

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

ORIGINAL

RECEIVED FPSC

JAN 28 PM 3:10

RECORDS AND REPORTING

January 28, 1999

HAND DELIVERED

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

990000-PH

Re: FPSC Rule 25-6.0185 - Electric utility Procedures for Long-Term Energy Emergencies

Dear Ms. Bayo:

In compliance with Rule 25-6.0185 enclosed are the original and fifteen (15) copies of Tampa Electric Company's Long Term Energy Emergency Plan for Fuel Supply Shortage.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMH _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPO _____
- RCH _____
- SEC _____
- WAS _____
- OTH _____

RECEIVED & FILED

Sincerely,

FPSC BUREAU OF RECORDS

James D. Beasley
James D. Beasley

JDB/pp

Enclosures

DOCUMENT NUMBER-DATE

01145 JAN 28 99

FPSC - RECORDS & REPORTING

ORIGINAL

1/27/99

TAMPA ELECTRIC COMPANY

**LONG TERM
ENERGY EMERGENCY PLAN**

FOR

FUEL SUPPLY SHORTAGE

TABLE OF CONTENTS

I. INTRODUCTION	1
II. PURPOSE	1
III. DEFINITIONS.....	1
IV. AUTHORITY	1
A. DECLARE EMERGENCY	1
B. ENERGY EMERGENCY COORDINATOR	3
C. IMPLEMENTATION PLAN.....	3
V. EMERGENCY PLAN	7
EMERGENCY PLAN SUMMARY	4
A. STEP A.....	7
B. STEP B.....	10
C. STEP C	12
D. STEP D	14
E. STEP E.....	16
VI. DETAILED DEPARTMENT PLANS FOR EACH STEP OF EMERGENCY.....	17
A. BUILDING SERVICES.....	17
B. BUSINESS MARKETING AND SALES.....	18
C. ENERGY MANAGEMENT SERVICES	19
D. ENVIRONMENTAL PLANNING	22
E. FIRM LOAD CURTAILMENT COORDINATOR.....	26
F. FUELS	26
G. GOVERNMENTAL / REGULATORY AFFAIRS	27
H. ENERGY DELIVERY ENGINEERING AND CONSTRUCTION	28
I. ENERGY SUPPLY	28
J. CORPORATE COMMUNICATIONS.....	30
K. WHOLESALE MARKETING AND SALES.....	32
L. SYSTEM OPERATIONS	33

TAMPA ELECTRIC COMPANY
LONG TERM ENERGY EMERGENCY PLAN
FOR FUEL SUPPLY SHORTAGE

I. INTRODUCTION

The uncertainty in fuel supply (both oil and coal) is beyond the control of prudent planning and has the potential for fuel shortages for both Tampa Electric Company(TEC) and the entire state. This could result in a long term electrical energy deficiency which would adversely affect all customers. Therefore, this emergency plan (Plan) was developed which will enable TEC to best cope with the energy shortage and thereby, protect the health, safety and welfare of its customers during the period of deficiency.

II. PURPOSE

The purpose of this Plan is to establish a systematic and effective means of anticipating, assessing and responding, in an appropriate and coordinated manner, to a long term energy emergency caused by a fuel supply shortage.

III. DEFINITIONS

A long term energy emergency exists when the utilities' fuel supplies are decreasing or are anticipated to decrease below a level adequate to provide for continuous service at required levels as established by its customer's normal energy needs. An energy emergency differs from a short term capacity emergency in that energy requirements cannot be met over an extended period. The period of advance warning and expected duration of an energy emergency is usually measured in terms of weeks or months, as opposed to hours or minutes for a short term capacity deficiency.

