# REVIEW OF THE 2014 TEN-YEAR SITE PLANS OF FLORIDA'S ELECTRIC UTILITIES



NOVEMBER 2014

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### List of Ten-Year Site Plan Utilities

Name	Abbreviation				
Investor-Owned	Electric Utilities				
Florida Power & Light Company	FPL				
Duke Energy Florida, Inc.	DEF				
Tampa Electric Company	TECO				
Gulf Power Company	GPC				
Municipal Ele	ctric Utilities				
Florida Municipal Power Agency	FMPA				
Gainesville Regional Utilities	GRU				
JEA	JEA				
Lakeland Electric	LAK				
Orlando Utilities Commission	OUC				
City of Tallahassee Utilities	TAL				
Rural Electric	Cooperatives				
Seminole Electric Cooperative	SEC				

## List of Acronyms

Acronym	Term
CC	Combined Cycle
СТ	Combustion Turbine
DACS	Florida Department of Agriculture and Consumer Services
DEP	Florida Department of Environmental Protection
DSM	Demand-Side Management
EIA	Energy Information Administration
EPA	Environmental Protection Agency
F.A.C.	Florida Administrative Code
F.S.	Florida Statutes
FEECA	Florida Energy Efficiency & Conservation Act
FRCC	Florida Reliability Coordinating Council
GWh	Gigawatt-hour
LFG	Landfill Gas
MMBtu	Million British Thermal Units
MSW	Municipal Solid Waste
MW	Megawatt
NSB	Utilities Commission of New Smyrna Beach
NEL	Net Energy for Load
NUG	Non-Utility Generator
OBS	Other Biomass Solids
PPSA	Power Plant Siting Act
QF	Qualifying Facilities
RPS	Renewable Portfolio Standard
TLSA	Transmission Line Siting Act
TYSP	Ten-Year Site Plan
WDS	Wood and Wood Waste Solids

Pursuant to Section 186.801(1), Florida Statutes (F.S.), each generating electric utility must submit to the Florida Public Service Commission (Commission) a Ten-Year Site Plan (TYSP or Plan) which estimates the utility's power generating needs and the general locations of its proposed power plant sites over a ten-year planning horizon. The Ten-Year Site Plans of Florida's electric utilities are designed to give state, regional, and local agencies advance notice of proposed power plants and transmission facilities. In accordance with Section 186.801(2), the Commission is required to perform a preliminary study of each plan and classify each one as either "suitable" or "unsuitable." This document represents the study of the 2014 Ten-Year Site Plans for Florida's electric utilities, filed by 11 reporting utilities.<sup>1</sup>

All findings of the Commission are made available to the Florida Department of Environmental Protection for its consideration at any subsequent certification proceedings pursuant to the Power Plant Siting Act or the Transmission Line Siting Act.<sup>2</sup> In addition, this document is forwarded to the Florida Department of Agriculture and Consumer Services pursuant to Section 377.703(2)(e), F.S., which requires the Commission to provide a report on electricity and natural gas forecasts.

#### **Review of the 2014 Ten-Year Site Plans**

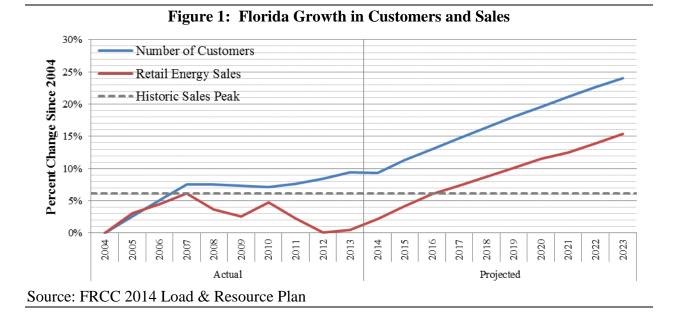
The Commission has divided this review into two portions: a Statewide Perspective, which covers the whole State of Florida, and Utility Perspectives, which address each of the reporting utilities. From a Statewide Perspective, the Commission has reviewed the implications of the combined trends of Florida's electric utilities regarding load forecasting, renewable generation, and traditional generation.

#### Load Forecasting

Forecasting load growth is an important component of system planning for Florida's electric utilities. Over the past ten years, the total number of electric customers has increased by 9.46 percent above 2004. However, growth in the number of customers has not necessarily resulted in growth in customer load. As of 2013, retail energy sales have only increased 0.52 percent above 2004, down from a historic 2007 peak. Florida's electric utilities project the economy to recover over the planning period, with growth remaining slower than before the financial crisis. Based on current projections, Florida's electric utilities anticipate exceeding the historic 2007 peak by 2017. Figure 1 below, details these trends.

<sup>&</sup>lt;sup>1</sup> Investor-owned utilities filing 2014 TYSPs include Florida Power & Light Company (FPL), Duke Energy Florida, Inc. (DEF), Tampa Electric Company (TECO), and Gulf Power Company (GPC). Municipal utilities filing 2014 TYSPs include Florida Municipal Power Agency (FMPA), Gainesville Regional Utilities (GRU), JEA (formerly Jacksonville Electric Authority), Lakeland Electric (LAK), Orlando Utilities Commission (OUC), and City of Tallahassee Utilities (TAL). Seminole Electric Cooperative (SEC) also filed a 2014 TYSP.

 $<sup>^2</sup>$  The Power Plant Siting Act is Sections 403.501 through 403.518, F.S. Pursuant to Section 403.519, F.S., the Commission is the exclusive forum for the determination of need for an electrical power plant. The Transmission Line Siting Act is Sections 403.52 through 403.5365, F.S. Pursuant to Section 403.537, F.S., the Commission is the sole forum for the determination of need for a transmission line.



Florida's electric utilities reduce the rate of growth in customer peak demand and annual energy consumption through demand-side management. The Commission, through its authority granted by Sections 366.80 through 366.85 and Section 403.519, F.S., otherwise known as the Florida Energy Efficiency and Conservation Act (FEECA), encourages demand-side management by establishing goals for the reduction of seasonal peak demand and annual energy consumption for those utilities under its jurisdiction. The Commission establishes goals at least once every five years, and is scheduled to establish goals by the end of 2014, which would be reflected in the 2015 Ten-Year Site Plans.

Based on current proposals, Florida's electric utilities project that by 2023 demand-side management programs will reduce the system's total summer peak demand by approximately 8,000 megawatts (MW), and annual energy consumption by over 11,000 gigawatt-hours (GWh). Including these reductions, Florida is forecasted to experience by 2023 a net firm summer peak demand of 52,633 MW and annual net energy for load of 270,773 GWh.

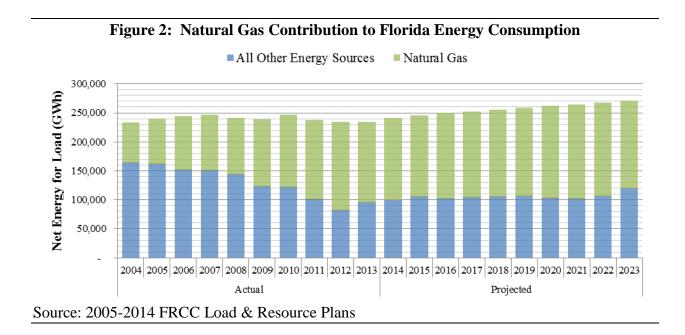
#### **Renewable Generation**

Renewable resources continue to expand in Florida, with approximately 1,620 MW of renewable generating capacity currently installed in Florida. The majority of installed renewable capacity is represented by biomass and municipal solid waste, making up approximately 60 percent of Florida's renewables. Other major renewable types, in order of capacity contribution, include waste heat, solar, hydroelectric, and landfill gas. Notably, Florida had 63 MW of demand-side renewable energy systems installed and using net metering by the end of 2013, an increase in capacity of 50 percent from 2012.

Over the next ten years, Florida's electric utilities have reported that 722 MW of additional renewable generation is planned in Florida, excluding any potential net metering additions. Almost half of the projected capacity additions are solar generation, the remainder consisting of solid biomass, municipal solid waste, and landfill gas. While these new projects represent a significant increase from the existing total, renewable generation continues to provide a relatively small contribution towards the reduction of the state's reliance upon fossil fuels.

#### **Traditional Generation**

Natural gas remains the dominant fuel over the planning horizon, with usage in 2013 at approximately 60 percent of the state's net energy for load (NEL). Figure 2 below, illustrates the use of natural gas as a generating fuel for electricity production in Florida. Natural gas usage is expected to remain approximately at its current level, on a percentage basis, and decline somewhat at the end of the planning period due to an increase in nuclear generation.



Generating capacity within the state of Florida is anticipated to grow to meet the increase in customer demand, with approximately 12,570 MW of new utility-owned generation added over the planning horizon. This figure represents an increase from the previous year, which estimated the need for about 9,960 MW new generation. Based on the 2014 Ten-Year Site Plans, Figure 3 below, illustrates the present and future aggregate capacity mix of the state of Florida. The capacity values in Figure 3 incorporate all proposed additions, changes, and retirements planned during the ten-year period. As in previous planning cycles, natural gas-fired generating units make up a majority of the generation additions and now represent a majority of capacity within the state.

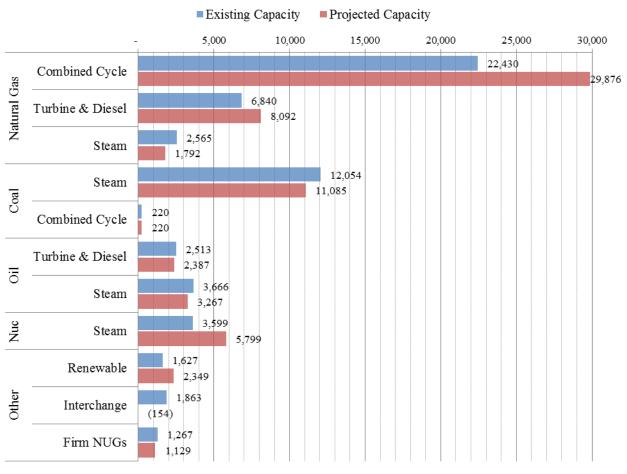


Figure 3: Florida Current and Projected Installed Capacity by Fuel and Technology

Source: 2014 FRCC Load & Resource Plan and TYSP Utilities Data Responses

As noted previously, the primary purpose of this review of the utilities' plans is to provide information regarding new electric power plants for local and state agencies to assist in the certification process. Table 1 below, displays those generation facilities that had not yet received from the Commission a certification under the Power Plant Siting Act. A petition for a determination of need is generally anticipated at four years in advance of the in-service date for a natural gas-fired combined cycle unit. The Commission most recently approved a determination of need for DEF's proposed Citrus plant, which will still have to seek approval from DEP and the Siting Board.

		Tabl	e 1: Planned Un	its Requiring a De	etermin	ation of	Need
	In-Service	Utility	Plant Name	Unit Type		'apacity IW)	Notes
	Year	Name	& Unit Number		Sum	Win	
	2018	DEF	Citrus	Combined Cycle	1,640	1,820	See Order No. PSC-14-0557-FOF-EI
	2019	FPL	Unsited	Combined Cycle	1,269	1,429	
	2020	SEC	Unsited	Combined Cycle	440	523	
	2021	DEF	Unsited	Combined Cycle	793	866	
So	urce: 2014	Ten-Yea	ar Site Plans				

While the Commission certifies transmission lines under the Transmission Line Siting Act (TLSA), there are none projected during the planning period that have not already been approved by the Commission.

#### **Future Concerns**

Florida's electric utilities must also consider environmental concerns associated with existing generators and planned generation to meet Florida's electric needs. The U.S. Environmental Protection Agency (EPA) has finalized or proposed several new rules in recent years that have a sizeable impact on Florida's existing generation fleet, as well as on its proposed new facilities.

Notably, the EPA proposed a rule in June 2014 associated with carbon pollution for existing power plants, also known as the Clean Power Plan. Due to the timing of the Ten-Year Site Plan filings, these proposed EPA Rules, though they may have a large effect on Florida's electric utilities, are not considered as part of this review. The Commission anticipates that the 2015 Ten-Year Site Plan will include more discussion of potential impacts to Florida's electric utilities from the Clean Power Plan, but uncertainty would remain as Florida's implementation plan would not be completed.

Regarding reliability, FPL is proposing using a third reliability criterion, a generation only planning reserve margin that excludes the benefits of demand response and incremental energy efficiency programs. While the proposed criterion has only a minor effect in the 2014 TYSP, it generally would result in higher installed or purchased capacity requirements for FPL to meet summer peak demand. At this time, FPL has not requested approval of this criterion, nor has the Commission approved its use. The Commission will continue to monitor annually FPL's reserve margin, demand response, and energy efficiency accomplishments. The Commission will have an opportunity to review FPL's proposed metric if it becomes a controlling factor for a determination of need of a new electrical power plant.

#### Conclusion

The Commission has reviewed the 2014 Ten-Year Site Plans and finds that the projections of load growth appear reasonable. The reporting utilities have identified sufficient additional generation facilities to maintain an adequate supply of electricity at a reasonable cost. The

Commission will continue to monitor the impact of current and proposed EPA Rules and the state's dependence on natural gas for electricity production.

Based on its review, the Commission finds the 2014 Ten-Year Site Plans to be suitable for planning purposes. Since the Plans are not a binding plan of action for electric utilities, the Commission's classification of these Plans as suitable or unsuitable does not constitute a finding or determination in docketed matters before the Commission. The Commission may address any concerns raised by a utility's Ten-Year Site Plan at a public hearing.

### Introduction

The Ten-Year Site Plans of Florida's electric utilities are designed to give state, regional, and local agencies advance notice of proposed power plants and transmission facilities. The Commission receives comments from these agencies regarding any issues with which they may have concerns. The Plans are planning documents that contain tentative data that is subject to change by the utilities upon written notification to the Commission.

For any new proposed power plants and transmission facilities, certification proceedings under the Power Plant Siting Act, Sections 403.501 through 403.518, Florida Statutes (F.S.) or the Transmission Line Siting Act, Sections 403.52 through 403.5365, F.S., will include more detailed information than is provided in the Plans. The Commission is the exclusive forum for determination of need for electrical power plants, pursuant to Section 403.519, F.S., and for transmission lines, pursuant to Section 403.537, F.S. The Plans are not intended to be comprehensive, and therefore may not have sufficient information to allow regional planning councils, water management districts, and other reviewing state and local agencies to evaluate site-specific issues within their respective jurisdictions. Other regulatory processes may require the electric utilities to provide additional information as needed.

#### **Statutory Authority**

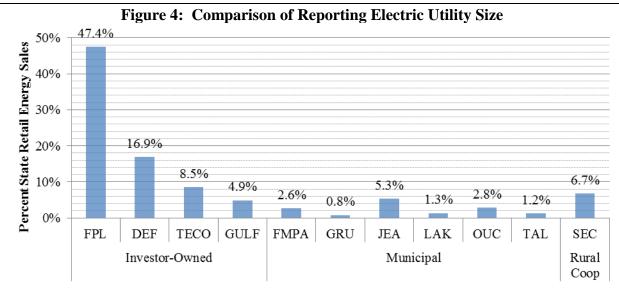
All major generating electric utilities are required by Section 186.801, F.S., to annually submit for review a Ten-Year Site Plan to the Commission. Based on these filings, the Commission performs a preliminary study of each plan and makes a non-binding determination as to whether it is suitable or unsuitable. The results of the Commission's study are contained in this report, the Review of the 2014 Ten-Year Site Plans, and are forwarded to the Florida Department of Environmental Protection for use in subsequent proceedings. In addition, Section 377.703(2)(e), F.S., requires the Department of Agriculture and Consumer Services in consultation with the Commission to collect and analyze energy forecasts. The Commission has adopted Rules 25-22.070 through 25-22.072, Florida Administrative Code (F.A.C.) in order to fulfill these statutory requirements.

#### Applicable Utilities

Florida is served by 58 electric utilities, including 5 investor-owned utilities, 35 municipal utilities, and 18 rural electric cooperatives. Pursuant to Rule 25-22.071(1), F.A.C., only generating electric utilities with an existing capacity above 250 megawatts (MW) or a planned unit with a capacity of 75 MW or greater are required to file with the Commission a Ten-Year Site Plan, at least once every two years.

In 2014, 11 utilities met these requirements and filed a Ten-Year Site Plan, including 4 investorowned utilities, 6 municipal utilities, and 1 rural electric cooperative. The investor-owned utilities, in order of size, are Florida Power & Light Company (FPL), Duke Energy Florida, Inc. (DEF), Tampa Electric Company (TECO), and Gulf Power Company (GPC). The municipal utilities, in alphabetical order, are Florida Municipal Power Agency (FMPA), Gainesville Regional Utilities (GRU), JEA (formerly Jacksonville Electric Authority), Lakeland Electric (LAK), Orlando Utilities Commission (OUC), and City of Tallahassee Utilities (TAL). The sole rural electric cooperative filing a 2014 Plan is Seminole Electric Cooperative (SEC). Collectively, these utilities are referred to as the Ten-Year Site Plan Utilities (TYSP Utilities).

Figure 4 below, illustrates the comparative size of the TYSP Utilities, in terms of each utility's percentage share of the state's retail energy sales in 2013. Combined, the reporting investor-owned utilities account for 77.7 percent of the state's retail energy sales. Non-reporting utilities make up approximately 1.5 percent of the State's retail energy sales.



Source: 2014 Ten-Year Site Plans, 2014 Load & Resource Plan

#### Required Content

The Commission requires each reporting utility to provide information on a variety of topics. Schedules describe the utility's existing generation fleet, customer composition, demand and energy forecasts, fuel requirements, reserve margins, changes to existing capacity, and proposed power plants and transmission lines. The utilities also provide a narrative documenting the methodologies used to forecast customer demand and the identification of resources to meet that demand over the ten-year planning period. This information, supplemented by additional data requests, provides the basis of the Commission's review.

#### **Additional Resources**

The Commission's Rule also task the reporting electric utilities with collecting information on both a statewide basis and for Peninsular Florida, which excludes the area east of the Apalachicola River. The Florida Reliability Coordinating Council (FRCC) provides this aggregate data for the Commission's review. Each year, the FRCC publishes a Regional Load and Resource Plan, which contains historic and forecast data on demand and energy, capacity and reserves, and proposed new generating units and transmission line additions. In addition, the FRCC publishes an annual Reliability Report which is also relied upon by the Commission. For certain comparisons additional data from various governmental agencies is relied upon, including the Energy Information Administration and the Florida Department of Highway Safety and Motor Vehicles.

The Commission held a public workshop on August 12, 2014, to facilitate discussion of the annual planning process and allow for public comments. A presentation was conducted by the FRCC summarizing the 2014 Load and Resource Plan and other related matters, including fuel reliability, environmental regulations, and physical security of infrastructure. Public comments were provided by the Sierra Club, which focused on the need to evaluate alternative energy options, planning for compliance with existing and future environmental regulations, and fuel diversity.

#### **Structure of the Commission's Review**

The Commission's review is divided into multiple sections. The Statewide Perspective provides an overview of the State of Florida as a whole, including discussions of load forecasting, renewable generation, and traditional generation. The Utility Perspectives provide more focus, discussing the various issues facing each electric utility and its unique situation. Lastly, the comments collected from various review agencies, local governments, and other organizations are included as Appendix A.

#### Conclusion

Based on its review, the Commission finds all 11 reporting utilities' 2014 Ten-Year Site Plans to be suitable for planning purposes. During its review, the Commission has determined that the projections for load growth appear reasonable and that the reporting utilities have identified sufficient generation facilities to maintain an adequate supply of electricity at a reasonable cost.

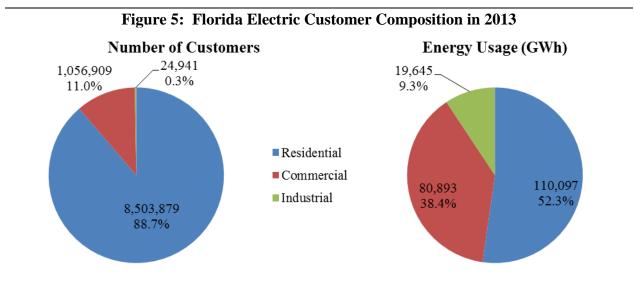
The Commission notes that, as the Ten-Year Site Plans are non-binding, the classification of suitable does not constitute a finding or determination in any docketed matter before the Commission, nor an approval of all planning assumptions contained within the Ten-Year Site Plans. The Commission may address any concerns raised by a utility's Ten-Year Site Plan at a public hearing.

# **STATEWIDE PERSPECTIVE**

Forecasting load growth is an important component of system planning for Florida's electric utilities. In order to maintain system reliability, utilities must be prepared for future changes in electricity consumption, including changes to the number of electric customers, customer usage patterns, building codes and appliance efficiency standards, new technologies such as electric vehicles, and the role of demand-side management.

#### **Electric Customer Composition**

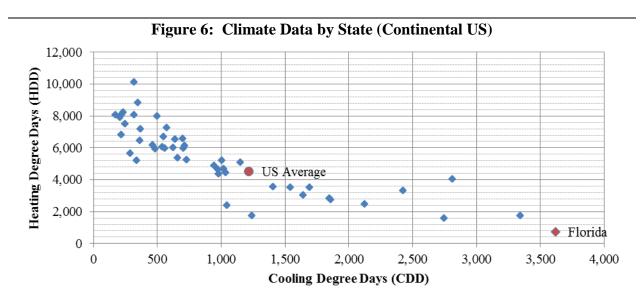
The residential class represent the majority in terms of number of customers, at 88.7 percent of customers, and retail energy sales, at 52.3 percent of sales, for the three major customer classes, as illustrated in Figure 5 below. Both commercial and industrial customers make up a sizeable percentage of energy sales, due to each class' higher energy usage per customer account.



