APPENDIX A

REVIEW OF THE

2024 TEN-YEAR SITE PLANS

OF FLORIDA'S ELECTRIC UTILITIES

FLORIDA PUBLIC SERVICE COMMISSION

DECEMBER 2024

Ten-Year Site Plan Comments

State Agencies

Regional Planning Councils

Local Governments

Water Management Districts

Ten-Year Site Plan Comments

State Agencies

Regional Planning Councils

Local Governments

Water Management Districts

State Agencies

Department of Environmental Protection

From:	Senn, Nate
To:	Greg Davis
Cc:	SCO; Patti Zellner; Phillip Ellis
Subject:	RE: DN 20240000-OT - 2024 Review of the Ten-Year Site Plans - Comment Request LTR (2)
Date:	Wednesday, August 7, 2024 1:05:09 PM
Attachments:	image002.png

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good day,

The Ten Year Site Plans are suitable for planning purposes.

Thank you,

Nate Senn
Florida Department of Environmental Protection
DWRM/Siting Coordination Office
Environmental Specialist
Nate.Senn@FloridaDEP.gov
Office: 850-717-9111

From: SCO <SCO@dep.state.fl.us>
Sent: Monday, May 6, 2024 11:40 AM
To: Senn, Nate <Nate.Senn@FloridaDEP.gov>
Subject: FW: DN 20240000-OT - 2024 Review of the Ten-Year Site Plans - Comment Request LTR (2)

Tysp ten year site plan plans

Nate Senn
Florida Department of Environmental Protection
DWRM/Siting Coordination Office
Environmental Specialist
Nate.Senn@FloridaDEP.gov
Office: 850-717-9111

From: Patti Zellner <PZELLNER@PSC.STATE.FL.US>
Sent: Thursday, May 2, 2024 8:08 AM
To: SCO <SCO@dep.state.fl.us>
Cc: Greg Davis <GDavis@psc.state.fl.us>; Phillip Ellis <PEllis@PSC.STATE.FL.US>; Patti Zellner <PZELLNER@PSC.STATE.FL.US>
Subject: DN 20240000-OT - 2024 Review of the Ten-Year Site Plans - Comment Request LTR (2)

Dear Ms. Mulkey,

Please find attached your copy of the 2024 Review of the Ten-Year Site Plans – Comment Request letter dated May 2, 2024, filed with the Florida Public Service Commission Clerk today.

Thank you,
Patti Zellner
Administrative Assistant
Division of Engineering
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
Office: 850-413-6208

State Agencies

Department of Transportation

Greg Davis

From: Overton, Patrick <Patrick.Overton@dot.state.fl.us>
Sent: Friday, August 2, 2024 3:13 PM
To: Patti Zellner
Cc: Greg Davis; Phillip Ellis
Subject: RE: DN 20240000-OT - 2024 Review of the Ten-Year Site Plans - Comment Request LTR (7)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good afternoon Patti,

No comments.

Thanks,

Patrick Overton, P.E., FCCM

Florida Department of Transportation
State Construction and State Utility Engineer
605 Suwannee Street, MS 31
Tallahassee, Florida 32399
Office# (850) 414-4273

From: Patti Zellner <PZELLNER@PSC.STATE.FL.US>
Sent: Thursday, May 2, 2024 8:08 AM
To: Overton, Patrick <Patrick.Overton@dot.state.fl.us>
Cc: Greg Davis <GDavis@psc.state.fl.us>; Phillip Ellis <PEllis@PSC.STATE.FL.US>; Patti Zellner <PZELLNER@PSC.STATE.FL.US>
Subject: DN 20240000-OT - 2024 Review of the Ten-Year Site Plans - Comment Request LTR (7)

EXTERNAL SENDER: Use caution with links and attachments.

Dear Mr. Overton,
Please find attached your copy of the 2024 Review of the Ten-Year Site Plans – Comment Request letter dated May 2, 2024, filed with the Florida Public Service Commission Clerk today.

State Agencies

Fish and Wildlife Conservation Commission

Florida Fish and Wildlife Conservation Commission

Commissioners
Rodney Barreto
Chairman
Coral Gables

Steven Hudson
Vice Chairman
Fort Lauderdale

Preston Farrior
Tampa

Gary Lester
Oxford

Albert Maury
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Gary Nicklaus
Jupiter

Sonya Rood
St. Augustine

Office of the
Executive Director
Roger A. Young
Executive Director

Charles "Rett" Boyd
Assistant Executive Director

George Warthen
Chief Conservation Officer

Jessica Crawford
Chief of Staff

Division of Habitat and
Species Conservation
Melissa Tucker
Director

850-488-3831

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

August 1, 2024

Greg Davis
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
GDavis@psc.state.fl.us

RE: Review of the 2024 Ten-Year Site Plans for Florida's Electric Utilities

Dear Mr. Davis:

Florida Fish and Wildlife Conservation Commission (FWC) staff reviewed the 2024 Ten-Year Site Plans for the electric utilities operating in Florida submitted to the Florida Public Service Commission (PSC) pursuant to Section 186.801, Florida Statutes. There are no comments or recommendations related to listed species or other fish and wildlife resources to offer on the following plans:

- Florida Power & Light Company
- Duke Energy Florida
- Tampa Electric Company
- Florida Municipal Power Agency
- Gainesville Regional Utilities
- JEA
- Lakeland Electric
- Orlando Utilities Commission
- Seminole Electric Cooperative
- City of Tallahassee Utilities

The Florida Power & Light Company (FPL) and Duke Energy Florida (Duke) plans describe work associated with existing and proposed solar power generating facilities and transmission lines. FWC staff are available as needed to provide technical assistance to FPL and Duke for project planning or pre-application processes.

FWC staff appreciates the opportunity to review the Ten-Year Site Plans submitted by the PSC. Please submit any future requests for assistance with fish and wildlife resources to our office at ConservationPlanningServices@MyFWC.com. For specific technical questions about this year's reviews, please call Laura DiGruttolo at (850) 728-5147.

Sincerely,

Josh Cucinella
Land Use Planning Program Administrator
Office of Conservation Planning Services

jc/ld
2024 Ten-Year Site Plans_08012024

State Agencies

FloridaCommerce

August 2, 2024

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

RE: Review of the 2024 Ten-Year Site Plans for Florida's Electric Utilities

Dear Mr. Davis:

At your request, we have reviewed the 2024 Ten-Year Site Plans for the electric utilities. FloridaCommerce's review focused on the potential and preferred sites for future power generation, and the compatibility of those sites with the applicable local comprehensive plan, including the adopted future land use map. Please see our enclosed comments.

Should you have any questions regarding these comments, please contact Scott Rogers, Regional Planning Analyst, at (850) 717-8510, or by email at Scott.Rogers@commerce.fl.gov.

Sincerely,

James D. Stansbury, Chief
Bureau of Community Planning and Growth

JDS/sr

Enclosure: FloridaCommerce Review Comments

FloridaCommerce 2024 Ten-Year Site Plan Review Comments

FloridaCommerce's review focused on potential and preferred sites for future power generation, and the compatibility of those sites with the applicable local government comprehensive plan, including the adopted future land use map. In addition, FloridaCommerce's comments provide information regarding the local zoning designation when the applicable future land use map designation for a site does not expressly address whether electric power generation facilities are allowed or prohibited. Eight utilities (Duke Energy Florida, Florida Municipal Power Agency, Florida Power and Light Company, Gainesville Regional Utilities, Jacksonville Electric Authority, Lakeland Electric, Seminole Electric Cooperative, and Tampa Electric Company) have identified potential or preferred sites for future power generation in their Ten-Year Site Plan (TYSP). Potential sites are defined in Rule 25-22.070, Florida Administrative Code (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." Preferred sites are defined in Rule 25-22.070, F.A.C., as "sites within the state on which an electric utility intends to construct a power plant, a power plant alteration, or an addition resulting in an increase in generating capacity."

Several TYSPs identify sites for solar facilities. Section 163.3205(2), Florida Statutes (F.S.), defines the term "solar facility" to mean a production facility for electric power which: (a) uses photovoltaic modules to convert solar energy to electricity that may be stored on site, delivered to a transmission system, and consumed primarily offsite; (b) consists primarily of photovoltaic modules, a mounting or racking system, power inverters, transformers, collection systems, battery systems, fire suppression equipment, and associated components; and (c) may include accessory administration or maintenance buildings, electric transmission lines, substations, energy storage equipment, and related accessory uses and structures. Section 163.3205(3), F.S., states that a solar facility shall be a permitted use in all agricultural land use categories in a local government comprehensive plan and all agricultural zoning districts within an unincorporated area and must comply with the setback and landscaped buffer area criteria for other similar uses in the agricultural district.

1. Duke Energy Florida

The Duke Energy Florida (DEF) TYSP identifies eight preferred sites (listed below) to increase power generating capacity (photovoltaic solar power generation).

A. Bailey Mill Solar Site: The Bailey Mill Solar site is located on approximately 500 acres in Jefferson County. The TYSP states that the site is located on timber and agricultural lands. The Jefferson County Comprehensive Plan Future Land Use Map designates the site as Agriculture 20 and a solar facility is allowed pursuant to Section 163.3205, F.S.

B. County Line Solar Site: The County Line Solar site is located on approximately 600 acres in Gilchrist County. The TYSP states that Gilchrist County issued final site plan approval for the solar site in November 2023 and construction began in December 2023. The site was previously used for timber and pasture land. The Gilchrist County Comprehensive Plan Future Land Use Map designates the site as "Agriculture-2" and a solar facility is allowed pursuant to Section 163.3205, F.S.

C. Falmouth Solar Site: The Falmouth Solar site is located on approximately 500 acres in Suwannee County. The TYSP states that Suwannee County has issued a final site plan approval for the solar site

and construction began in June 2023. The site was previously used for timber and pasture land. The Suwannee County Comprehensive Plan Future Land Use Map designates the site as "Agriculture-1" and a solar facility is allowed pursuant to Section 163.3205, F.S.

D. Half Moon Solar Site: The Half Moon Solar site is located on approximately 500 acres in Sumter County. The TYSP states that the site contains timber lands. The Sumter County Comprehensive Plan Future Land Use Map designates the site as Agriculture and a solar facility is allowed pursuant to Section 163.3205, F.S.

E. Mule Creek Solar Site: The Mule Creek Solar site is located on approximately 600 acres in Bay County. The TYSP states that construction of the solar site began in the spring of 2023 and that the site was previously used for pasture lands. The Bay County Comprehensive Plan Future Land Use Map designates the site as "Conservation/Habitation," which allows public utilities.

