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ORIGINAL
FILE COPY

PREFILED DIRECT TESTIMONY
OF
MIKE BROST
ON BEHALF OF
JACKSONVILLE ELECTRIC AUTHORITY
DOCKET NO. 950307-EU

1 Q. PLEASE STATE YOUR NAME AND PLACE OF EMPLOYMENT.

2 A. My name is Mike Brost and I am employed by the
3 Jacksonville Electric Authority ("JEA"), 21 West
4 Church Street, Jacksonville, Florida 32202.

5 Q. PLEASE STATE YOUR TITLE AND BRIEFLY DESCRIBE YOUR
6 RESPONSIBILITIES WITH JEA.

7 A. I am the Division Chief of JEA's Distribution
8 Engineering Division and have held that position
9 since August of 1993. Prior to that time, I spent
10 ten years working in our System Operations
11 department at the JEA's Systems Operations Control
12 Center. The Distribution Engineering Division is
13 responsible for the engineering design of all the
14 electrical distribution facilities within the JEA
15 service territory. This includes feeder additions,
16 conversions and relocations, service additions and
17 upgrades, coordination with other agencies, street
18 light additions, and various other related
19 activities.

20 Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

21 A. I have a Bachelor of Science degree in Electrical
22 Engineering from the University of Florida, 1983,
23 and a Masters degree in Electrical Engineering from
24 Florida Atlantic University, 1986. I am presently
25 pursuing a Masters in Business Administration from

1 the University of North Florida and expect to
2 graduate in December of 1995. I am also a
3 Registered Professional Engineer in the State of
4 Florida.

5 Q. HAVE YOU EVER TESTIFIED BEFORE THE FLORIDA PUBLIC
6 SERVICE COMMISSION?

7 A. No.

8 Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THE DOCKET?

9 A. The Jacksonville Electric Authority.

10 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

11 A. The purpose of my testimony is:

12 - to present and discuss the situation in
13 northern St. Johns County where JEA is currently
14 experiencing problems serving new customers in
15 accordance with the 1979 Territorial Agreement with
16 FPL.

17 - to describe JEA's facilities in the affected
18 area.

19 - to discuss the impact of the territorial
20 problems on system reliability in the area.

21 - to discuss the impact of the territorial
22 problems on JEA and the new electric service
23 customers in the area.

- 1 - to detail for the Commission JEA's recent
2 attempts at coordinating with FPL to arrive at a
3 workable resolution satisfactory to all parties.
4 - to discuss the importance and urgency of
5 resolving these territorial service problems.
6 - to recommend a final resolution to the
7 problems being experienced by JEA in this portion
8 of its service territory.

9 **Q. PLEASE DESCRIBE THE PORTION OF JEA'S SERVICE**
10 **TERRITORY WHERE THE PROBLEMS EXIST.**

11 A. The only area of JEA's service territory where
12 there are presently substantial territorial service
13 problems is the southern portion of JEA's territory
14 in St. Johns County. Attached to my testimony is
15 Exhibit ____ (MB-1) which is a colored map showing:
16 (1) the JEA/FPL boundary line in northern St. Johns
17 County; (2) the general location of FPL's existing
18 facilities along and in the vicinity of this line;
19 (3) the general location of JEA's facilities along
20 and in the vicinity of this line; and (4) the
21 approximate location and number of customers served
22 by FPL in JEA's territory.

23 As shown by this map, the territorial boundary
24 line between JEA and FPL in northern St. Johns
25 County begins at the Intracoastal Waterway and runs

1 west along Palm Valley Road. The line then turns
2 south on U.S. 1 to County Road 210. At County Road
3 210, the line runs west along County Road 210 and
4 then south crossing County Road 16A and State Road
5 13, terminating at the St. John's River.

6 **Q. PLEASE DESCRIBE THE EXTENT OF JEA'S EXISTING**
7 **FACILITIES IN NORTHERN ST. JOHNS COUNTY.**

8 A. JEA has existing distribution facilities and
9 substations installed throughout much of its
10 territory in northern St. Johns County. JEA has
11 distribution facilities located along U.S. 1,
12 Racetrack Road, State Road 13, Greenbriar Road,
13 Roberts Road and County Road 210. Additional maps
14 of these facilities are available. The JEA line
15 running south along State Road 13 into the
16 Orangedale area is a radial line stopping just
17 before County Road 16A. The JEA line that begins
18 at State Road 13 and Greenbriar Road runs east on
19 Greenbriar Road onto County Road 210, and continues
20 east on County Road 210 stopping at Southern Grove,
21 a new residential subdivision. JEA also has lines
22 along Racetrack Road running east from State Road
23 13 and west from U.S. 1. These two lines do not
24 tie at this time.

1 JEA presently serves portions of northern St.
2 Johns County from two substations, each of which
3 has 100 MVA of installed distribution transformer
4 capacity. The two substations are: (1) the
5 Switzerland Substation located north of Roberts
6 Road between State Road 13 and Greenbriar Road
7 which was built in March of 1993 at a cost of
8 \$3,400,000; and (2) the Southeast Jax Substation,
9 completed in October of 1990 at a cost of
10 \$7,600,000, located east of Southside Boulevard,
11 just north of the U.S. 1 intersection. The
12 Switzerland Substation serves the western portion
13 of JEA's territory in St. Johns County, while the
14 Southeast Jax Substation serves, among other areas,
15 the eastern portion of JEA's territory in St.
16 John's County. The distribution system out of
17 these two substations has ties to other JEA
18 substations to the north. Exhibits ___ (MB-2) and
19 ___ (MB-3) show the distribution facilities tied to
20 these two substations.