Source: FRCC 2014 Load & Resource Plan

Florida's residential customers make up a larger portion of retail energy sales than the United States as a whole, with a national average of 38 percent for residential retail sales. As a result, Florida's utilities are impacted more by trends in residential energy usage, which tend to be associated with weather conditions. Florida's residential customers rely more upon electricity for heating than the national average, with only a small portion using alternate fuels such as natural gas or oil for home heating needs.

Florida's unique climate plays an important role in electric utility planning. Florida is an outlier in terms of climate, with the highest number of cooling degree days and lowest number of heating degree days within the continental United States, as shown below by Figure 6. Other states tend to rely upon alternative fuels for heating, but Florida's heavy use of electricity results in high winter peak demand.



Source: National Oceanic & Atmospheric Administration, Historical Climatology Series 5-1 and 5-2 (30 year period)

#### **Growth Projections**

Florida traditionally has been a high growth state, with significant annual increases in both customers and retail energy sales. The financial crisis and resulting economic impact to Florida resulted in a freezing of customer growth and decline in retail energy sales from the 2007 peak. While customer growth has resumed, albeit at a slower pace, retail sales have declined since 2007 excluding a spike in usage associated with extreme winter weather in 2010. The result of both of these trends has been that over the last ten year period, the number of Florida's electric customers have risen 9.46 percent, while retail energy sales have risen only 0.52 percent. Since 2004, the effective average annual growth rate for electric sales during the past ten years was 0.06 percent. These trends are illustrated in Figure 7, below.



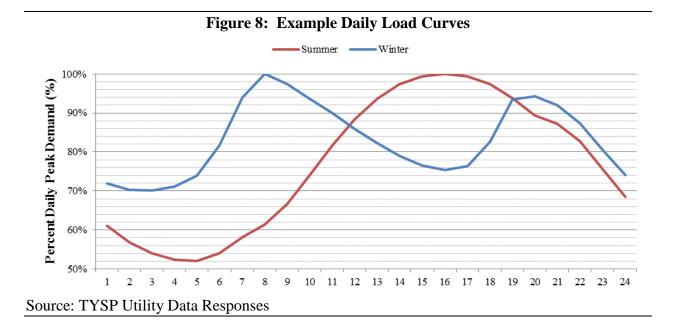
**Figure 7: Florida Growth in Customers and Sales** 

For the next ten-year period, Florida's customer base and retail sales are anticipated by the reporting utilities to grow at a faster pace than the last few years, reversing a trend of small population increases with declining retail sales. While this rate remains below those experienced before the financial crisis, it would set the state on track to exceed its previous 2007 retail sales peak in 2017. The current divide between customers and retail sales is anticipated to remain similar over the ten-year period, with customers growing at an average annual rate of 1.41 percent while retail sales increase by 1.36 percent annually. Florida's electric utilities are projecting an increase in economic growth in the state, but at levels below those experienced before the financial crisis.

#### **Peak Demand**

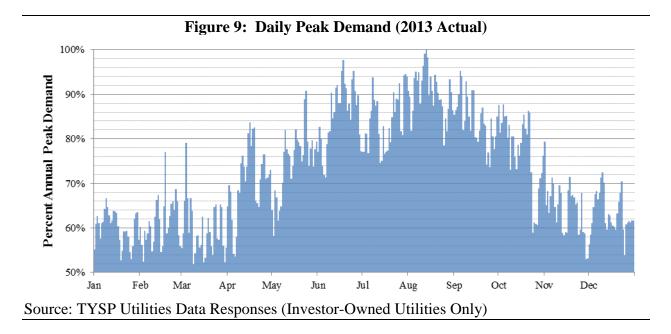
The aggregation of each individual customer's electric consumption must be met at all times by Florida's electric utilities to ensure reliable service. The time at which customers demand the most energy simultaneously is referred to as peak demand. While retail energy sales primarily vary the amount of fuel consumed by the electric utilities to deliver energy, peak demand determines the amount of generating capacity required to deliver that energy at a single moment in time.

A primary factor in this is seasonal weather patterns, with peak demands calculated separately for the summer and winter periods annually. The influence of residential customers is evident in the determination of these seasonal peaks, as they correspond to times of increased usage to meet home heating (winter) and cooling (summer) demand. Figure 8 below, illustrates a daily load curve for a typical day for each season. In the summer, air-conditioning needs increase throughout the day, climbing steadily until a peak is reached in the late afternoon and then declining into the evening. In the winter, electric heat and electric water heating produces a higher base level of usage, with a large spike in the morning and a smaller spike in the evening.



Florida is typically a summer-peaking state, meaning that the summer peak demand generally exceeds winter peak demand, and therefore controls the amount of generation required. Weather conditions impact generation capacity in ways that cause summer demand to control. Higher temperatures in the summer reduce the efficiency of generation, with high water temperatures reducing the quality of cooling provided, and can sometimes limit the quantity as units may be required to operate at reduced power or go offline based on environmental permits. Conversely, in the winter, utilities can take advantage of lower ambient air and water temperatures to produce more electricity from a power plant.

As daily load varies, so do seasonal loads. Figure 9 below, illustrates this for 2013, showing the daily peak demand as a percentage of the annual peak demand for the reporting investor-owned utilities combined. As 2013 featured a mild winter, so summer peak demand set the annual peak demand. Typically, winter peaks are short events while summer demand tends to stay at near peak levels for longer periods. The periods between seasonal peaks are referred to as shoulder months, in which the utilities take advantage of lower demand to perform maintenance without impacting their ability to meet daily peak demand.



While the utilities assume normalized weather in forecasts of peak demand, during operation of the system utilities continuously monitor the short-term weather patterns. Utilities adjust maintenance schedules to ensure the highest unit availability during the utility's projected peak demand, bringing units back online if necessary or delaying maintenance until after a weather system has passed.

#### **Electric Vehicles**

Utilities also examine other trends that may impact the amount of customer peak demand and energy consumption. This includes new sources of energy consumption, such as electric vehicles, which can be considered analogous to a home air conditioning system in terms of system load. The reporting electric utilities estimate approximately 8,000 electric plug-in vehicles were operating in Florida by the end of 2013. The Florida Department of Highway Safety and Motor Vehicles lists the number of registered vehicles in Florida as of December 31, 2013, as 18.9 million vehicles, resulting in 0.042 percent penetration rate of electric vehicles of Florida's registered vehicle fleet.

Florida's electric utilities anticipate growth in the electric vehicle market, as illustrated in Table 2 below. Electric vehicles are anticipated to grow rapidly throughout the planning period, resulting in almost a half-million electric vehicles operating within the electric service territories by the end of 2023. The projected increase in electric vehicle ownership would result in approximately 2 percent share of Florida's vehicles being fueled by electricity.

Table	Table 2: Estimated Number of Electric Vehicles by Service Territory										
Year	FPL	DEF	TECO	GPC	JEA	OUC	TAL	Total			
2013	4,603	1,647	382	196	111	1,030	24	7,993			
2014	8,787	3,125	N/A	445	173	1,624	36	14,190			
2015	14,662	5,256	N/A	873	212	2,689	45	23,737			
2016	22,628	8,273	N/A	1,442	282	4,037	54	36,716			
2017	35,374	12,273	N/A	2,053	385	5,685	65	55,835			
2018	48,200	17,482	N/A	2,836	520	7,646	84	76,768			
2019	64,525	24,228	N/A	3,693	689	9,937	110	103,182			
2020	97,425	32,893	N/A	4,626	891	12,574	142	148,551			
2021	146,771	43,882	N/A	5,684	1,156	15,570	185	213,248			
2022	220,792	57,338	N/A	6,872	1,485	18,859	250	305,596			
2023	331,824	73,187	N/A	8,111	1,879	22,630	325	437,956			
ΓYSP Ut	ilities Dat	a Respo	nses								

In terms of energy consumed by electric vehicles, Table 3 below, illustrates the estimates provided by the reporting utilities. The anticipated growth would result in an annual energy consumption of 2,266 GWh, or approximately 0.9 percent of retail sales for the state of Florida.

able 3: Estimates for Electric Vehicle Annual Energy Consumption (GWI											
Year	FPL	DEF	TECO	GPC	JEA	OUC	TAL	Total			
2013	22	9	N/A	1	1	0	8	41			
2014	42	21	N/A	2	1	1	12	79			
2015	70	41	N/A	4	1	2	15	133			
2016	108	70	N/A	7	2	2	18	207			
2017	169	107	N/A	10	3	3	22	314			
2018	230	152	N/A	13	5	5	28	433			
2019	309	207	N/A	17	7	6	37	583			
2020	466	273	N/A	21	9	8	48	825			
2021	702	349	N/A	26	13	9	62	1,162			
2022	1,056	421	N/A	32	17	11	84	1,621			
2023	1,587	495	N/A	37	23	14	110	2,266			

Source: TYSP Utilities Data Responses

The effect of increased electric vehicle ownership on peak demand is more difficult to determine. While comparable in electric demand to a home air conditioning system, the time of charging and whether charging would be shifted away from periods of peak demand are uncertainties that must be clarified to determine impact on system peak. As electric vehicle ownership increases, the effects of electric vehicles on system peak should become clearer and able to be addressed by the electric utilities.

#### **Demand-Side Management**

Florida's electric utilities also must consider how the efficiency of customer energy consumption changes over the planning period. Changes in government mandates, such as building codes and appliance efficiency standards, reduce the amount of energy consumption for new construction and electric equipment. Electric customers, through the power of choice, can elect to engage in behaviors that decrease peak load or annual energy usage. Examples include, turning off lights and fans in vacant rooms, increasing thermostat settings, and purchasing appliances that go beyond efficiency standards. While a certain portion of customers will engage in these activities without incentives due to economic, aesthetic, or environmental concerns, other customers may lack information or require additional incentives. Demand-side management represents an area where Florida's electric utilities can empower and educate its customers to make choices that reduce peak load and annual energy consumption.

#### Florida Energy Efficiency and Conservation Act (FEECA)

The Florida Legislature has directed the Commission to encourage utilities to decrease the growth in seasonal peak demand and annual energy consumption by FEECA, which consists of Sections 366.80 through 366.85 and Section 403.519, F.S. Under FEECA, the Commission is required to set goals for seasonal demand and annual energy reduction for seven electric utilities, known as the FEECA Utilities. These include the five investor-owned electric utilities (including Florida Public Utility Company, which is a non-generating utility and therefore does not file a Ten-Year Site Plan) and two municipal electric utilities (JEA and OUC). The FEECA utilities represented approximately 86 percent of 2013 retail sales in Florida.

The FEECA utilities currently offer demand-side management programs for residential, commercial, and industrial customers. Energy audit programs are designed to provide an overview of customer energy usage and to evaluate conservation opportunities, including behavioral changes, low-cost measures customers can undertake themselves, and participation in utility-sponsored DSM programs.

The last FEECA goal-setting proceeding was completed in December 2009, establishing goals for the period 2010 through 2019. As the Commission is required to establish goals once every five years, the Commission opened dockets in 2013 to begin the review process, and held a hearing in July 2014, with a final decision on annual goals reached on November 25, 2014. Each FEECA Utility's 2014 Ten-Year Site Plan includes either a continuation of existing programs or the utility's proposed goals. The 2015 Ten-Year Site Plans should reflect the impact of the goals established by the Commission for the period 2015 through 2024.

#### Demand Side Management Programs

DSM Programs generally are divided into three categories: interruptible load, load management, and energy efficiency. The first two are considered dispatchable, and are collectively known as demand response, meaning that the utility can call upon them during a period of peak demand or other reliability concerns, but otherwise they are not utilized. In contrast, energy efficiency measures are considered passive and are always working to reduce customer demand and energy consumption.

Interruptible load is achieved through the use of agreements with large customers to allow the utility to interrupt the customer's load, reducing the generation required to meet system demand. Interrupted customers may use back-up generation to fill their energy needs, or cease operation until the interruption has passed. A subtype of interruptible customers is curtailable customers, which allow the utility to interrupt only a portion of the customer's load. In exchange for the ability to interrupt these customers, the utility offers a discounted rate for energy or other credits which are paid for by all ratepayers.

Load management is similar to interruptible customers, but focuses on smaller customers and targets individual appliances. The utility installs a device on an electric appliance, such as a water heater or air conditioner that allows for remote deactivation for a short period of time. Load management activations tend to have less advanced notice than those for interruptible customers, but tend to be activated only for short periods and are cycled through groups of customers to reduce the impact to any single customer. Due to the focus on specific appliances, certain appliances would be more appropriate for addressing certain seasonal demands. For example, load management programs targeting air conditioning units would be more effective to reduce a summer peak, while water heaters are more effective for reducing a winter peak. As of 2014, demand response available for reduction of peak load is 3,105 MW for summer peak and 2,987 MW for winter peak. Demand response is anticipated to increase to approximately 3,500 for summer peak and 3,300 for winter peak by the end of the planning period in 2023.

Energy efficiency or conservation measures also have an impact on peak demand, and due to their passive nature do not require activation by the utility. Conservation measures include improvements in a home or business' building envelope to reduce heating or cooling needs, or the installation of more efficient appliances. By installing additional insulation, energy-efficient windows or window films, and more efficient appliances, customers can reduce both their peak demand and annual energy consumption, leading to reductions in customer bills. Demand-side management programs work in conjunction with building codes and appliance efficiency standards to increase energy savings above the minimum required by local, state, or federal regulations. As of 2014, energy efficiency is responsible for peak load reduction of 3,766 MW for summer peak and 3,519 MW for winter peak. Energy Efficiency is anticipated to increase to approximately 4,454 MW for summer peak and 4,223 MW for winter peak by the end of the planning period in 2023.

#### Forecast Load & Peak Demand

The historic and forecasted seasonal peak demand and annual energy consumption values for the state of Florida are illustrated below in Figure 10. It should be noted that the forecasts shown below are based upon normalized weather conditions, while the historic demand and energy values represent the actual impact of weather conditions on Florida's electric customers. Florida relies heavily upon both air conditioning in the summer and electric heating in the winter, so both seasons experience a great deal of variability due to severe weather conditions.

Demand-side management, including demand response and energy efficiency, along with selfservice generation is included in each figure for seasonal peak demand and annual energy for load. The total demand or total energy for load represents what otherwise would need to be served if not for the impact of these programs and self-service generators. The net firm demand is used as a planning number for the calculation of generating reserves and determination of generation needs for Florida's electric utilities.

Demand response is included in Figure 10 below, in two different ways based upon the time period considered. For historic values of seasonal demand, the actual rates of demand response activation are shown, not the full amount demand response that was available at the time. Overall, demand response has only been partially activated as sufficient generation assets were available during the annual peak. Residential load management has been called upon to a limited degree during peak periods, with a lesser amount of interruptible load activated. The primary exception to this trend was the summer of 2008 and winter of 2009, when a larger portion of the available demand response resources were called upon.

For forecast values of seasonal demand, it is assumed that all demand response resources will be activated during peak. The assumption of all demand response being activated reduces generation planning need. Based on operating conditions in the future, if an electric utility has sufficient generating units and it is economic to serve all customer load demand response would not be activated or only partially activated in the future.

As previously discussed, Florida is normally summer-peaking. Only three of the past ten years have had higher winter net firm demand than summer, and all ten of the forecast years are anticipated to be summer peaking. Based upon current forecasts using normalized weather data, Florida's electric utilities do not anticipate exceeding the winter 2009 peak during the planning period.

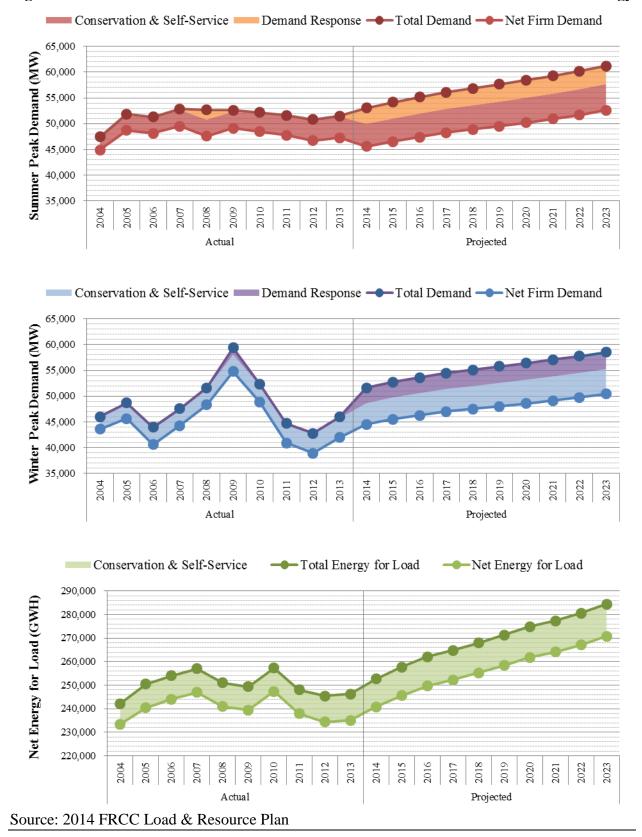


Figure 10: Historic and Forecast for Statewide Seasonal Peak Demand and Annual Energy

#### Forecast Methodology

Florida's electric utilities perform forecasts of peak demand and annual energy sales using historical data from several variables to infer relationships through multiple linear regressions. These variables include historic energy consumption, customer data such as square footage of housing, climate data such as cooling-degree-days or heating-degree days, and economic indicators such as income and employment. For some customer classes, such as industrial customers, surveys may periodically be conducted to determine the customer's expectations for their own future electricity consumption.

Florida's electric utilities rely upon econometric techniques for load forecasting, incorporating a variety of tools such as advanced software and analysis from independent experts from public and private sources for historic and forecast values of specific variables. Public resources such as the University of Florida's Bureau of Economic and Business Research, which provides data on population growth, and the Bureau of Labor Statistics, which publishes the Consumer Price Index, are utilized along with private forecasts for economic growth from macroeconomic experts. By combining historic and forecast macroeconomic data with customer and climate data, Florida's electric utilities project future load conditions.

Through multiple linear regressions, Florida's electric utilities demonstrate historical relationships between dependent variables such as load and retail energy sales, and independent variables such as economic conditions and climate. Projecting peak loads is more mathematically complicated and depends on the interrelationships between these variables.

Overall, while each of Florida's electric utilities forecast peak load and retail energy sales differently, the econometric techniques utilized appear to be sound. The forecasts allow each electric utility to evaluate its individual needs for new generation, transmission, and distribution resources to meet customers' current and future needs reliably and affordably.

#### Historic Forecast Accuracy

For each reporting electric utility, the Commission reviewed the historic forecast accuracy of past retail energy sales forecasts. The review methodology, previously used by the Commission, involves comparing actual retail sales for a given year to energy sales forecasts made three, four, and five years prior. For example, the actual 2013 retail energy sales were compared to the forecasts made in 2010, 2009, and 2008. These differences, expressed as a percentage error rate, are used to determine each utility's historic forecast accuracy using a five year rolling average. An average error with a negative value indicates an under-forecast, while a positive value represents an over-forecast. An absolute average error provides an indication of the total magnitude of error, regardless of the tendency to under or over forecast.

For the 2014 Ten-Year Site Plans, determining the accuracy of the five-year rolling average forecasts involves comparing the actual retail energy sales for the period 2013 through 2009 to forecasts made between 2010 and 2004. As discussed previously, the period before the financial crisis experienced a higher annual growth rate for retail energy sales than the post-crisis period. As most electric utilities and macroeconomic forecasters did not predict the financial crisis, the

economic impact and its resulting effect on retail energy sales of Florida's electric utilities was not included in these projections. Therefore, the use of a metric that compares pre-crisis forecasts with post-crisis actual data has a high rate of error.

Table 4 below, confirms that the forecast error is increasing with time due to the unexpected impact of the financial crisis on retail energy sales in Florida due to decreased population growth, decreased economic growth, and decreased usage of electricity per capita. However, the forecast error should start to return to its historically normal lower levels as utility retail sales forecasts include more years after the financial crisis.

Table 4:	TYSP	Utilities – Acc	uracy of Re	etail Ener	gy Sales I	Forecasts
	TYSP	Five Year	Forecast	<b>Forecast</b>	Error (%)	
	Year	Analysis	Years	Average	Absolute	
		Period	Analyzed		Average	
	2009	2008 - 2004	2005-1999	1.74%	3.56%	
	2010	2009 - 2005	2006-2000	4.98%	5.70%	
	2011	2010 - 2006	2007-2001	8.28%	8.29%	
	2012	2011 - 2007	2008-2002	11.93%	11.93%	
	2013	2012 - 2008	2009-2003	15.13%	15.13%	
	2014	2013 - 2009	2010-2004	16.16%	16.16%	
Source: 1999-2014 Te	en-Year	Site Plans				

To verify whether more recent forecasts lowered these error rates, an additional analysis was conducted to determine with more detail the source of high error rates in terms of forecast timing. Table 5 below, provides the forecast error rate for forecasts made between one and six years prior, along with the average and absolute average error rates for the three- to five-year period used in the analysis above.

Type of the second state of the second stat										
		Annua	3-5 Year l	Error (%)						
Year			Years	Prior			A	Absolute		
	6	5	4	3	2	1	Average	Average		
2004	-	-5.08%	-3.18%	0.19%	-0.59%	0.93%	-2.69%	2.81%		
2005	-5.82%	-4.03%	-0.69%	-0.64%	0.71%	0.90%	-1.79%	1.79%		
2006	-3.29%	-0.03%	1.03%	2.30%	2.43%	2.37%	1.10%	1.12%		
2007	0.57%	2.26%	3.49%	3.59%	4.20%	3.05%	3.11%	3.11%		
2008	7.02%	8.40%	8.56%	9.97%	9.24%	8.34%	8.98%	8.98%		
2009	11.95%	12.15%	14.48%	13.91%	12.68%	10.18%	13.51%	13.51%		
2010	12.93%	15.57%	14.89%	13.70%	10.55%	-0.73%	14.72%	14.72%		
2011	21.56%	20.79%	20.09%	17.02%	3.79%	0.08%	19.30%	19.30%		
2012	26.31%	25.97%	23.04%	8.47%	3.90%	3.71%	19.16%	19.16%		
2013	28.55%	26.29%	10.00%	5.98%	5.58%	2.97%	14.09%	14.09%		
rce: 1999-	-2014 Te	n-Year S	ite Plans							

As displayed in Table 5, the companies retail energy sales forecasts show a consistent positive error rate beginning in 2007 and extending through 2013 for forecasts prepared two to six years prior. However, 2013 sales forecasted in 2009 and 2010 reveal that three and four year error rates (5.98 percent and 10.00 percent, respectively) have declined considerably compared to the three and four year forecast error rates associated with 2009-2012 sales. The fact that three and four year forecast errors started to decline in 2009 and 2010 forecasts is not surprising because by 2009 the inputs to the utilities' forecast models reflected the impacts of the financial crisis and population growth decline.