IV. AUTHORITY

A. DECLARE EMERGENCY

<u>Activity</u>	<u>Person Responsible</u>
1. Regularly monitor fuel inventories and system load and publish weekly fuel inventory projections.	Director, Fuels
2. Alert the Vice President who is authorized to declare an energy emergency (See 4 below) any time fuel supplies appear to be in jeopardy due to availability of and/or quality constraints and it is probable that Inventory levels will drop below desirable levels.	Director, Fuels

<u>Activity</u>	<u>Person Responsible</u>
<p>3. After an energy emergency is declared, or at the direction of the Vice President authorized to declare an energy emergency, the following procedure will be followed in determining the fuel supply situation and inventory plan.</p> <p>a. Monitor and prepare short term forecast of system load.</p> <p>b. Monitor and forecast fuel inventories (including reasonable delays or delivery problems).</p> <p>c. Using the above data, run the "Commit" Program and provide the amount of each type of fuel expected to be used to the Fuels Department. The estimated fuel consumption should be established on a daily basis for the first 30 days and then on a weekly basis for up to 75 days.</p> <p>d. Using the output of b and c above, prepare and distribute a daily or weekly report on the overall fuel supply situation.</p>	<p>Director, Energy Delivery Systems</p> <p>Director, Fuels</p> <p>Director, Energy Delivery Systems</p> <p>Director, Fuels</p>
<p>4. Declare an energy emergency when necessary and notify the Chairman of the FRCC Technical Advisory Group of the existence of a long term energy emergency on the Tampa Electric Company system. Also, declare when to move to each step in the plan and declare when the energy emergency is over.</p> <p>Implement all or any part of this Plan in cooperation with the FRCC. Implement the Fuel Supply Shortage Element of the Florida Electrical Emergency Contingency Plan upon the declaration of an Emergency Alert by the Florida Public Service Commission or upon the declaration of any Energy Emergency by the Governor of the State of Florida.</p>	<p>Vice President, Energy Supply Alternate: V. P. Energy Delivery</p>

B. ENERGY EMERGENCY COORDINATOR

<u>Activity</u>	<u>Person Responsible</u>
1. After the energy emergency is declared, the Energy Emergency Coordinator is required to coordinate all activities involved in implementing the Energy Emergency Plan.	Director, Energy Delivery Systems

C. IMPLEMENTATION PLAN

The individuals below will assist the Energy Emergency Coordinator and be responsible for implementing the part of the plan listed by their title.

<u>Activity</u>	<u>Person Responsible</u>
1. Expedite fuel procurement	Director, Fuels
1A Expedite water borne coal transportation	V.P. Energy Supply President, TECO Transport
2. Communicate with TEC employees	Assistant to V.P. Corp. Communications Director, Communication Services
3. Communicate with media and public	Assistant to V.P. Corp. Communications Director, Communication Services Director, Customer Services
4. Communicate with Governmental organizations	V.P. Governmental Affairs and V.P. Regulatory Affairs
5. Purchase power and control sales	Director, Wholesale Marketing and Sales Director, Business Marketing and Sales
6. Obtain approval to waive environmental restrictions	V.P. Energy Supply
7. Curtail TEC energy use	V.P. Corporate and Operating Services V.P. Energy Supply

- | | | |
|-----|---|--|
| 8. | Promote load conservation (voluntary and mandatory) | Director, Energy & Market Planning
Director, Business Marketing and Sales |
| 9. | Utilize load control | Director, Energy Delivery Systems |
| 10. | Curtail customer load | Firm Load Curtailment Coordinator |
| 11. | Modify system operations | Director, Energy Delivery Systems |

V. LONG-TERM ENERGY EMERGENCY PLAN - SUMMARY
The following shows the additional measures to be taken for each step

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
1. Expedite Fuel: Oil	Purchase any proper oil.	Determine types of oil available.	Purchase any satisfactory burnable oil.	Search for and purchase <u>any</u> usable fuel.	
Coal	Purchase any proper coal. Expedite coal transportation.	Purchase any satisfactory burnable coal. Plan fuel transfers.			
2. Communicate With TEC Employees	Issue Groupwise and Intranet announcements.				
3. Communicate With Public and Media	Issue news release. Provide daily status briefing. Promote load conservation.				
4. Communicate With Governmental Organizations	Coordinate with Corporate Communications in notifying appropriate agencies. Request Governor to waive regulations.	Request legal authority for actions to be taken in this step. Update governmental agencies.			
5. Wholesale Market - Power Sales and Purchases	Stop non-firm sales to wholesale customers. Request 5% KWH reduction from firm wholesale customers.	Non-emergency power purchases are arranged and transmission reserved. Request 15% KWH reduction from firm wholesale customers.	Reduce firm sales to a min. Purchase all available non-emergency power. Request 30% KWH reduction from firm wholesale customers.	Reduce firm sales to a minimum. Purchase all available emergency and non-emergency power. Request 50% KWH reduction from firm wholesale customers.	Notify wholesale customers of firm load curtailment. Continue purchasing all available power.