F. Rattler Solar Site: The Rattler Solar site is located on approximately 561 acres in Hernando County. The TYSP states that the site is located on agricultural lands. The Hernando County Comprehensive Plan Future Land Use Map designates the site as Rural and the site is designated as Agricultural District on the County's Zoning Map, and a solar facility is allowed pursuant to Section 163.3205, F.S.

G. Sundance Solar Site: The Sundance Solar site is located on approximately 500 acres in Madison County. The TYSP states that the site is located on former agricultural lands. The Madison County Comprehensive Plan Future Land Use Map designates the site as Agriculture 1, and a solar facility is allowed pursuant to Section 163.3205, F.S.

H. Winquepin Solar Site: The Winquepin Solar site is located on approximately 500 acres in Madison County. The TYSP states that Madison County has issued final site plan approval for the solar site and construction began in the spring of 2023. The TYSP states that the site is located on former agricultural and timber lands. The Madison County Comprehensive Plan Future Land Use Map designates the site as Agriculture 1, and a solar facility is allowed pursuant to Section 163.3205, F.S

2. Florida Municipal Power Agency

The Florida Municipal Power Agency TYSP identifies three potential sites for the increase in power generating capacity: (1) Cane Island Power Park; (2) Treasure Coast Energy Center; and (3) Stock Island.

A. Cane Island Power Park Site: The Cane Island Power Park (CIPP) site is located on 1,027 acres in rural northwest Osceola County, approximately one mile northwest of Intercession City. The site contains existing power generation facilities. The Osceola County Comprehensive Plan Future Land Use Map designates the site as "Rural/Agriculture," which allows electric utility facilities.

B. Treasure Coast Energy Center Site: The Treasure Coast Energy Center site is located on 69 acres in the Midway Industrial Park in the City of Fort Pierce. The site contains existing power generation facilities. The City of Fort Pierce Comprehensive Plan Future Land Use Map designates the site as "Institutional," which allows an electric generating plant.

C. Stock Island Power Plant Site: The Stock Island Power Plant site is located on Stock Island near Key West, and the site contains existing power generation facilities. The Monroe County Comprehensive

Plan Future Land Use Map designates the Stock Island Power Plant site as "Public Facilities," which allows electric generation plants.

3. Florida Power and Light Company

The Florida Power and Light Company (FPL) TYSP identifies 47 preferred sites and 12 potential sites for the increase of power generating capacity.

A. The TYSP identifies the following as preferred sites:

1. Turkey Point Units 6 and 7 Site: The Turkey Point Plant site is located on approximately 3,300 acres in the southern portion of Miami-Dade County. The site contains existing power generating facilities. The Miami-Dade County Comprehensive Plan Future Land Use Map designates the site as "Institutions, Utilities, and Communications" which allows power generation and "Environmental Protection Area."

3. Other Preferred Sites: For the sites identified in the table below, the TYSP does not include maps of a suitable scale that show the location of each site in relation to an identified nearby or surrounding roadway network. For these sites, it would be helpful to readers if the TYSP included maps of a suitable scale that show the location of each site in relation to an identified nearby or surrounding roadway network in order to assist the reader in understanding the location and suitability of the sites and to assist in determining the comprehensive plan future land use map designations.

Name of Site	Site Area	County
Ambersweet SEC	598 acres	Indian River
Big Brook SEC	848 acres	Calhoun
Big Water SEC	701 acres	Okeechobee
Boardwalk SEC	553 acres	Collier
Buttonwood SEC	522 acres	St. Lucie
Catfish SEC	862 acres	Okeechobee
Cedar Trail SEC	2,450 acres	Baker
Clover SEC	433 acres	St. Lucie
Cocoplum SEC	470 acres	Hendry
County Line SEC	630 acres	DeSoto
Fawn SEC	664 acres	Martin
Flatford SEC	1,806 acres	Manatee
Fox Trail SEC	2,657 acres	Brevard
Georges Lake SEC	743 acres	Putnam
Goldenrod SEC	610 acres	Collier
Green Pasture SEC	2,757 acres	Charlotte
Hardwood Hammock SEC	870 acres	Walton
Hendry SEC	641 acres	Hendry
Hendry Isles SEC	445 acres	Hendry
Hog Bay SEC	832 acres	Okeechobee
Holopaw SEC	761 acres	Brevard
Honeybell SEC	617 acres	Okeechobee
Indrio SEC	400 acres	St. Lucie

Kayak SEC	627 acres	Okaloosa
LaBelle SEC	687 acres	Hendry
Long Creek SEC	810 acres	Manatee
Mallard SEC	456 acres	Brevard
Maple Trail SEC	930 acres	Baker
Mare Branch SEC	1,936 acres	DeSoto
Middle Lake SEC	571 acres	Madison
Mitchell SEC	464 acres	Escambia
North Orange SEC	656 acres	St. Lucie
Norton Creek SEC	674 acres	Madison
Pinecone SEC	1,220 acres	Calhoun
Price Creek SEC	3,668 acres	Columbia
Redlands SEC	285 acres	Miami-Dade
Saddle SEC	647 acres	DeSoto
Sand Pine SEC	719 acres	Calhoun
Sea Grape SEC	564 acres	St. Lucie
Speckled Perch SEC	664 acres	Okeechobee
Swallowtail SEC	1,588 acres	Walton
Swamp Cabbage SEC	1,367 acres	Hendry
Tangelo SEC	748 acres	Okeechobee
Tenmile SEC	718 acres	Calhoun
Thomas Creek SEC	400 acres	Nassau
Wood Stork SEC	603 acres	St.Lucie

B. The TYSP identifies the following as potential sites:

1. For the 12 potential sites identified in the table below, the TYSP does not: (1) state the size of the site in number of acres; nor (2) include maps of a suitable scale that show the location of each site in relation to an identified nearby or surrounding roadway network. For these potential sites, it would be helpful to readers if the TYSP identified the amount of acres of each site and included maps of a suitable scale that show the location of each site in relation to an identified nearby or surrounding roadway network in order to assist the reader in understanding the location and suitability of the sites and to assist in determining the comprehensive plan future land use map designations.

Name of Site	County
Cardinal Solar Energy Center (SEC)	Brevard
Carlton SEC	St. Lucie
Inlet SEC	Indian River
Joshua SEC	DeSoto
Myakka SEC	Manatee
Owen Branch SEC	Manatee
Pine Lilly SEC	St. Lucie
Shell Creek SEC	DeSoto
Spanish Moss SEC	St. Lucie
Wabasso SEC	Indian River

Waveland SEC	St. Lucie
Vernia SEC	Indian River

4. Gainesville Regional Utilities

The Gainesville Regional Utilities TYSP identifies one preferred site (Deerhaven Generating Station site) for the increase in power generating capacity.

A. Deerhaven Generating Station Site: The Deerhaven Generating Station site is located on 3,474 acres within the City of Gainesville, and the site contains an existing power generation facility. The City of Gainesville Comprehensive Plan Future Land Use Map designates the site as "Public and Institutional Facilities," which allows utilities.

5. Jacksonville Electric Authority

The Jacksonville Electric Authority TYSP identifies one potential site (Jacksonville) for the increase in power generating capacity. The TYSP describes the site as 30 acres but does not identify the specific location of the site. The TYSP states that further updates will be presented in subsequent TYSPs as the site evaluation process is finalized.

6. Lakeland Electric

The Lakeland Electric TYSP identifies one preferred site (McIntosh Power Plant) for the increase in power generating capacity.

A. McIntosh Power Plant Site: The McIntosh Power Plant site is located on 530 acres in the City of Lakeland and contains an existing power generation facility. The City of Lakeland Comprehensive Plan Future Land Use Map designates the site as "Industrial" and electric power generating facilities may be allowed as a conditional use through the Land Development Code.

7. Seminole Electric Cooperative

The Seminole Electric Cooperative TYSP identifies one potential site (Gilchrist site) and one preferred site (Seminole Generating Station site) for the increase in power generating capacity.

A. Gilchrist Site: The Gilchrist site is located on 520 acres in the central portion of Gilchrist County, approximately two miles northeast of the City of Bell. The site does not contain existing power generation facilities. 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. The Comprehensive Plan allows solar farms within the Agriculture-2 future land use category by special use permit.

B. Seminole Generating Station Site: The Seminole Generating Station site is located on 1,996 acres in unincorporated Putnam County, approximately five miles north of the City of Palatka. The site contains existing power generation facilities. The site is designated as Public Facilities on the adopted Future Land Use Map of the Putnam County Comprehensive Plan. Power generation facilities are an allowable use within the Public Facilities future land use category.

8. Tampa Electric Company

The Tampa Electric Company TYSP identifies 18 preferred sites for the increase in power generating capacity.

1. Bayside Power Station Site: The Bayside (H.L. Culbreath) Power Station site is located in unincorporated Hillsborough County and contains existing power generation facilities. 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.

2. Polk Power Station Site: The Polk Power Station site is located in unincorporated Polk County and contains existing power generation facilities. The site is designated as "Phosphate Mining" on the Polk County Comprehensive Plan Future Land Use Map, and electric power generation facilities are an allowable use within the Phosphate Mining future land use category.

3. Other Sites: The Tampa Electric Company TYSP lists the following sites for the increase in power generating capacity but does not include maps of a suitable scale that show the specific location of these sites in relation to the nearby or surrounding roadway network:

Name of Site	Site Area	County
Big Four Solar	680 acres	Hillsborough
Bullfrog Creek Solar	570 acres	Hillsborough
Brewster Solar	200 acres	Polk
Clear Springs I Solar	450 acres	Polk
Clear Springs II Solar	unspecified	Polk
Cottonmouth Solar	530 acres	Hillsborough
Dover Energy Storage Capacity	1 acre	Hillsborough
Duette Solar	690 acres	Manatee
English Creek Solar	240 acres	Hillsborough
Farmland Solar	330 acres	Hillsborough
Lake Mabel Energy Storage Capacity	2 acres	Polk
Mattaniah Solar	unspecified	Hillsborough
South Tampa Energy Storage Capacity	1 acre	Hillsborough
South Tampa Resiliency Project	2 acres	Hillsborough
Wimauma 3 Solar	680 acres	Hillsborough
Wimauma Energy Storage Capacity	2 acres	Hillsborough

For these sites, it would be helpful to readers if the Tampa Electric Company TYSP (Chapter VI: Environmental and Land Use Information) included maps of a suitable scale that show the location of

each site in relation to an identified nearby or surrounding roadway network in order to assist the reader in understanding the location and suitability of the sites and to assist in determining the comprehensive plan future land use map designations.