On a going forward basis (2014 and beyond), average forecasted energy sales error rates for forecasts prepared three to five years prior are likely to continue to decline as the older forecasts drop out of the analysis. Florida's electric utilities, however, have responded to the recent declines in customer load growth by delaying and cancelling new generation, and by taking opportunities to modernize existing plants, as discussed in previous annual reviews of the Ten-Year Site Plans.

Pursuant to Section 366.91, F.S., it is in the public interest to promote the development of renewable energy resources in Florida. Section 366.91(2)(d), F.S., defines renewable energy in part, as follows:

"Renewable energy" means electrical energy produced from a method that uses one or more of the following fuels or energy sources: hydrogen produced from sources other than fossil fuels, biomass, solar energy, geothermal energy, wind energy, ocean energy, and hydroelectric power.

Although not considered a traditional renewable resource, some industrial plants take advantage of waste heat, produced in production processes, to also provide electrical power via Phosphate fertilizer plants, which produce large amounts of heat in the cogeneration. manufacturing of phosphate from the input stocks of sulfuric acid, are a notable example of this type of renewable resource. The Section 366.91(2) (b), F.S., definition also includes the following language which recognizes the aforementioned cogeneration process:

The term [Renewable Energy] includes the alternative energy resource, waste heat, from sulfuric acid manufacturing operations and electrical energy produced using pipeline-quality synthetic gas produced from waste petroleum coke with carbon capture and sequestration.

#### **Existing Renewable Resources**

Currently, renewable energy facilities provide approximately 1,617 MW of firm and non-firm generation capacity, which represents 2.8 percent of Florida's overall generation capacity of 57,375 MW in 2013. Table 6 below, is a table that summarizes Florida's existing renewable energy sources.

Table 6: State of Florida - Existing Renewable Re		
Renewable Type	MW	% Total
Municipal Solid Waste	398	24.6%
Waste Heat	308	19.0%
Solar	218	13.5%
Hydro	64	3.9%
Wind	0	0.0%
Solid Biomass	581	35.9%
Landfill Gas	49	3.1%
Total of All	1,617	100.0%
Source: FRCC 2014 Load & Resource Plan an	nd TYSP Uti	lities Data

#### **a**. . 0 11

Of the total 1,617 MW of renewable generation, approximately 490 MW are considered firm based on either operational characteristics or contractual agreement. Firm renewable generation can be relied on to serve customers and can contribute toward the deferral of new fossil fueled power plant construction.

The remaining renewable generation can generate energy on an as-available basis or for internal use (self-service). As-available energy is considered non-firm, and cannot be counted on for reliability purposes; however, it can contribute to the avoidance of burning fossil fuels in existing generators. Self-Service generation reduces demand on Florida's utilities.

#### **Non-Utility Renewable Generation**

The majority of Florida's existing renewable energy generation, approximately 84 percent, comes from non-utility generators. In 1978, the US Congress enacted the Public Utility Regulatory Policies Act (PURPA). PURPA requires utilities to purchase electricity from cogeneration facilities and renewable energy power plants with a capacity no greater than 80 MW (collectively referred to as Qualifying Facilities or QFs). PURPA required utilities to buy electricity from qualifying QFs at the utility's full avoided cost. These costs are defined in Section 366.051, F.S., which provides in part that:

A utility's "full avoided costs" are the incremental costs to the utility of the electric energy or capacity, or both, which, but for the purchase from cogenerators or small power producers, such utility would generate itself or purchase from another source.

If a renewable energy generator can meet certain deliverability requirements, it can be paid for by its capacity and energy output under a firm contract. Rule 25-17.250, F.A.C., requires each IOU to establish a standard offer contract with timing and rate of payments based on each fossil-fueled generating unit type identified in the utility's TYSP. In order to promote renewable energy generation, the Commission requires the IOUs to offer multiple options for capacity payments, including the options to receive early (prior to the in-service date of the avoided-unit) or levelized payments. The different payment options allow renewable energy providers the option to select the payment option that best fits its financing requirements and provides a basis from which negotiated contracts can be developed. On July 8, 2014, the Commission approved standard offer contracts resulting in the continuous offering of nearly 3,484 MW for Florida's four largest IOUs.

As previously discussed, large amounts of renewable energy is generated on an as-available basis. As-available energy is energy produced and sold by a renewable energy generator on an hour-by-hour basis for which contractual commitments as to the quantity and time of delivery are not required. As-available energy is purchased at a rate equal to the utility's hourly incremental system fuel cost, which reflects the highest fuel cost of generation each hour.

#### **Utility Owned Renewable Generation**

Utility owned renewable generation also contributes to the State's total renewable capacity. The majority of this generation is from solar facilities. Due to the intermittent nature of solar resources, capacity from these facilities is considered non-firm for planning purposes.

In 2008, Section 366.92(4), F.S., was enacted and provides, in part, the following:

In order to demonstrate the feasibility and viability of clean energy systems, the commission shall provide for full cost recovery under the environmental cost-recovery clause of all reasonable and prudent costs incurred by a provider for renewable energy projects that are zero greenhouse gas emitting at the point of the generation, up to a total of 110 MW statewide.

In 2008, the Commission approved a petition by FPL seeking installation of the full 110 MW across three solar energy facilities. The solar projects consisted of, a pair of solar PV facilities and a single solar thermal facility. In response to staff interrogatories, FPL estimated that the three solar facilities would cost an additional \$573 million above traditional generation costs over the life of the facilities. In 2012, Section 366.92, F.S., was revised and no longer includes the passage described above.

Based on actual data provided by FPL, the combined cost of generation of the three solar facilities was \$.45/kWh in 2013. These facilities make up a significant portion of the utility owned renewable generation. Since full operation began, the two solar PV facilities have operated largely as expected; however, the solar thermal facility has experienced multiple outages which have hindered its performance. Based on actual data collected from the three facilities, the maximum output does not appear to be coincident with the system's peak demand.

Hydroelectric units at two sites, one owned by the City of Tallahassee Utilities, and one operated by the Federal government, supply 63 MW of renewable capacity. Because of Florida's geography, however, new hydroelectric power generation is largely limited.

#### **Customer Owned Renewable Generation**

With respect to customer owned renewable generation, Rule 25-6.065, F.A.C., requires the IOUs to offer net metering for all types of renewable generation up to 2 MW in capacity and a standard interconnection agreement with an expedited interconnection process. Net metering allows a customer, with renewable generation capability, to offset their energy usage. In 2008, the effective year of the discussed Rule, customer owned renewable generation accounted for 3 MW of renewable capacity. As of 2013, approximately 63 MW of renewable capacity from nearly 6,700 systems has been installed statewide. Table 7 below, summarizes the growth of customer owned renewable generation interconnections.

	Table 7: State of Florida - Net Metering Growth								
	Year 2008 2009 2010 2011 2012 2013								
	Number of Installations	577	1,625	2,833	3,994	5,302	6,697		
	<b>Installed Capacity (MW)</b> 2.8 13.0 19.9 28.4 42.2 63.0								
Sour	ce: Annual Net Metering Re	eports							

#### **Planned Renewable Additions**

Florida's utilities plan to construct or purchase an additional 722 MW of renewable generation over the ten-year planning period. Table 8 below, summarizes the planned renewable capacity increases by generation type.

Table 8: State of Florida - P	lanned Ren	ewable Re
<b>Renewable Type</b>	MW	% Total
Municipal Solid Waste	90	12.4%
Waste Heat	0	0.0%
Solar	332	46.1%
Hydro	0	0.0%
Wind	0	0.0%
Solid Biomass	272	37.6%
Landfill Gas	28	3.9%
Total of All	722	100%
Source: FRCC 2014 Load & Resource Plan and	TYSP Utilit	ies Data R

Of the 722 MW of planned renewable capacity, 361.5 MW is projected to be from firm resources. All of the projected firm capacity additions are from renewable contracts with nonutility generators. Table 9 below, summarizes the firm capacity renewable resources that are planned over the ten-year planning horizon. The remaining planned capacity from renewable resources is projected to be from non-firm resources including several 50 MW solar facilities.

	Table 9: Planned Firm Renewables							
Purchasing Utility	Facility Name	Fuel Type	Capacity (MW)	In-Service Date				
JEA	Trailridge	LFG	9.0	2014				
JEA	Sarasota County	LFG	6.4	2014				
RCI	Harvest Power	OBS	2.4	2014				
GPC	Perdido	LFG	1.5	2015				
JEA	New River	LFG	3.2	2015				
OUC	Shaw Environmental	LFG	9.0	2015				
FPL	Solid Waste Authority of Palm Beach County	MSW	90.0	2015				
DEF	Unknown - US EcoGen	WDS	60.0	2017				
FPL	Ecogen Clay	OBS	60.0	2021				
FPL	Ecogen Martin	OBS	60.0	2021				
FPL	Ecogen Okeechobee	OBS	60.0	2021				
	Total of All		361.5					
ce: FRCC 20	14 Load & Resource Plan and TYSP	Utilities D	ata Respons	ses				

More than 170 MWs of contracted firm renewable capacity are projected to expire within the ten-year planning. If new contracts are signed in the future to replace those that expire, these resources will once again be included in the state's capacity mix to serve future demand. If these contracts are not extended, the renewable facilities could still deliver energy on an as-available basis.

#### **Renewable Outlook**

The Commission, in conjunction with the U.S. Department of Energy and the Lawrence Berkeley National Laboratory, retained Navigant Consulting, Inc. (Navigant) to prepare a detailed assessment of Florida's renewable potential in 2008. Navigant's assessment identified several key drivers that impact renewable energy development in Florida. Three of the "key drivers" were the cost of the natural gas, the cost of CO2, and the adoption of a Renewable Portfolio Standard (RPS).

Under the scenario considered to be favorable in fostering renewable generation, Navigant assumed natural gas prices between \$11-\$14/MMBTU, CO2 emission costs (\$2/ton initially, then scaling to \$50/ton by 2020) and the adoption of an RPS in Florida. At this time, natural gas prices are projected at \$4.40/MMBTU in 2014, there is no current federal pricing for CO2 emissions, and no RPS legislation has been enacted. Therefore, current market conditions do not favor the development of renewable generation.

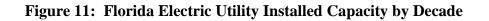
Even with these difficulties, Florida's renewable generation is projected to increase over the planning period. Renewable generation contributes to the state's fuel diversity and reduces dependence on fossil fuels. While current economic conditions may prevent more expensive forms of renewable generation, those cost-effective forms of renewable generation will continue to increase the state's share of renewable generation.

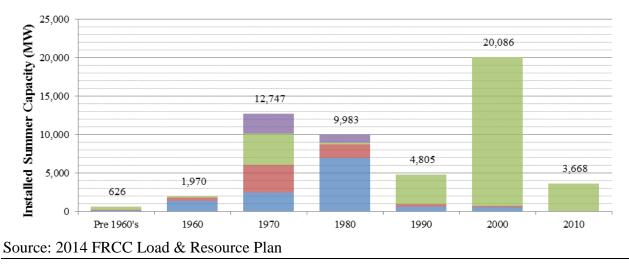
While renewable generation increases its contribution to the state's generating capacity, a majority of generation is projected to come from traditional sources, such as fossil-fueled steam and turbine generators that have been added to Florida's electric grid over the last several decades. Due to forecasted increases in peak demand, further traditional resources are anticipated over the planning period.

Florida's electric utilities have historically relied upon several different fuel types to serve customer load. Previous to the oil embargo, Florida used oil-fired generation as its primary source of electricity until the increase in oil prices made this undesirable. Since that time, Florida's electric utilities have sought a variety of other fuel sources to diversify the state's generation fleet to more reliably and affordably serve customers. Numerous factors, including swings in fuel prices, availability, environmental concerns, and other factors have resulted in a variety of capacity on Florida's electric grid. Solid fuels such as coal and nuclear increased during the shift away from oil-fired generation, and more recently natural gas has emerged as the dominant fuel type in Florida.

# **Existing Generation**

Florida's generating fleet includes incremental new additions to a historic base fleet, with units retiring as they become uneconomical to operate or maintain. Currently, Florida's existing capacity ranges greatly in age and fuel type, and legacy investments continue. The weighted average age of Florida's generating units is 23 years. While the original commercial in-service date may be in excess of 60 years for some units, they are constantly maintained as necessary in order to ensure safe and reliable operation, including uprates from existing capacity which may have been added after the original in-service date. Figure 11 below, illustrates the decade currently operating generating capacity was originally added to the grid, with the largest additions occurring in the 2000s.





Coal Oil Natural Gas Nuclear

The existing generating fleet will be impacted by several events over the planning period. New and proposed environmental regulations may require changes in unit dispatch, fuel switching, or installation of pollution control equipment which may reduce net capacity. Modernizations will allow more efficient resources to replace older generation while potentially reusing power plant assets such as transmission and other facilities, switching to more economic fuel types, or uprates at existing facilities to improve power output. Lastly, retirements of units which can no longer be economically operated and maintained or meet environmental requirements will reduce the existing generation.

#### **Impact of EPA Rules**

In addition to maintaining a fuel efficient and diverse fleet, Florida's utilities must also comply with changing environmental requirements. During the past several years, the U.S. Environmental Protection Agency (EPA) has finalized or proposed several rules which will impact both existing and planned generating units in the state. Environmental requirements and associated costs must be considered to fully evaluate any new supply-side resources, as well as the operation of existing generating units.

Six EPA rules are anticipated to affect electric generation in Florida:

 Carbon Pollution Emissions Standards for Modified and Reconstructed Secondary Sources: Electric Utility Generating Units – Sets carbon dioxide emissions limits for modified or reconstructed electric generators. These limits vary by type of fuel (coal/IGCC or natural gas), size of unit (less than or above approximately 100 megawatts), and whether the unit is modified or reconstructed. This rule was proposed by the EPA on June 18, 2014, and has not yet been finalized.

- Carbon Pollution Emission Guideline for Existing Electric Generating Units Requires each state to submit a plan to EPA that outlines how the state's existing electric generation fleet will meet a series of goals, in terms of pounds of carbon dioxide emitted per generated megawatt-hour, to reduce the state's carbon dioxide emissions. The guidelines will apply to a statewide average of all generating units over 25 megawatts. EPA proposed this rule on June 18, 2014, and anticipates finalizing it by June 2015, with state plans to be filed by June 2016, with possible one-year extensions. The Commission has sought comments from interested parties to be filed with the EPA, which has extended the period to file comments until December 1, 2014.
- Mercury and Air Toxics Standards (MATS) Sets limits for air emissions from existing and new coal- and oil-fired electric generators with a capacity greater than 25 megawatts. Covered emissions include: mercury and other metals, acid gases, and organic air toxics for all generators, as well as particulate matter, sulfur dioxide, and nitrogen oxide from new and modified coal and oil units. On April 15, 2014, U.S. Court of Appeals for the D.C. Circuit fully upheld the rule. This decision will not become active, however, until all appeals have been resolved.
- Cross-State Air Pollution Rule (CSAPR) Requires 28 states, including Florida, to reduce air emissions that contribute to ozone and/or fine particulate pollution in other states. The rule applies to all fossil-fueled (i.e., coal, oil, and natural gas) electric generators with a capacity over 25 megawatts within these states. Florida is only subject to the rule's seasonal NOx emissions requirements. On April 29, 2014, the U.S. Supreme Court upheld the rule by a 6-2 vote. On June 26, 2014, EPA asked the U.S. Court of Appeals for the D.C. Circuit to lift its stay on the rule. The court has not yet acted on this request, and it is not clear at this time if or when the stay will be lifted.
- Cooling Water Intake Structures (CWIS) Sets impingement standards to reduce harm to aquatic wildlife pinned against cooling water intake structures at electric generating facilities. All existing electric generators that use water for cooling with an intake velocity of at least two million gallons per day must meet impingement standards. Generating units with higher intake velocity may have additional requirements to reduce the damage to aquatic wildlife due to entrapment in the cooling water system (entrainment). On May 28, 2014, the final rule was published in the *Federal Register*.
- Coal Combustion Residuals (CCR) Requires liners and ground monitoring to be installed on new landfills in which coal ash is deposited. A Consent Decree, filed January 29, 2014, in the U.S. District Court for the District of Columbia, requires EPA to publish notice of a final action by December 19, 2014.

For many of the units that will remain in operation, these new rules will result in an increased cost of operations. Each utility will need to evaluate whether these additional costs or new operational limitations allow the continued economic operation of each affected unit, and whether installation of emissions control equipment, fuel switching, or retirement is the proper course of action.

#### **Modernization and Efficiency Improvements**

Modernizations involve removing existing generator units that may no longer be economical to operate, such as oil-fired steam units, and reusing the power plant site's transmission or fuel handling facilities with a new set of generating units. The modernization of existing plant sites allows for significant improvement in both performance and emissions, typically at a lower price than new construction at a greenfield site. Not all sites are candidates for modernization due to site layout and other concerns, and to minimize rate impacts, modernization of existing units should be considered along with new construction at greenfield sites.

The Commission has previously granted determinations of need for several conversations of oilfired steam units to natural gas-fired combined cycle units, including FPL's Cape Canaveral, Riviera, and Port Everglades power plants. DEF has also recently conducted a conversion of its Bartow power plant, but this did not require a determination of need from the Commission.

Utilities also plan several efficiency improvements to existing generating units. An example is the conversion of existing simple cycle combustion turbines into a combined cycle unit, which captures the waste heat and uses it to generate additional electricity using a steam turbine. The Commission has granted a determination of need for the conversion of TECO's Polk Units 2 through 5 to a single combined cycle unit. FPL plans on upgrades to its existing combined cycle fleet by improving the performance of the integrated combustion turbines at many of its current and planned power plants. DEF plans to upgrade the capacity of its Hines combined cycle units by installing chiller modules.

# **Planned Retirements**

Power plant retirements occur when the electric utility is unable to economically operate or maintain a generating unit due to environmental, economic, or technical concerns. Table 10 below, lists the 4,252 MW of existing generation that is scheduled to be retired during the planning period and a majority of which is natural gas-fired peaking units. Approximately 1,260 MW of the planned retirements are three dozen small peaking units at two power plant sites operated by FPL.

A notable retirement is DEF's Crystal River Units 1 and 2. Originally scheduled to retire in 2016, the retirement of these units have been delayed until 2018. This delay is due in part to a temporary averaging of emissions across the existing four units at the Crystal River site to meet environmental regulations, as Crystal River Units 4 and 5 have pollution controls installed.

Some retired units will continue operation in a different form. FPL intends to retire Turkey Point 1, a large oil-fired steam unit, and convert it to a synchronous condenser to support the transmission system and provide voltage regulation. FPL previously converted Turkey Point 2 to operate as a synchronous condenser.

Year	Utility Name	Plant Name & Unit Number	Unit Type	Fuel Type	Net Summ Capac (MW
2014	NSB	Smith (3-4,6-11)	Internal Combustion	Oil	
2014	NSB	Swoope Station (2-4)	pe Station (2-4) Internal Combustion		
2014	DEF	G. E. Turner P3	Combustion Turbine	Oil	
2014	JEA	Girvin Landfill	Internal Combustion	Landfill Gas	
				2014 Subtotal	
2015	FPL	Municipal Plant 1 & 3-4	Steam	Natural Gas	
2015	JEA	Northside	Steam	Natural Gas	5
2015	TAL	Hopkins GT1	Combustion Turbine	Natural Gas	
2015	TAL	Purdom GT1&2	Combustion Turbine	Natural Gas	
2015	FPL	Putnam 1 & 2	Combined Cycle	Natural Gas	4
2015	GULF	Scholz 1 & 2	Steam	Coal	
	_			2015 Subtotal	1,2
2016	DEF	Avon Park P2	Combustion Turbine	Oil	
2016	DEF	Rio Pinar P1	Combustion Turbine	Oil	
2016	DEF	G. E. Turner P1&2	Combustion Turbine	Oil	
2016	DEF	Avon Park	Combustion Turbine	Natural Gas	
				2016 Subtotal	
2017	FPL	Turkey Point 1	Steam	Oil	3
2017	TAL	Hopkins GT2	Combustion Turbine	Natural Gas	
				2017 Subtotal	4
2018	DEF	Crystal River 1 & 2	Steam	Coal	7
2018	DEF	Suwannee River 1-3	Steam	Natural Gas	1
2018	GPC	Pea Ridge 1-3	Combustion Turbine	Natural Gas	
2018	FPL	Lauderdale 1-24	Combustion Turbine	Natural Gas	8
2018	FPL	Port Everglades 1-12	Combustion Turbine	Natural Gas	4
2018	FPL	Municipal Plant 2&5	Combined Cycle	Natural Gas	
				2018 Subtotal	2,1
2020	DEF	Higgins P1-4	Combustion Turbine	Natural Gas	1
2020	TAL	Hopkins	Steam	Natural Gas	
				2020 Subtotal	1
2022	GRU	Deerhaven	Steam	Natural Gas	
				2022 Subtotal	
			Т	otal Retirements	4,2

JEA's Northside 5, a natural gas and oil-fired steam unit, was scheduled for retirement in 2019 in the utility's Ten-Year Site Plan, but subsequently JEA announced that the retirement would be accelerated by four years to 2015.