*Refers to total fuel supply in pipe line. Consideration is to be given to the "realistic days supply" which is defined as the "days supply" calculated as though there would be no fuels receipts but then adjusted for realistic, expected fuel deliveries.

V. LONG-TERM ENERGY EMERGENCY PLAN - SUMMARY
The following shows the additional measures to be taken for each step

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
6. Waive Environmental Restrictions	Requests Governor to suspend SIP of CAA.				
7. Curtail TEC Energy Use: Offices and Operation Center	Curtail non-essential energy uses. Reduce KWH's by 10%. Monitor usage weekly.	Reduce KWH's BY 20%. Set thermostats to 65° for heating and to 80° for cooling. Cut off 25% of exterior lights. Cut off hot water heaters.	Further reduce A/C. Cut off 50% of exterior lights. Close leisure house.	Cut off all but critical A/C and heating.	
8. Promote Load Conservation: Voluntary	Request 5% KWH reduction. Educate customers. Advertise conservation.	Request 15% KWH reduction. Adjust thermostats -5%. Cut out indoor & outdoor advertising lights. Cut out flood lighting as possible.	Commercial & Industrial: Request 30% KWH reduction. Set thermostats to 65° to 80°. Encourage alternate energy usage. Reduce operating hours if necessary. Residential: Stop using A/C, heating, H.W.H., dryers, dish washers, etc. Ban displays & window lighting. Ban in commercial establishments: a) A/C and heating during nonuse hours and in unoccupied areas	Commercial & Industrial: Request 50% KWH reduction.	
Mandatory		Ban night sports. Close lighted parks, etc. Ban non-essential flood and outdoor advertising lighting.		Reduce street and area lighting where possible.	

b) Non-essential use of hot water.

V. LONG-TERM ENERGY EMERGENCY PLAN - SUMMARY

The following shows the additional measures to be taken for each step

ACTION	50 Days* Emergency Declared STEP A	35 Days STEP B	25 Days STEP C	15 Days STEP D	10 Days STEP E
9. Utilize Load Control	Heat & A/C off 2-4 hrs. W.H. off 4-6 hrs.	Heat & A/C off 6 hrs. W.H. off 8-10 hrs.	Heat & A/C off 6-8 hrs. W.H. off 12-14 hrs.	Heat & A/C off 8-10 hrs. W.H. off 16-18 hrs.	
10. Curtail Customer Load					Implement "Load Curtailment Plan."
11. Modify System Operations	Review maintenance schedule Place 75% of Op. Margin on non-spin reserve.	Modify unit dispatch. Cycle units off-line.	Use emergency line ratings. Reduce voltage 2 to 4%.		Implement orderly shutdown of units as required. Insure power avail. to plants.

V. EMERGENCY PLAN

When a long term Energy Emergency Plan is declared, the following steps and actions may be taken so as to minimize the effect of the fuel shortage upon customers.

A. STEP A

After the Energy Emergency has been declared and the total fuel supply* has decreased to 50 days and a continued downward trend is anticipated, the following measures should be implemented and continued for the duration of the emergency.