Regional Planning Council

Central Florida Regional Planning Counsel

July 24, 2024

VIA EMAIL

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

Dear Mr. Davis,

RE: Review of 2024 Ten-Year Site Plans for Florida's Electric Utilities

The CFRPC reviewed ten-year site plans from Duke Energy Florida (DEF), Florida Power and Light Company (FPL), Lakeland Electric (LAK), FMPA Municipal Power (FMPA), and Tampa Electric Company (TECO) as requested in the letter dated May 2, 2024, 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:

Looking forward DEF plans to end high-priced legacy contracts and retire combustion turbine (CT) units. Replacing these legacy sources are new solar, storage, and solar plus storage generation. DEF's planned investments in renewable generation will enable fuel savings for customers, energy diversification, and will continue DEF's commitment towards a lower carbon future. By the end of the period, DEF expects to have more than 6,100 MW of utility scale solar generating capacity online. It is clear that the utility transition to cleaner sources will have a positive impact on the environment.

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 Duke 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.

Florida Power and Light Company

Notable in this plan update FPL is investing heavily into battery storage expansion throughout its footprint. The expansion should help system reliability and capacity. FPL continues to heavily invest in Solar projects as well. The plan discusses preferred solar

sites in DeSoto and Okeechobee Counties in the region. In DeSoto County, they include Saddle Creek Solar Energy Center, County Line Solar Energy Center, Mare Branch Solar Energy Center and Hog Bay Solar Energy Center. In Okeechobee County, they include Catfish Solar Energy Center, Honeybell Solar Energy Center, Speckled Perch Solar Energy Center, Big Water Solar Energy Center, and Tangelo Solar Energy Center. Potential sites in the region are identified for DeSoto and Okeechobee Counties. In DeSoto County, they include Joshua Creek Solar Energy Center and Shell Creek Solar Energy Center. In Okeechobee County, there currently are zero potential sites.

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 FPL'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:

LE will add 120 MW of gas based Reciprocating Internal Combustion Engines (RICE) by the end of 2024. Lakeland Electric will add 74.8 MW of solar power by 2026, which amounts to a total of 89 MW. Future plans are to integrate battery storage and develop microgrid solutions. The plan is to diversify power sources and improve infrastructure for the benefit of customers. LE is also exploring the feasibility of installing a 50-kW floating solar structure at the McIntosh Power Plant.

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.

FMPA Municipal Power:

The FMPA is a collective of municipal utilities throughout Florida. The only member utility in the CFRPC region is Fort Meade. FMPA is expecting to no longer burn coal after 2027. FMPA is actively seeking to expand its solar site capacity and plans to bring four new sites online in 2026 which will help grow its share of Solar capacity to 96.5 MW-AC.

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 Seminole Electric Cooperative boundaries cover so much of the State of Florida.

Tampa Electric Company:

According to the plan, there are existing and planned solar facilities within the Central Florida Regional Planning Council Region for the 10-year planning reporting period. TECO is actively adding to its solar power generation portfolio. By 2024 13% of its power generation will come from solar sources.

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. A recommendation would be to include boundaries of the counties to make it clear as to the location of facilities.

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
Program Manager – Research

Regional Planning Council

Treasure Coast Regional Planning Counsel

June 26, 2024

Mr. Greg Davis, Engineering Specialist
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Subject: Review of the 2024 Ten-Year Site Plans for Florida's Electric Utilities

Dear Mr. Davis:

The Treasure Coast Regional Planning Council has reviewed the 2024 Ten-Year Site Plans for Florida Power & Light (FPL) Company and Florida Municipal Power Agency (FMPA). Council approved the comments in the attached reports at their board meeting on June 21, 2024.

The report concludes that while the region and all of South Florida remain vulnerable to fuel price increases and supply interruptions because of the continued heavy reliance on only two primary fuel types, natural gas and nuclear fuel, the use of solar power is projected to increase dramatically.

Council urges FPL, FMPA, 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 use of renewable energy sources to produce electricity.

Please contact me if you have any questions.

Sincerely yours,

Thomas J. Lanahan
Executive Director

Attachments

cc: William P. Cox, FPL
Robert Nelcoski, FMPA

TREASURE COAST REGIONAL PLANNING COUNCIL

M E M O R A N D U M

To: Council Members AGENDA ITEM 4B4

From: Staff

Date: June 14, 2024

Subject: Florida Power & Light Ten-Year Power Plant Site Plan (2024-2033)

Background

Each year, every major 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) requested that Council review the most recent ten-year site plan prepared by FPL and provide comments to the FPSC on or before August 2, 2024. This plan addresses FPL generating power additions and retirements for the years 2024 through 2033. FPL's service area contains approximately 35,000 square miles and serves a population of more than twelve million people.

Analysis

The attached report summarizes FPL's plans for future power generation and provides comments for transmittal to the FPSC. The report concludes that FPL continues to plan for increasing demand over the planning period. They will primarily meet that demand with continued heavy dependence on fossil and nuclear fuels, but also concentrate on a rapid increase in renewable sources, primarily solar generating capacity. FPL should be commended for their commitment to dramatically increasing solar power generation.

Council supports FPL's and the State's continued focus to develop new programs to 1) reduce 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 use of renewable energy sources to produce electricity.

Recommendation

Council should approve the attached report and authorize its transmittal to the Florida Public Service Commission.

Council Action – June 21, 2024

Vice Mayor Marino from Palm Beach County moved approval of the staff report. Vice Mayor Hmara from the Village of Royal Palm Beach seconded the motion, which carried unanimously.

Attachment

TREASURE COAST REGIONAL PLANNING COUNCIL

Report on the

Florida Power & Light (FPL) Company
Ten Year Power Plant Site Plan 2024-2033

June 21, 2024

Introduction

Each year every major 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 FPL and provide comments to the FPSC on or before August 2, 2024. FPL's service area contains approximately 35,000 square miles and serves a population of more than twelve million people.

Summary of the Plan

The plan indicates combined total summer peak demand projected growth of 13.9% over the 10-year period; from 25,939 megawatts (MW) in 2024 to 29,538 MW in 2033. During the same timeframe, FPL is expecting to reduce electrical use through demand-side management (DSM) programs that include conservation, energy efficiency, and load management initiatives. FPL's combined DSM savings are expected to decrease 5.7% over the reporting period; from 1,846 MW in 2024 to 1,740 MW in 2033 (see Exhibit 1, Schedule 7.1).

Federal and state energy efficiency code standard changes have significantly lowered FPL's projected load and resource needs and the potential for cost-effective DSM programs. Additionally, increasing energy producing efficiency has reduced DSM program cost effectiveness. FPL is beginning a full review of demand-side renewable technologies to determine recommended DSM goals and programs for the future.

The current plan makes primary electricity gains through upgrades and modernization to existing facilities plus construction of new generating units. Simultaneously, their plan continues to take older and coal-fired capacity out of service.

Major changes in generating capacity are as follows:

FPL system area:

- 2024-2033: Approximately 21,009 MW (nameplate) new solar photovoltaic (PV) additions.
- 2024: Retire FPL's ownership portion of coal-fueled Daniel Units 1 & 2 (approx. 500 MW)
- 2028: Capacity upgrades at several of FPL's existing Combined Cycle (CC) units.

- 2028: Retirement of FPL's 25% ownership portion of the coal-fueled Scherer Unit 3 (approximately 215 MW).
- 2033: 4,022 MW of additional battery storage is planned.

Preferred and Potential Power Plant Sites

One of the primary reasons to prepare an annual ten-year power plant site plan is to get information on a utility's plans on preferred and potential siting of new facilities.

Based on projected future resource needs, FPL has identified forty-seven "preferred sites" for future power generating facilities. The following are in the Treasure Coast Region (Exhibit 2).

1. Ambersweet Solar Energy Center, Indian River County: Proposed 598-acre site TBD.
2. Buttonwood Solar Energy Center, St. Lucie County: Proposed 522-acre site located at 6351 Granada Ranch Road, Fort Pierce, FL 34945.
3. Clover Solar Energy Center, St. Lucie County: Proposed 433-acre site TBD.
4. Fawn Solar Energy Center, Martin County: Proposed 664-acre site located at 15924 SW Citrus Boulevard, Palm City, FL 34990.
5. Holopaw Solar Energy Center, Palm Beach County: Proposed 761-acre site located at 21743 State Road 80, Loxahatchee, FL 33470.
6. Indrio Solar Energy Center, St. Lucie County: Proposed 400-acre site TBD.
7. North Orange Solar Energy Center, St. Lucie County: Proposed 656-acre site located at 3551 Minute Maid Road, Fort Pierce, FL 34945.
8. Sea Grape Solar Energy Center, St. Lucie County: Proposed 564-acre site located at 5201 Minute Maid Road, Fort Pierce, FL 34945.
9. Wood Stork Solar Energy Center, St. Lucie County: Proposed 603-acre site TBD.

Each of the above sites are planned for 74.5 MW PV solar plants. These nine sites take up approximately 5,201 acres of land, and by their nature these facilities have minimal offsite impacts.

FPL has also identified twelve "potential sites" for future generation and storage facilities, though potential sites do not represent a commitment by the utility to construct these new facilities. Seven of these sites are currently planned to be in the Treasure Coast Region.

1. Carlton Solar Energy Center, St. Lucie County
2. Inlet Solar Energy Center, Indian River County
3. Pine Lily Solar Energy Center, St. Lucie County
4. Spanish Moss Solar Energy Center, St. Lucie County
5. Vernia Solar Energy Center, Indian River County
6. Wabasso Solar Energy Center, Indian River County
7. Waveland Solar Energy Center, St. Lucie County

Other Factors

The FPL 2024-2033 plan describes nine factors that have influenced or may influence this resource plan. They are summarized below:

1. Continued Impacts of Tax Credits for Batteries, Solar, and Hydrogen.
2. The critical need to maintain a balance between load and generating capacity in specific regions of FPL's service area, such as in Northwest Florida and Southeastern Florida (Miami-Dade and Broward counties).
3. The desire to maintain/enhance fuel diversity in the FPL system while considering system economics and reliability.
4. The need to maintain an appropriate balance of DSM and supply resources from the perspectives of both system reliability and operations.
5. The significant impact of federal and state energy efficiency codes and standards.
6. The fuel cost and efficiency of FPL's fossil-fueled generation fleet and the avoidance of fuel cost through increased solar generation.
7. Projected changes in CO_2 regulation and associated compliance costs.
8. Projected increases in electric vehicle (EV) adoption.
9. Ensuring system reliability during extreme weather events.