21 **Q. ARE THERE AREAS ALONG THE MAIN ARTERIES IN NORTHERN**
22 **ST. JOHNS COUNTY IN JEA'S TERRITORY WHERE JEA DOES**
23 **NOT HAVE DISTRIBUTION FACILITIES?**

24 **A. Yes, as shown on Exhibit ___ (MB-1), JEA presently**
25 **has no distribution lines installed along: (1)**

1 County Road 16A; (2) portions of County Road 210;
2 (3) Russell Sampson Road; (4) Palm Valley Road; and
3 (5) U.S. 1 between Palm Valley Road and County Road
4 210.

5 Q. DOES THE JEA HAVE SUFFICIENT EXCESS CAPACITY TO
6 SERVE THESE AREAS OF NORTHERN ST. JOHNS COUNTY
7 WHICH ARE SITUATED IN JEA'S SERVICE TERRITORY?

8 A. Yes. JEA has incorporated this area of St. Johns
9 County into its growth forecasts and has, and does,
10 plan its Generation, Transmission and Distribution
11 facilities to serve the territory. As previously
12 noted, two relatively new 100MVA substations,
13 Southeast Jax and Switzerland, have been built
14 during the past few years and there is sufficient
15 capacity on the substations' transformers and
16 distribution feeders to serve the disputed area now
17 and in the foreseeable future. The load of the
18 Southeast Jax Substation is expected to increase
19 from 33MVA to 44MVA over the next five years, the
20 load at the Switzerland Substation is expected to
21 increase from 19MVA to 26MVA over the same period.

22 Q. WHAT ARE JEA'S PLANS FOR FUTURE ENHANCEMENTS AND
23 ADDITIONS IN ITS TERRITORY IN ST. JOHNS COUNTY?

24 A. JEA has a number of additions and improvements
25 planned for its distribution system in the area.

1 In order to be in a better position to serve
2 existing customers and new customers, JEA has
3 additions planned for County Road 16A, County Road
4 210, Russell Sampson Road, U.S. 1, Palm Valley Road
5 and Racetrack Road. In order to improve the
6 reliability of service to existing and future
7 customers, JEA is installing aerial cable along
8 State Road 13 to Orangedale in the locations
9 characterized by heavy tree canopies. In addition,
10 the radial line along State Road 13 will be looped
11 through County Road 16A to County Road 210, U.S. 1
12 will tie Racetrack Road and County Road 210, and
13 the two radial lines running along Racetrack Road
14 will be tied. Although JEA's proposed line on Palm
15 Valley Road will be fed radially from U.S. 1 (as is
16 the case today with FPL's existing line), JEA is
17 considering approaching FPL with a plan to provide
18 backup support for the two systems with a normally
19 open tie point located at the Intracoastal
20 Waterway. If built, this tie point will provide
21 backup support to both JEA and FPL customers along
22 Palm Valley Road, thus protecting against extended
23 outages on the two radial lines.

1 The locations of these planned additions are
2 shown on the map attached to my testimony as
3 Exhibit ____ (MB-4).

4 **Q. WHY ARE THE ORANGEDALE PROJECTS NECESSARY?**

5 A. The expansion is needed to improve reliability for
6 existing customers and to serve new customers.

7 **Q. WHEN ARE THE ORANGEDALE PROJECTS EXPECTED TO BE
8 COMPLETED?**

9 A. The addition of aerial cable on State Road 13 is
10 expected to be completed in July, 1995. The line
11 extension west on County Roads 210 and 16A, which
12 will loop two radial distribution lines, is
13 presently scheduled for completion in September,
14 1995. We have encountered several problems on the
15 second project due to the location of the FPL
16 radial lateral from County Road 16A located on the
17 north side of County Road 210. For JEA to complete
18 its project, it will be necessary for JEA to: (1)
19 cross FPL's primary lines in two locations and
20 cross FPL's secondary lines in numerous locations;
21 or (2) incur the additional cost of putting a
22 portion (or all) of the project underground.

23 **Q. IT IS DANGEROUS FOR JEA'S AND FPL'S DISTRIBUTION
24 LINES TO CROSS?**

1 A. Yes. Crossing of electrical facilities, whether
2 primary-over-primary, or primary-over-secondary, is
3 a serious safety concern for the general public and
4 for the employees of both utilities. As new
5 customers are added, this situation would worsen as
6 JEA crosses FPL's lines to serve its customers and
7 FPL crosses JEA's lines to serve its customers.

8 Q. DOES UNDERGROUNDING OFFER A COST EFFECTIVE
9 ALTERNATIVE?

10 A. Undergrounding provides a safer alternative than
11 crossing lines, but at a substantial cost to JEA
12 and its ratepayers; a cost that JEA and its
13 customers should not be required to incur due to
14 the presence of FPL's facilities in JEA's
15 territory. In addition, overhead facilities offer
16 much greater flexibility for providing service to
17 new customers, whereas the addition of customers to
18 an underground system typically requires the
19 addition of conduit, manholes, switch gear and
20 fusing cabinets. Also, if the road is widened in
21 the future, and the utility must vacate the
22 existing right-of-way, it is significantly cheaper
23 to relocate overhead facilities than to relocate
24 underground facilities.

1 Q. WHAT ALTERNATIVES ARE AVAILABLE FOR RESOLVING THE
2 PROBLEM REGARDING THE PRESENCE OF FPL FACILITIES IN
3 JEA'S TERRITORY?