#### **Reliability Requirements**

Florida's electric utilities are expected to have enough generating assets available at the time of peak demand to meet forecasted customer demand. Potential instabilities could occur if customer demand exceeds the forecast or if generating units are unavailable due to maintenance or forced outages. To address these circumstances, utilities are required to maintain additional planned generating capacity above the forecasted customer demand, referred to as the reserve margin.

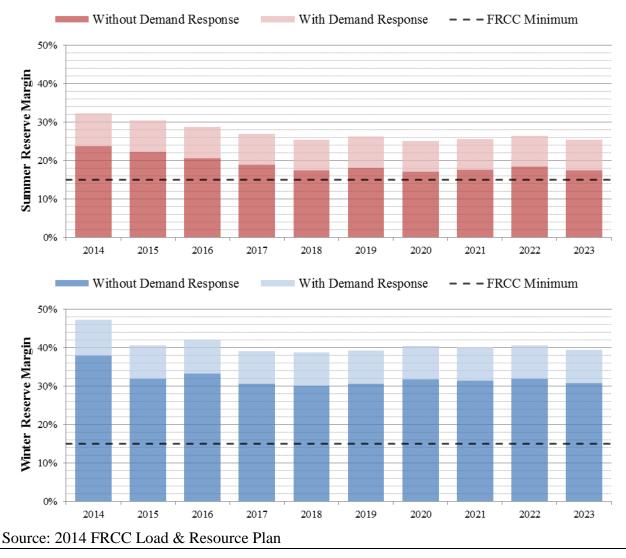
Electric utilities within the FRCC region, which consists of Peninsular Florida, must maintain a minimum of 15 percent reserve margin for planning purposes. Certain utilities have elected to have a higher reserve margin, either on an annual or seasonal basis. The three largest reporting electric utilities, FPL, DEF, and TECO, are party to a stipulation approved by the Commission that utilizes a 20 percent reserve margin for planning.

While Florida's electric utilities are separately responsible for maintaining an adequate planning reserve margin, a statewide view illustrates the degree to which capacity may be available for purchases during periods of high demand or unit outages. Figure 12 below, is a projection of the statewide seasonal reserve margin including all proposed power plants.

#### Role of Demand Response in Reserve Margin

The Commission also considers the planning reserve margin without demand response. As illustrated in Figure 12 below, the statewide seasonal reserve margin exceeds the FRCC's required 15 percent planning reserve margin without activation of demand response. Demand response activation increases the reserve margin in the summer by 8 percent on average, and represents 30 percent of the planning reserve margin.

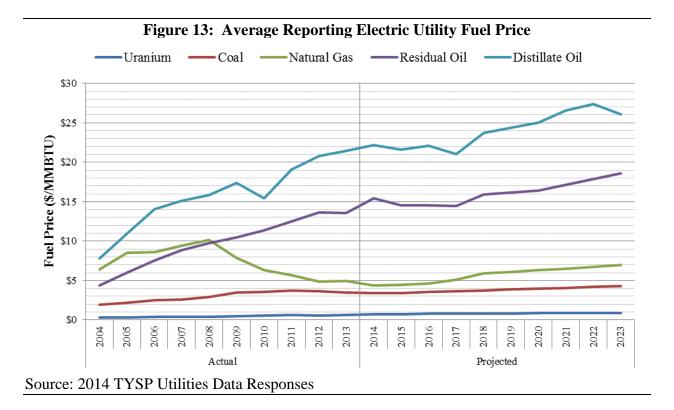
Demand response participants receive discounted rates or credits regardless of activation, with these costs recovered from all ratepayers. Because of the voluntary nature of demand response, a concern exists that a heavy reliance upon this resource would make participants eschew the discounted rates or credits for firm service. For interruptible customers, participants must provide notice that they intend to leave the demand response program, with a notice period of three or more years being typical. For load management participants, usually residential or small commercial customers, no advanced notice is typically required to leave. Historically, demand response participants have rarely been called upon during the peak hours, but are more frequently called upon during off-peak periods due to other reliability concerns. This trend is assumed to continue during the planning period.



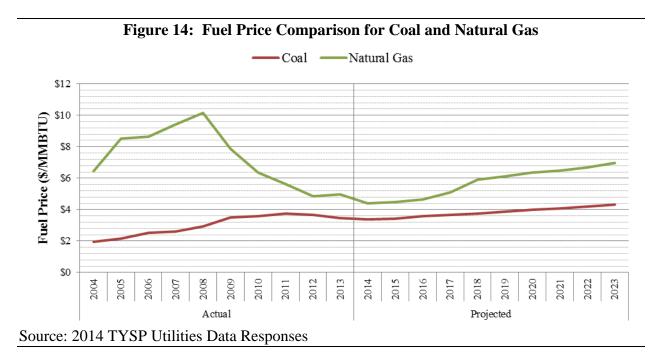
# Figure 12: State of Florida Reserve Margin with New Units

#### **Fuel Price Forecast**

In general, the capital cost of a power plant is inversely proportional to the cost of the fuel used to generate electricity from that unit. However, fuel price is an important economic factor affecting the dispatch of the existing generating fleet and the selection of new generating units. The major fuels consumed by Florida's electric utilities are natural gas, coal, uranium, and oil. Figure 13 below, illustrates the weighted average fuel price history and forecasts for the reporting electric utilities.

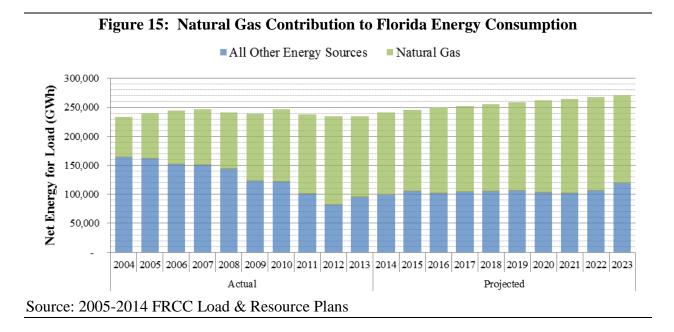


As Figure 14 below, shows the price of natural gas declined rapidly after the financial crisis, and is forecasted to remain near historically low levels. The smaller differential and higher efficiency of natural gas has shifted the dispatch order, with natural gas units displacing coal units. The trend has also encouraged utilities to modify existing units to be capable of burning natural gas, either as a starter fuel, supplemental fuel, or primary fuel.



#### **Fuel Diversity**

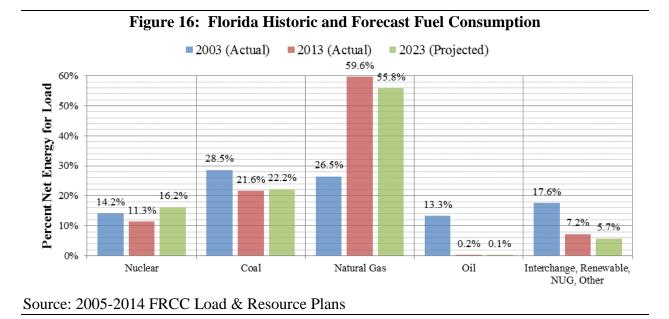
The volatility of natural gas in the early 2000s led to concern regarding escalating customer bills and an expectation that natural gas prices would remain high. While Florida's electric utilities made plans to build coal-fired units rather than continuing to increase the reliance on natural gas, concerns regarding potential environmental regulations and other projected costs lead to cancellation of new coal-fired generation. Traditionally, coal was the lowest cost fuel besides nuclear and was dispatched before most natural gas-fired units. Natural gas has since risen to become the dominant fuel in Florida within the last ten years, displacing coal, and since 2010 has generated more net energy for load than all other fuels combined. As Figure 15 illustrates, natural gas is the source of approximately 60 percent of electric energy consumed in Florida, down from its peak in 2012 of 65 percent. The 2012 spike in natural gas usage was associated with extended outages at FPL's nuclear plants for uprates, with gas usage decreasing as the nuclear units returned to operation. Natural gas generation is anticipated to serve future growth until the end of the planning period, when additional nuclear generation comes online.



Because a balanced fuel supply can enhance system reliability and mitigate the effects of volatility in fuel price fluctuations, it is important that utilities have a level of flexibility in their generation mix. Maintaining fuel diversity on Florida's system faces several difficulties. Existing coal units will require additional emissions control equipment leading to reduced output, or retirement, if the emissions controls are uneconomic to install or operate. New solid fuel generating units such as nuclear and coal have long lead times and high capital costs. New coal units face challenges relating to new environmental compliance requirements, making it unlikely they could be permitted without novel emissions control technology.

Figure 16 below, shows Florida's historic and forecast percent net energy for load by fuel type for the actual years 2003 and 2013, and forecast year 2023. Oil has declined significantly, with

its uses reduced to start-up fuel, peaking, and back-up for dual-fuel units in case of a fuel outage. Nuclear generation was reduced beginning in 2010 by the outage and eventual retirement of Crystal River 3 and extended outages for uprates at FPL's St. Lucie and Turkey Point power plants. The uprates of Florida's four remaining nuclear units were completed by 2013, and added approximately 520 MW of capacity, reducing the impact of the loss of Crystal River 3. While coal generation has declined somewhat, it is expected to rebound slightly and remain at a plateau throughout the planning period. This rebound was based upon the Utility's filings before the announcement of the EPA's Clean Power Plan. The 2015 Ten-Year Site Plans should include some considerations of the potential impacts of this regulation on each utility's fuel consumption. Natural gas has been the primary fuel used to meet the growth energy consumption, and this trend is anticipated to continue throughout the planning period.



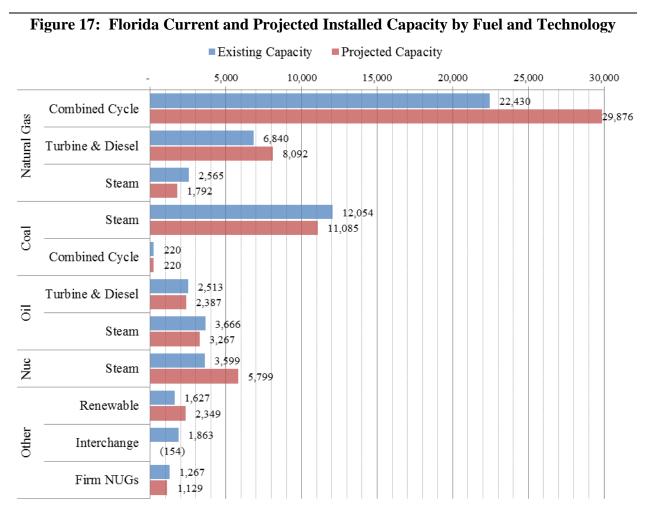
#### **New Generation Planned**

Current demand and energy forecasts continue to indicate that in spite of increased levels of conservation, energy efficiency, renewable generation, and existing traditional generation resources, the need for additional generating capacity still exists. While reductions in demand have been significant, the total demand for electricity is expected to increase, making the addition of traditional generating units necessary to satisfy reliability requirements and provide sufficient electric energy to Florida's consumers. Because any capacity addition has certain economic impacts based on the capital required for the project, and due to increasing environmental concerns relating to solid fuel-fired generating units, Florida's utilities must carefully weigh the factors involved in selecting a supply-side resource for future traditional generation projects.

In addition to traditional economic analyses, utilities also consider several strategic factors, such as fuel availability, generation mix, and environmental compliance prior to selecting a new

supply-side resource. Limited supplies, access to water or rail delivery points, pipeline capacity, water supply and consumption, land area limitations, cost of environmental controls, and fluctuating fuel costs are all important considerations.

Figure 17 below, illustrates the present and future aggregate capacity mix. The capacity values in Figure 17 incorporate all proposed additions, changes, and retirements contained in the reporting utilities' 2014 Ten-Year Site Plans and the FRCC's 2014 Load and Resource Plan.



Source: 2014 FRCC Load & Resource Plan and TYSP Utilities Data Responses

# New Power Plants by Fuel Type

#### Nuclear

Nuclear capacity, while an alternative to natural gas-fired generation, is capital-intensive and requires a long lead time to construct. Only a single Florida electric utility, FPL, is projecting additional nuclear power plants during the planning period. Table 11 below, lists the two new

nuclear units anticipated in the planning period, Turkey Point Units 6 and 7. FPL had previously uprated its existing four nuclear generating units, with the last uprate completed in early 2013. While DEF had previously projected the addition of two nuclear units, Levy Units 1 and 2, it has discontinued this project but continues its efforts to obtain a combined operating license from the Nuclear Regulatory Commission.

	Table 11: Planned Nuclear Units								
	In-Service	Utility	Plant Name	Unit Type		Net Capacity (MW)			
	Year	Name	& Unit Number	•••	Sum	Win			
	2022	FPL	Turkey Point 6	Nuclear Steam	1,100	1,100			
	2023	FPL	Turkey Point 7	Nuclear Steam	1,100	1,100			
Source: 2014	4 Ten-Year	Site Pla	ns						

#### Natural Gas

All remaining new utility-owned power plants are natural gas-fired combustion turbines or combined cycle units. Natural gas-fired combined cycle units represent 39.1 percent of installed capacity in 2013. Combustion turbines, which run in simple cycle mode as peaking units, represent the third most abundant type of generating capacity, behind only coal-fired steam generation. Because combustion turbines are not a form of steam generation, they do not require siting under the Power Plant Siting Act. Table 12 below, lists the approximate 10,363 MW net summer capacity of proposed new natural gas-fired generation included in the 2014 Ten-Year Site Plans.

Table 12: Planned Natural Gas Units							
In-Service	linit Type			apacity [W)			
Year	Name	& Unit Number		Sum	Win		
2014	FPL	Riviera Beach	Combined Cycle	1,212	1,344		
2016	FPL	Port Everglades	Combined Cycle	1,237	1,346		
2017	TECO	Polk	Combined Cycle	459	463		
2018	DEF	Citrus	Combined Cycle	1,640	1,820		
2019	FPL	Unsited	Combined Cycle	1,269	1,429		
2020	SEC	Unsited Combined Cycle		440	523		
2021	DEF	Unsited Combined Cycle		793	866		
		Co	mbined Cycle Subtotal	7,050	7,791		
2016	DEF	Suwannee River 3 & 4	Combustion Turbine	316	375		
2019	FPL	Lauderdale CT1-5	Combustion Turbine	1,005	1,000		
2020	TAL	Hopkins 5	Combustion Turbine	46	48		
2020	TECO	Future CT1	Combustion Turbine	190	220		
2020	SEC	Unsited CT 1 & 2	Combustion Turbine	402	450		
2021	SEC	Unsited CT 3-7	Combustion Turbine	1,005	1,125		
2023	GPC	Unsited CT	Combustion Turbine	349	360		
		Combu	stion Turbine Subtotal	3,313	3,578		
		Total Plann	ed Natural Gas Units	10,363	11,369		

Source: 2014 Ten-Year Site Plans

#### **Commission's Authority over Siting**

The Commission has been given exclusive jurisdiction to determine the need for new electric power plants by the Legislature through the Power Plant Siting Act (PPSA) at Section 403.519, F.S. Any proposed steam or solar generating unit of at least 75 MW requires a certification under the PPSA. Upon receipt of a determination of need, the electric utility would then seek approval from the Florida Department of Environmental Protection, which addresses land use and environmental concerns. Finally, the Governor and Cabinet, sitting as the Siting Board, must approve or deny the overall certification of a proposed power plant.

Approximately 12,565 MW of new utility-owned generating units are planned to enter service over the next ten-year period, with 74 percent of that capacity, 9,250 MW, subject to the PPSA. However, a majority of the proposed units have already received a determination of need from the Commission. The Commission most recently approved the determination of need for DEF's proposed Citrus plant, which will still have to seek approval from DEP and the Siting Board. A total of 2,502 MW still requires a determination of need, as shown in Table 13 below.

	Table 13: Planned Units Requiring a Determination of Need									
In-Service	Utility	Plant Name	Unit Type		apacity IW)	Notes				
Year	Name	& Unit Number	<b></b>	Sum	Win					
2018	DEF	Citrus	Combined Cycle	1,640	1,820	See Order No. PSC-14-0557-FOF-EI				
2019	FPL	Unsited	Combined Cycle	1,269	1,429					
2020	SEC	Unsited	Combined Cycle	440	523					
2021	DEF	Unsited	Combined Cycle	793	866					
Source: 20	14 Ten-	Year Site Plans								

#### Transmission

The Commission has been given broad authority pursuant to Chapter 366, F.S., to require reliability within Florida's coordinated electric grid and to ensure the planning, development, and maintenance of adequate generation, transmission, and distribution facilities within the state. As generation capacity increases, the transmission system must grow accordingly to maintain the capability of delivering energy to end users.

The Commission has been given sole jurisdiction to determine the need for new electric transmission lines by the Legislature through the Florida Electric Transmission Line Siting Act (TLSA) at Section 403.537, F.S. To require certification under Florida's TLSA, a proposed transmission line must meet the following criteria: a nominal voltage rating of at least 230 kV, crossing a county line, and a length of at least 15 miles. Proposed lines in an existing corridor are exempt from TLSA requirements. The Commission determines the reliability need and the proposed starting and end points for lines requiring TLSA certification. The proposed corridor route is subsequently determined by the Florida DEP during the certification process. Much like the PPSA, the Governor and Cabinet sitting as the Siting Board ultimately must approve or deny the overall certification of a proposed line.

Table 14 below, lists all proposed transmission lines in the 2014 Ten-Year Site Plans that require TLSA certification. All planned lines have already received the approval of the Commission, either independently or as part of a PPSA determination of need.

Utility	Transmission Line	Line Length	Nominal Voltage	Date Need	Date TLSA	In-Service Date
		(Miles)	(kV)	Approved	Certified	
FPL	Manatee - Bobwhite	30	230	8/28/2006	11/06/2008	12/01/2014
FPL	St Johns – Pringle	25	230	5/13/2005	4/01/2006	12/01/2018
TECO	Thonotosassa - Wheeler	8	230	6/22/2007	8/08/2008	TBD
TECO	Wheeler - Willow Oak	17	230	6/23/2007	8/09/2008	TBD

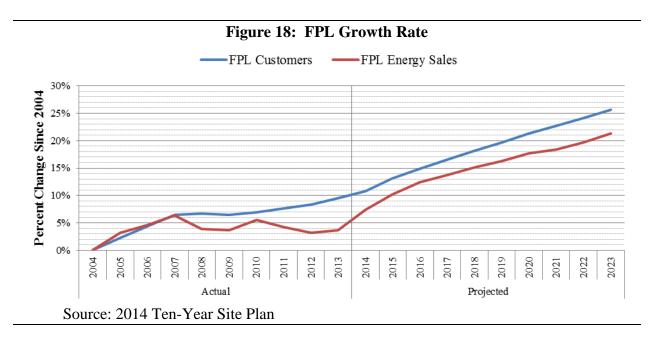
# **UTILITY PERSPECTIVES**

# Florida Power & Light Company (FPL)

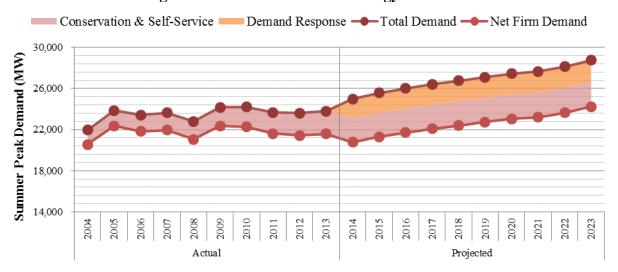
FPL is an investor-owned utility and Florida's largest electric utility. The utility's service territory is within the FRCC region and is primarily in south Florida and along the east coast. As an investor-owned utility, the Commission has regulatory authority over all aspects of operations, including rates, reliability, and safety. Pursuant to Section 186.801(2), F.S., the Commission finds FPL's 2014 Ten-Year Site Plan suitable for planning purposes.

#### Load & Energy Forecasts

In 2013, FPL had approximately 4,627,000 customers and annual retail energy sales of 102,784 GWh, or approximately 47.4 percent of Florida's annual retail energy sales. Figure 18 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, FPL's customer base has increased by 9.5 percent, while retail sales have grown by only 3.7 percent. Since 2009, FPL has been outperforming the state average in retail energy sale growth, a trend it projects to continue into the future. As illustrated below, retail energy sales are anticipated to exceed their historic 2007 peak in 2014, three years faster than the state as a whole. This forecast includes FPL's acquisition of the Vero Beach electric system beginning in 2015, which is estimated to represent 0.6 percent of FPL's 2023 net energy for load.

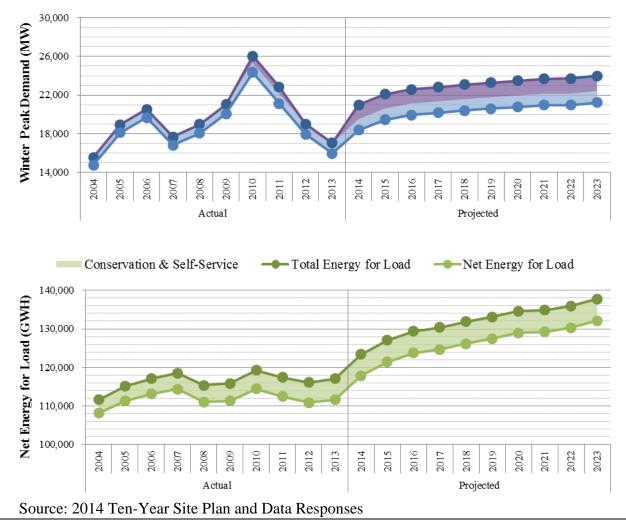


The three graphs in Figure 19 below, shows FPL's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. These graphs include the impact of demand-side management, and for future years assume that all available demand response resources will be activated during the seasonal peak. Historically, demand response was not activated during the seasonal peak demand, excluding the winters of 2010 and 2011.