Each of these factors described above will continue to be examined in FPL's ongoing resource planning work in 2024 and future years.

Evaluation

The ten-year site plan indicates fossil fuels will remain a primary but decreasing source of energy used to generate electricity; dropping from 68.6% in 2024 (.2% from coal and 68.40% from natural gas) to 42.0% (all natural gas) by the end of 2033 (see Exhibit 3, Schedule 6.2). During the same period, nuclear sources are predicted to fall from 19.8% in 2024 to 18.8% in 2033, primarily due to significant FPL solar investment and the delay of significant nuclear power expansion beyond the 10-year time horizon. Solar sources are predicted to dramatically increase from 9.8% in 2024 to 38.0% in 2033.

Renewable Energy

The ten-year site plan indicates FPL is continuing its efforts to implement cost-effective renewable energy. FPL has facilitated several renewable energy projects (facilities which burn bagasse, waste wood, municipal waste, etc.) through power purchase agreements. For example, FPL has a contract to receive firm capacity from the Solid Waste Authority of Palm Beach County through April 2034. FPL's efforts to increase use of cost-effective renewable energy also include the use of utility-scale solar and customer-focused solar. FPL also has continued interest in battery storage. These efforts are described below.

1. **Universal Solar**: This plan shows a significant increase in utility-scale solar throughout the 10-year period. Approximately 21,009 MW of new solar PV generation is projected to be added in the 2024-2033 time period. When combined with the current 6,442 MW of solar PV already installed, projected total of solar PV climbs to 25,812 MW by the end of 2033.

2. **Distributed PV Pilot Programs**: FPL began implementation of SolarNow, a distributed PV pilot program, in 2015. The voluntary, community-based solar partnership pilot program

provides customers a flexible opportunity to bring solar projects into local communities by funding solar facility construction in public areas such as parks, zoos, schools, and museums. At the end of 2023, there were 37,949 participants enrolled in the program with seventy-nine projects located in thirty-six communities within the FPL service territory. These projects represent approximately 2,553 kW-DC of PV generation. This program will sunset on December 31, 2025.

3. **FPL SolarTogether Program** offers FPL customers the option to purchase solar output/attributes from cost-effective, large-scale solar energy centers with no long-term contracts, administrative fees, or termination penalties. Under this program, participants' monthly electric bills show a subscription charge and a direct credit on their electric bills associated with the amount of solar-generated capacity purchased. The first phase of the program added 1,490 MW of new solar facilities. Open enrollment began on March 17, 2020 which received favorable reception by residential, small businesses, and commercial customers. As of June 2021, all twenty approved solar sites under this program were complete and operational.

   FPL received approval to extend the FPL SolarTogether program through the construction of an additional 1,788 MW of cost-effective solar through 2025. The capacity will be allocated 40% to residential and small business customers with a carve out of 45 MW to low-income participants. The remaining 60% is allocated to commercial, industrial, and governmental customers.

4. **Solar Power Facilities Pilot Program:** As part of FPL's 2021 Settlement Agreement, FPL received approval to offer a four-year voluntary pilot program to commercial and industrial customers that may elect to have FPL install and maintain a solar facility on their site for a monthly tariff charge (the "Solar Power Facilities Pilot Program"). The output of this solar facility would be used solely by the participating customer. The fixed term tariff will recover the project capital costs and ongoing operating expenses from the program participants, such that the general body of customers will not be impacted.

Battery Storage:

A 409 MW battery storage facility was added in 2021 at the existing Manatee plant site and two 30 MW battery storage units were added in 2021; one at the existing Sunshine Gateway Solar Energy Center and at the Echo River Solar Energy Center. An additional total of approximately 4,022 MW (nameplate) of battery storage is also included in the resource plan through 2033.

Electric Vehicle Efforts:

Florida ranks second nationally for EV adoption, and more Floridians are buying EVs every year. FPL began implementing the FPL EVolution pilot program in 2019 to support EV growth with the goal of installing more than 1,000 charging ports, which would increase public EV charging stations in Florida by 50%.

This pilot program is being conducted in partnership with interested host customers over an approximate 3-year period. Installations encompass different EV charging technologies and market segments, including level 2 workplace charging at public and/or private workplaces; destination charging at well-attended locations; residential charging at customers' homes; and fast charging in high-traffic areas, along highway corridors and evacuation routes to enable long distance travel. These places include Florida's Turnpike Service Plazas, public parking areas, tourist attractions, hospitals, and large businesses that employ hundreds of Florida residents. As of December 31, 2023, FPL EVolution has installed 1,024 ports across 191 site locations.

As part of FPL's 2021 Settlement Agreement, FPL received approval to expand the initial FPL EVolution Pilot and add additional EV programs that were launched in 2022, including: i) public fast charging; ii) new technologies and software; iii) education and outreach; iv) a voluntary residential commercial EV charging services tariff; and v) a voluntary commercial EV charging services tariff. The tariffs took effect in 2021 and will last for a period of five years.

Conclusions and Recommendations

Recent dramatic spikes and volatility in the oil and gas markets and international threats to supply confirms the value of moving as quickly as possible towards a more balanced fuels portfolio, with continued emphasis on increasing renewable energy sources. Council supports this approach to reduce vulnerability to fuel price increases and supply interruptions and continues to encourage the Florida Legislature to adopt a Renewable Portfolio Standard to provide a mechanism to expand the use of renewable energy in Florida.

FPL has shown a commendable commitment to dramatically increasing solar power generation. FPL should consider developing programs to install, own, and operate PV units on the rooftops of private and public buildings. One reason to shift to rooftop PV systems distributed throughout the area of demand is that it reduces reliance on large transmission lines and reduces 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. Additionally, the incentive for owners of buildings to participate in this strategy is to offer reduced rates for purchasing electricity.

Also, FPL should consider expanding solar rebate programs for customers who install PV and solar water heating systems on their homes and businesses. These rebates should be coordinated with other programs, such as the Solar and Energy Loan Fund (SELF) and Property-Assessed Clean Energy (PACE) programs. 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.

Council urges FPL and the State of Florida to continue developing new programs to increase conservation measures and to rely, to a greater extent, on renewable energy sources. State legislators should amend the regulatory framework to provide financial incentives for power providers and customers. The phasing in of PV and other locally available energy sources will help Florida achieve a sustainable future as called for in Council's Strategic Regional Policy Plan.

The utility filing can be accessed at the following link:
Florida Power and Light Company.pdf (floridapsc.com)

Attachments

Exhibit 1

Schedule 7.1
Forecast of Capacity, Demand, and Scheduled Maintenance At Time Of Summer Peak

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
August of Year	Firm Installed Capacity MW	Firm Capacity Import MW	Firm Capacity Export MW	Firm QF MW	Total Firm Capacity Available MW	Total Peak Demand MW	DSM MW	Firm Summer Peak Demand MW	Total Reserve Margin Before Maintenance MW	Total Reserve Margin Before Maintenance % of Peak	Scheduled Maintenance MW	Total Reserve Margin After Maintenance MW	Total Reserve Margin After Maintenance % of Peak	Generation Only Reserve Margin After Maintenance MW	Generation Only Reserve Margin After Maintenance % of Peak
2024	31,575	240	0	4	31,818	27,785	1,846	25,939	5,879	22.7	0	5,879	22.7	4,033	14.5
2025	32,059	239	0	4	32,302	28,039	1,865	26,174	6,129	23.4	0	6,129	23.4	4,264	15.2
2026	32,841	239	0	4	33,083	28,273	1,853	26,420	6,664	25.2	0	6,664	25.2	4,811	17.0
2027	33,158	239	0	0	33,397	28,477	1,833	26,644	6,753	25.3	0	6,753	25.3	4,920	17.3
2028	33,466	239	0	0	33,705	28,819	1,815	27,004	6,701	24.8	0	6,701	24.8	4,886	17.0
2029	33,579	239	0	0	33,817	29,160	1,799	27,361	6,456	23.6	0	6,456	23.6	4,657	16.0
2030	33,893	238	0	0	34,132	29,544	1,785	27,759	6,373	23.0	0	6,373	23.0	4,588	15.5
2031	34,205	238	0	0	34,443	29,998	1,769	28,229	6,214	22.0	0	6,214	22.0	4,445	14.8
2032	34,481	198	0	0	34,679	30,644	1,754	28,890	5,788	20.0	0	5,788	20.0	4,035	13.2
2033	35,256	198	0	0	35,454	31,278	1,740	29,538	5,915	20.0	0	5,915	20.0	4,175	13.3

Col. (2) represents capacity additions and changes projected to be in-service by June 1st. These MW are generally considered to be available to meet Summer peak loads which are forecasted to occur during August of the year indicated.
Col. (6) = Col.(2) + Col.(3) - Col(4) + Col(5).
Col.(7) reflects the 2024 load forecast without incremental DSM or cumulative load management.
Col.(8) represents cumulative load management capability, plus incremental conservation and load management, from 9/2023-on intended for use with the 2024 load forecast.
Col.(10) = Col.(6) - Col.(9)
Col.(11) = Col.(10) / Col.(9)
Col.(12) indicates the capacity of units projected to be out-of-service for planned maintenance during the Summer peak period.
Col.(13) = Col.(10) - Col.(12)
Col.(14) = Col.(13) / Col.(9)
Col.(15) = Col.(6) - Col.(7) - Col.(12)
Col.(16) = Col.(15) / Col.(7)