4 A. The alternatives are as follows:

5 (1) In the portion of the area where FPL's
6 facilities are located on FPL's side of the
7 boundary line, little to no problems exist.
8 In these areas JEA can build overhead
9 distribution facilities on its side of the
10 boundary line, and the only potential crossing
11 of lines occurs where FPL has an existing
12 service across the boundary line into JEA's
13 territory.

14 (2) In cases where FPL has primary distribution
15 lines installed on JEA's side of the boundary
16 line, it becomes necessary for JEA to either
17 cross FPL's facilities and locate its lines in
18 FPL's territory, or to install underground
19 facilities. The additional cost of installing
20 underground facilities and serving new
21 customers from that underground system has
22 been discussed previously and is a major
23 concern to JEA. The crossing of facilities is
24 clearly an unsafe situation for both
25 utilities' employees and for the general

1 public. Further, the situation will worsen in
2 the future as JEA crosses FPL lines to pick up
3 its new customers while FPL does the same.
4 Clearly the best option for resolving problems
5 in these areas involves having each utility
6 move its existing lines to the appropriate
7 side of the boundary.

8 (3) In the areas where FPL has facilities
9 installed entirely in JEA's territory (i.e.,
10 Russell Sampson Road and Orangedale), there is
11 clearly a problem with JEA trying to pick up
12 new customers. Uneconomic duplication of
13 facilities, unsafe crossing of lines, and more
14 costly underground installations will result
15 throughout the area -- all to the detriment of
16 JEA, its ratepayers and the general public.
17 In a practical sense, four options are
18 available to resolve these issues:

19 (a) The territorial line can be re-drawn
20 giving the area and all future customers
21 to the utility presently serving the area
22 (in this case, FPL).

23 (b) The existing utility (FPL) can remain in
24 the area but service to new customers can
25 be provided by JEA through primary or

1 secondary metered service points. FPL
2 has refused to provide such service to
3 JEA.

4 (c) The facilities and existing customers can
5 be transferred to JEA, leaving the
6 territorial boundary line as defined by
7 the 1979 Agreement. FPL could be
8 compensated for this transfer.

9 (d) The facilities can be transferred to JEA,
10 leaving the territorial boundary line as
11 defined by the 1979 Agreement, while the
12 customers remain with FPL served by JEA
13 through meter points. As with (c), FPL
14 could be compensated for this transfer.

15 **Q. WHEN DID YOU FIRST BECOME AWARE OF THE MAGNITUDE OF**
16 **THE TERRITORIAL SERVICE PROBLEMS IN THIS PORTION OF**
17 **JEA'S TERRITORY?**

18 **A.** With the World Golf Village project, other
19 potential commercial projects, the construction of
20 a new I-95 interchange at Nine Mill Road, and
21 substantial residential growth, this area of our
22 service territory has been the focus of
23 considerable attention by JEA's Distribution
24 Engineering employees over the past few years. The
25 increased level of growth in JEA's territory in

1 northern St. Johns County has brought a number of
2 new customers to JEA in 1994 and 1995. From a
3 historical standpoint, many customers in JEA's
4 territory in northern St. Johns County had been
5 provided interim or temporary service by FPL
6 pursuant to Section 3.4 of the 1979 Agreement. In
7 the early 1994 time frame, JEA became aware of the
8 fact that for some period of time (probably back to
9 around 1990) FPL had discontinued the practice of
10 requesting release letters when new customers were
11 served in JEA's territory. As this was clearly a
12 violation of the 1979 Agreement, and in light of
13 the foregoing observation regarding growth
14 potential in the area, JEA began to work on re-
15 instituting the formal release procedure.

16 **Q. WHAT ACTION DID YOU TAKE?**

17 **A.** The JEA pursued two courses of action to address
18 this situation. First, on June 7, 1994, Ms. Vivian
19 Geohagan, JEA's Service Coordinator, sent a letter
20 to Mr. Ronald Holt, Director of Building and Codes
21 for St. Johns County, asking for his department's
22 assistance in properly directing all requests for
23 electrical permits in JEA's service territory to
24 JEA's attention. A copy of that letter is attached
25 hereto as Exhibit ____ (MB-5). Prior to that time,

1 requests for electrical permits in northern St.
2 Johns County and in JEA's territory were simply
3 routed to FPL if FPL was already providing service
4 in the area. In order to assist St. Johns County
5 with our request, we provided Mr. Holt's department
6 with a map detailing the territorial boundary line
7 and we met with several of his employees.

8 Second, we conducted field surveys of our
9 territory in northern St. Johns County and
10 determined that FPL presently was providing service
11 to approximately 400 customers in JEA's territory.
12 Of those 400 or so customers, some were pre-1979
13 Agreement "grandfathered" FPL customers and the
14 others were customers being provided
15 interim/temporary service by FPL pursuant to the
16 1979 Agreement. I worked with Mark Martin of FPL's
17 St. Augustine Office and we jointly developed an
18 official temporary service release letter that was
19 satisfactory to both parties.

20 **Q. HOW LONG HAVE THE PARTIES USED THIS RELEASE LETTER?**
21 **A.** The latest version of the release letter from JEA
22 to FPL has been in use since August 26, 1994. A
23 copy of one of the release letters is attached to
24 my testimony as Exhibit ____ (MB-6). Over the past
25 year, JEA has reluctantly released a number of new

1 customers to FPL in areas where FPL lines are
2 blocking JEA from providing service. Over the
3 June-August, 1994 time period, JEA attempted to
4 work this problem out with FPL. I had several
5 conversations with Mr. Martin and Sandy Sanderson,
6 FPL's External Affairs Manager, also working out of
7 FPL's St. Augustine Office. FPL refused to provide
8 JEA with either a primary or secondary metered
9 point of service so that JEA could provide service
10 in its territory to its customers. Mr. Sanderson
11 ultimately referred JEA to Ms. Lucille Wright as
12 the principal FPL employee to address this matter.