1. Expedite Fuel Procurement:
 - a. Oil - Request TEC suppliers to locate and acquire any oil of the proper quality to meet both environmental and operational constraints.
 - b. Coal - Attempt to purchase available coal from any sources that meet both environmental and operational constraints.
 - c. Continue inventory tracking, forecasting, and reporting.
- 1A. Expedite water borne coal transportation:

Establish priorities with transportation companies to insure prompt delivery of TEC coal in adequate quantities. Also, when required, assist the transportation companies in obtaining ample supplies of diesel fuel and other petroleum products to operate tug boats in transporting coal to TEC.
2. Communicate with TEC Employees:
 - a. Issue newsletter bulletin that explains why the fuel shortage has occurred, provides an overview of the Emergency Plan and communicates details of Step A.
 - b. Provide updates as needed via Groupwise and/or Intranet to employees.
3. Communicate with Public and Media
 - a. Issue news release to the news media. It will explain why the fuel shortage has occurred, communicate actions TEC is taking to deal with the problem, and will provide specific conservation information to customers.
 - b. Provide daily briefings to media on status of emergency.
 - c. Promote load conservation by the public via advertisements that

will provide customers with specific information on how to conserve electricity.

*Refers to the fuel on the property and that already exists in the delivery "pipeline".

4. Communicate with Governmental Organizations:

a. Notify appropriate agencies.

5. Wholesale Power Sales and Purchases:

a. Discontinue non-firm sales.

b. Contact firm wholesale customers and request voluntary 5% load reduction.

6. Waive Environmental Restrictions:

Start procedures to obtain approval of the Florida Governor and the President of the United States to suspend the State Implementation Plan (SIP) requirements of the Clean Air Act (CAA) so as to be able to burn available fuels that may not meet the environmental constraints.

7. Curtail TEC Energy Use:

Curtail all non essential uses of electrical energy at all utility owned facilities. This should reduce TEC megawatt hour usage by at least 10% at all offices and operation centers. Monitor usage of energy weekly.

8. Promote Load Conservation:

a. Voluntary:

(1) Increase efforts to educate customers in the efficient use of electrical equipment and supplies.

(2) Inform customers through advertising programs of specific ways to conserve electric energy.

(3) Request all customers to reduce their kilowatt hour usage by at least 5%. Provide examples of how this can be achieved.

b. Mandatory - No action required.

9. Utilize Load Control:

Utilize direct load control to reduce system demand on peak periods and optimize the use of TEC's base load generating units by increasing off times of air conditioning and heating to 2 to 4 hours per day. Water heating will be off 4 to 6 hours per day.

10. Curtail Customer Load - No action required.
11. Modify System Operations:
 - a. Maintain 75% of the Operating Margin as non spinning reserve.
 - b. Review the maintenance schedule to optimize use of obtainable fuels.

B. STEP B

If the total fuel supply has decreased to 35 days and a continued downward trend is anticipated, the following additional measures should be implemented.

1. Expedite Fuel Procurement:
 - a. Oil - Suppliers of oil should be solicited by telephone to determine types of oil available for purchase as well as quantity and delivery time. Maximize on site inventory.
 - b. Coal - Purchase any coal that is available and can be burned in the TEC power plants.
 - c. Develop plans for any physical transfers of fuel that would be practical.
 - d. Continue inventory tracking, forecasting and reporting.
- 1A. Expedite water borne coal transportation:
 - a. Review priorities to assure prompt delivery.
2. Communicate with TEC Employees:
 - a. Issue updated Groupwise and Intranet announcements to employees.
3. Communicate with Public and Media:
 - a. Issue updated news statement.
 - b. Continue advertisements telling customers how to conserve electricity.
4. Communicate with Governmental Organizations:
 - a. Request legal authority from the proper governmental organization for the actions to be taken in steps 6 -11.
 - b. Update appropriate governmental agencies.
5. Wholesale Power Sales and Purchases:
 - a. Contact cogenerators, utilities and power marketers and arrange

non-emergency power purchases.

