far exceeds the availability of funds. Also, the application period should be standardized so that the rebates can be coordinated with other programs, such as the Solar and Energy Loan Fund (SELF) and Property-Assessed Clean Energy (PACE) programs, to provide participants in these programs the option of receiving a rebate. SELF is a low interest rate loan program that provides financing for clean energy solutions. PACE programs allow property owners to finance energy retrofits by placing an additional tax assessment on the property in which the investment is made. New PACE programs have recently been established in Martin and St. Lucie counties, and the cities of Fellsmere, Sebastian, Stuart, and West Palm Beach. The current schedule for rebate applications makes it difficult for SELF and PACE participants to take part in the FPL rebate program.

FPL should also consider developing a program to install, own, and operate PV units on the rooftops of private and public buildings. The shift to rooftop PV systems distributed throughout the area of demand could reduce reliance on large transmission lines and reduce costs associated with owning property; purchasing fuel; and permitting, constructing, and maintaining a power plant. Another advantage of this strategy is that PV systems do not require water for cooling. The incentive for owners of buildings to participate in this strategy is they could be offered a reduced rate for purchasing electricity. The future development of ocean current technology, which is currently under investigation by the Florida Atlantic University Southeast National Marine Renewable Energy Center, may be another opportunity to expand the use of renewable energy.

Council urges FPL and the State of Florida to continue developing new programs to: 1) reduce the reliance on fossil fuels as future energy sources; 2) increase conservation activities to offset the need to construct new power plants; and 3) increase the reliance on renewable energy sources to produce electricity. The complete costs of burning fossil fuels, such as the costs to prevent environmental pollution and costs to the health of the citizens, need to be considered in evaluating these systems. State legislators should amend the regulatory framework to provide

financial incentives for the power providers and the customers to increase conservation measures and to rely to a greater extent on renewable energy sources. Also, the State should reconsider the currently used test for energy efficiency and choose a test that will maximize the potential for energy efficiency and renewable energy sources. The phasing in of PV and other locally available energy sources will help Florida achieve a sustainable future.

Attachments

EXHIBIT 1

Table ES-1: Projected Capacity & Firm Purchase Power Changes

Value *	Desired Committee Committe	Summer		Summer Reserve
Year*	Projected Capacity & Firm Purchase Power Changes	MW	Date	Margin **
2014	Martin Unit 1 ESP - Return from ESP outage	823	March-14	
	Martin Unit 2 ESP - Temporary Outage to install ESPs	(826)	March-14	
	Turkey Point Unit 5 CT Upgrade	30	March-14	ć.
	Sanford 5 CT Upgrade	9	September-13	
4023444444	Riviera Beach Next Generation Clean Energy Center	1,212	April-14	Water and the second
2015		1,247		28.0%
2015	Manatee Unit 3 CT Upgrade	32	October-14	
	Martin Unit 2 ESP - Returned from ESP Outage	823	December-14	
	Putnam 1&2 Retirement	(498)	December-14	
	OUC - Stanton PPAs	37	January-15	
	Vero Beach Combined Cycle ^{1/}	46	January-15	
	Palm Beach SWA - additional capacity	70	January-15	
	Fort Myers Unit 2 CT Upgrades	18	June-15	
	Fort Myers Unit 2 CT Upgrades	18	March-15	
	Fort Myers Unit 2 CT Upgrades	18	May-15	
* Jillia (*)	Total of MW changes to Summer firm capacity:	563		27.5%
2016	UPS Replacement	(928)	December-15	
	Port Everglades Next Generation Clean Energy Center	1,237	June-16	
11111		309	1 11 11 11 11 11	26.6%
2017	Turkey Point Unit 1 synchronous condenser	(396)	October-16	
	Total of MW changes to Summer firm capacity:	(396)	Table 1 4 4 4	22.6%
2018	OUC - Stanton PPAs	(37)	December-17	
	Vero Beach Combined Cycle 17	(46)	January-18	
	Total of MW changes to Summer firm capacity:	(83)	F. P. J. Wall	20.5%
2019	Port Everglades GT retirement	(420)	December-18	
	Lauderdale GT retirement	(840)	December-18	
	Lauderdale CT	1,005	January-19	
	SJRPP suspension of energy	(381)	April-19	
	Unsited CC	1,269	June-19	
· # 11	Total of MW changes to Summer firm capacity:	633	1.4000 (1.14)	21.6%
2020	Unspecified Purchase	129	June-20	
1307.31	Total of MW changes to Summer firm capacity:	129	ra Rijarana	20.5%
2021	Eco-Gen PPA	180	January-21	
	Unspecified Purchase	168	June-21	
	Total of MW changes to Summer firm capacity:	348	10.70-0-011.401	20.6%
2022	Cape Next Generation Clean Energy Center	87	June-22	SECURICAN CANCELLAND
	Turkey Point Nuclear Unit 6	1,100	June-22	
. 446.45		1,187	12.00	22.6%
2023	Riviera Beach Next Generation Clean Energy Center	55	June-23	Minutes of the Section (Sec
	Turkey Point Nuclear Unit 7	1,100	June-23	
i la		1,155	Udile Eu	24.4%