13 **Q. WHAT MEETINGS HAVE JEA AND FPL HAD REGARDING THIS**
14 **MATTER?**

15 A. I, along with John Norse, one of my engineers, met
16 in August of 1994 with Alan Weaver from FPL's
17 Construction Services section in St. Augustine.
18 The meeting was held in the field to discuss JEA's
19 planned addition of the line down County Road 210
20 from Greenbriar Road and west along County Road 16A
21 to State Road 13. This addition was required, in
22 large part, to improve reliability for JEA
23 customers in Orangedale. The principal concern for
24 JEA involved the presence of an FPL single-phase
25 lateral running east along the north side of County

1 Road 210 from County Road 16A. To accommodate the
2 JEA addition, it would be necessary for FPL to
3 relocate its facilities to the south side of County
4 Road 210 (which would place the line entirely in
5 JEA's territory); otherwise, JEA would have to
6 cross FPL's lines in several locations or incur the
7 additional expense of an underground installation.

8 In addition, the status of service to several
9 new customers in the area was discussed at the
10 meeting. As previously noted, JEA had recently
11 (June, 1994) made St. Johns County and FPL aware of
12 the need to get a written release letter from JEA
13 for any new customers served by FPL in JEA's
14 territory.

15 I also was involved in several meetings with
16 Lucille Wright and Mike Garman of FPL regarding
17 several territorial issues. Shel Ferdman from JEA
18 was present at all such meetings and on a few
19 occasions, Paul Abdullah, Director of System
20 Engineering, and Chris Western, one of my
21 engineers, were also in attendance. The initial
22 purpose of the meetings with Ms. Wright was to
23 address a small number of customers in southern
24 Nassau County for whom JEA had assumed
25 responsibility for providing service from

1 Okefenokee REA. As that issue was eventually
2 resolved to the satisfaction of both utilities,
3 discussions then moved to the problem in northern
4 St. Johns County.

5 Ms. Wright indicated that she had previously
6 spent some time studying the area (sometime during
7 1993), but noted that FPL had never formally
8 pursued a resolution to the problem. It was clear
9 that Ms. Wright, with support from legal, was
10 charged with meeting with JEA to work out a
11 solution to the problem. Nothing close to an
12 agreement acceptable to both parties ever
13 materialized. FPL's position was that service to
14 customers in JEA's territory constituted, in
15 effect, a modification of the territorial boundary
16 around and encompassing those areas. Further, that
17 the only direction that FPL was interested in
18 moving the official territorial line was north.
19 JEA's position was that the territorial line is
20 fixed and is located as described in the 1963 and
21 1979 Territorial Agreements. Also, JEA indicated
22 that the only reasonable and workable solution was
23 to move the FPL lines and to transfer those
24 customers that FPL was presently serving in JEA's
25 territory so that the territorial boundary area

1 would be cleaned up and clarified for the benefit
2 of both parties.

3 On the issue of JEA attempting to get past any
4 FPL "blockage" of JEA additions, Ms. Wright stated
5 that she would file a complaint with the FPSC if
6 JEA were to attempt to build past, over, or under
7 any existing FPL line. With the growth potential
8 in the area, there is clearly alot at stake for
9 both utilities. It was apparent to the JEA that
10 FPL was attempting to use the fact that it had an
11 established presence in the area to effectively
12 block JEA, preventing it from providing service to
13 new customers in a portion of its service
14 territory, and preventing it from making additions
15 in the area aimed at improving customer service
16 reliability.

17 JEA's next and only available course of action
18 was to file a petition with the FPSC seeking a
19 resolution to the conflict.

20 **Q. PLEASE EXPLAIN JEA'S CONTENTION THAT MAINTAINING**
21 **THE TERRITORIAL BOUNDARY ALONG ITS PRESENT ROUTE IS**
22 **THE BEST WORKABLE SOLUTION TO THIS DISPUTE.**

23 **A.** Although there are portions of the existing
24 territorial line where JEA presently has no
25 facilities installed and likewise, other areas

1 where FPL has none installed, the boundary has been
2 in place since 1963 and its location was reaffirmed
3 by both utilities in 1979. Each utility has been
4 working since that time with the understanding that
5 the line was as described in the Territorial
6 Agreement and each has been building lines and
7 substations in the area toward that end. Both JEA
8 and FPL have made substantial capital investments
9 in the area and, notwithstanding the previously
10 noted exceptions, both utilities have generally set
11 up their facilities along the boundary line agreed
12 to in the 1979 Territorial Agreement.

13 The territorial line as it exists today can be
14 easily maintained as the boundary between JEA and
15 FPL with minimal impact on each utility and minimal
16 impact on the existing customers in the area. With
17 the growth potential in the area, now is the time
18 to act to clean up the boundary area before a large
19 influx of new residential and commercial customers
20 makes the final resolution much more difficult and
21 expensive to implement. There are a number of
22 reasonable and workable solutions available to
23 effect the necessary reconciliation of customers
24 and facilities along the territorial line; several
25 such alternatives have been presented by JEA.