- b. Identify electrical transmission availability via OASIS.
 - c. Contact all firm wholesale customers and request 15% load reduction.
6. Waive Environmental Restrictions - No new action required.
7. Curtail TEC Energy Use:
- a. Reduce energy use by at least 20% at all offices and operation centers.
 - b. Discontinue the use of lunchroom kitchens, turn off 25% of exterior lights, turn off hot water heaters.
 - c. Reset and lock air conditioning thermostats and heating thermostats to 80° and 65°, respectively.
8. Promote Load Conservation:
- a. Voluntary:
 - (1) Request residential and commercial customers to cut back on essential usage and to adjust thermostat settings 5° down from normal during a heating season and 5° up from a normal setting during a cooling season.
 - (2) Request customers to temporarily discontinue use of indoor advertising devices, outdoor displays and flood lighting except that essential for safety and security.
 - (3) Request all customers to reduce their kilowatt hour usage by at least 15%. Provide specific examples of how this can be achieved.
 - b. Mandatory:
 - (1) Ban all nighttime sporting activities. Close all lighted parks, tennis courts, golf courses, etc. Also, eliminate nonessential outdoor flood lighting and restrict the use of outdoor advertising lighting.
9. Utilize Load Control:
- a. Increase off times of controlled space heating and air conditioners to 6 hours per day. Water heaters will be off 8 to 10 hours per day.
10. Curtail Customer Load - No action required.

11. **Modify System Operations:**
 - a. Modify unit dispatch load units with obtainable fuels (other than No. 2 oil) first, and then load units which burn the fuel in short supply.
 - b. Where possible, cycle units fueled by short supply fuel off line and still allow the same demand and energy output.

C. STEP C

When the total fuel supply has decreased to 25 days and a continued downward trend is anticipated, the following additional measures should be implemented:

1. **Expedite Fuel Procurement:**
 - a. Oil - Locate and purchase any oil available which would satisfactorily burn in TEC power plants.
 - b. Coal - Locate and purchase any usable coal.
 - c. Implement physical transfers of fuel that is necessary and practical.
 - d. Continue inventory tracking, forecasting and reporting.
- 1A. **Expedite water borne coal transportation:**
 - a. Review priorities to assure prompt delivery.
2. **Communicate with TEC Employees:**
 - a. Issue updated Groupwise and Intranet announcement to employees.
3. **Communicate with Public and Media:**
 - a. Issue updated news statement.
 - b. Continue advertising conservation.
4. **Communicate with Governmental Organizations:**
 - a. Request legal authority from the proper governmental agency for the actions to be taken in steps 6-11.
 - b. Update governmental agencies.
5. **Wholesale Power Sales and Purchases:**
 - a. Purchase all available non-emergency power.
 - b. Contact other utilities regarding potential emergency power

- purchases.
 - c. Contact all firm wholesale customers and request 30% load reduction.
 - d. Reduce firm sales to minimums based on individual contracts.
6. Waive Environmental Restrictions - No new action required.
7. Curtail TEC Energy Use:
- a. Discontinue the use of air conditioning units serving large areas with a small number of people (moving the people as necessary).
 - b. Turn off at least 50% of all exterior lights and discontinue the use of Leisure House facilities.
8. Promote Load Conservation:
- a. Voluntary:
 - (1) Direct residential customers to further reduce energy consumption by stopping use of certain electrical services such as air conditioning, heating, hot water heaters, clothes dryers, dish washers and other convenience devices and equipment.
 - (2) Conditioned offices and buildings other than critical services such as hospitals will be directed to lower thermostat settings to 65° during the heating season and raise the thermostat settings to 80° during cooling season.
 - (3) Commercial establishments, institutional facilities, public and private schools, office buildings and industrial plants will be directed to further reduce their consumption which may require a reduction in their operating hours.
 - (4) Encourage customer use of generation and alternate energy supplies.
 - (5) Request all commercial and industrial customers to reduce their kilowatt hour usage by at least 30%. Provide specific examples of how this can be achieved.
 - b. Mandatory:
 - (1) In commercial establishments, ban all non essential use of hot water.
 - (2) Elimination of window and display lighting.
 - (3) Ban all air conditioning and heating during non use hours and in unoccupied areas of commercial establishments.