^{*} Year shown reflects when the MW change begins to be accounted for in Summer reserve margin calculations. (Note that addition of MW values for each year will not yield a current cumulative value.)

^{**} Winter Reserve Margins are typically high than Summer Reserve Margin. Winter Reserve Margin are shown on Schedule 7.2 in Chapter III.

^{1/1} This unit will be added as part of the agreement that FPL will serve Vero Beach's electric load starting January, 2015. This unit is expected to be retired within 3 years.

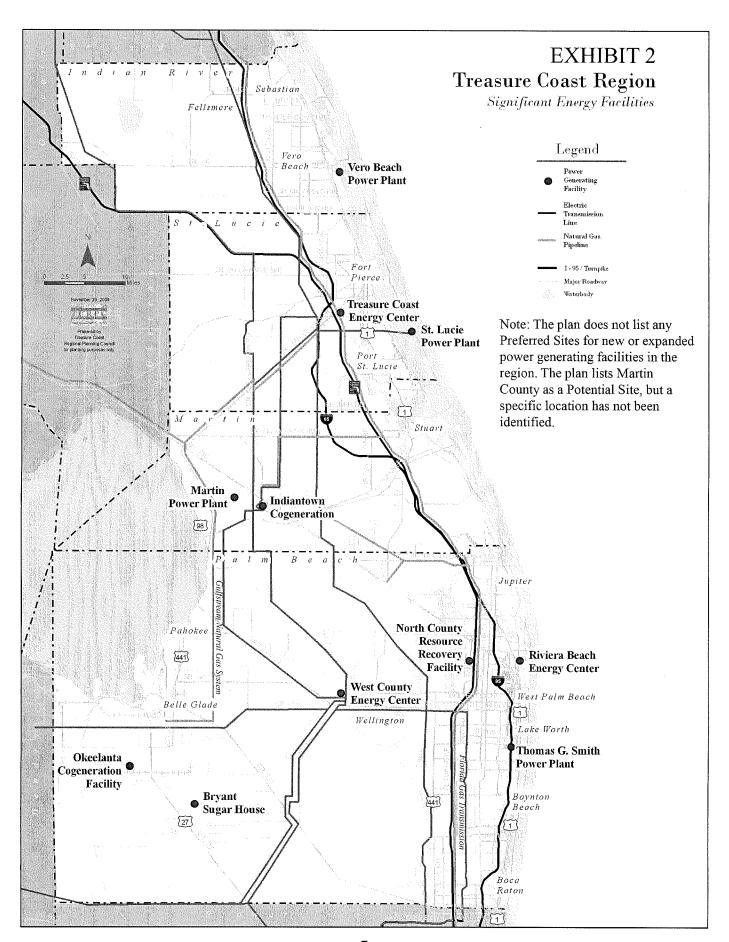


EXHIBIT 3

Schedule 6.2 Energy Sources % by Fuel Type

			Actual	10.					Foreca	Forecasted					
	Energy Source	Units	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	
(1)	Annual Energy Interchange 2/	%	4.7	4,0	3,0	3.2	1,7	1.9	2:1	8.0	0.0	0,0	0.0	0.0	
(2)	Nuclear	%	15.3	22.6	23.6	23.0	23.1	22.6	22.1	22.4	21.8	21.6	25.6	32.4	
(3)	Coal	%	4.3	5.4	5.1	5.5	3.1	4.4	5.1	5.4	5.4	5,3	5,2	5.1	
(4)	Residual (FO6) -Total	%	0.3	0.1	0.4	0.6	0.6	0.3	0.3	0.1	0.1	0.1	0.1	0.0	
(5)	Steam	%	0.3	0.1	0.4	0.6	0,6	0,3	0.3	0.1	0.1	0.1	0.1	0.0	
(6)	Distillate (FO2) -Total	%	0.0	0.1	0.0	0.0	0.1	0.0	0.2	0.1	0.2	0.2	0.1	0.1	
(7)	Steam	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0,0	0.0	0.0	
(8)	CC	%	0.0	0.1	0.0	0.0	0.1	0.0	0.1	0.1	0:1	0.1	0.1	0.0	
(9)	CT	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0,0	0.1	0.1	0.0	0.0	
	Natural Gas -Total	%	72.6	67.4	66.3	64.1	67.9	67.1	66.6	66.5	67.8	68,1	64.3	57.7	
	Steam	%	5.0	2.2	0.3	0.6	0.8	0.7	0.6	0.2	0.2	0.2	0.1	0.1	
(12)	CC	%	67.3	64.8	65.9	63.4	67.0	66.3	65.7	66.1	67.3	67.6	64.0	57.5	
(13)	CT	%	0.3	0.4	0.1	0.1	0.2	0.1	0.3	0.2	0.2	0.2	0.1	0,1	
(14)	Solar ^{a/}	%	0.1	0.1	0.2	0.1	0.2	0.2	0.2	0.2	0,1	0.1	0,1	0.1	
(15)	PV	%	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