1 Q. WHAT IS YOUR RECOMMENDATION FOR THE RESOLUTION OF
2 THIS DISPUTE?

3 A. The existing territorial line is an excellent,
4 effective, and workable boundary between JEA and
5 FPL and is located generally between the existing
6 facilities of the two utilities. The best course
7 of action is to move a small amount of existing
8 facilities and transfer a small number of existing
9 customers such that the boundary area is clarified
10 for the benefit of both utilities and of future
11 customers in the area. Once this work is complete,
12 both utilities will be better positioned to plan
13 for and add to their distribution systems. Overall
14 costs will be minimized and reliability will be
15 enhanced. Also, future customers will know which
16 utility to approach for service additions.

17 Q. WHAT ABOUT THE POSSIBILITY OF REDRAWING THE LINE
18 AROUND THE LOCATIONS WHERE FPL IS PRESENTLY
19 SERVING?

20 A. As previously noted JEA feels that the existing
21 boundary, notably County Road 210, U.S. 1 and Palm
22 Valley Road, is best suited regarding the mutual
23 coexistence of both utilities. The roadways
24 involved, being large fixed landmarks, provide an
25 excellent boundary between the two utilities. In a

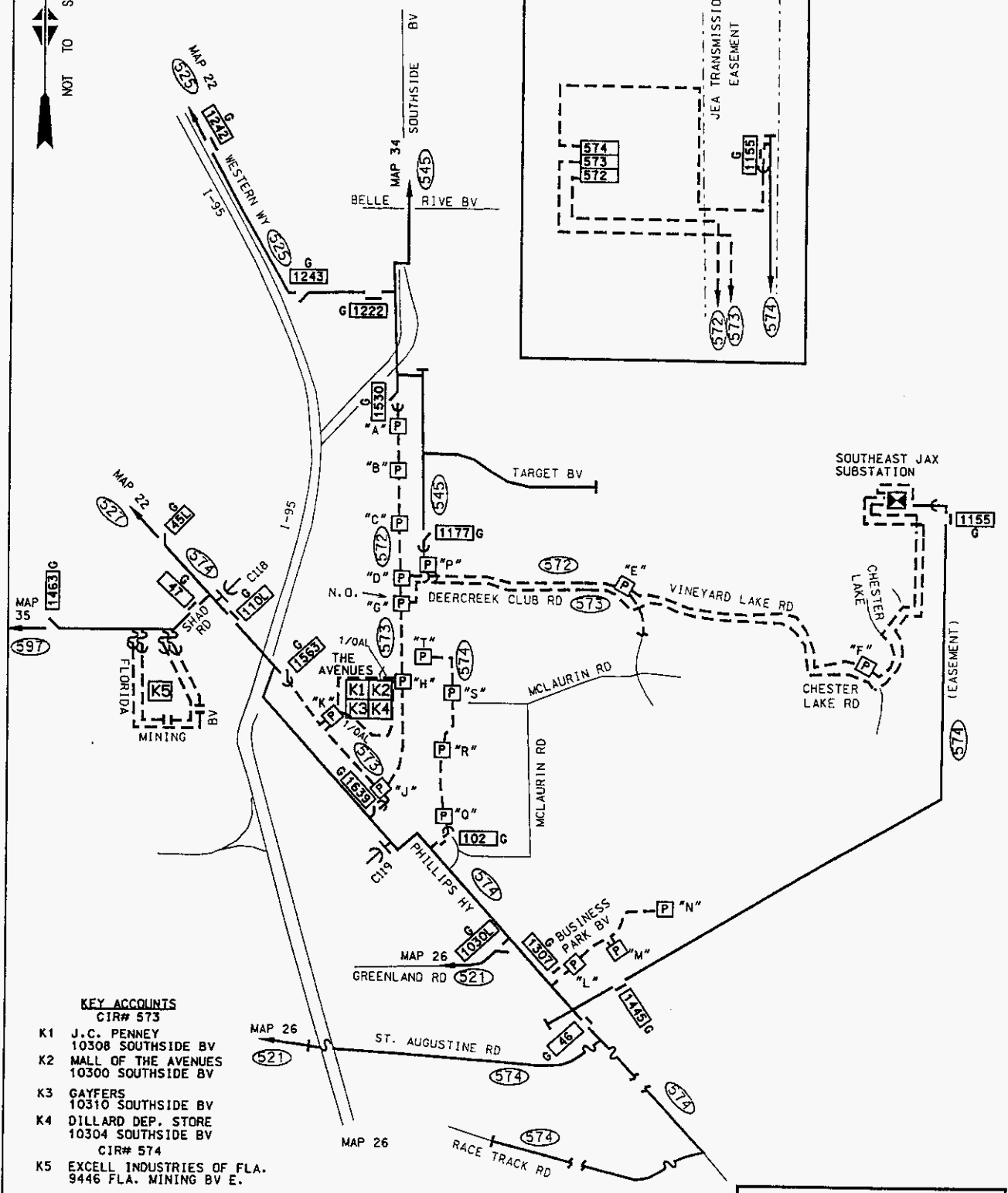
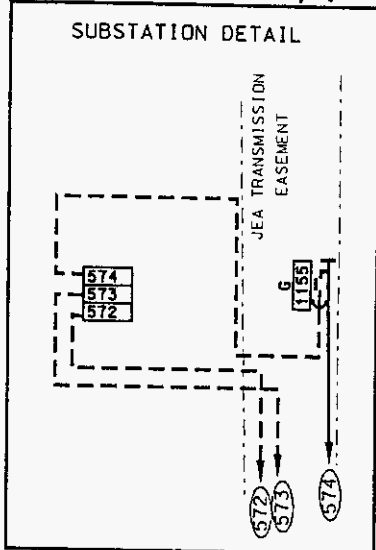
1 practical sense in fact, such roadways generally
2 serve as excellent territorial boundary lines,
3 second only to rivers and large bodies of water.
4 The associated rights-of-way are wide and there are
5 few problems with the utilities locating facilities
6 on each side of the road. With such an
7 arrangement, each utility may efficiently serve new
8 customers and the ability to loop their respective
9 distribution lines for improved reliability is
10 enhanced.