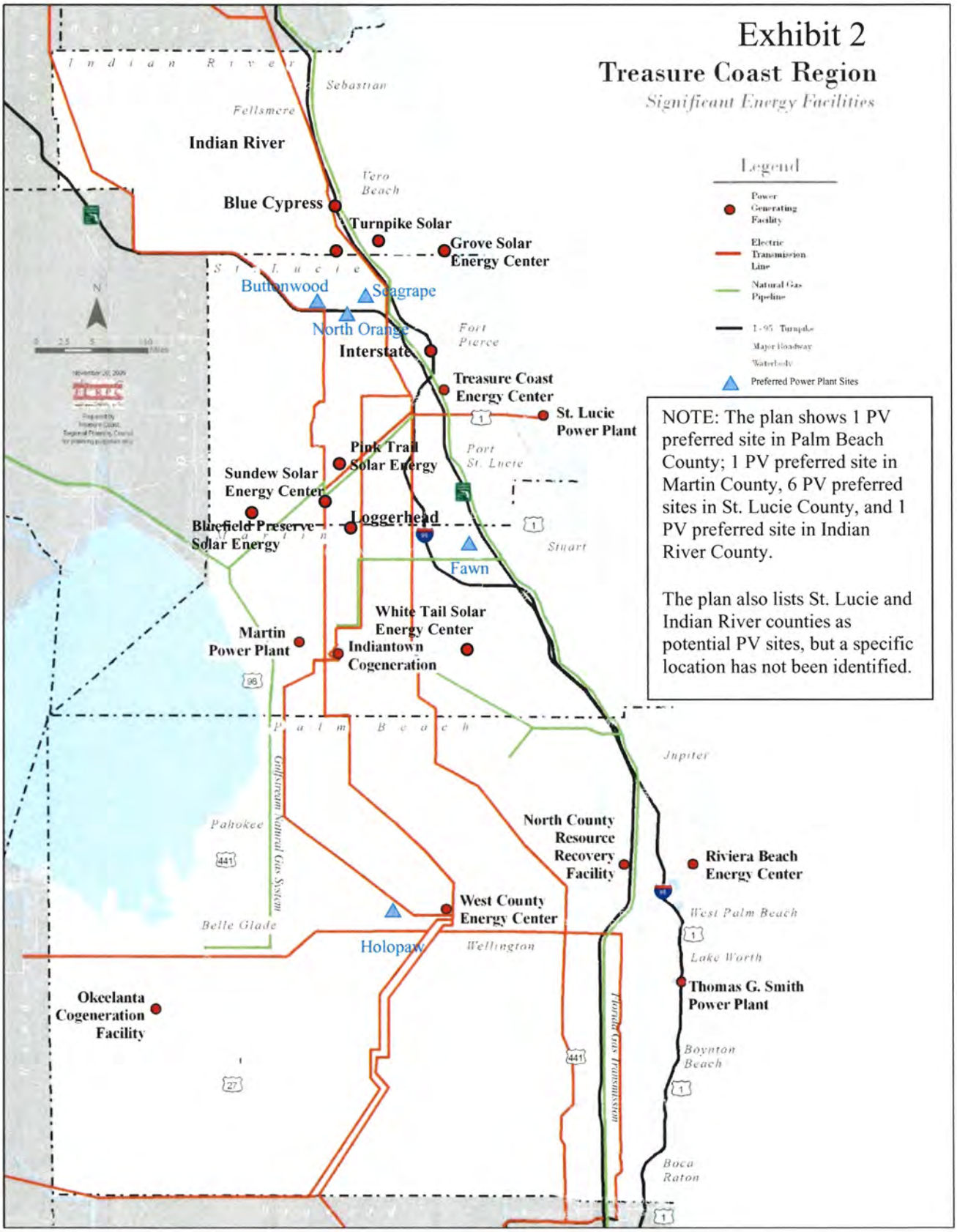


Exhibit 2
Treasure Coast Region
Significant Energy Facilities
Legend
Power Generating Facility
Electric Transmission Line
Natural Gas Pipeline
I-95 Turnpike
Major Roadway
Waterbody
Preferred Power Plant Sites
NOTE: The plan shows 1 PV preferred site in Palm Beach County; 1 PV preferred site in Martin County, 6 PV preferred sites in St. Lucie County, and 1 PV preferred site in Indian River County.
The plan also lists St. Lucie and Indian River counties as potential PV sites, but a specific location has not been identified.
Indian River
Blue Cypress
Turnpike Solar
Grove Solar Energy Center
Buttonwood
Seagrape
North Orange
Interstate
Treasure Coast Energy Center
St. Lucie Power Plant
Pink Trail Solar Energy
Sundew Solar Energy Center
Bluefield Preserve Solar Energy
Loggerhead
Fawn
White Tail Solar Energy Center
Martin Power Plant
Indiantown Cogeneration
North County Resource Recovery Facility
Riviera Beach Energy Center
West County Energy Center
Holopaw
Okeelanta Cogeneration Facility
Thomas G. Smith Power Plant
Florida Gas Transmission
Gulfstream Natural Gas System
Sebastian
Fellsmere
Vero Beach
Fort Pierce
Port St. Lucie
Stuart
Jupiter
Palm Beach
West Palm Beach
Lake Worth
Boynton Beach
Boca Raton
Pahokee
Belle Glade
Wellington

Exhibit 3

Schedule 6.2
Forecasted Energy Sources % by Fuel Type

		FPL									
Energy Source	Units	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
(1) Annual Energy Interchange [1/]	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(2) Nuclear	%	19.8	20.2	19.9	19.7	20.1	19.7	19.5	19.3	19.1	18.8
(3) Coal	%	0.2	0.3	0.4	0.3	0.3	0.0	0.0	0.0	0.0	0.0
(4) Residual (FO6) -Total	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(5) Steam	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(6) Distillate (FO2) -Total	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(7) Steam	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(8) CC	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(9) CT	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(10) Natural Gas -Total	%	68.4	65.6	61.8	58.4	54.3	51.6	48.6	46.1	44.2	42.0
(11) Steam	%	0.5	0.5	0.3	0.4	0.3	0.4	0.3	0.3	0.4	0.2
(12) CC	%	67.9	65.1	61.4	58.0	54.0	51.2	48.3	45.8	43.8	41.7
(13) CC PPAs - Gas	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(14) CT	%	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0
(15) Solar [2/]	%	9.8	12.0	16.0	19.7	23.4	26.8	30.1	32.9	35.3	38.0
(16) PV	%	5.7	6.9	10.8	14.5	18.3	21.8	25.1	28.2	31.0	33.8
(17) Solar Together [3/]	%	3.9	5.0	5.1	5.0	5.0	4.9	4.8	4.5	4.2	4.1
(19) Solar PPAs	%	0.2	0.2	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1
(20) Wind PPAs	%	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7
(21) Other [4/]	%	1.1	1.2	1.3	1.2	1.2	1.1	1.1	1.1	0.7	0.6
		100	100	100	100	100	100	100	100	100	100

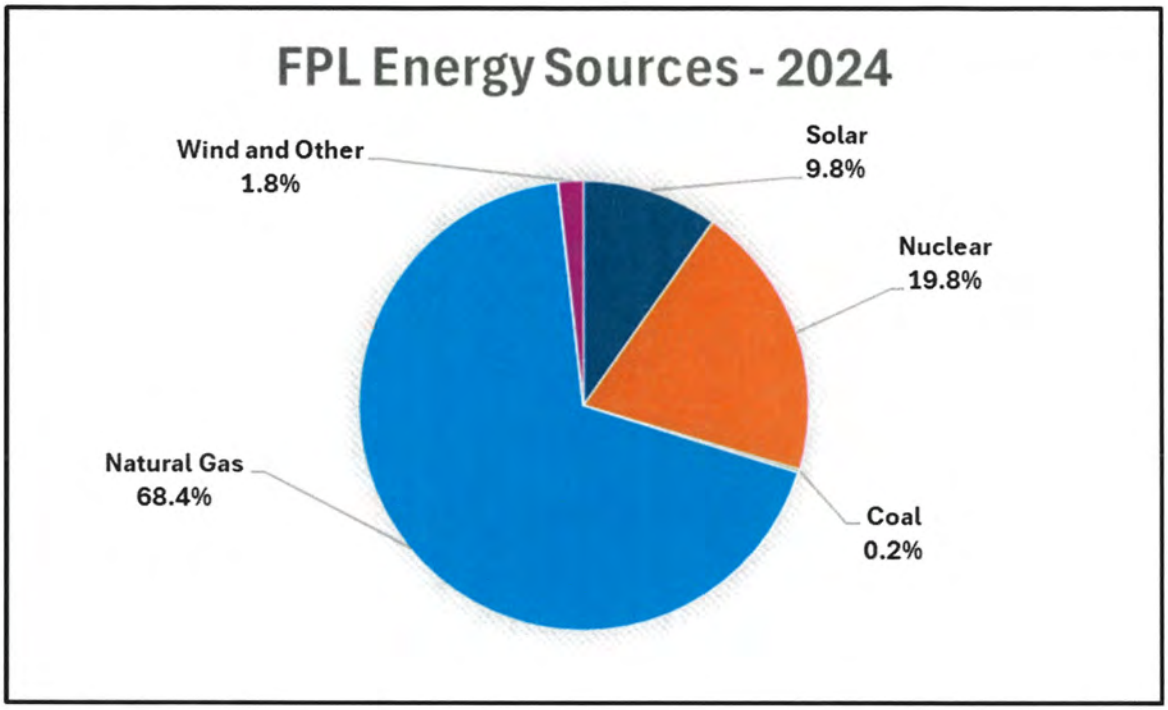
1/ Represents interchange between FPL and other utilities.

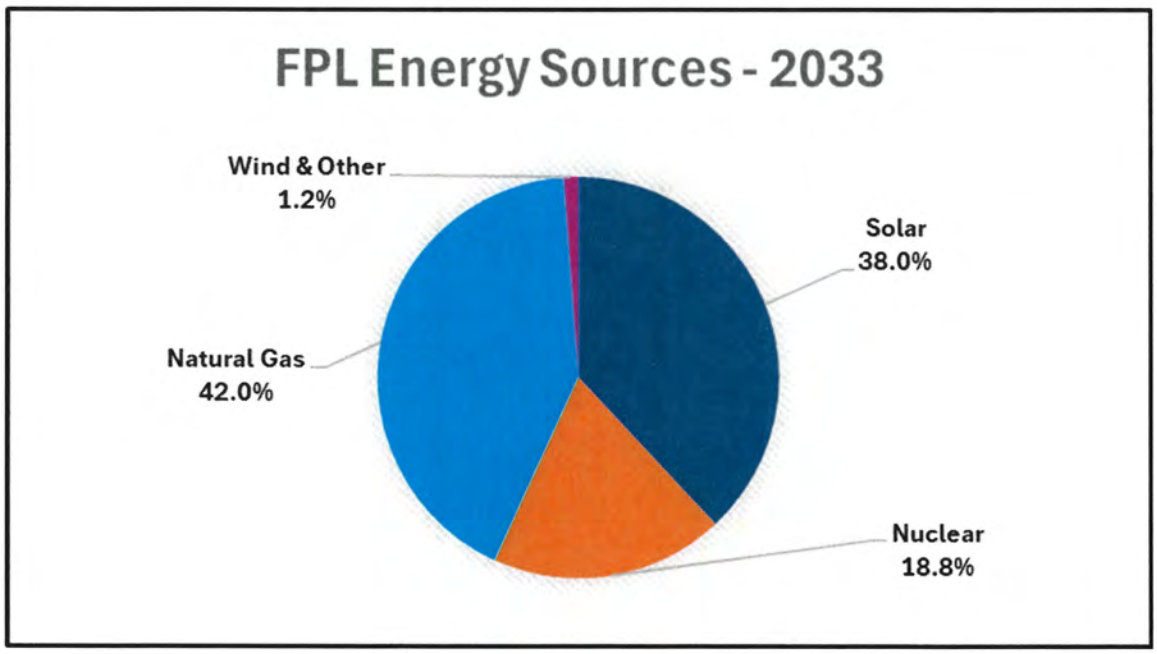
2/ Represents output from FPL's Solar PV, Solar Together, Solar Thermal, and Solar PPA facilities.