#### Figure 19: FPL Demand and Energy Forecasts





As an investor-owned utility, FPL is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. For planning purposes, FPL utilized its proposed demand-side management goals for the forecast period. The utility's 2015 Ten-Year Site Plan should include revised values that would reflect the Commission's decision in the currently open FEECA goal-setting Docket No. 130199-EI.

# **Fuel Diversity**

Table 15 below, shows FPL's actual net energy for load by fuel type as of 2013, and the projected fuel mix for 2023. FPL relies primarily upon natural gas and nuclear for energy generation, making up approximately 90 percent of net energy for load.

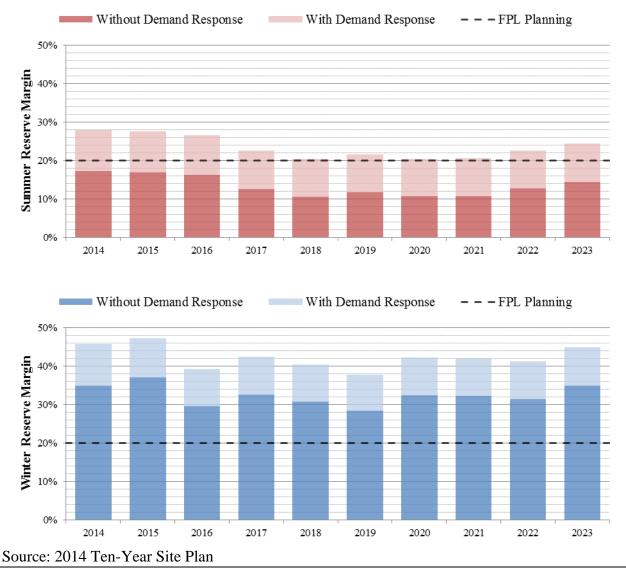
Table 15: FPL Energy Consumption by Fuel Type								
	Net Energy for Load							
Fuel Type	201	13	2023					
	GWh	%	GWh	%				
Natural Gas	75,208	67.4%	76,379	57.7%				
Coal	5,981	5.4%	6,779	5.1%				
Nuclear	25,243 <b>22.6%</b>		42,915	32.4%				
Oil	196	0.2%	123	0.1%				
Renewable	155	0.1%	192	0.1%				
Interchange	4,445	4.0%	0	0.0%				
NUG & Other	428	0.4%	5,968	4.5%				
Total	111,656		132,356					

Source: 2014 Ten-Year Site Plan and Data Responses

# **Reliability Requirements**

While previously only reserve margin has been discussed, Florida's utilities use multiple indices to determine the reliability of the electric supply. An additional metric is the Loss of Load Probability (LOLP), which is a probabilistic assessment of the duration of time electric customer demand will exceed electric supply, and is measured in units of days per year. FPL uses a maximum LOLP of no more than 0.1 days per year, or approximately 1 day of outage per ten years. Between the two reliability indices, LOLP and reserve margin, the reserve margin requirement is typically the controlling factor for the addition of capacity.

Since 1999, FPL has utilized a 20 percent planning reserve margin criterion. Figure 20 below, displays the forecast planning reserve margin for FPL through the planning period for both seasons, with and without the use of demand response. As shown in the figure, FPL's generation needs are controlled by its summer peak throughout the planning period.



#### Figure 20: FPL Reserve Margin Forecast

#### Proposed Third Reliability Requirement

In addition to these two reliability indices, FPL is proposing in its 2014 Ten-Year Site Plan to introduce a third reliability criterion. FPL's proposed requirement would be to have available firm capacity 10 percent greater than the sum of customer seasonal demand, without consideration of incremental energy efficiency and all existing and incremental demand response resources. FPL refers to this as its 10 percent generation-only reserve margin. Currently, no other utility has proposed a similar metric. While TECO includes a minimum supply-side contribution in its planning methodology, TECO uses a lower value of seven percent and incremental energy efficiency is included in its calculation.

While FPL proposes to not include incremental energy efficiency resources and cumulative demand response in its resource planning for the proposed metric, the utility would remain subject to FEECA and the conservation goals established by the Commission. FPL would continue paying rebates and other incentives to participants, which are collected from all ratepayers through the Energy Conservation Cost Recovery Clause, but would not consider the potential capacity reductions of any future participation in energy efficiency or demand response programs during the ten-year planning period for planning purposes with this new reliability criterion only.

Energy efficiency, which includes installation of equipment designed to reduce peak demand and annual energy consumption, is considered a passive resource. While demand response must be activated by the utility, energy efficiency provides benefits consistently for the duration of the installation, reducing annual energy consumption, and if usage is coincident with system peak, peak demand. Customers do not remove building envelope improvements or newly installed equipment until the end of its service life for replacement.

As noted in the Statewide Perspective, the Commission does review the impact on reserve margin of demand response resources. At this time, FPL offers two types of demand response programs. The first type is interruptible and curtailable load programs, consisting of the Commercial/Industrial Load Control Program (CILC) and Commercial/Industrial Demand Reduction Rider (CDR) tariffs. The second type is load management programs, including the Residential On-Call and Business On-Call Programs.

FPL expresses an over-reliance upon demand response will result in frequent customer interruptions, which will in turn, cause customers to end their voluntary participation, which could negatively impact reliability. FPL addresses this concern for large commercial and industrial customers by including minimum noticing requirements for customers to leave the CILC and CDR tariffs. Customers must provide five years notice before the customer is able to end participation, excluding special provisions. This is sufficient time for a utility to plan a unit to provide firm capacity. In contrast, the Residential On-Call and Business On-Call programs have only a seven day advanced notice requirement. However, each individual customer's demand reduction for these programs is much smaller.

As previously noted, FPL has historically not activated demand response customers during seasonal peaks, excluding two winter peaks in which only CILC and CDR customers were activated. Regardless of whether or not demand response capacity is activated, participants receive bill credits or discounted rates. It should be noted that peak reductions during annual peaks, which is the focus of a reserve margin, are not the only use for demand response. In fact, FPL reports a total of 144 activations within the past ten years of its demand response resources, with an average 11 activations per summer and 4 activations per winter. Only seven of the 144 activations included CILC and CDR participants.

While FPL's proposed generation-only reserve margin would increase the amount of capacity required for all years of the planning period, based upon the timing of other unit additions, it is the controlling factor for two years of the ten-year planning period. In 2020 and 2021, FPL would increase firm capacity purchases by 113 MW and 130 MW, respectively, to meet the

proposed metric. At this time, FPL has not yet entered into purchased power agreements for this additional capacity. Without these additional purchases, FPL's generation only reserve margin, excluding demand response and incremental energy efficiency would be 9.6 percent in 2020 and 9.5 percent in 2021. During the years of 2020 and 2021, the statewide summer reserve margin would be in excess of 17 percent without activating demand response, so it is likely that additional power would be available for purchase in case of high demand.

As part of FEECA, the Commission annually publishes a report on the accomplishments of the FEECA Utilities, of which FPL is one, towards meeting conservation goals established by the Commission. The Commission monitors and tracks the anticipated and actual program participation and savings associated with the utility's conservation programs, including energy efficiency and demand response. If participation in a program is less than anticipated, the utility has the opportunity to respond by modifying the program. This annual review mechanism would therefore alert the Commission if a utility were not meeting its conservation goals and allow steps to be taken to adjust as necessary.

At this time, while FPL has noted its use of this metric in several dockets before the Commission, the utility has not requested approval to use this metric or its value, nor does the Commission's suitability finding of FPL's 2014 Ten-Year Site Plan constitute approval. The Commission will have an opportunity to review FPL's proposed metric if it becomes a controlling factor for a determination of need of a new electrical power plant.

#### **Generation Resources**

FPL plans multiple unit retirements and additions during the planning period, as described below in Table 16. Three dozen of the retirements are small natural gas-fired combustion turbines used as peakers, to be replaced by five new units that will offer superior efficiency and emissions profiles. FPL's 2014 Ten-Year Site Plan includes the acquisition of Vero Beach's generating units, which are all planned for retirement by 2018. Lastly, FPL is converting Turkey Point 1 to operate as a synchronous condenser to support the transmission system in South Florida.

In addition to the peaking units discussed above, FPL included the addition of three new natural gas-fired combined cycle units and two new nuclear steam units. Only one of the combined cycles has yet to receive a determination of need from the Commission, with a filing anticipated sometime during 2015.

	Table 16: FPL Unit Retirements and Additions								
Year	Plant Name	Unit Type	Net Capacity (MW)		Notes				
	& Unit Number		Sum	Win					

	Retiring Units								
	Oil								
2017	Turkey Point 1	Steam	396	398	Synchronous Condenser				
	Natural Gas								
2015	Municipal Plant 1 & 3-4	Steam	94	98	From Vero Beach				
2015	Putnam 1 & 2	Combined Cycle	498	529					
2018	Lauderdale 1-24	Combustion Turbine	840	917					
2018	Port Everglades 1-12	Combustion Turbine	420	458					
2018	Municipal Plant 2&5	Combined Cycle	44	46	From Vero Beach				

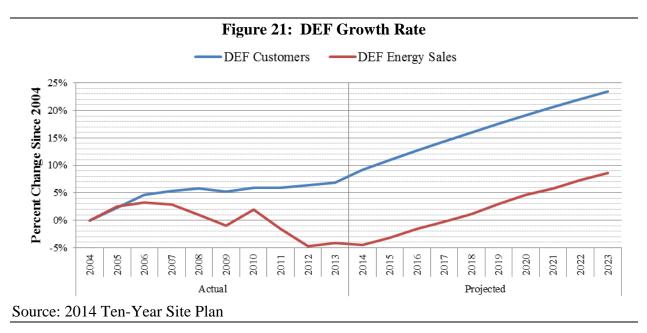
	New Units								
Natural Gas									
2014	Riviera Beach Energy Center	Combined Cycle	1,212	1,344	In Service				
2016	Port Everglades Modernization	Combined Cycle	1,237	1,346	Previously Approved				
2019	Unsited Combined Cycle	Combined Cycle	1,269	1,429	Requires Approval				
2019	Lauderdale CT1-5	Combustion Turbine	1,005	1,000					
		Nuclear							
2022	Turkey Point 6	Steam	1,100	1,100	Previously Approved				
2023	Turkey Point 7	Steam	1,100	1,100	Previously Approved				
Source	e: 2014 Ten-Year Site Plan an	d Data Responses							

# **Duke Energy Florida, Inc. (DEF)**

DEF is an investor-owned utility and Florida's second largest electric utility. The utility's service territory is within the FRCC region and is primarily in central and west central Florida. As an investor-owned utility, the Commission has regulatory authority over all aspects of operations, including rates, reliability, and safety. Pursuant to Section 186.801(2), F.S., the Commission finds DEF's 2014 Ten-Year Site Plan suitable for planning purposes.

#### Load & Energy Forecasts

In 2013, DEF had approximately 1,657,000 customers and annual retail energy sales of 36,616 GWh, or approximately 16.9 percent of Florida's annual retail energy sales. Figure 21 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, DEF's customer base has increased by 6.88 percent, while retail sales have declined by 4.13 percent. As illustrated below, retail energy sales are anticipated to exceed the historic 2006 peak by 2020, three years later than the state as a whole.



The three graphs in Figure 22 below, show DEF's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. These graphs include the full impact of demand-side management, and assume that all available demand response resources were or will be activated during the seasonal peak. Historically, demand response has not been activated during seasonal peak demand excluding extreme weather events. As an investor-owned utility, DEF is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. DEF based its estimated conservation values off of its existing demand-side management portfolio. The utility's 2015 Ten-Year Site Plan should include revised values that would reflect the Commission's decision in the currently open FEECA goal-setting docket.

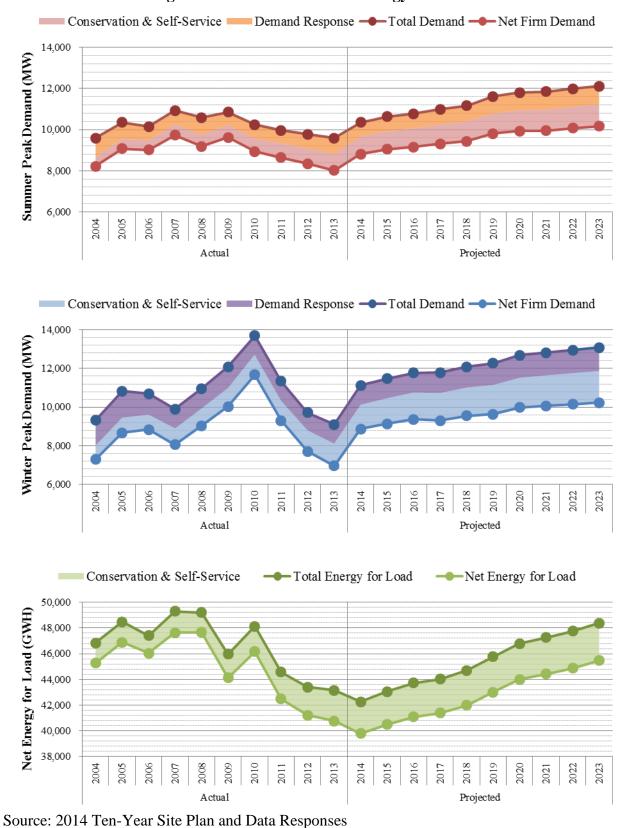


Figure 22: DEF Demand and Energy Forecasts

# **Fuel Diversity**

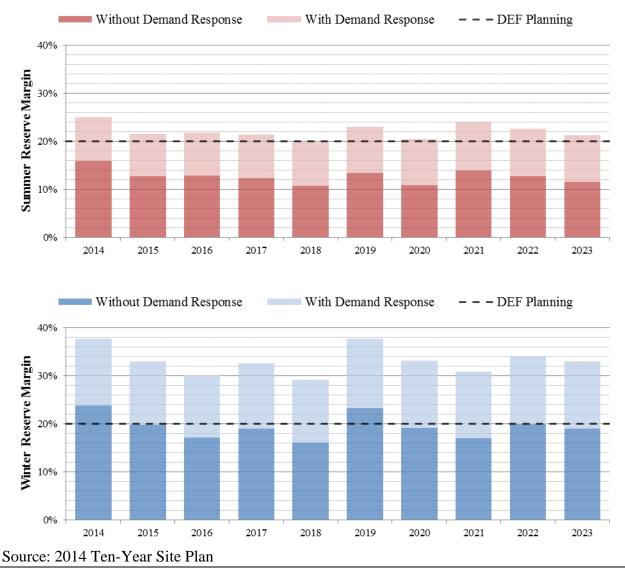
Table 17 below, shows DEF's actual net energy for load by fuel type as of 2014 and the projected fuel mix for 2023. DEF relies primarily upon natural gas and coal for energy generation, making up approximately 80 percent of net energy for load. DEF plans to substantially reduce coal usage over the planning period, but coal usage will be greater than all other energy types excluding natural gas.

Table 17: DEF Energy Consumption by Fuel Type								
		N	Net Energy for Load					
Fuel Type		2013		2023				
		GWh	%	GWh	%			
Natural	Gas	23,061	56.6%	35,370	77.8%			
Coa	1	10,577	25.9%	6,585	14.5%			
Nucle	ar	0	0.0%	0	0.0%			
Oil		220	0.5%	57	0.1%			
Renewa	able	1,132	2.8%	1,256	2.8%			
Intercha	ange	1,409	3.5%	687	1.5%			
NUG &	Other	4,373	10.7%	1,505	3.3%			
Tota	ıl	40,772		45,459				

Source: 2014 Ten-Year Site Plan and Data Responses

# **Reliability Requirements**

Since 1999, DEF has utilized a 20 percent planning reserve margin criterion. Figure 23 below, displays the forecast planning reserve margin for DEF through the planning period for both seasons, with and without the use of demand response. As shown in the figure, DEF's generation needs are controlled by its summer peaking throughout the planning period. While the utility's summer planning reserve margin dips below 20 percent in 2018, the deficiency is only 19.6 MW and is anticipated to be resolved by 2019.



#### Figure 23: DEF Reserve Margin Forecast

#### **Generation Resources**

DEF plans multiple unit retirements and additions during the planning period, as described below in Table 18. DEF's 2014 Ten-Year Site Plan includes the retirement of the coal-fired Crystal River Units 1 and 2, to be replaced by a pair of natural gas-fired combined cycle units. DEF's Plan also includes the addition of two combustion turbines at the Suwannee River plant site, but this is subject to change based upon the outcome of a potential purchase of merchant capacity.

In addition to the units discussed above, DEF includes the retirement of five oil-fired units and eight natural gas-fired units at multiple power plant sites. An additional new combined cycle is planned for 2021 which will require a determination of need from the Commission

Table 18: DEF Unit Retirements and Additions							
Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)		Notes		
			Sum	Win			

	Retiring Units								
	Coal								
2018	Crystal River 1 & 2 Steam			743					
	Oil								
2014	G. E. Turner P3	Combustion Turbine	53	77					
2016	Avon Park P2	Combustion Turbine	24	35					
2016	Rio Pinar P1	Combustion Turbine	12	15					
2016	G. E. Turner P1&2	Combustion Turbine	20	26					
Natural Gas									
2016	Avon Park	Combustion Turbine	24	35					
2018	Suwannee River 1-3	Steam	128	129					
2020	Higgins P1-4	Combustion Turbine	105	116					

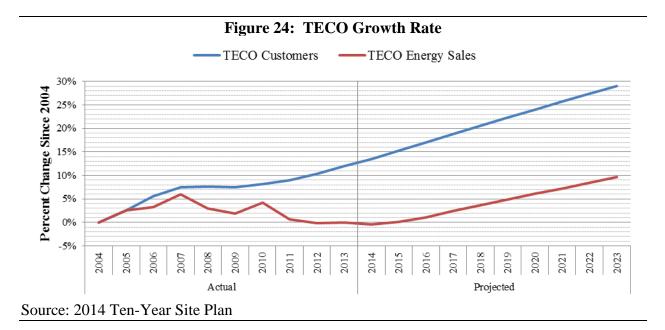
New Units						
Natural Gas						
2016	Suwannee River	Combustion Turbine	316	375	Docket No. 140111-EI	
2018	Citrus Combined Cycle	Combined Cycle	1,640	1,820	Docket No. 140110-EI	
2021	Unsited Combined Cycle	Combined Cycle	793	866	Requires Approval	
Source: 2014 Ten-Year Site Plan						

# **Tampa Electric Company (TECO)**

TECO is an investor-owned utility and Florida's third largest electric utility. The utility's service territory is within the FRCC region and consists primarily of the Tampa metropolitan area. As an investor-owned utility, the Commission has regulatory authority over all aspects of operations, including rates, reliability, and safety. Pursuant to Section 186.801(2), F.S., the Commission finds TECO's 2014 Ten-Year Site Plan suitable for planning purposes.

#### Load & Energy Forecasts

In 2013, TECO had approximately 695,000 customers and annual retail energy sales of 18,418 GWh, or approximately 8.5 percent of Florida's annual retail energy sales. Figure 24 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, TECO's customer base has increased by 12.01 percent, while retail sales have declined by 0.10 percent. As illustrated below, retail energy sales are anticipated to exceed the historic 2007 peak by 2020, three years later than the state as a whole.



The three graphs in Figure 25 below, shows TECO's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. These graphs include the full impact of demand-side management, and assume that all available demand response resources were or will be activated during the seasonal peak. Historically, demand response has not been activated during seasonal peak demand excluding extreme weather events.

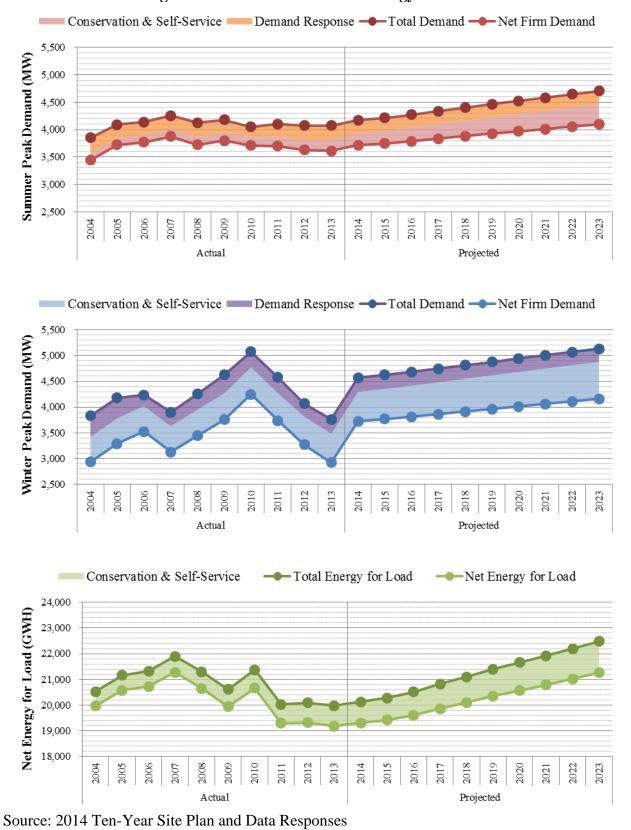


Figure 25: TECO Demand and Energy Forecasts

As an investor-owned utility, TECO is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. The utility's 2015 Ten-Year Site Plan should include revised values that would reflect the Commission's decision in the currently open FEECA goal-setting docket.