(16)	Solar Thermal	%	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
(17)	Other 4	·% _	2.6	0.4	1.5	3.4	3.4	3,6	3.5	4.6	4.7	4.6	4,6	4.5	
			100	100	100	100	100	100	100	100	100	100	100	100	

Source: A Schedules and Actual Data for Next Generation Solar Centers Report
 The projected figures are based on estimated energy purchases from SJRPP, the Southern Companies (UPS contract), and other utilities.
 Represents output from FPL's PV and solar thermal facilities.
 Represents a forecast of energy expected to be purchased from Qualifying Facilities, independent Power Producers, net of Economy and other Power Sales.

EXHIBIT 4

Peter G. Merritt

From: Stan Boling <sboling@ircgov.com>
Sent: Thursday, May 08, 2014 9:59 AM

To: 'lgulick@tcrpc.org'

Cc: BCC - Board Members; Joe Baird; Chris Mora; Phil Matson; Sasan Rohani; John McCoy;

Roland Deblois; John King; Michael Zito; Dylan Reingold; Vincent Burke; Dori Roy;

'Amy_Brunjes@fpl.com'; 'pmerritt@tcrpc.org'

Subject: Indian River County Community Development Staff Comments on Florida Power & Light

Ten Year Power Plant Site Plan 2014-2023

Liz:

Indian River County Community Development staff reviewed FPL's latest 10 year plan. Although no sites for future development are located within Indian River County, the 2,800 acre site in northeast Okeechobee County is proposed as a potential combined cycle (CC) or photovoltaic (PV) plant location and is adjacent to Indian River County. At this time, staff's only comment is that if the Okeechobee site is developed and is to be accessed from Indian River County, such as via SR 60, then FPL will need to coordinate with Indian River County to evaluate and address any identified traffic impacts. We appreciate the opportunity to comment.