3/ The values shown represent energy produced from FPL-owned solar facilities that are part of FPL's SolarTogether (ST) program.
Environmental attributes in the form of renewable energy certificates for that participant's allocation of the total energy produced are retired on the participant's behalf.

4/ Represents a forecast of energy expected to be purchased from Qualifying Facilities, Independent Power Producers, etc., net of Economy and other Power Sales.

Exhibit 4


FPL Energy Sources - 2024
Wind and Other
1.8%
Solar
9.8%
Nuclear
19.8%
Natural Gas
68.4%
Coal
0.2%


FPL Energy Sources - 2033
Wind & Other
1.2%
Solar
38.0%
Natural Gas
42.0%
Nuclear
18.8%

TREASURE COAST REGIONAL PLANNING COUNCIL

MEMORANDUM

To: Council Members AGENDA ITEM 4B3

From: Staff

Date: June 14, 2024

Subject: Florida Municipal Power Agency Ten-Year Power Plant Site Plan 2024-2033

Background

Each year, every major 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) requested that Council review the most recent ten-year site plan prepared by the Florida Municipal Power Agency (FMPA) and provide comments to the FPSC on or before August 2, 2024.

This plan addresses FMPA generating power additions and retirements for the years 2024 through 2033, focused on the All-Requirements Power Supply Projects (ARP) whereby all the electrical power generating needs of member communities are met through FMPA.

The FMPA is a governmental wholesale power company owned by municipal electric utilities. It was created in 1978 to allow its original members to jointly own, operate, and manage electric power plants and currently has thirty-three members. The FMPA has responsibilities for power supply planning related to the ARP, where the Agency has committed to supplying all the power requirements of thirteen cities. Two of the FMPA's members, Fort Pierce Utilities Authority and the City of Lake Worth Beach are in the Treasure Coast Region.

FMPA currently has six power supply projects that provide all the power needs of thirteen cities and some of the power need for other cities. FMPA generates electricity using various fuel types, including natural gas, coal, nuclear and renewables.

The FMPA electric generation capabilities include: 1) nuclear capacity entitlements, 2) ARP-owned generation capacity, and 3) ARP member-owned generation capacity. Some of this generation occurs within our region. In 1983, the FMPA purchased an 8.8 percent ownership interest in FPL's St. Lucie Unit No. 2 nuclear generating unit. This project is known as the St. Lucie Project. Fourteen of the FMPA members, including the one member in the Treasure Coast Region, are participants in the St. Lucie project.

Analysis

The attached report summarizes FMPA plans for future power generation and provides comments for transmittal to the FPSC. The report concludes that FMPA continues to plan for demand over the planning period. They will primarily meet that demand with continued heavy dependence on fossil and nuclear fuels, but also concentrate on a rapid increase in renewable sources, primarily solar generating capacity.

Council supports FMPA's and the State's efforts to develop new programs to: 1) reduce reliance on fossil fuels as future energy sources, including retirement of coal facilities, 2) increase conservation activities to offset the need to construct new power plants, and 3) increase the use of renewable energy sources to produce electricity.

Recommendation

Council should approve the attached report and authorize its transmittal to the Florida Public Service Commission.

Council Action – June 21, 2024

Vice Mayor Marino from Palm Beach County moved approval of the staff report. Vice Mayor Hmara from the Village of Royal Palm Beach seconded the motion, which carried unanimously.

Attachment

TREASURE COAST REGIONAL PLANNING COUNCIL

Report on the

Florida Municipal Power Agency
Ten Year Power Plant Site Plan 2024-2033

June 21, 2024

Introduction

Each year every major 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 the Florida Municipal Power Agency (FMPA) and provide comments to the FPSC on or before August 2, 2024.

Summary of the Plan

The FMPA is a governmental wholesale power company owned by municipal electric utilities. It was created in 1978 to allow its original members to jointly own, operate, and manage electric power plants and currently has thirty-three members. FMPA's member utilities are located throughout the state from the Panhandle to Key West. Together, they provide electricity to nearly 3 million Floridians, or 14% of the state population, and employ nearly 3,600 people.

The FMPA has responsibilities for power supply planning related to the All Requirements Power Supply (ARP) members, where the agency has committed to supplying all the power requirements of thirteen cities. The Fort Pierce Utilities Authority joined the ARP in January 1998.

FMPA currently has six power supply projects (Stanton, Tri-City, Stanton II, St. Lucie, Florida Municipal Solar Project Phase II, and Florida Municipal Solar Project Phase III) that provide all the power needs of thirteen cities and some of the power need for other cities. FMPA generates electricity using various fuel types, including natural gas, coal, nuclear and renewables. A map of the ARP participants and FMPA's power sources as of December 31, 2023, is shown in Exhibit 2, Figure ES-1.

The FMPA electric generation capabilities include: 1) nuclear capacity entitlements, 2) ARP-owned generation capacity, and 3) ARP member-owned generation capacity. Some of this generation occurs within the region. In 1983, the FMPA purchased an 8.8 percent ownership interest in FPL's St. Lucie Unit No. 2 nuclear generating unit. This project is known as the St. Lucie Project. Fourteen of the FMPA members, including one member in the Treasure Coast Region, are participants in the St. Lucie Project.

The total summer capacity of ARP resources for 2024 is 1,919 MW and 1,733 MW for 2033, comprised of ARP member-owned resources, ARP shares in nuclear, coal, and gas-fired plants,

and power purchase agreements. Demand within ARP in 2024 is 1,447 MW, reducing to 1,410 MW in 2033 with reductions driven by changes in how much ARP produced power is made available for resale (see Exhibit 1, Schedule 7.1).

The current plan makes primary electricity gains through peaking purchase, which could be comprised of solar, energy storage, offsets from load management, and reserve capacity. FMPA anticipates ceasing to burn coal after 2027 as one jointly owned coal unit retires in 2025 and the other is converted to natural gas in 2027. There are no new generating facilities proposed with ARP member owned systems (see Exhibit 3, Schedule 6.2).

Evaluation

The ten-year site plan indicates that fossil fuels will remain the primary but shrinking source of energy used by FMPA to generate electricity during the next 10 years (see Exhibit 3, Schedule 6.2); accounting for 91.7% (11.5% from coal and 80.2% from natural gas) of FMPA's electric generation in 2024. The plan predicts fossil fuels will account for 84.9% (0.0% from coal and 84.9% from natural gas) of FMPA electric generation in 2033. During the same period, nuclear sources are predicted to increase from 5.3% in 2024 to 5.6% in 2033. Solar sources are predicted to dramatically increase from 2.3% in 2024 to 9.0% in 2033.

Renewable Energy

FMPA is actively involved in planning and developing new renewable energy resources. Currently, the ARP purchases power from a sugar bagasse fueled cogeneration plant and uses landfill gas to supplement coal fuel requirements. The ARP has member-owned photovoltaic solar generating capacity and 20-year power purchase agreement solar capacity which will dramatically increase the share of electricity generated through renewable sources.

Conclusions and Recommendations

Recent dramatic spikes and volatility in the oil and gas markets and international threats to supply confirms the value of moving as quickly as possible towards a more balanced fuels portfolio, with continued emphasis on increasing renewable energy sources. Council supports this approach to reduce vulnerability to fuel price increases and supply interruptions and continues to encourage the Florida Legislature to adopt a Renewable Portfolio Standard to provide a mechanism to expand the use of renewable energy in Florida.

Council applauds FMPA's plan to reduce reliance on coal and replace it with renewable energy solar power. To enhance these efforts, FMPA should consider expanding solar rebate programs for customers who install PV and solar water heating systems on their homes and businesses. These rebates should be coordinated with other programs, such as the Solar and Energy Loan Fund (SELF) and Property-Assessed Clean Energy (PACE) programs. 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.

Council urges FMPA and the State of Florida to continue developing new programs to increase conservation measures and to rely, to a greater extent, on renewable energy sources. State legislators should amend the regulatory framework to provide financial incentives for power providers and customers. The phasing in of PV and other locally available energy sources will help Florida achieve a sustainable future as called for in Council's Strategic Regional Policy Plan.

The utility filing can be accessed at the following link:

FMPA Municipal Power.pdf (floridapsc.com)

Attachments

Exhibit 1

Schedule 7.1
Forecast of Capacity, Demand, and Scheduled Maintenance at Time of Summer Peak All-Requirements Power Supply Project

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Year	Total Installed Capacity (MW) [1]	Firm Capacity Import (MW)	Firm Capacity Export (MW)	QF (MW)	Total Available Capacity (MW)	System Firm Summer Peak Demand [2] (MW)	Reserve Margin before Maintenance		Scheduled Maintenance (MW)	Reserve Margin after Maintenance	
							(MW)	(% of Peak)		(MW)	(% of Peak)
2024	1,616	303	0	0	1,919	1,447	472	33%	0	472	33%
2025	1,724	322	0	0	2,046	1,547	499	32%	0	499	32%
2026	1,731	361	0	0	2,092	1,552	539	35%	0	539	35%
2027	1,731	361	0	0	2,091	1,550	541	35%	0	541	35%
2028	1,625	247	0	0	1,872	1,465	407	28%	0	407	28%
2029	1,625	247	0	0	1,872	1,475	397	27%	0	397	27%
2030	1,642	92	0	0	1,734	1,387	347	25%	0	347	25%
2031	1,642	91	0	0	1,734	1,394	340	24%	0	340	24%
2032	1,642	91	0	0	1,733	1,401	332	24%	0	332	24%
2033	1,642	91	0	0	1,733	1,410	323	23%	0	323	23%

[1] See Table 5-1 for a listing of the resources identified as Installed Capacity and Firm Capacity Import.