# **Fuel Diversity**

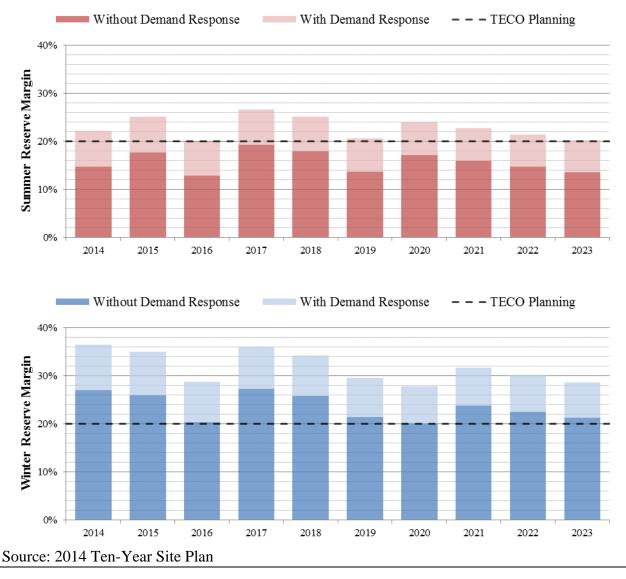
Table 19 below, shows TECO's actual net energy for load by fuel type as of 2014 and the projected fuel mix for 2023. TECO uses coal for a majority of energy generation, and based on the 2014 Ten-Year Site Plan, energy from coal is anticipated to be equal to all other sources combined. Natural gas is the second largest source of energy for the utility, at approximately 40 percent of net energy for load.

Table 19: TECO Energy Consumption by Fuel Type						
		Net Energy for Load				
Fuel Type	2013		2023			
	GWh	%	GWh	%		
Natural Gas	7,601	39.6%	9,009	42.4%		
Coal	9,647	50.3%	10,650	50.1%		
Nuclear	0	0.0%	0	0.0%		
Oil	8	0.0%	0	0.0%		
Renewable	0	0.0%	0	0.0%		
Interchange	200	1.0%	0	0.0%		
NUG & Other	1,720	9.0%	1,604	7.5%		
Total	19,177		21,263			

Source: 2014 Ten-Year Site Plan and Data Responses

# **Reliability Requirements**

Since 1999, TECO has utilized a 20 percent planning reserve margin criterion. TECO also elects to maintain a minimum supply-side reserve margin of 7 percent. Figure 26 below, displays the forecast planning reserve margin for TECO through the planning period for both seasons, with and without the use of demand response. As shown in the figure, TECO's generation needs are controlled by its summer peaking throughout the planning period.



#### Figure 26: TECO Reserve Margin Forecast

#### **Generation Resources**

TECO plans a pair of unit additions during the planning period, as described below in Table 20. TECO plans to convert a set of four natural gas-fired simple cycle combustion turbines at its Polk power plant to combined cycle operation. The additional capacity associated with the modernization is listed below, and has already been certified through the Power Plant Siting Act. TECO also plans the addition of a peaking unit, a natural gas-fired combustion turbine in 2020.

Table 20: TECO Unit Additions							
Year	Plant Name	Unit Type	Net Capacity (MW)		Notes		
	& Unit Number		Sum	Win			

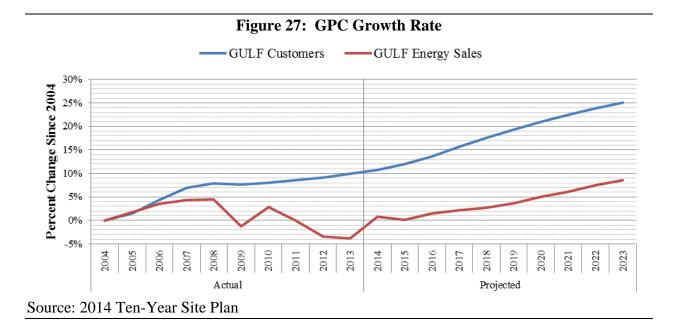
New Units								
	Natural Gas							
2017	Polk CC Conversion	Combined Cycle	459	463	Previously Approved			
2020	Future CT1	Combustion Turbine	190	220				
Source	Source: 2014 Ten-Year Site Plan							

# **Gulf Power Company (GPC)**

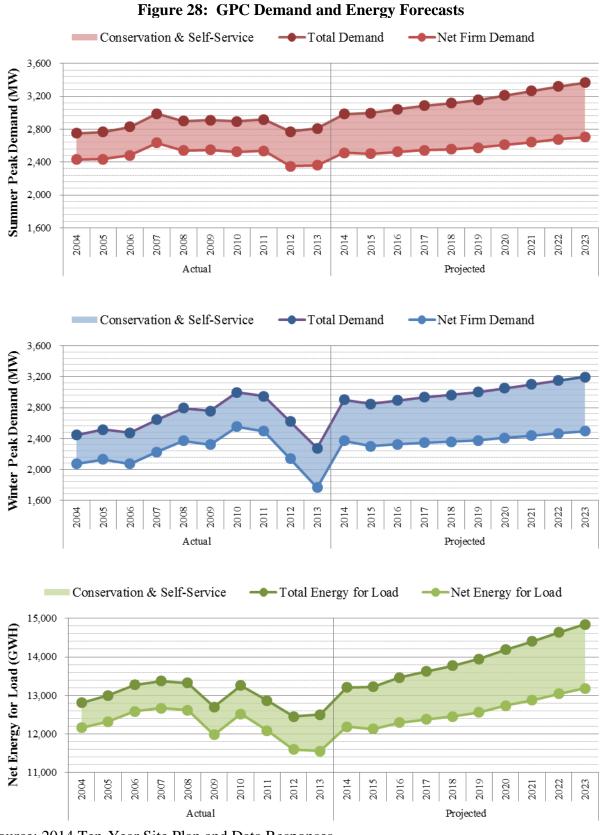
GPC is an investor owned utility, and is Florida's sixth largest electric utility. It represents the smallest of the generating investor-owned utilities, and the only one inside the Southern Company electric system. As GPC plans and operates its system in conjunction with the other Southern Company utilities, not all of the energy generated by GPC is consumed within Florida. As an investor-owned utility, the Commission has regulatory authority over all aspects of operations, including rates, reliability, and safety. Pursuant to Section 186.801(2), F.S., the Commission finds GPC's 2014 Ten-Year Site Plan suitable for planning purposes.

#### Load & Energy Forecasts

In 2013, GPC had approximately 438,000 customers and annual retail energy sales of 10,620 GWh, or approximately 4.9 percent of Florida's annual retail energy sales. Figure 27 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, GPC's customer base has increased by 9.90 percent, while retail sales have declined by 3.86 percent. As illustrated below, retail energy sales are anticipated to exceed the historic 2008 peak by 2020, three years later than the state as a whole.



The three graphs in Figure 28 below, shows GPC's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. These graphs include the full impact of demand-side management.



Source: 2014 Ten-Year Site Plan and Data Responses

As an investor-owned utility, GPC is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. The utility's 2015 Ten-Year Site Plan should include revised values that would reflect the Commission's decision in the currently open FEECA goal-setting docket.

### **Fuel Diversity**

Table 21 below, shows GPC's actual net energy for load by fuel type as of 2013, and the projected fuel mix for 2023. GPC is an energy exporter, producing over a quarter more energy than it requires for native load. While natural gas was the dominant fuel source in 2013, coal made up approximately half of energy produced. By 2023, GPC's 2014 Ten-Year Site Plan projects a decline in sales to only 11.1 percent of native load, with coal representing approximately 70 percent of system energy. GPC projects a greater percent of energy consumption from coal in 2023 than any other investor-owned utility and all but two other TYSP Utilities, JEA and OUC.

Table 21: GPC Energy Consumption by Fuel Type						
		Net Energy for Load				
Fuel Type	201	13	202	23		
	GWh %		GWh	%		
Natural Gas	8,834	76.5%	5,258	39.9%		
Coal	5,601	48.5%	9,078	68.9%		
Nuclear	0	0.0%	0	0.0%		
Oil	1	0.0%	1	0.0%		
Renewable	0	0.0%	0	0.0%		
Interchange	-3,174	-27.5%	-1,469	-11.1%		
NUG & Other	290	2.5%	311	2.4%		
Total	11,552		13,179			

Source: 2014 Ten-Year Site Plan and Data Responses

### **Reliability Requirements**

As previously noted, GPC is the only Ten-Year Site Plan Utility outside of the FRCC region. As part of Southern Company's electric system, GPC plans to maintain a 15 percent seasonal planning reserve margin beginning in 2017. Figure 29 below, displays the forecast planning reserve margin for GPC through the planning period for both seasons, including the impact of energy efficiency programs. As shown in the figure, GPC's generation needs are typically determined by its summer peak, but in 2014 the winter peak is the controlling factor. Notably, GPC's 2014 Ten-Year Site Plan projects a low reserve margin for its summer 2023 period, with a reserve margin of only 1.1 percent. The decline in reserve margin is associated with the expiration of a purchased power agreement of approximately 885 MW of natural gas-fired generation in June 2023. It is anticipated that GPC would either construct additional generation

beyond the units identified above or contract for purchased power to meet its planning reserve requirement in 2023.

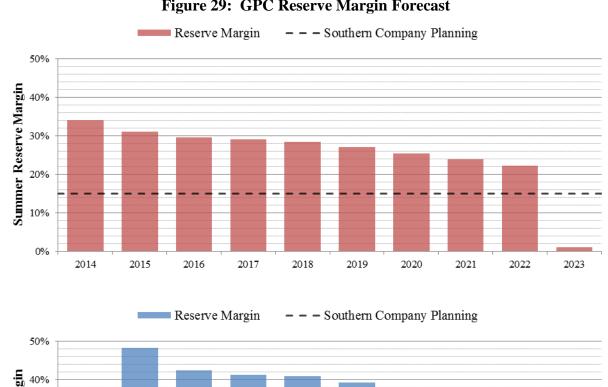
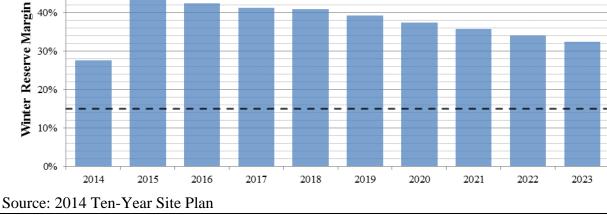


Figure 29: GPC Reserve Margin Forecast



#### **Generation Resources**

GPC plans multiple unit retirements and additions during the planning period, as described below in Table 22. A pair of coal-fired steam units and three natural gas-fired combustion turbines would be retired during the planning period. Based on its 2014 Ten-Year Site Plan, GPC plans to add a single natural gas-fired combustion turbine in 2023, after the expiration of a purchased power agreement expires. In addition, GPC plans on the addition of utility-owned renewable generation from a landfill gas-fired internal combustion unit, which would provide firm capacity.

	Table 22: GPC Unit Retirements and Additions							
Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)		Notes			
			Sum	Win				
	Retiring Units							
		Coal						
2015	Scholz 1 & 2	Steam	92	92				
		Natural Gas						
2018	2018Pea Ridge 1-3Combustion Turbine1215							
	New Units							

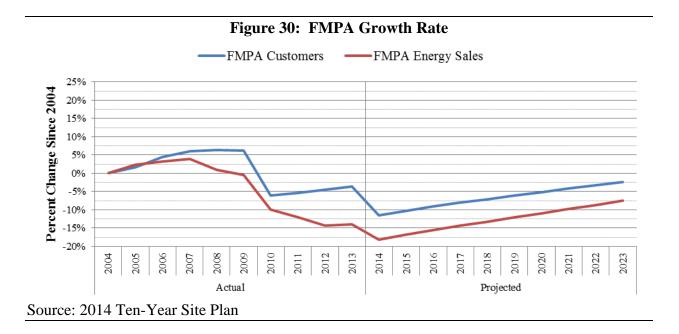
	New Units						
Natural Gas							
2023	Unsited CT	Combustion Turbine	349	360			
	Landfill Gas						
2015	Perdido	Internal Combustion	2	2			
Source	Source: 2014 Ten-Year Site Plan						

# Florida Municipal Power Agency (FMPA)

FMPA is a governmental wholesale power company owned by several Florida municipal utilities throughout Florida. Collectively, FMPA is Florida's eighth largest electric utility and third largest municipal electric utility. While FMPA has 31 member systems, only those members who are participants of the All-Requirements Power Supply Project (ARP) are addressed in the utility's Ten-Year Site Plan. FMPA is responsible for planning activities associated with ARP member systems. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds FMPA's 2014 Ten-Year Site Plan suitable for planning purposes.

#### Load & Energy Forecasts

In 2013, FMPA had approximately 267,000 customers and annual retail energy sales of 5,688 GWh, or approximately 2.6 percent of Florida's annual retail energy sales. Figure 30 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, FMPA's customer base has decreased by 3.68 percent, while retail sales have decreased by 14.04 percent. As illustrated below, retail energy sales are not anticipated to exceed the historic 2007 peak during the planning period, and will, in fact, be below 2004 retail energy sale levels by 7.56 percent. The reduction in sales is associated with several ARP member systems modifying their contractual agreements with FMPA, such that FMPA no longer provides for the system's capacity and energy needs. Those member systems modifying agreements include the City of Vero Beach in 2010, the City of Lake Worth in 2014, and the City of Fort Meade in 2015.





The three graphs in Figure 31 above, shows FMPA's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. As FMPA is a wholesale power company, it does not directly engage in energy efficiency or demand response programs. ARP member systems do offer demand-side management programs, the impacts of which are included in the graphs below.

### **Fuel Diversity**

Table 23 below, shows FMPA's actual net energy for load by fuel type as of 2014 and the projected fuel mix for 2023. FMPA uses natural gas as its primary fuel, supplemented by coal and nuclear generation. FMPA projects an increase in purchased power and energy from coal in 2023, but 70 percent of energy would still be sourced from natural gas and nuclear.

Table 23: FMPA Energy Consumption by Fuel Type						
Fuel Type	201	13	202	23		
	GWh	%	GWh	%		
Natural Gas	4,527	73.8%	4,336	66.8%		
Coal	734	12.0%	960	14.8%		
Nuclear	618	10.1%	287	4.4%		
Oil	2	0.0%	1	0.0%		
Renewable	46	0.8%	23	0.4%		
Interchange	0	0.0%	0	0.0%		
NUG & Other	206	3.4%	881	13.6%		
Total	6,133		6,488			

Source: 2014 Ten-Year Site Plan and Data Responses

### **Reliability Requirements**

FMPA utilizes an 18 percent planning reserve margin criterion for summer peak demand, and a 15 percent planning reserve margin criterion for winter peak demand. Figure 32 below, displays the forecast planning reserve margin for FMPA through the planning period for both seasons, with the impact of energy efficiency programs. As shown in the figure, FMPA's generation needs are controlled by its summer peak throughout the planning period.



## Figure 32: FMPA Reserve Margin Forecast

#### **Generation Resources**

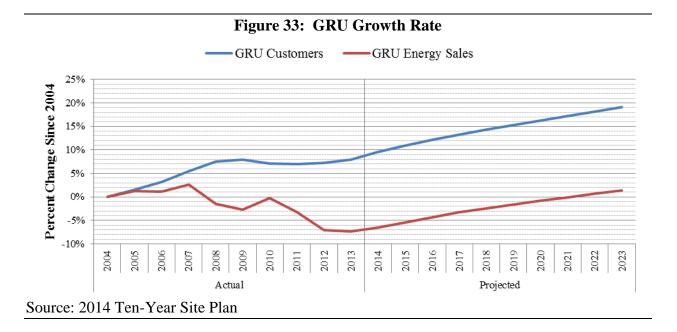
FMPA plans no unit additions or retirements during the planning period. However, as discussed above, several ARP member systems have elected to modify their contractual agreements with FMPA, such that FMPA no longer utilizes the member system's generation resources.

# **Gainesville Regional Utilities (GRU)**

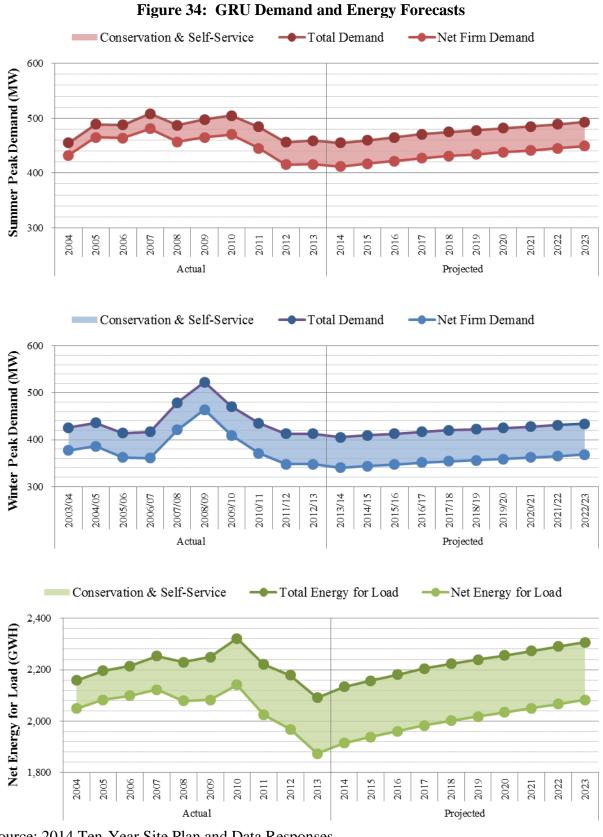
GRU is a municipal utility and the smallest electric utility required to file a Ten-Year Site Plan. The utility's service territory is within the FRCC region and consists of the City of Gainesville and its surrounding area. GRU also provides wholesale power to the City of Alachua and Clay Electric Cooperative. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds GRU's 2014 Ten-Year Site Plan suitable for planning purposes.

### Load & Energy Forecasts

In 2013, GRU had approximately 93,000 customers and annual retail energy sales of 1,694 GWh, or approximately 0.8 percent of Florida's annual retail energy sales. Figure 33 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, GRU's customer base has increased by 7.96 percent, while retail sales have decreased by 7.41 percent. As illustrated below, retail energy sales are not anticipated to exceed their historic 2007 peak during the planning period.



The three graphs in Figure 34 below, shows GRU's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. GRU engages in multiple energy efficiency programs to reduce customer peak demand and annual energy for load. The graphs in Figure 34 include the impact of these demand-side management programs.



Source: 2014 Ten-Year Site Plan and Data Responses

### **Fuel Diversity**

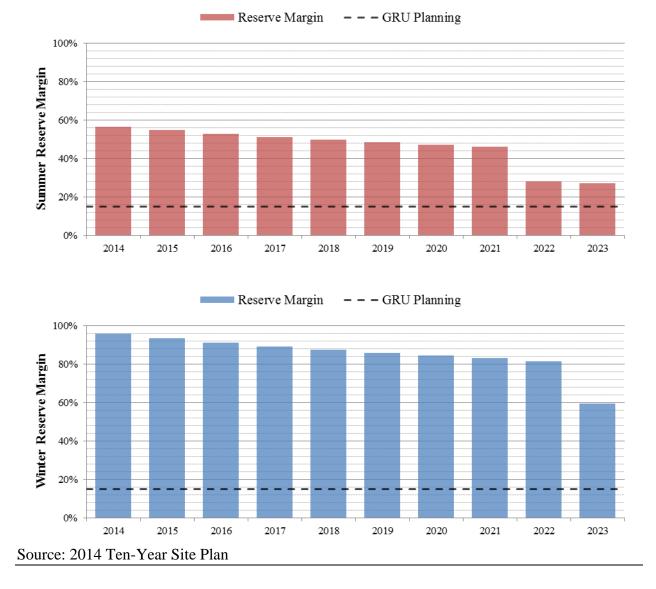
Table 24 below, shows GRU's actual net energy for load by fuel type as of 2013 and the projected fuel mix for 2023. In 2013, natural gas and coal were approximately equal in terms of contribution to net energy for load, with the remaining energy split between renewable generation and non-utility generators. By 2023, GRU projects a decline in natural gas and an increase in renewable energy to over 40 percent of net energy for load. This increase in renewables is primarily associated with the Gainesville Renewable Energy Center, a biomass facility that GRU has a long-term purchased power agreement with for approximately 100 MW of firm capacity and energy.

Table 24: GRU Energy Consumption by Fuel Type							
Net Energy for Load							
<b>Fuel Type</b>	201	.3	2023				
	GWh	%	GWh	%			
Natural Gas	696	37.1%	426	20.5%			
Coal	626	33.4%	756	36.3%			
Nuclear	81	4.3%	0	0.0%			
Oil	0	0.0%	0	0.0%			
Renewable	215	11.5%	901	43.3%			
Interchange	0	0.0%	0	0.0%			
NUG & Other	255	13.6%	0	0.0%			
Total	1,873		2,083				

Source: 2014 Ten-Year Site Plan and Data Responses

### **Reliability Requirements**

GRU utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 35 below, displays the forecast planning reserve margin for GRU through the planning period for both seasons, including the impacts of demand-side management. As shown in the figure, GRU's generation needs are controlled by its summer peak throughout the planning period. As a smaller utility, the reserve margin is an imperfect measure of reliability due to the relatively large impact a single unit may have on reserve margin. For example, GRU's largest single unit, Deerhaven 2, a coal-fired steam unit, represents 56.3 percent of summer net firm peak demand in 2014, almost the entirety of the utility's reserve margin.



## Figure 35: GRU Reserve Margin Forecast

#### **Generation Resources**

GRU currently plans to retire a natural gas-fired steam unit towards the end of the planning period, as described below in Table 25. As a smaller utility, single units can have a large impact upon reserve margin, discussed below. GRU does not plan to add additional generating capacity during the planning period.