.....Stan Boling, Community Development Director





MEMORANDUM

DATE:

7/1/14

TO:

Phillip Ellis, Engineering Specialist, Public Service Commission

pellis@psc.state.fl.us

FROM:

Terry Joseph, Executive Director, WFRPC

850-332-7976, Extension 201 terry.joseph@wfrpc.org

RE: WFRPC:

Grant Application Project Description:

MJ894042514

Review of the 2014 Ten-Year Site Plans for Florida's Electric Utilities (Gulf

Power Company)

The Florida State Clearinghouse referred your grant application to the WFRPC Regional Clearinghouse for review. Section 4 of Gubernatorial Executive Order 95-359 provides that all federal applications which originate from non-state agencies, such as local governments and not-for-profit organizations, and which will have no significant effect on Florida's environment, are exempted from the intergovernmental coordination and review process overseen by the State Clearinghouse. Your application was referred to the WFRPC for review because the State Clearinghouse determined it meets exempted review requirements.

As required by the Executive Order, the staff of the West Florida Regional Planning Council has reviewed the above referenced proposed project under the Intergovernmental Coordination & Review Process (IC&RP) for consistency with the West Florida Strategic Regional Policy Plan (WFSRPP). Based upon review of the information submitted, the Planning Council staff finds the proposal generally consistent with the WFSRPP, adopted July 15, 1996. A finding of consistency with the West Florida Strategic Regional Policy Plan does not necessarily affect eligibility or obligate funding of your project. For information about the WFSRPP, please see the WFRPC's web page www.wfrpc.org

X	Staff had no additional comments.						
	Please find attached staff comments.						

If you have any questions concerning this communication, please refer to the WFRPC # listed above.

Water Management Districts

- Northwest Florida Water Management District
- Southwest Florida Water Management District
- Suwannee River Water Management District



Jonathan P. Steverson Executive Director

Appendix A Northwest Florida Water Management District

152 Water Management Drive, Havana, Florida 32333-4712 (U.S. Highway 90, 10 miles west of Tallahassee)

Phone: (850) 539-5999 • Fax: (850) 539-2693

June 24, 2014

State of Florida Public Service Commission Attn: Mr. Phillip Ellis Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850



RE: Review of the 2014 Ten-Year Site Plans for Florida's Electric Utilities

Dear Mr. Ellis,

The Northwest Florida Water Management District (District) has reviewed the Ten-Year Site Plans for Gulf Power Company and the City of Tallahassee Utilities as requested in your correspondence dated April 22, 2014. The District has no comments on the site plans at this time.

If you have any questions or if any additional information is needed, please feel free to contact us at (850) 539-5999.

Sincerely,

Kevin R. Hayes, P.G., CPG, GISP Chief, Bureau of Groundwater

Kerrin R. Hayes

Regulation

Y:\REG_GW\PSC 10-Year Plan Reviews 2014\PSC Ten-Year Plan Reviews - Electrical Utilities June 2014.docx



Southwest Florida Water Management District

2379 Broad Street, Brooksville, Florida 34604-6899 (352) 796-7211 or 1-800-423-1476 (FL only)
On the World Wide Web at WaterMatters.org

Bartow Service Office 170 Century Boulevard Bartow, Florida 33830-7700 (863) 534-1448 or

1-800-492-7862 (FL only)

Sarasota Service Office 6750 Fruitville Road Sarasota, Florida 34240-9711 (941) 377-3722 or 1-800-320-3503 (FL only) **Tampa Service Office** 7601 U.S. 301 North Tampa, Florida 33637-6759 (813) 985-7481 or 1-800-836-0797 (FL only)