9. Utilize Load Control:
 - a. Increase air conditioning and heating off time to 6 to 8 hours per day. Water heaters will be off 12 to 14 hours per day.
10. Curtail Customer Load - No action required.
11. Modify System Operations:
 - a. Implement emergency line ratings so as to increase import capability.
 - b. Lower system distribution voltage 2 to 4 percent where it is expedient to do so.

D. STEP D

When the total fuel supply has decreased to 15 days supply and a continued downward trend is anticipated, the following additional measures should be implemented.

1. Expedite Fuel Procurement:
 - a. Investigate all possible fuel sources in search of any usable fuel.
 - b. Continue inventory tracking, forecasting and reporting.
2. Communicate with TEC Employees:
 - a. Issue Groupwise and Intranet announcement. Emphasize that most customers will experience rotating blackouts and why.
3. Communicate with Public and Media:
 - a. Issue updated news statement explaining that most customers will experience rotating blackouts and why.
4. Communicate with Governmental Organizations:
 - a. Request legal authority from the proper governmental agencies for the actions to be taken in steps 6-11.
 - b. Update appropriate governmental agencies. In particular, advise them of customer load curtailment and its impact on their activities.
5. Wholesale Power Sales and Purchases:
 - a. Purchase all available emergency and non-emergency power.
 - b. Request 50% load reduction from all firm wholesale customers.
 - c. Maintain firm sales minimums and notify firm wholesale

customers of impending load curtailment.

6. Waive Environmental Restrictions - No new action required.
7. Curtail TEC Energy Use:
 - a. Eliminate all but critical air conditioning and heating such as that for microwaves and computer facilities.
8. Promote Load Conservation:
 - a. Voluntary:
 - (1) Request all commercial and industrial customers to reduce their kilowatt hour usage by at least 50%. Provide specific examples of how this can be achieved.
 - b. Mandatory:
 - (1) Reduce street and area lighting where possible.
 - (2) Discontinue service to interruptible customers.
9. Utilize Load Control:
 - a. Increase air conditioning and heating off periods to at least 8 to 10 hours per day. Water heaters will be off 16 to 18 hours per day.
10. Curtail Customer Load:

The implementation of this step will result in the interruption of electrical service to our customers on a rotating basis. The periods of interruption to electrical service will be rotated among the service areas so that no one area will be without electricity for an unduly long period of time.

Whenever possible during such emergencies, the Company will give priority for service to critical customers such as hospitals, vital parts of military installations and major airports, major TV stations, and water and sewer facilities where no emergency power source is available.

The TEC Load Curtailment Plan will be used in determining which circuits or loads should be curtailed for a Long Term Energy Emergency. Application of this Plan will be made by company personnel in the exercise of their judgment according to circumstances existing at the time of the emergency. The selection will be based upon giving minimal disruption of convenience and general social and economic well being of the TEC service area, considering practical implementation procedures and effectiveness as well as community and governmental response. These actions can result in some customer's service being interrupted more than others.

If the energy shortage is long enough and severe enough, it may become necessary to implement additional interruptions of service that result in moderate or even severe disruption to the community.

E. STEP E

When the total fuel supply has decreased to the area of 10 days and a continued downward trend is expected, the following additional measures should be implemented:

1. Expedite Fuel Procurement - No new action required.
2. Communicate with TEC Employees:
 - a. Issue updated Groupwise and Intranet announcement.
3. Communicate with Public and Media:
 - a. Issue updated news statement.
4. Communicate with Governmental Organizations:
 - a. Update appropriate governmental agencies.
5. Wholesale Power Sales and Purchases.
 - a. Notify firm wholesale customers of their contribution to firm load curtailment.
 - b. Continue purchasing all available power.
6. Waive Environmental restrictions - No new action required.
7. Curtail TEC Energy Use - No new action required.
8. Promote Load Conservation - No new action required.
9. Utilize Load Control - No new action required.
10. Curtail Customer Load - No new action required.
11. Modify System Operations:
 - a. Implement plans to insure the orderly shut down of all units burning the fuel in short supply in the event the fuel is exhausted.
 - b. Implement plans to insure power availability to all power plants and fuel handling facilities.