[2] System Firm Summer Peak Demand includes transmission losses for the ARP Participants and additional ARP wholesale obligations served through FPL, DEF, and KUA.

Exhibit 2

Figure ES-1
ARP Participants and FMPA Power Supply Resource Locations

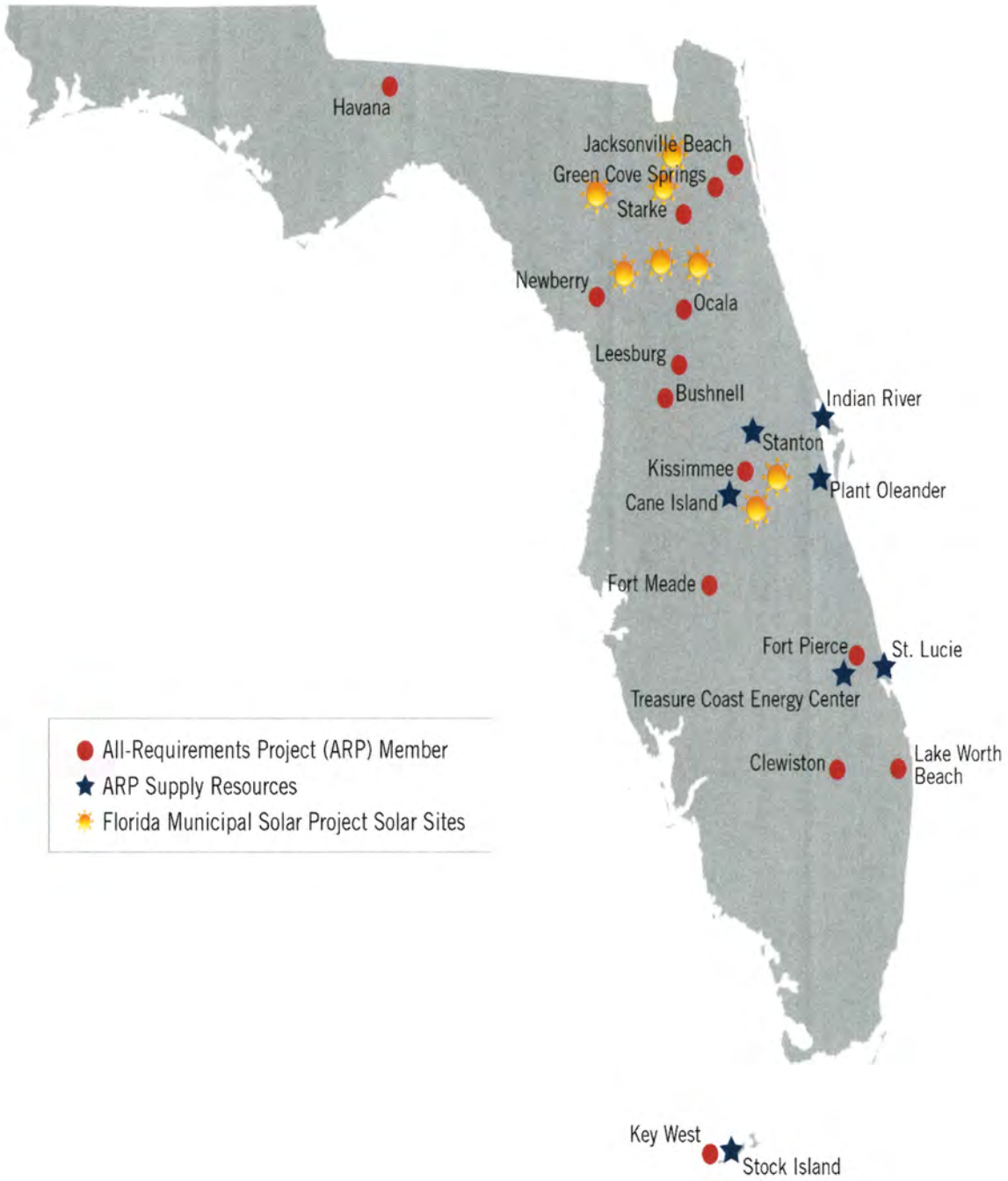


Exhibit 3

Schedule 6.2 - Energy Sources (%) – All-Requirements Power Supply Project

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Line		Prime		Actual	Forecasted									
No.	Energy Source	Mover	Units	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
1	Annual Firm Inter-Region Interchange		%	-	-	-	-	-	-	-	-	-	-	-
2	Nuclear [1]		%	5.7%	5.3%	5.4%	5.5%	5.3%	5.8%	5.7%	5.7%	5.8%	5.8%	5.6%
3	Coal		%	10.7%	11.5%	11.1%	6.4%	4.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Residual													
4		Steam	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5		CC	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6		CT	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7		Total	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Distillate													
8		Steam	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9		CC	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10		CT	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11		Total	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Natural Gas													
12		Steam	%	1.8%	1.5%	1.5%	0.9%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13		CC	%	78.3%	77.9%	76.9%	76.7%	78.3%	82.0%	81.7%	82.3%	81.9%	81.8%	81.8%
14		CT	%	1.5%	0.8%	0.2%	1.6%	2.0%	2.8%	3.3%	2.2%	2.5%	2.7%	3.1%
15		Total	%	81.6%	80.2%	78.6%	79.1%	81.0%	84.8%	85.0%	84.5%	84.4%	84.5%	84.9%
16	NUG		%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Renewables													
17		Biofuels	%	0.6%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%
18		Biomass	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19		Geothermal	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20		Hyrdro	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21		Landfill Gas	%	0.1%	0.1%	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22		MSW	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23		Solar	%	1.3%	2.3%	4.3%	8.5%	8.4%	8.9%	8.8%	9.3%	9.2%	9.1%	9.0%
24		Wind	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
25		Other	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
26		Total	%	2.0%	2.9%	4.9%	9.0%	9.0%	9.4%	9.3%	9.8%	9.8%	9.7%	9.6%
27	Interchange		%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	Net Energy for Load		%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

[1] Nuclear generation shown is the ARP Participants' Entitlement Shares in the St. Lucie Project.

Local Governments

Miami-Dade County

Regulatory and Economic Resources
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111 NW 1st Street • 11th Floor
Miami, Florida 33128-1902
T 305-375-2886

miamidade.gov

August 2, 2024

Public Service Commission c/o Greg Davis
Capital Circle Office Center
2450 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Delivered via E-mail to gdavis@psc.state.fl.us

Re: Review of the 2024 Ten-Year Site Plans for Florida's Electrical Utilities

To: Mr. Greg Davis

In response to the Florida Public Service Commission's May 2, 2024 letter soliciting Miami-Dade County's comments on the 2024 Ten-Year Site Plans (TYSP) for Florida's electric utilities, the Miami-Dade County Department of Regulatory and Economic Resources (RER) provides the following commentary on the Florida Power & Light Company (FPL) TYSP:

The following facilities noted as proposed on the FPL TYSP, are applicable and within Miami-Dade County:

- Turkey Point Units 6 & 7*
- Redlands Solar Energy Center

*The FPL TYSP states the following regarding Units 6 & 7 at Turkey Point: FPL has paused the decision whether to seek FPSC approval to move forward with construction of Turkey Point Units 6 & 7. FPL intends to incorporate into any decision regarding Turkey Point Units 6 & 7 the experience gained from the construction and operation of Georgia Power's nuclear units at its Vogtle site. As a result, the earliest possible in-service dates for Turkey Point 6 & 7 are beyond the ten-year period addressed in this 2024 Site Plan. This Site Plan continues to present the Turkey Point location as a Preferred Site for nuclear generation as indicated in Chapter IV.

Miami-Dade County has previously commented on the Proposed Turkey Point Nuclear Units 6 & 7 via the "*Miami-Dade County Report on FPLs Proposed Turkey Point Nuclear Units 6 & 7 and Non-Transmission Associated Facilities - February 1, 2013*. We are happy to provide more detailed comments on the next TYSP.

Planning and Zoning

Both projects identified are undergoing local entitlements, have completed their review processes, or are undergoing reviews. While there are no objection to these projects, the following are comments to be considered:

- The report identifies FPL's current 157 kW floating solar Living Lab project, and it is recommended that FPL continue to explore opportunities to use this innovative practice to generate electricity over man-made water bodies, thus reducing the need for agricultural land for ground mounted solar PV installations.

- It is recommended that the proposed expansion of the solar installation on the Redlands Solar Site be designed to accommodate complimentary agricultural uses under the solar panels (i.e. pollinator environments, grazing of farm animals, etc.), the continuation of agriculture on any portion of the site not covered by solar panels, and for the site to be returned to agriculture use upon any future removal of the solar panels.

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- For Appendix B, Preferred Site #20, FPL should clarify its statement in Row h of its table where it states that "Solar facilities are not permitted in the Agricultural Zone at this time. Permitting requires amendment to county comprehensive plan and Conditional Use Permit issuance." A Letter of Interpretation dated December 3, 2018, and an updated letter on November 5, 2021 was provided, stating that development of a solar facility would be allowed as a utility in the Agriculture area consistent with the County's Comprehensive Development Master Plan (CDMP).

- For Appendix B, Preferred Site #47, FPL should clarify its statement in Row h of its table where it states that "Current future land use designations include Industrial, Utilities, Communications, and Unlimited Manufacturing with a dual designation Mangrove Protection Area." The CDMP designates the Turkey Point site as "Institutions, Utilities, and Communications", and its cooling canals and the proposed Units 6 & 7 are designated "Environmental Protection" and the surroundings are designated "Environmental Protection" and "Environmentally Protected Parks". The environmentally designated areas include areas in the County's most environmentally significant, most susceptible to environmental degradation and where such degradation would adversely affect the supply of potable fresh water or environmental systems of County, regional, State or national importance.

- The Turkey Point power plant project received unusual use approval with conditions to allow expansion of the existing nuclear power plant and ancillary structures and equipment through Resolution Z-56-07 (adopted by the Board of County Commissioners ((BCC)) on December 20, 2007). Said approval was later modified with conditions through Resolution Z-1-13 (adopted by the BCC on January 10, 2013) to allow a reclaimed water treatment facility and radial collector well system. The expansion of the power plant shall be in accordance with the conditions of said approvals.