Carlos Beruff Chair, Manatee

Michael A. Babb Vice Chair, Hillsborough

Randall S. Maggard Secretary, Pasco

Jeffrey M. Adams
Treasurer. Pinellas

Todd Pressman Former Chair, Pinellas

H. Paul Senft, Jr. Former Chair, Polk

Bryan K. Beswick
DeSoto, Hardee, Highlands

Thomas E. Bronson Hernando, Marion

Jennifer E. Closshey Hillsborough

> Wendy Griffin Hillsborough

George W. Mann

Polk Vacant

Charlotte, Sarasota

Vacant Citrus, Lake, Levy, Sumter

> Blake C. Guillory Executive Director

May 16, 2014

Mr. Phillip Ellis, Engineering Specialist III Division of Engineering Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Subject: Electric Utility 2014 Ten-Year Site Plans

Dear Mr. Ellis:

In response to your request, the Southwest Florida Water Management District (District) has completed its review of the 2014 Ten-Year Site Plans (Site Plans) for Duke Energy Florida (DEF) and Tampa Electric Company (TECO). The District's review is being conducted pursuant to Section 186.801(2)(e), Florida Statutes, which requires that the Public Service Commission consider "the views of the appropriate water management district as to the availability of water and its recommendation as to the use by the proposed plant of salt water or fresh water for cooling purposes."

Please note that, pursuant to Section II.A.1.f of the current Operating Agreement between the Florida Department of Environmental Protection (DEP) and the District concerning the division of responsibility for management and storage of surface waters regulation and wetland resource regulation under Chapter 373, Part IV, Florida Statutes, the DEP is responsible for conducting the Environmental Resource Permit-related review and for taking final agency action for power plants, electrical distribution and transmission lines, and other facilities related to the production, transmission, and distribution of electricity.

Both DEF and TECO indicate in their Site Plans that new generating facilities are proposed within the ten-year planning horizon. The Site Plan for DEF indicates that new combined cycle units are proposed in 2018 and 2021 adjacent to the Crystal River Site and at an undesignated site, respectively. The Site Plan for TECO indicates that conversion of the Polk Power Station's simple cycle combustion turbines (Units 2-5) to a natural

Mr. Phillip Ellis, Engineering Specialist III May 16, 2014 Page 2

gas combined cycle unit is proposed in 2017. In addition, a new combustion turbine is proposed in 2020 at an undesignated site.

Based on the information provided in the Site Plans, the District offers the following technical assistance comments for your consideration:

- During the site certification or permitting process, consideration must be given to the lowest quality water available which is acceptable for the proposed use. If a lower quality water is available and is environmentally, technically and economically feasible for all or a portion of the proposed use, this lower quality water must be used.
- 2) For new generating facilities proposed in the southern and much of the central portions of the District, there are additional water use constraints. These areas have been designated as Water Use Caution Areas. This designation has occurred in response to water resource impacts, such as salt water intrusion, lowered water levels in lakes and wetlands, and reduced stream flows, which have been caused by excessive ground water withdrawals. Regional recovery strategies are being implemented to address these adverse water resource impacts. Consequently, the District has heightened concerns regarding potential impacts due to additional water withdrawals.
- 3) The most water conserving practices must be used in all processes and components of the power plant's water use that are environmentally, technically and economically feasible for the activity, including reducing water losses, recycling, and reuse.

We appreciate this opportunity to participate in the review process. If you have any questions or require further assistance, please do not hesitate to contact me at (352) 796-7211, extension 4790, or james.golden@watermatters.org.

Sincerely,

James J. Golden, AICP

pour fr. Sella

Senior Planner

JG



DON QUINCEY, JR. Chairman Chiefland, Florida

ALPHONAS ALEXANDER Vice Chairman Madison, Florida

RAY CURTIS Secretary / Treasurer Perry, Florida

> KEVIN BROWN Alachua, Florida

GEORGE COLE Monticello, Florida

VIRGINIA H. JOHNS Alachua, Florida

GARY F. JONES Old Town, Florida

VIRGINIA SANCHEZ Old Town, Florida

GUY N. WILLIAMS Lake City, Florida

ANN B. SHORTELLE, Ph.D. Executive Director Gainesville, Florida

SUWANNEE RIVER WATER MANAGEMENT DISTRICT

July 1, 2014

Florida Public Service Commission ATTN: Phillip Ellis Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: SRWMD Review of the 2014 Ten-Year Site Plans for Florida's Electric Utilities – Duke Energy Florida and Seminole Electric Cooperative