VI. DETAILED DEPARTMENT PLANS FOR EACH STEP OF EMERGENCY

A. BUILDING SERVICES

Upon declaration of a long term energy emergency, the Building Services Department will be responsible for the following actions:

1. Step A - Curtail all non essential uses of electric energy at all utility owned facilities. This should reduce TEC Kwh usage by at least 10% at all offices and operation centers. Some measures to be taken are:
 - a. Turn off all unnecessary lights i.e., work areas, conference rooms and hallways.
 - b. Each department head should inform their employees (meeting/memo) to conserve electricity. This is in addition to informational releases by the Public Affairs Department.
 - c. Refrain from using any piece of equipment requiring electrical power that can be delayed for a long period of time.
 - d. The Meter Reading Department will take weekly readings at all TEC facilities and provide information for monitoring to the Building Service Department.
 - e. The Building Service Department will assist those departments not meeting their reduction goal by making additional recommendations.
 - f. The Building Service Department will provide the Energy Emergency Coordinator the results of the weekly monitoring.
 - g. The Building Service Department will take such actions recommended by the Energy Emergency Coordinator.
2. Step B - Reduce TEC Kwh usage 20% at all offices and operation centers. Some additional measures to achieve this are:
 - a. Discontinue the use of lunchroom kitchens i.e., stoves, microwaves and refrigerators.
 - b. Turn off 25% of exterior lights. Each department head and/or building landlord will be responsible for doing this. The Building Service Department will assist those departments who need help in achieving this goal.
 - c. The Building Service Department will turn off all hot water heaters.

- d. The Building Service Department will reset and lock all air conditioning thermostats to 80° and 65°, respectively.
3. Step C -
 - a. Turn off at least 50% of all exterior lights.
 - b. Discontinue the use of all Leisure House facilities.
 - c. Discontinue the use of air conditioning units servicing large areas with a small number of people. This will involve the moving of some personnel.
4. Step D - Eliminate all but critical air conditioning and heating i.e., microwave and computer facilities.

B. BUSINESS MARKETING AND SALES

Upon declaration of a long term energy emergency, the Business Marketing and Sales Department, with the cooperation of the Conservation and Load Management Department, will be responsible for the following steps: (These goals will generally be achievable, however, consideration must be given to the general social and economic well-being of the TEC service area, as well as community and governmental response).

1. Step A - Business Marketing and Sales account managers will contact all assigned commercial and industrial customers (including interruptible load customers) and advise them of the fuel shortage and the need to curtail their load by 5% until further notice. They will also be advised of the potential for further curtailment if the fuel supply continues to diminish.
2. Step B - The Business Marketing and Sales account managers will contact all assigned commercial/industrial customers (including interruptible load customers) and advise them the fuel supply has diminished to a point which makes it necessary to request a further curtailment of 10% for a total at this point of 15% load curtailment until further notice. Also, advise them of the specific conservation measures which should be taken as stated in Section VI. C.
3. Step C - The Business Marketing and Sales account managers will contact all assigned commercial and industrial customers (including interruptible load customers) and advise them the fuel supply has diminished to a point which makes it necessary to request a further curtailment of 15% for a total at this point of 30% load curtailment until further notice. Also, advise them of the specific conservation measures which should be taken as stated in Section VI. C.
4. Step D - The Business Marketing and Sales account managers will contact all assigned commercial and industrial customers (including interruptible load customers) and advise them the fuel supply has diminished to a point which makes it necessary to request a further

curtailment of 20% for a total at this point of 50% load curtailment until further notice. Also, advise them of the specific conservation measures which should be taken as stated in Section VI .C.

5. Step E - The Business Marketing and Sales account managers will contact all commercial and industrial customers (including interruptible load customers) and advise them of the continued need to maintain all load curtailment action until further notice.

Note: In all steps, the Business Marketing and Sales Department will:

- a. Maintain communications with each interruptible load customer for the purpose of providing status reports on the fuel shortage emergency and answering any questions.
- b. Be responsible for communicating with each interruptible load customer upon restoring gradual load to each customer as he was for the curtailment process. The restoration process will follow basically the same steps as curtailment, however, in reverse.