11 To locate a territorial line off such a road
12 through and/or between private property, as opposed
13 to along a road right-of-way, causes substantial
14 problems for both utilities. The utility whose
15 area is being encroached upon by the modification
16 is forced to either purchase expensive easements
17 along private property to get around the other
18 utility, or build unsafe and uneconomical
19 duplicative facilities. The other utility, while
20 its service territory is enlarged, will in all
21 likelihood be forced into serving the area through
22 a less reliable radial system.

23 Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?

24 A. Yes, it does.

25



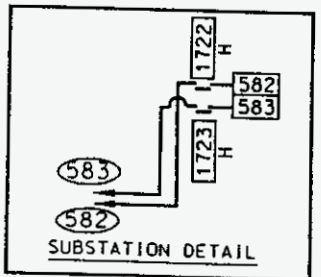
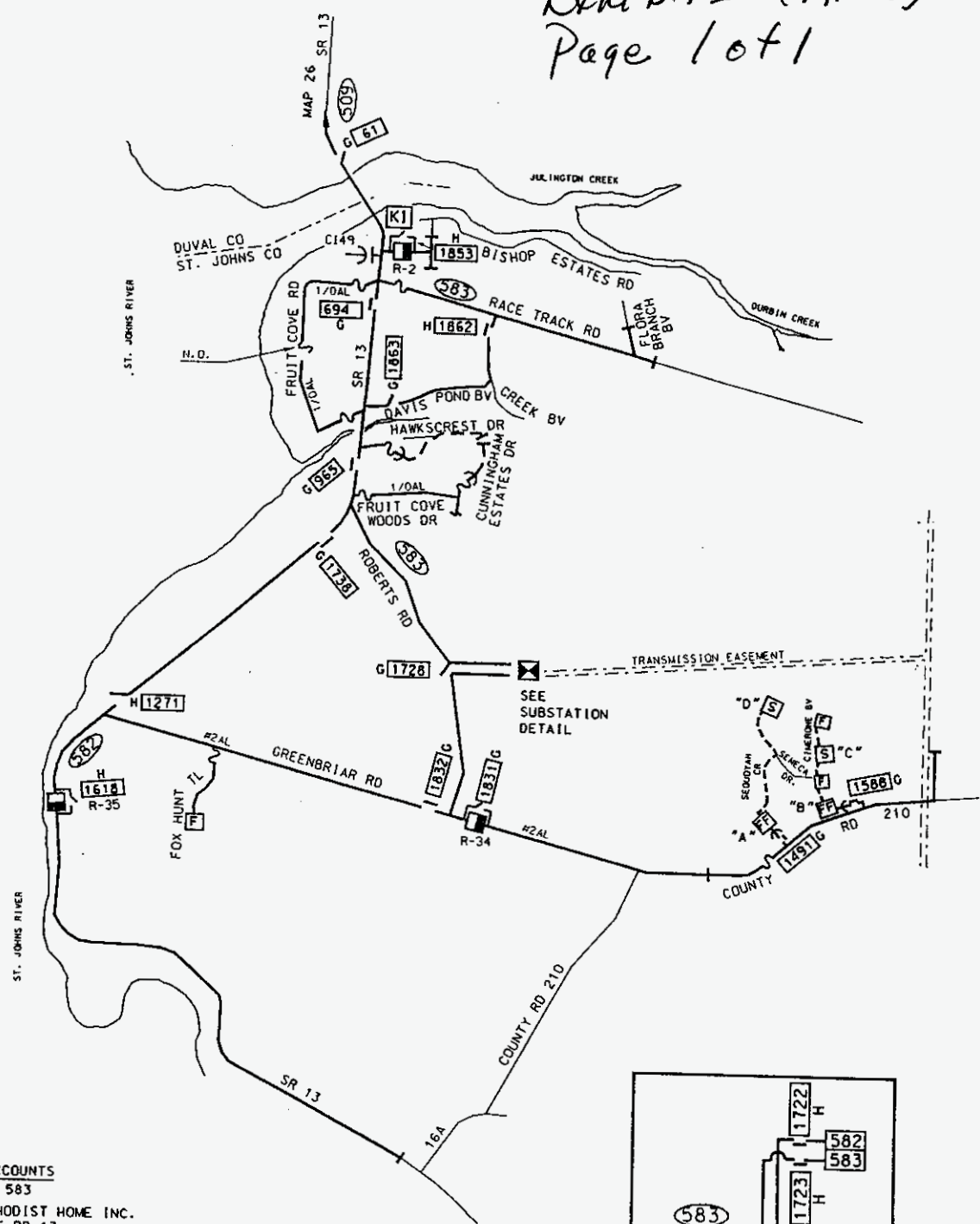
KEY ACCOUNTS
CIR# 573

- K1 J.C. PENNEY
10308 SOUTHSIDE BV
- K2 MALL OF THE AVENUES
10300 SOUTHSIDE BV
- K3 GAYFERS
10310 SOUTHSIDE BV
- K4 DILLARD DEP. STORE
10304 SOUTHSIDE BV
CIR# 574
- K5 EXCELL INDUSTRIES OF FLA.
9446 FLA. MINING BV E.