Table 25: GRU Unit Retirements							
Year	Zear Plant Name & Unit Number	Unit Type	Net Capacity (MW)		Notes		
			Sum	Win			

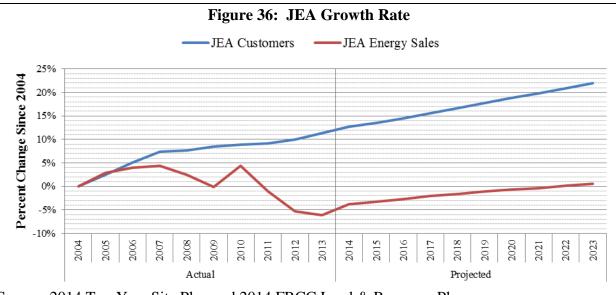
Retiring Units						
	Natural Gas					
2022	Deerhaven	Steam	75	75		
Source	e: 2014 Ten-Year Site Plan					

# JEA

JEA, formerly known as Jacksonville Electric Authority, is Florida's largest municipal utility and fifth largest electric utility. JEA's service territory is within the FRCC region, and includes all of Duval County as well as portions of Clay and St. Johns Counties. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds JEA's 2014 Ten-Year Site Plan suitable for planning purposes.

### Load & Energy Forecasts

In 2013, JEA had approximately 425,000 customers and annual retail energy sales of 11,556 GWh, or approximately 5.3 percent of Florida's annual retail energy sales. Figure 36 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, JEA's customer base has increased by 11.36 percent, while retail sales have declined by 6.14 percent. As illustrated below, JEA exceeded its 2007 peak for retail energy sales in 2010, but does not forecast returning to that level of energy sales during the planning period.



Source: 2014 Ten-Year Site Plan and 2014 FRCC Load & Resource Plan

The three graphs in Figure 37 below, shows JEA's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. These graphs include the full impact of demand-side management, and assume that all available demand response resources were or will be activated during the seasonal peak.

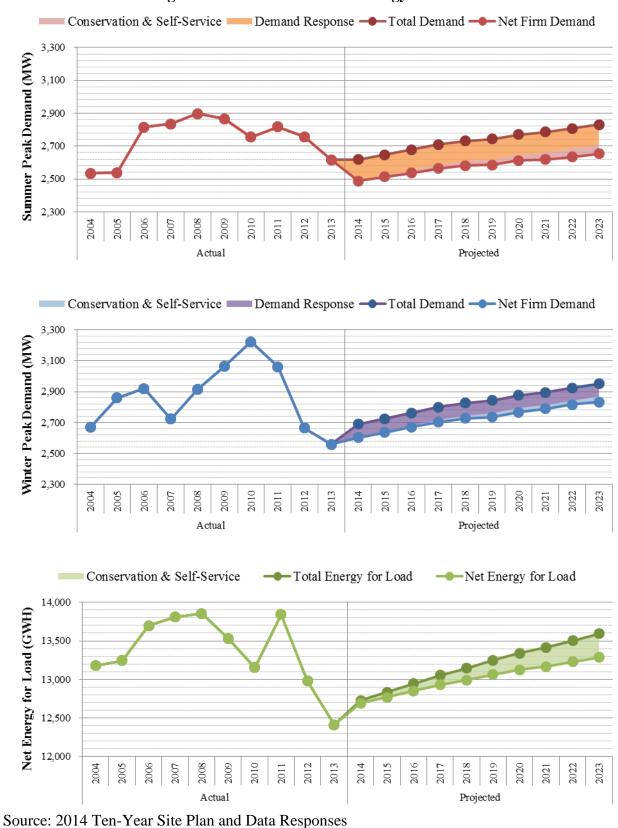


Figure 37: JEA Demand and Energy Forecasts

While a municipal utility, JEA is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. The utility's 2015 Ten-Year Site Plan should include revised values that would reflect the Commission's decision in the currently open FEECA goal-setting docket.

### **Fuel Diversity**

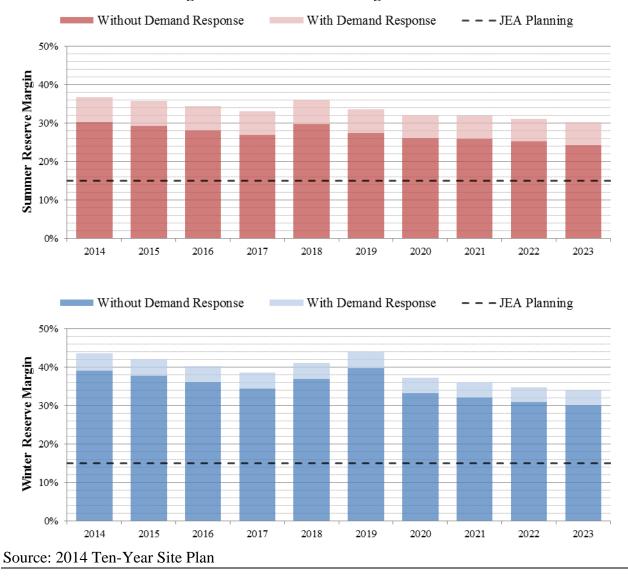
Table 26 below, shows JEA's actual net energy for load by fuel type as of 2013 and the projected fuel mix for 2023. In 2013, a majority JEA's net energy for load came from coal and petroleum coke, which is listed in the "NUG & Other" category in Table 26. While the utility plans on eliminating petroleum coke usage over the planning period, JEA projects the highest percent energy consumption from coal in 2023 of the Ten-Year Site Plan utilities, almost doubling its usage of the solid fuel.

Table 26: JEA Energy Consumption by Fuel Type							
	Net Energy for Load						
Fuel Type	201	13	2023				
	GWh	%	GWh	%			
Natural Gas	3,890	31.7%	1,090	8.2%			
Coal	5,376	43.8%	10,440	78.6%			
Nuclear	0	0.0%	0	0.0%			
Oil	3	0.0%	2	0.0%			
Renewable	92	0.7%	101	0.8%			
Interchange	841	6.8%	1,654	12.4%			
NUG & Other	2,084	17.0%	0	0.0%			
Total	12,286		13,286				

Source: 2014 Ten-Year Site Plan and Data Responses

### **Reliability Requirements**

JEA utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 38 below, displays the forecast planning reserve margin for JEA through the planning period for both seasons, with and without the use of demand response. As shown in the figure, JEA's generation needs are controlled by its summer peak throughout the planning period.



#### Figure 38: JEA Reserve Margin Forecast

#### **Generation Resources**

JEA plans to retire a pair of units during the planning period, as described below in Table 27. The Northside Unit 3, a natural gas-fired steam unit is planned for retirement in 2019 based on the utility's Ten-Year Site Plan, but JEA subsequently announced that its retirement would be accelerated to 2015. JEA also has retired its Girvin landfill units due to a decline in gas flows.

Table 27: JEA Unit Retirements							
Year	Plant Name	Unit Type	Net Capacity (MW)		Notes		
	& Unit Number		Sum	Win			

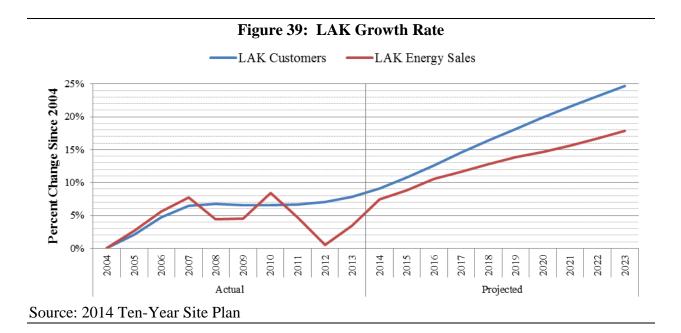
Retiring Units							
Natural Gas							
2019	Northside	Steam	524	524	Accelerated to 2015		
	Landfill Gas						
2014	Girvin Landfill	Internal Combustion	1	1	2014		
Source	Source: 2014 Ten-Year Site Plan						

# Lakeland Electric (LAK)

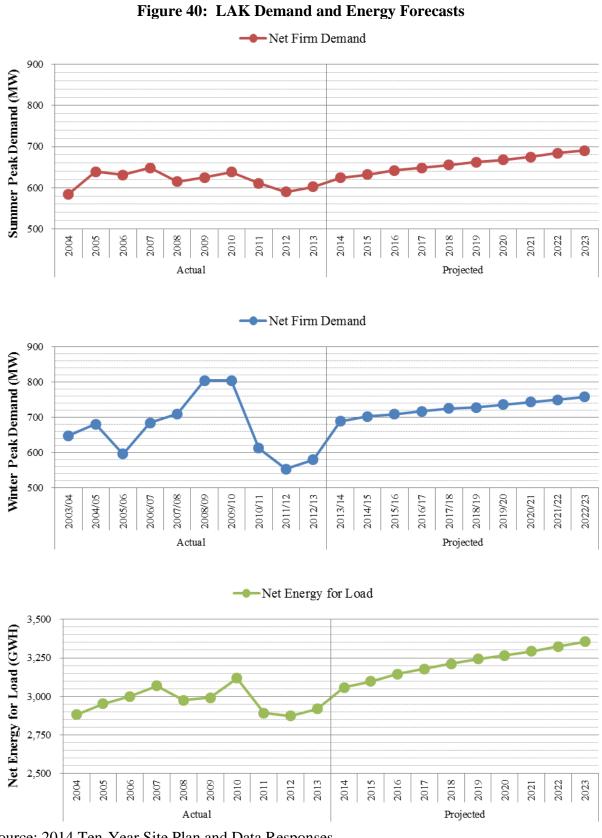
LAK is a municipal utility and the state's third smallest electric utility required to file a Ten-Year Site Plan. The utility's service territory is within the FRCC region and consists of the City of Lakeland and surrounding areas. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds LAK's 2014 Ten-Year Site Plan suitable for planning purposes.

#### Load & Energy Forecasts

In 2013, LAK had approximately 123,000 customers and annual retail energy sales of 2,831 GWh, or approximately 1.3 percent of Florida's annual retail energy sales. Figure 39 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, LAK's customer base has increased by 7.82 percent, while retail sales have grown by 3.47 percent. As illustrated below, retail energy sales exceed their historic 2007 peak in 2010, and are anticipated to again exceed this value in 2015.



The three graphs in Figure 40 below, shows LAK's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. LAK offers energy efficiency programs, the impacts of which are included in the graphs below.



Source: 2014 Ten-Year Site Plan and Data Responses

#### **Fuel Diversity**

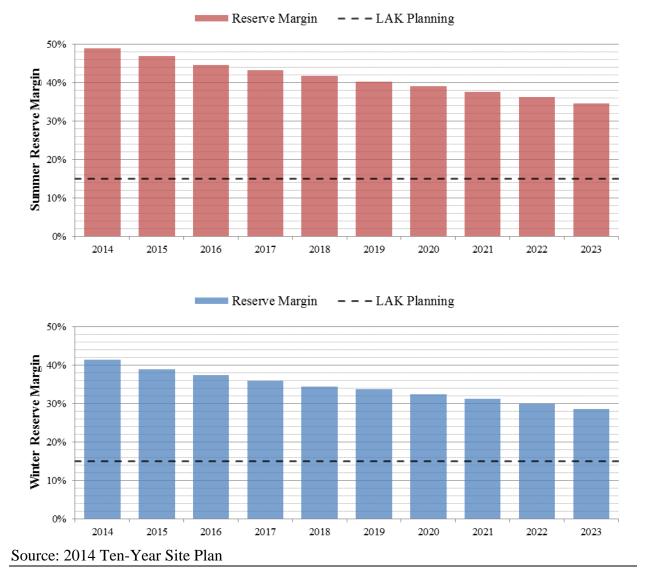
Table 28 below, shows LAK's actual net energy for load by fuel type as of 2013 and the projected fuel mix for 2023. LAK uses natural gas as its primary fuel type for energy, with coal representing slightly more than a quarter of net energy for load. While natural gas usage is anticipated to increase somewhat as a percent of net energy for load, coal is projected to remain at a similar level to 2013.

Table 28: LAK Energy Consumption by Fuel Type						
Net Energy for Load						
Fuel Type	201	2013		23		
	GWh	%	GWh	%		
Natural Gas	2,018	69.1%	2,705	80.6%		
Coal	786	26.9%	926	27.6%		
Nuclear	0	0.0%	0	0.0%		
Oil	0	0.0%	0	0.0%		
Renewable	6	0.2%	21	0.6%		
Interchange	0	0.0%	0	0.0%		
NUG & Other	109	3.7%	-297	-8.9%		
Total	2,919		3,355			

Source: 2014 Ten-Year Site Plan and Data Responses

#### **Reliability Requirements**

LAK utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 41 below, displays the forecast planning reserve margin for LAK through the planning period for both seasons, including the impacts of demand-side management. As shown in the figure, LAK's generation needs are controlled by its winter peak throughout the planning period. As a smaller utility, the reserve margin is an imperfect measure of reliability due to the relatively large impact a single unit may have on reserve margin. For example, LAK's largest single unit, McIntosh 5, a natural gas-fired combined cycle unit, represents 51.4 percent of winter net firm peak demand in 2014, in excess of the utility's reserve margin.



## Figure 41: LAK Reserve Margin Forecast

## **New Units**

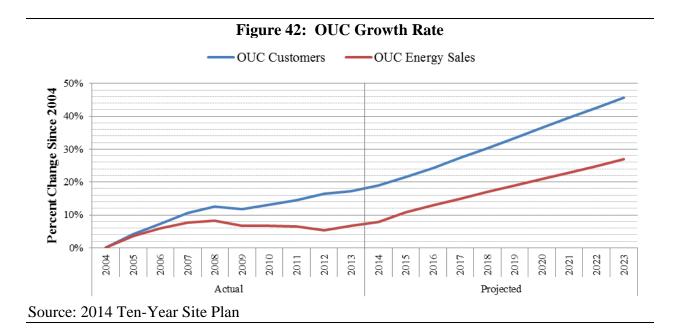
LAK plans no unit additions or retirements during the planning period.

# **Orlando Utilities Commission (OUC)**

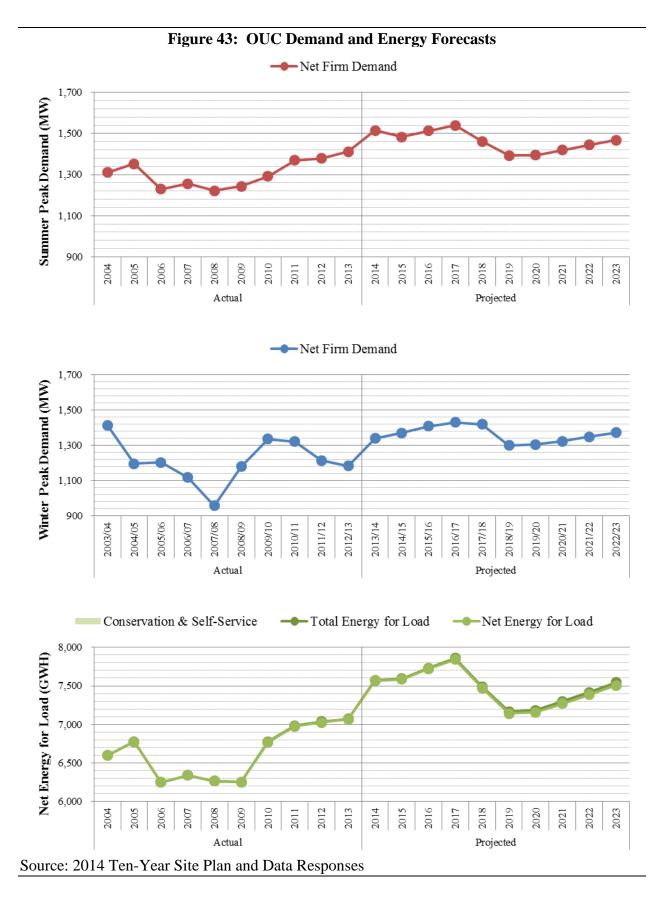
OUC is a municipal utility and Florida's seventh largest electric utility and second largest municipal utility. The utility's service territory is within the FRCC region and primarily consists of the Orlando metropolitan area. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds OUC's 2014 Ten-Year Site Plan suitable for planning purposes.

#### Load & Energy Forecasts

In 2013, OUC had approximately 215,000 customers and annual retail energy sales of 6,025 GWh, or approximately 2.8 percent of Florida's annual retail energy sales. Figure 42 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, OUC's customer base has increased by 17.28 percent, while retail sales have grown by 6.62 percent. As illustrated below, retail energy sales are anticipated to exceed their historic 2008 peak in 2015.



The three graphs in Figure 43 below, shows OUC's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. These graphs include the impact of the utility's demand side management programs. While a municipal utility, OUC is subject to FEECA and currently offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. The utility's 2015 Ten-Year Site Plan should include revised values that would reflect the Commission's decision in the currently open FEECA goal-setting docket.



### **Fuel Diversity**

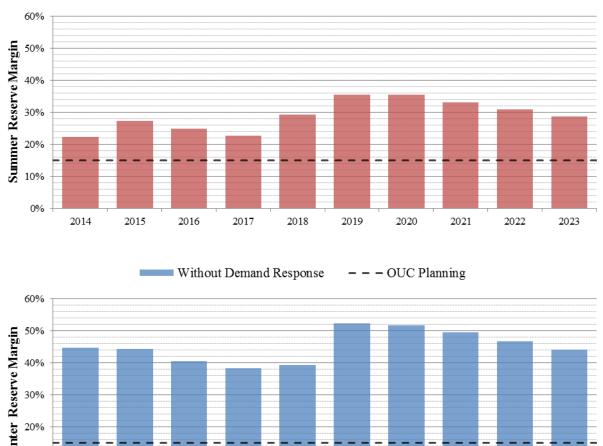
Table 29 below, shows OUC's actual net energy for load by fuel type as of 2013 and the projected fuel mix for 2023. In 2013, OUC used approximately equal portions of natural gas and coal as fuel to meet the utility's net energy for load. However, OUC projects to significantly increase the quantity of energy consumed from coal, while decreasing natural gas usage by 2023. Based upon this projection, OUC as a percent of net energy for load would be the second largest user of coal in Florida by 2023.

Table 29: OUC Energy Consumption by Fuel Type						
	Net Energy for Load					
Fuel Type	201	.3	2023			
	GWh	%	GWh	%		
Natural Gas	3,040	43.0%	839	12.4%		
Coal	3,030	42.9%	5,284	77.9%		
Nuclear	569	8.1%	462	6.8%		
Oil	0	0.0%	0	0.0%		
Renewable	91	1.3%	194	2.9%		
Interchange	0	0.0%	0	0.0%		
NUG & Other	336	4.8%	0	0.0%		
Total	7,065		6,779			

Source: 2014 Ten-Year Site Plan and Data Responses

### **Reliability Requirements**

OUC utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 44 below, displays the forecast planning reserve margin for OUC through the planning period for both seasons, including the impact of demand-side management programs. As shown in the figure, OUC's generation needs are controlled by its summer peak demand throughout the planning period.



## Figure 44: OUC Reserve Margin Forecast

- - - OUC Planning

Reserve Margin

#### Winter Reserve Margin 10% 0% 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 Source: 2014 Ten-Year Site Plan

#### **Generation Resources**

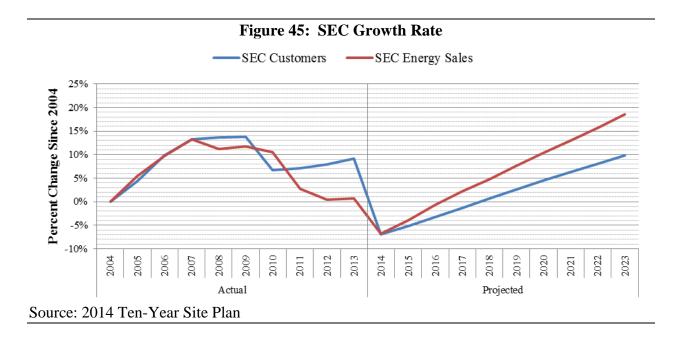
OUC plans no unit additions or retirements during the planning period.

# **Seminole Electric Cooperative (SEC)**

SEC is a generation and transmission rural electric cooperative that serves its member cooperatives, and is collectively Florida's fourth largest utility. SEC's generation and member cooperatives are within the FRCC region, with member cooperatives located in central and north Florida. As a rural electric cooperative, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds SEC's 2014 Ten-Year Site Plan suitable for planning purposes.

#### Load & Energy Forecasts

In 2013, SEC had approximately 865,000 customers and annual retail energy sales of 14,631 GWh, or approximately 6.7 percent of Florida's annual retail energy sales. Figure 45 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, SEC's customer base has increased by 9.15 percent, while retail sales have grown by only 0.67 percent. As illustrated below, retail energy sales are anticipated to exceed their historic 2007 peak by 2022, approximately five years later than Florida as a whole. The decline shown in 2014 is associated with one member cooperative, Lee County Electric Cooperative, electing to end its membership with SEC.



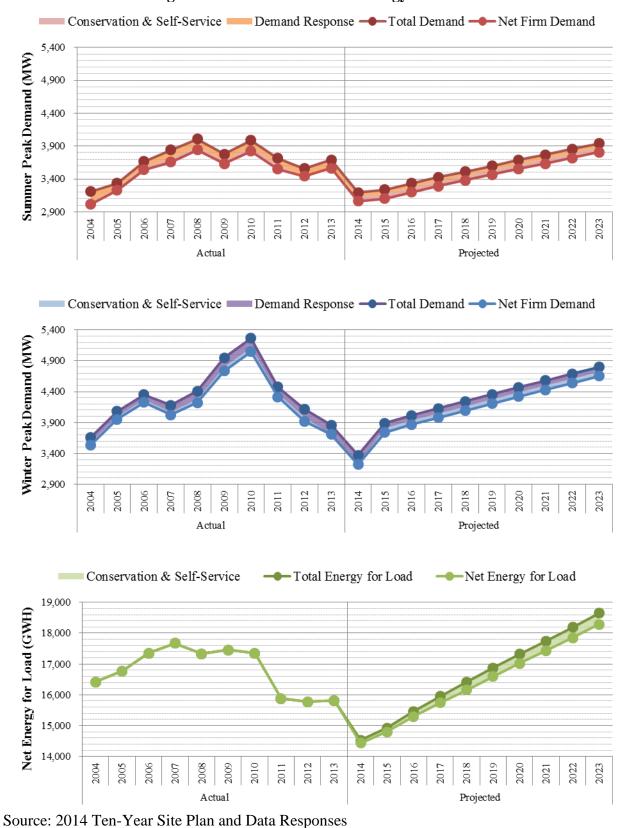


Figure 46: SEC Demand and Energy Forecasts

The three graphs in Figure 46 above, shows SEC's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. As SEC is a generation and transmission company, it does not directly engage in energy efficiency or demand response programs. Member cooperatives do offer demand-side management programs, the impacts of which are included in the graphs below.