Division of Environmental Resources Management (RER-DERM)

RER-DERM enforces the provisions of Chapter 24 of the Miami-Dade County Code, also known as the Miami-Dade County Environmental Protection Ordinance. RER-DERM is responsible for applying Chapter 24 regulations for any existing, new or improved facilities not covered by the Conditions of Certification (CoCs) in the Florida Electrical Power Plant Siting Act (PPSA) and notes the following:

- For compliance with Miami-Dade County stormwater disposal requirements, all stormwater shall be retained on-site utilizing a properly designed seepage or infiltration drainage system. RER-DERM review and approval is required for any proposed grading and drainage improvements. Drainage plans shall provide for full on-site retention of the stormwater runoff generated by a 5-year / 1-day storm event.

- An Environmental Resource Permit (ERP) from the South Florida Water Management District (1-800-432-2045) or a Miami-Dade County Surface Water Management General Permit may be required to construct and operate the necessary surface water management system. This permit shall be obtained before any development activity on the property.

- Site grading and development plans shall comply with the applicable requirements of Chapter 11C of the Code and all state and federal criteria at the time of obtaining development approvals and shall not cause flooding of adjacent properties.

- Any proposed development shall comply with county and federal flood criteria requirements.

Regulatory and Economic Resources
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- Pursuant to Section 24-48.1(1)(f) of the Miami-Dade County Code, a RER-DERM Class VI is required for the installation of a drainage system for any project that has known soil or groundwater contamination or that uses, generates, handles, disposes of discharges, or stores hazardous materials.

- Pursuant to Section 24-48.1(1)(e) of the Miami-Dade County Code, a RER-DERM Class V permit is required for any activities that require dewatering on the property. Class V permits are required for any dewatering of groundwater, surface water, or water that has entered an underground facility, excavation, or trench.

- Best management practices for erosion control shall be implemented and maintained at all times during construction. Methods shall include but are not limited to using staked hay bales, staked filter cloth, sodding, seeding, and mulching; staged construction; and the installation of turbidity screens around the immediate project site.

- The report indentified "*the proposed potable water supply is "Delivered to Site by Truck or via existing permitted supply"* for the Redlands Solar Energy Center. Please note that approved on-site potable water supply and onsite sewage treatment and disposal systems are required. Pursuant to Section 24-43.2 and Section 24-42.7 of the Code, the existing and any proposed structures at the Redlands Solar Site shall obtain RER-DERM review and approval of onsite potable water supply and onsite sewage treatment and disposal systems. The permit process number C2022130433 is pending RER-DERM approval for on-site potable water supply and onsite sewage treatment and disposal systems as well as Department of Health approval, as repeated below.

- The County coordinates with the State of Florida's Department of Environmental Protection Power Plant Siting Act (PPSA) office for environmental reviews and approvals of certified facilities in Turkey Point outside of those provided by Chapter 24 of the Miami-Dade County Code.

Open Applications (Processes) for Folio No. 3068200000010 as of 8/2/2024

There are two open applications that require FPL's attention at the Redlands Solar Energy site with the Miami-Dade County folio number of 3068200000010. The County is in receipt of a permit application for temporary trailers at 21950 SW 232 Street, Miami, FL 33170 that requires corrections. The application or "process number" C2022130433, is currently in disapproval status as the application requires more information regarding the source of on-site potable water supply, details of the on-site water treatment system, engineering details of the onsite sewage and treatment disposal systems for each trailer. Process number C2022130433 has been disapproved by RER-DERM, RER-DERM Water Treatment and the Florida Department of Health. There is a dry run hold. The last corrections were submitted on 06/24/2022. Additionally, permit number 2024006824 was issued on 11/01/2023 but expired on 04/29/2024. A completion hold has been placed for a County Public Works inspection. There are no records of the inspections having occurred.

If you have any questions or concerns, please contact Lourdes M. Gomez, Director, Department of Regulatory and Economic Resources by phone at 786-229-1008 or via e-mail at lourdes.gomez@miamidade.gov.

Sincerely,

Lourdes M. Gomez, Director
Department of Regulatory and Economic Resources

Local Government

Orange County

Jon V. Weiss, P.E., Deputy County Administrator
Infrastructure Community and Development
Orange County Government
201 S. Rosalind Avenue - Reply To: Post Office Box 1393, Orlando, Florida 32802-1393
Telephone: 407-836-5393 | Jon.Weiss@ocfl.net

June 21, 2024

VIA ELECTRONIC MAIL

Mr. Greg Davis, Engineering Specialist
Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Email: GDavis@psc.state.fl.us

Re: Review of the 2024 Ten-Year Site Plans for Florida's Electric Utilities

Dear Mr. Davis:

Thank you for providing the letter and notice inviting Orange County to review the 2024 Ten-Year Site Plans for Florida's Electric Utilities in accordance with Rule 25-22.071, Florida Administrative Code.

We reviewed the relevant Ten-Year Site Plans for Florida Municipal Power Agency and Orlando Utilities Commission. After reviewing the plans, we found there are no projects listed that would require County review. Therefore, at this time, we have no comments to provide for these plans.

We look forward to the opportunity again next year to participate in the annual review.

Sincerely,

Jon V. Weiss, P.E.
Deputy County Administrator
Infrastructure Community and Development

Local Government

Pinellas County

August 2, 2024

State of Florida Public Service Commission
Attn: Greg Davis, Engineering Specialist
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Review of 2024 Ten-Year Site Plans for Florida's Electric Utilities

Dear Mr. Davis:

Thank you for the invitation to review the Ten-Year Site Plans (TYSP) for Florida's Electric Utilities. Pinellas County (County) is included in the Duke Energy Florida (DEF} electric utility service area. Hence, comments on the TYSP the focus of the County's review is specific to DEF's TYSP. The County has a keen interest in DEF's TYSP, as there remains a current Qualified Facility (QF) Power Purchase Agreement (PPA) in place between both parties for avoided electrical power capacity and the sale of electrical power from a municipal solid waste to energy facility. The PPA expires on December 31, 2024.

The County has questions, issues, and/or concerns with the following:

1. On Page 63 of 214, or 2-44, the DEF TYSP mentions a Residential Incentive Program. Additionally, it states "DEF expects to provide incentives to customers for the installation of approximately 75,000 energy saving measures over the 2020 to 2024 time period." Duke Energy's website states Smart $aver residential incentives are not available for customers in Florida.

2. The Pinellas Waste-to-Energy (WTE) facility is listed as 'Renewable MSW' but continues to use non-renewable natural gas fired combustion turbines as the basis of cost for avoided capacity calculations for a QF Standard Offer Contract. As listed as 'renewable', why not combine Renewable MSW into the same category as Renewable Solar and pay at the equivalent rates as avoided capacity for PV installations? The County strongly believes that all 'Renewables' should be treated on the same economic basis. This is especially true for Renewable MSW since it provides base load, highly reliable capacity, with a proven track record of over 30-years in the State of Florida.

3. Pinellas County is one of Duke Energy's largest municipal partners and would recommend DEF to increase grid resiliency within the County, including the placement of transmission and

distribution lines underground, where feasible.

If you have any questions regarding the County's review, please contact Kelly Grabovac, Department of Resilience and Asset Management at 727-464-4771 or at kgrabovac@pinellas.gov.

Sincerely,

Barry A. Burton
County Administrator

cc: Jill Silverboard, Deputy County Administrator/Chief of Staff
Robert Mills, Director, Office of Resilience and Asset Management
Kelly Grabovac, Energy and Water Program Manager, Department of Resilience and Asset Management

Water Management District

Southwest Florida Water Management District

Southwest Florida Water Management District

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Sarasota Office
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Sarasota, Florida 34240-9770
(941) 377-3722 or
1-800-320-3503 (FL only)

Tampa Office
7601 U.S. 301 North
Tampa, Florida 33637-6759
(813) 985-7481 or
1-800-836-0797 (FL only)

June 5, 2024

Mr. Greg Davis, Engineering Specialist
Florida Public Service Commission
Division of Engineering
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Subject: 2024 Electric Utility Ten-Year Site Plans

Dear Mr. Davis:

In response to your request, the Southwest Florida Water Management District (District) has completed its review of the 2024 Ten-Year Site Plans for Duke Energy Florida (DEF), Florida Municipal Power Agency (FMPA), Florida Power & Light Company (FPL), Lakeland Electric (LAK), Tampa Electric Company (TECO) and Seminole Electric Cooperative (SEC). The District conducted its review pursuant to Section 186.801(2)(e), Florida Statutes, which requires the Public Service Commission to 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." Considering solar generating facilities only require small quantities of water for occasional cleaning of solar panels, they have been excluded from this review.

Regarding the construction of prospective non-solar generating facilities within the District (i.e., those that are not already approved, undergoing approval or under construction) our findings are as follows.

- DEF is planning to place two new combustion turbine units in service in 2032 and 2033 at undesignated sites which may or may not be located in the District
- FMPA is not planning to construct any new generating facilities within the District
- FPL is planning upgrades at its Manatee plant in 2027
- LAK is not planning to construct any new generating facilities within the District
- TECO is planning a simple cycle conversion project at Polk Unit 1 with a 2025 in service date and a future combustion turbine in 2030 at an undesignated site likely to be located within the District
- SEC is planning to place a new combustion turbine unit in service in 2029 and a new combined cycle unit in service in 2030 at undesignated sites that may or may not be located in the District

The District offers the following technical assistance comments for consideration.

- 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. 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.

- 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 saltwater 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. In Polk and southern Lake counties, there are also water use constraints associated with groundwater withdrawals above the 2025 demand within the Central Florida Water Initiative area. This designation has occurred in response to current and future water resource impacts which are anticipated to occur as a result of future growth and water withdrawals. The District has heightened concerns regarding potential impacts due to additional water withdrawals in these areas.

- Early coordination with the District's Water Use Permit (WUP) staff is encouraged prior to submittal of any site certification or WUP applications. For assistance or additional information concerning the District's WUP program, or to schedule a meeting, please contact April Breton, WUP manager, at (813) 445-6981 or april.breton@watermatters.org.

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) 269-6937 or james.golden@watermatters.org.

Sincerely,

James J. Golden, AICP
Senior Planner

JG
c: April Breton, SWFWMD
Elizabeth Fernandez, SWFWMD
Darrin Herbst, SWFWMD