SEE SHEET 39.1 FOR
DETAILS OF SWITCHES
SHOWN ON THIS SHEET

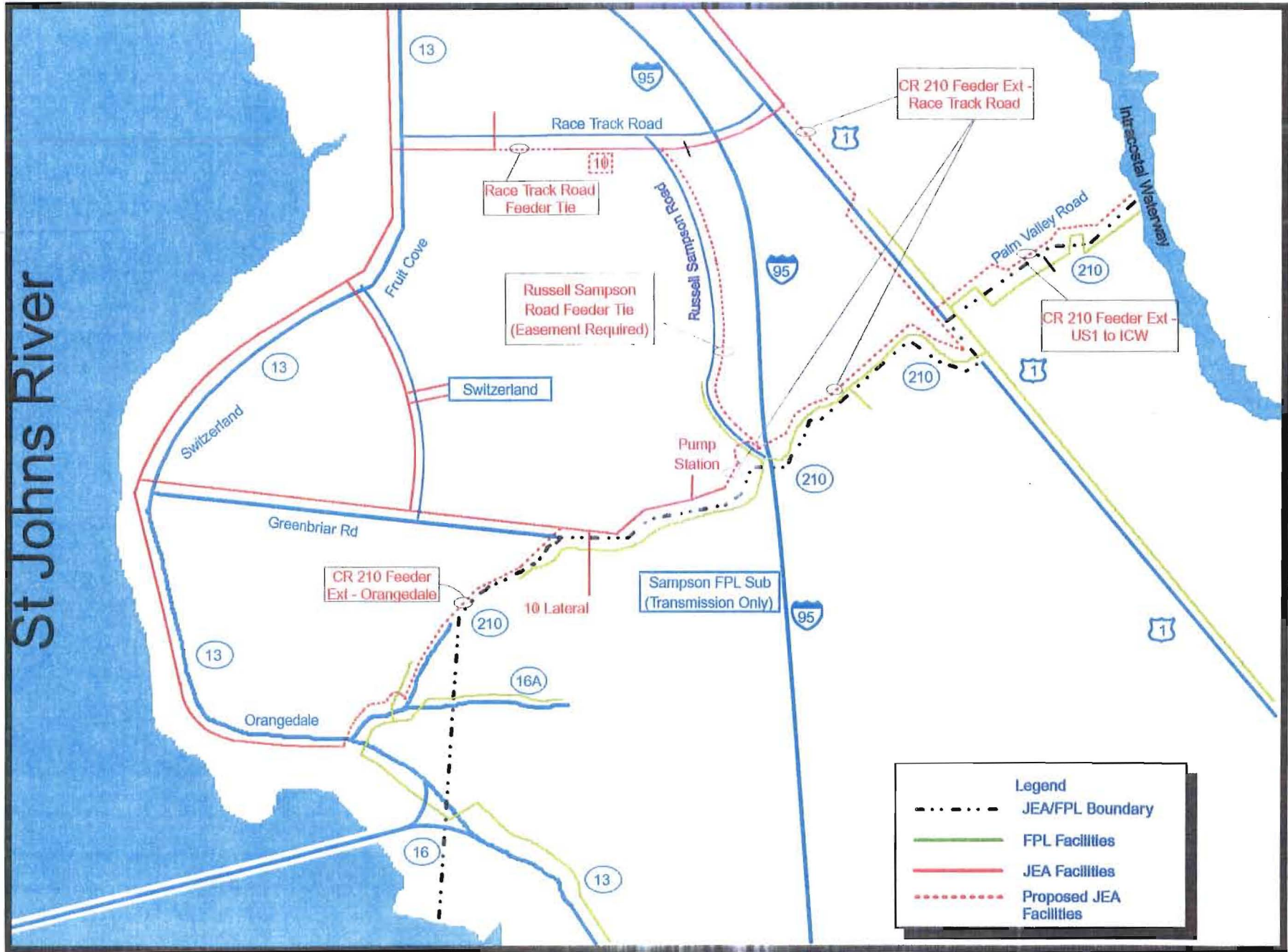
SOUTHEAST JAX 25 KV SUBSTATION MAP NO. 39		
	DATE	BY
DESIGNED:	04-06-90	GC
DRAWN:	03-07-94	NK
APPROVED:	04-06-90	CT
REVISED:	12-06-94	BJ
SUPERCEDES	10-17-94	V8

Exhibit - (MB-3)
Page 1 of 1



SWITZERLAND
25 KV SUBSTATION
MAP NO. 41

	DATE	BY
DESIGNED:	09-22-92	GC
DRAWN:	03-07-94	VB
APPROVED:	03-12-93	RW
REVISED:	12-06-94	BJ
SUPERCEDES	10-17-94	BJ



File: b.t - (48-4)
Page 1 of 1

Exhibit — (UB-6)
Page 1 of 1

JACKSONVILLE ELECTRIC AUTHORITY

21 WEST CHURCH STREET • JACKSONVILLE, FL 32202-3139



September 29, 1994

Florida Power & Light Company
P. O. Box 668
Bunnell, Florida 32110

Re: 216 Clatter Bridge Rd. St. Johns County Permit # 242048

Dear Sir:

JEA and FP&L are presently seeking a resolution to the interpretation of the territorial boundary in St. Johns County. FP&L has electrical distribution facilities in the area but has stated that, in the interest of good engineering practices and economic constraints, they cannot offer a secondary or primary metered service to JEA in order that JEA may provide service to this customer. To serve this and other customers in the area, JEA is planning to build distribution facilities in the near future; but, has no facilities installed at this time.