### **Fuel Diversity**

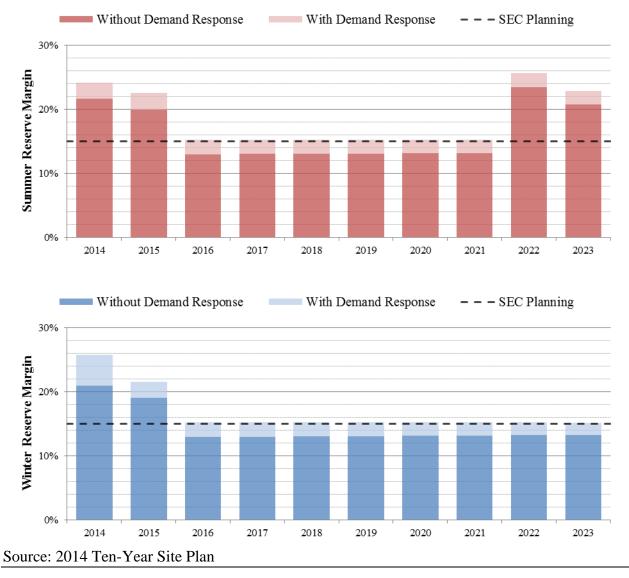
Table 30 below, shows SEC's actual net energy for load by fuel type as of 2013 and the projected fuel mix for 2023. In 2013, SEC uses a combination of coal and natural gas to meet its member cooperatives' net energy for load, with coal use slightly higher than natural gas. By 2023, SEC projects this to reverse, with natural gas usage somewhat higher than coal.

Table 30: SEC Energy Consumption by Fuel Type						
	Net Energy for Load					
Fuel Type	2013		2023			
	GWh	%	GWh	%		
Natural Gas	7,071	44.7%	9,814	53.7%		
Coal	7,725	48.9%	7,859	43.0%		
Nuclear	0	0.0%	0	0.0%		
Oil	54	0.3%	61	0.3%		
Renewable	962	6.1%	550	3.0%		
Interchange	0	0.0%	0	0.0%		
NUG & Other	0	0.0%	0	0.0%		
Total	15,812		18,284			

Source: 2014 Ten-Year Site Plan and Data Responses

#### **Reliability Requirements**

SEC utilizes a 15 percent planning reserve margin criterion for seasonal peak demand. Figure 47 below, displays the forecast planning reserve margin for SEC through the planning period for both seasons, with and without the use of demand response. Member cooperatives allow SEC to coordinate demand response resources to maintain reliability. As shown in the figure, SEC's generation needs are determined by winter peak demand more often than summer peak demand during the planning period.



#### Figure 47: SEC Reserve Margin Forecast

#### **Generation Resources**

SEC plans the addition of several generating units during the planning period, as described below in Table 31. All unsited natural gas-fired units, SEC plans the addition of a total of seven combustion turbines and a single combined cycle unit over the planning period.

Table 31: SEC Unit Retirements and Additions						
Year	Year Plant Name & Unit Number	Unit Type	Net Capacity (MW)		Notes	
			Sum	Win		

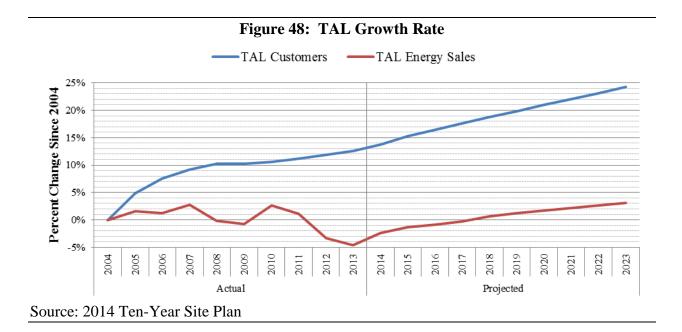
New Units						
2020	Unsited Combined Cycle	Combined Cycle	440	523	Requires Approval	
2020	Unsited CT 1 &2	Combustion Turbine	402	450		
2021	Unsited CT 3-7	Combustion Turbine	1,005	1,125		
Source	Source: 2014 Ten-Year Site Plan					

# **City of Tallahassee Utilities (TAL)**

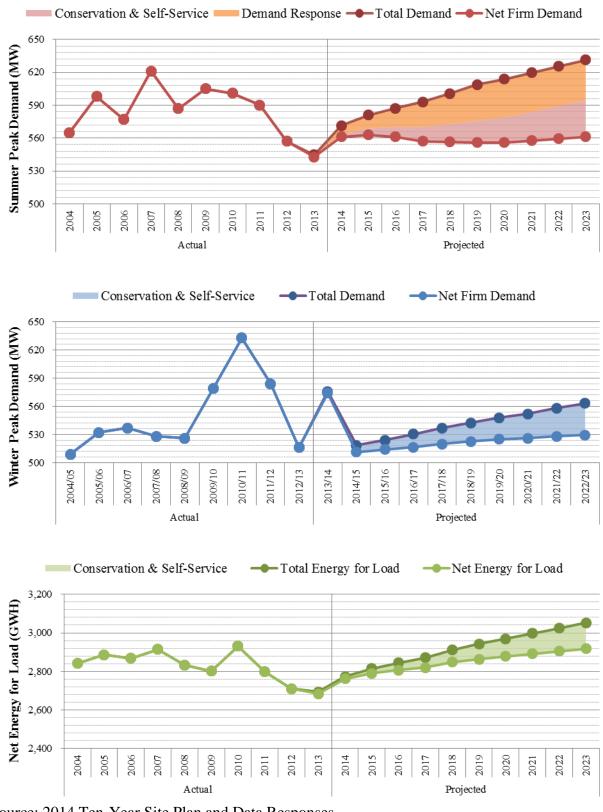
TAL is a municipal utility and the second smallest electric utility and municipal electric utility. The utility's service territory is within the FRCC region and primarily consists of the City of Tallahassee and surrounding areas. As a municipal utility, the Commission's regulatory authority is limited to safety, rate structure, territorial boundaries, bulk power supply, operations, and planning. Pursuant to Section 186.801(2), F.S., the Commission finds TAL's 2014 Ten-Year Site Plan suitable for planning purposes.

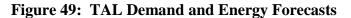
#### Load & Energy Forecasts

In 2013, TAL had approximately 116,000 customers and annual retail energy sales of 2,558 GWh, or approximately 1.2 percent of Florida's annual retail energy sales. Figure 48 below, illustrates the company's historic and forecast number of customers and retail energy sales, in terms of percentage growth from 2004. Over the last ten years, TAL's customer base has increased by 12.59 percent, while retail sales have declined by 4.63 percent. As illustrated below, retail energy sales are not anticipated to exceed their historic 2007 peak until 2023, six years later than the state as a whole.



The three graphs in Figure 49 below, shows TAL's seasonal peak demand and net energy for load for the historic years of 2004 through 2013 and forecast years 2014 through 2023. These graphs include the impact of demand-side management, and for future years assume that all available demand response resources will be activated during the seasonal peak. TAL offers energy efficiency and demand response programs to customers to reduce peak demand and annual energy consumption. Currently TAL only offers demand response programs targeting appliances that contribute to summer peak, and therefore have no effect upon winter peak.





Source: 2014 Ten-Year Site Plan and Data Responses

### **Fuel Diversity**

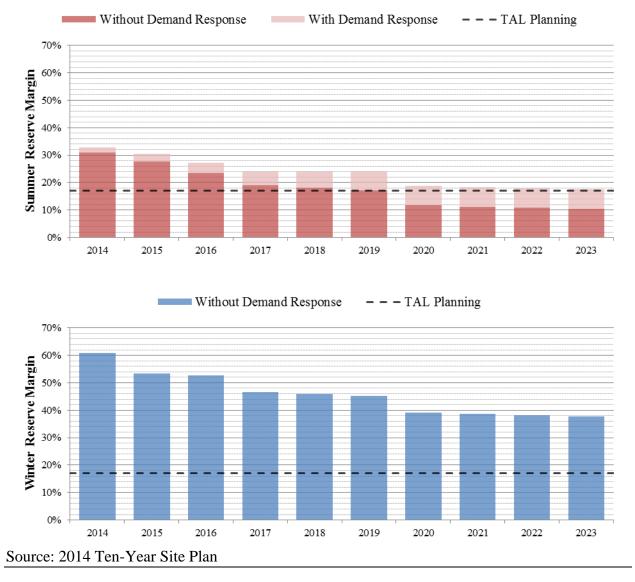
Table 32 below, shows TAL's actual net energy for load by fuel type as of 2013 and the projected fuel mix for 2023. TAL relies almost exclusively on natural gas for its generation, excluding some purchases from other utilities and qualifying facilities and the use of oil as a backup fuel. Natural gas is anticipated to remain the sole fuel on the system, with only natural gas-fired generation to be added.

Table 32: TAL Energy Consumption by Fuel Type						
		Net Energy for Load				
Fuel Type	202	2013		23		
	GWh	%	GWh	%		
Natural Gas	2,662	99.2%	2,903	99.5%		
Coal	0	0.0%	0	0.0%		
Nuclear	0	0.0%	0	0.0%		
Oil	2	0.1%	0	0.0%		
Renewable	23	0.8%	11	0.4%		
Interchange	1	0.0%	27	0.9%		
NUG & Other	-3	-0.1%	-23	-0.8%		
Total	2,684		2,918			

Source: 2014 Ten-Year Site Plan and Data Responses

### **Reliability Requirements**

TAL utilizes a 17 percent planning reserve margin criterion for seasonal peak demand. Figure 50 below, displays the forecast planning reserve margin for TAL through the planning period for both seasons, with and without the use of demand response. As discussed above, TAL only offers demand response programs applicable to the summer peak. As shown in the figure, TAL's generation needs are controlled by its summer peak throughout the planning period.



## Figure 50: TAL Reserve Margin Forecast

### **Generation Resources**

TAL plans multiple unit retirements and a single addition during the planning period, as described below in Table 33. Several older combustion turbines at two plant sites and a single steam unit, all natural gas-fired, are anticipated to be retired during the planning period. Based upon its current planning, TAL intends to add a new natural gas-fired combustion turbine in 2020.

	Table 33: TAL Unit Retirements and Additions							
Year	Plant Name & Unit Number	Unit Type	Net Capacity (MW)		Notes			
			Sum	Win				

	Retiring Units							
	Natural Gas							
2015	Hopkins GT1	Combustion Turbine	12	14				
2015	Purdom GT1&2	Combustion Turbine	20	20				
2017	Hopkins GT2	Combustion Turbine	24	26				
2020	Hopkins	Steam	76	78				

		New Units				
Natural Gas						
2020	Hopkins 5	Combustion Turbine	46	48		
Source	e: 2014 Ten-Year Site Plan					

# **APPENDIX A**

# REVIEW OF THE 2014 TEN-YEAR SITE PLANS OF FLORIDA'S ELECTRIC UTILITIES



NOVEMBER 2014

# **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

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

Rick Scott



Jesse Panuccio EXECUTIVE DIRECTOR

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 <a href="mailto:scott.rogers@deo.myflorida.com">scott.rogers@deo.myflorida.com</a>.

Sincerely,

Ana Richmond, Chief Bureau of Community Planning

AR/sr

Florida Department of Economic Opportunity | Caldwell Building | 107 E. Madison Street | Tallahassee, FL 32399 866.FLA.2345 | 850.245.7105 | 850.921.3223 Fax www.floridajobs.org www.twitter.com/FLDEO | www.facebook.com/FLDEO

### 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, 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. <u>Manatee Plant site, Manatee County</u>. 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: Sent: To: Cc: Subject: Green, Justin B. <Justin.B.Green@dep.state.fl.us> Wednesday, June 18, 2014 2:58 PM Phillip Ellis Bull, Robert 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.



Division of Air Resource Management 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

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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). 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 <u>FWCConservationPlanningServices@MyFWC.com</u>.

Sincerely,

Junifu D. Soft

Jennifer Goff 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

FWC OES

Appendix A



Florida Fish and Wildlife Conservation Commission

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Ronald M. Bergeron Fort Lauderdale

Richard Hanas Oviedo

Aliese P. "Liesa" Priddy Immokalee

Bo Riverd Penema City

Charles W. Roberts III Tallahassee

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June 30, 2014

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

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

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 (<u>http://myfwc.com/media/2612908/bearmanagement-plan.pdf</u>) 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 (<u>http://www.fws.gov/midwest/midwestbird/eaglepermits/bagepa.html</u>), Florida's Bald Eagle rule (section 68A-16.002), and the Florida Bald Eagle Management Plan (<u>http://myfwc.com/media/427567/Eagle\_Plan\_April\_2008.pdf</u>). 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

FWC DES

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 eagle nests may become reactivated at any time or eagles may establish a new nest, at which point the FWC Bald Eagle Management Plan (<u>http://myfwc.com/media/427567/Eagle\_Plan\_April\_2008.pdf</u>) guidelines, found in the Section entitled "Permitting Framework April 2008," would apply.

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 (<u>http://myfwc.com/license/wildlife/gopher-tortoise-permits/</u>) provides recommended survey methodologies. permitting options, and midelines for commenced ensure that there is

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 <u>FWCConservationPlanningServices@MyFWC.com</u>. 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 <u>maryann.poole@myfwc.com</u>.

Sincerely,

Janife D-Soff)

Jennifer D. Goff Land Use Planning Program Administrator Office of Conservation Planning Services

jdg/map

ENV 1-11-2/3 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,

many

Marisa M. Barmby, AICP Senior Planner

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17



# 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.

**Executive Committee Chair** Chuck Nelson County Commissioner Brevard County

Vice Chair Lee Constantine County Commissioner Seminole County **Treasurer** Welton Cadwell County Commissioner Lake County **Secretary** Leigh Matusick City Commissioner Volusia County League of Cities

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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

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## 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

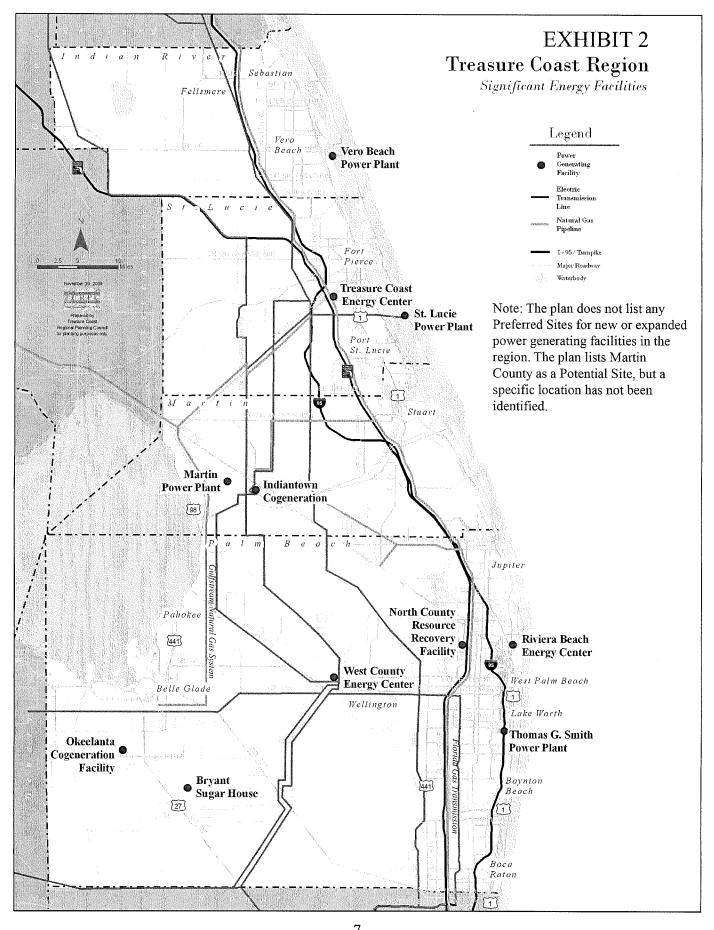
## Table ES-1: Projected Capacity & Firm Purchase Power Changes

		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	
	Sanford 5 CT Upgrade	9	September-13	
	Riviera Beach Next Generation Clean Energy Center	1,212	April-14	
	Total of MW changes to Summer firm capacity:	1,247	en a station de	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 <sup>17</sup>	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	
	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	
	Total of MW changes to Summer firm capacity:	309	1 april anti-	26.6%
2017	Turkey Point Unit 1 synchronous condenser	(396)	October-16	
	Total of MW changes to Summer firm capacity:	(396)		22.6%
2018	OUC - Stanton PPAs	(37)	December-17	
	Vero Beach Combined Cycle <sup>17</sup>	(46)	January-18	
	Total of MW changes to Summer firm capacity:	(83)	Sector and the	20.5%
2019	Port Everglades GT retirement	(420)	December-18	
	Lauderdale GT retirement	(840)	December-18	4
	Lauderdale CT	1,005	January-19	
	SJRPP suspension of energy	(381)	April-19	
	Unsited CC	1,269	June-19	
	Total of MW changes to Summer firm capacity:	633	中国的时代	21.6%
2020	Unspecified Purchase	129	June-20	
	Total of MW changes to Summer firm capacity:	129	the Residual des	20.5%
2021	Eco-Gen PPA	180	January-21	
	Unspecified Purchase	168	June-21	
	Total of MW changes to Summer firm capacity:	.348	[-1, 1, 1] = [1, 1] = [1, 2]	20.6%
2022	Cape Next Generation Clean Energy Center	87	June-22	
	Turkey Point Nuclear Unit 6	1,100	June-22	
	Total of MW changes to Summer firm capacity:	1,187		22.6%
2023	Riviera Beach Next Generation Clean Energy Center	55	June-23	NUNCTON 102010 1021
	Turkey Point Nuclear Unit 7	1,100	June-23	
to final de	Total of MW changes to Summer firm capacity:	1,155		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.

17 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 <sup>V</sup>			Forecasted										
	Energy Source	Units	2012	<u>2013</u>	<u>2014</u>	2015	2016	2017	<u>2018</u>	2019	2020	2021	2022	2023
(1)	Annual Energy Interchange <sup>-2/</sup>	%	4.7	4,0	3,0	3.2	1,7	1.9	2:1	0.8	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	Ó.0	0.0	0.0	0,0	0.0	0.0
(8)	00	%	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
(10)	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 <sup>3/</sup>	%	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></sboling@ircgov.com>
Sent:	Thursday, May 08, 2014 9:59 AM
То:	'lgulick@tcrpc.org'
Cc:	BCC - Board Members; Joe Baird; Chris Mora; Phil Matson; Sasan Rohani; John McCoy; Roland Doblair: John King: Michael Zita: Dylan Baingeld: Vincent Burke: Dari Bay
	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



Terry A. Joseph, Executive 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: WFRF	C: Grant Application Project Description:
MJ89404251	4 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.
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Please find attached staff comments.

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

4081 E. Olive Road, Suite A • Pensacola, FL 32514 • P.O. Box 11399 • Pensacola, FL 32524 • P: 850.332-7976 • 1.800.226.8914 • F: 850.637.1923 www.wfrpc.org

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



Jonathan P. Steverson Executive Director 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

RECEIVED JUN 26 2014 Fronius: Public Service Commission Division of BBC ENG

### 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,

Kerrin R. Hayes

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

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

GEORGE ROBERTS Chair Panama City JERRY PATE Vice Chair Pensacola JOHN ALTER Malone

31

GUS ANDREWS DeFuniak Springs STEPHANIE BLOYD Panama City Beach

GARY CLARK Chipley JON COSTELLO Tallahassee NICK PATRONIS Panama City Beach BO SPRING Port Saint Joe



Opportunity Employer Southwest Florida Water Management District

Bartow Service Office 170 Century Boulevard Bartow, Florida 33830-7700 (863) 534-1448 or 1-800-492-7862 (FL only)

May 16, 2014

Chair, Manatee Michael A. Babb Vice Chair, Hillsborough Randall S. Maggard Secretary, Pasco Jeffrey M. Adams Treasurer, Pinellas Todd Pressman

**Carlos Beruff** 

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**H. Paul Senft, Jr.** Former Chair, Polk

Bryan K. Beswick DeSoto, Hardee, Highlands

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> Jennifer E. Closshey Hillsborough

Wendy Griffin Hillsborough

George W. Mann Polk

Vacant Charlotte, Sarasota Vacant Citrus, Lake, Levy, Sumter

> Blake C. Guillory Executive Director

**Sarasota Service Office** 6750 Fruitville Road Sarasota, Florida 34240-9711 (941) 377-3722 or 1-800-320-3503 (FL only)

Appendix A 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* 

 Tampa Service Office

 7601 U.S. 301 North

 Tampa, Florida 33637-6759

 (813) 985-7481 or

 1-800-836-0797 (FL only)

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.
- 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,

pour fr. hella

James J. Golden, AICP 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

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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.

Respectfully

Ann B. Shortelle, Ph.D. **Executive Director** 

ABS/wz

Water for Nature, Water for People



9225 CR 49 • LIVE OAK, FLORIDA 320604

- Leon County
- Suwannee County



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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

# Leon County

Board of County Commissioners

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

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 emailed to <u>pellis@psc.state.fl.us</u>, 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

Appendix A

# **Suwannee County**



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

"In The Heart Of The Suwannee River Valley"

Please Reply to:

June 23, 2014

**COUNTY OFFICES** 

13150 80th Terrace

Live Oak, FL 32060

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.

Sincerely, Randy-Harris

County Administrator