Dear Mr. Ellis:

The Suwannee River Water Management District (District) appreciates the opportunity to provide comments regarding the above-referenced ten-year site plans. After review by District Staff, no comment is offered related to the Duke Energy proposal as it involves no change from the current water usage. The Seminole Electric Cooperative (SEC) proposal, however, is of concern.

The SEC site is almost entirely within the Lower Santa Fe River Water Resource Caution Area. This is a region that the District has determined to already have water resource problems or in which water resource problems are projected to develop during the next twenty years. As such, additional large groundwater withdrawals will likely exacerbate these problems. A previous evaluation of the effects of both a two and an eight million gallon per day groundwater withdrawal were submitted to the District. At that time the technical report for the Lower Santa Fe and Ichetucknee Rivers and Associated Springs Minimum Flows and Levels (MFLs) was not completed. The recently completed and proposed MFLs show that these river and spring resources will be in recovery when the proposed rule is adopted. Based on the Florida Department of Environmental Protection's proposed rule (Chapter 62-42, Florida Administrative Code) any new impacts to the MFLs from groundwater withdrawals would need to be offset or eliminated.

These constraints will be evaluated under the District's existing rules at the time a water use permit application or site certification is submitted for review. Please contact our office if you have any questions.

Ann B. Shortelle, Ph.D.

Executive Director

Respectfully

ABS/wz

Water for Nature, Water for People

Local Governments

- Leon County
- Suwannee County



Leon County

Board of County Commissioners

301 South Monroe Street, Tallahassee, Florida 32301 (850) 606-5302 www.leoncountyfl.gov June 4, 2014

Commissioners

BILL PROCTOR

District 1

JANE G. SAULS

District 2

JOHN DAILEY District 3

BRYAN DESLOGE

District 4

KRISTIN DOZIER

District 5

MARY ANN LINDLEY

At-Large

NICK MADDOX

At-Large

VINCENT S. LONG
County Administrator

HERBERT W.A. THIELE County Attorney

Mr. Phillip Ellis

Division of Engineering Public Service Commission Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Dear Mr. Ellis:

The Tallahassee-Leon County Planning Department has reviewed the City of Tallahassee's 2014 Ten Year Site Plan Report and determined that it is suitable as a planning document. The report indicates the City Utilities plan for additional power supply needs is to add another generator at the existing Hopkins Plant site. The Hopkins Power Plant site is currently in the Government Operations Future Land Use Map category or our Comprehensive Plan and is a suitable site for continued power generation.

A hard copy of this letter will be mailed to you and an electronic copy will be e-mailed to pellis@psc.state.fl.us, as requested in your April 22, 2014 letter.

Thank you for the opportunity to review the Ten Year Site Plan Report. If you have any questions concerning these comments, please contact Brian Wiebler of my staff at (850) 891-6400.

Sincerely,

Vincent S. Long

County Administrator

Suwannee County



COUNTY OFFICES 13150 80th Terrace Live Oak, FL 32060

(386) 364-3400 FAX (386) 362-1032

"In The Heart Of The Suwannee River Valley"

Please Reply to:

June 23, 2014

Mr. Phillip Ellis
Engineering Specialist
Division of Engineering
State of Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Fl. 32399-0850

Re: Review of the 2014 Ten-Year Site Plans for Florida's Electric Utilities

Dear Mr. Ellis:

Suwannee County has completed its' review of the Ten-Year Site Plan for Duke Energy Florida electric utility and has concluded that it is "suitable" as a planning document.

If you have any questions or need additional information please feel free to contact my office.

County Administrator