Accordingly, and in order that the above referenced customer may receive timely electric service, we temporarily release this service to FP&L until such time as JEA has lines in place to serve this customer. Currently, there are no electrical inspections on file with St. Johns County Building and Codes Department for this service.

Sincerely,

M. J. Brost, PE, Division Chief
Distribution Engineering

MJB:vfg

cc: Mr. Mark Martin, Superintendent, FP&L
Mrs. Virginia Langston, Office Manager, St. Johns County Building and Codes Department

Exhibit 4 — (48-5)
Page 1 of 2

JACKSONVILLE ELECTRIC AUTHORITY

21 WEST CHURCH STREET • JACKSONVILLE, FL 32202-3139



June 7, 1994

Mr. A. Roland Holt
Director, Building and Codes
St. Johns County
P. O. Drawer 349
St. Augustine, Florida 32085-0349

Dear Mr. Holt,

As per our conversation, I am enclosing an area map that delineates the agreed service area boundary between the JEA and FP&L.

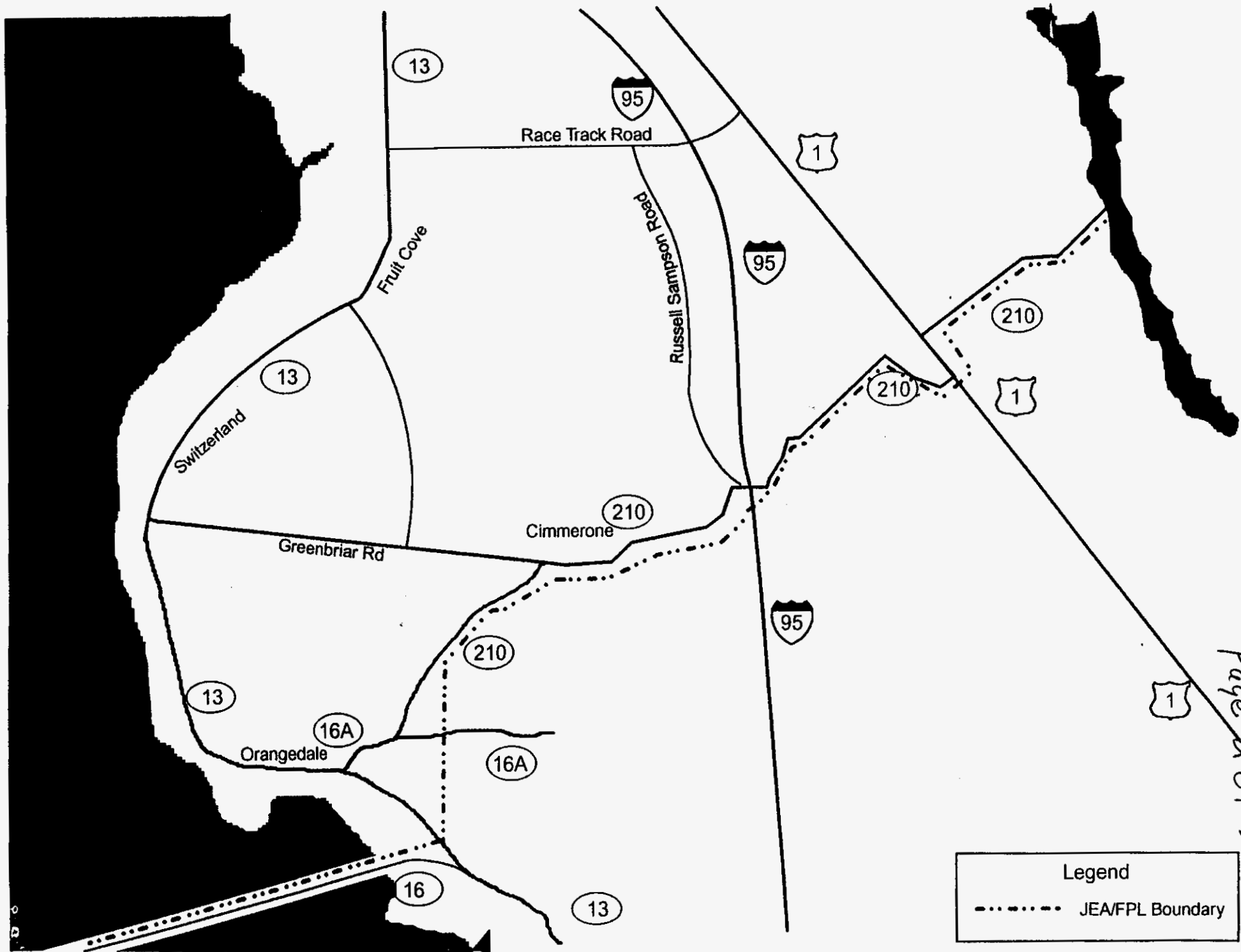
We request that all electrical permits from St. Johns County within the JEA's service area be routed to the JEA. We will forward to FP&L any permits that the JEA will not service within our service area.

If you have any questions, please advise. Your assistance in this matter is greatly appreciated.

With kind regards,

V. F. Geohagan
Service Coordinator

cc: M. J. Brost, Chief, JEA Distribution Engineering
H. F. Barrington, Supervisor, JEA General Services



Legend
 - - - - - JEA/FPL Boundary

Exhibit — (48-5)
 Page 2 of 2