C. ENERGY MANAGEMENT SERVICES

Upon the declaration of a long term energy emergency, the Energy Management Services Department, with the cooperation of the Business Marketing and Sales Department, will be responsible for the steps: (These goals will generally be achievable, however, considerations must be given to the general social and economic well being of the TEC service area, as well as community and governmental response).

1. **Step A - Promote Load Conservation:**
 - a. **Voluntary Measures:**
 - (1) Inform customers through advertising programs of specific ways to conserve electric energy.
 - (2) Educate customers in the efficient and wise use of electrical equipment and appliances.
 - (3) Request all customers to curtail their load by 5%.
 - b. **Mandatory Measures - No action required.**
2. **Step B - Promote Load Conservation:**
 - a. **Voluntary Measures:**
 - (1) Announce to the public by newspaper, television and radio that an electric supply emergency exists and that they are being requested by the Company to implement Step B of Load Reduction Program.

- (2) Direct commercial customers to temporarily discontinue use of indoor advertising devices, outdoor displays and flood lighting except that is essential for safety and security.
 - (3) Request residential and commercial customers to do without all non essential electrical services, cut back on essential usage and adjust thermostat setting 5° down from a normal setting during a heating season and 5° up from a normal setting during a cooling season.
 - (4) Notify the public daily through news media as to the status of the Company's electric supply emergency and the extent to which the emergency plan is working.
- b. Mandatory Measures:
- (1) Initiate a governmental ban on all night time sporting activities, including closure of all lighted parks, tennis courts, golf courses, etc.
 - (2) Eliminate non essential outdoor flood lighting, and restrict the use of outdoor advertising lighting.
3. Step C - Promote Load Conservation:
- a. Voluntary Measures Residential:
- (1) Announce to the public that the Company's electric energy emergency supply continues to worsen and that it is requesting its customers to control and cease use of certain electric energy consuming devices.
 - (2) Direct residential customers to further reduce energy consumption by eliminating use of non essential electrical services, such as electric hot water heaters, clothes dryers, dishwashers, air conditioning, heating and other convenience devices and equipment.
 - (3) Notify customers daily through news media as to the status of the electric supply emergency and the extent to which the plan is working.
- b. Voluntary Measures: Commercial:
- (1) Direct conditioned offices and buildings other than critical services such as hospitals to lower thermostat settings to 65° during the heating season and raise thermostat to 80° during the cooling season.
 - (2) Direct commercial establishments, institutional facilities, public and private schools, office buildings and industrial

plants to further reduce their consumption which may require a reduction in their operating hours.

- (3) Encourage customer use of generation and alternate energy supplies.
 - (4) Ask all commercial and industrial customers to curtail their load by 30%.
 - c. Mandatory Measures: Residential - No new action required.
 - d. Mandatory Measures: Commercial:
 - (1) Eliminate window and display lighting.
 - (2) Ban air conditioning and heating during non use hours.
 - (3) Ban air conditioning and heating in unoccupied areas.
 - (4) Ban all non essential hot water use. Exceptions: Medical facilities, educational facilities and food establishments.
4. Step D - Promote Load Conservation:
- a. Voluntary Measures: Residential
 - (1) Announce to the public that the electric supply continues to deteriorate and that the Company's rotating feeder disconnect plan, which will interrupt electrical service mainly to residential and small commercial customers for specified periods of time, will be implemented to achieve capacity and energy reduction as dictated by the electric supply emergency. This plan will allow for feeder disconnect as often as required to achieve desired results.
 - b. Voluntary Measures: Commercial
 - (1) Encourage strict temperature control of HVAC systems.
 - (2) Ask all commercial and industrial customers to curtail their load by 50%.
 - c. Mandatory Measures: Street and Area Lighting
 - (1) Reduce exterior TEC Street and Area Lighting Systems as practical within prudent guidelines.
5. Step E - Residential/Commercial/Industrial Customer Action:
- a. Voluntary Measures:
 - (1) Continue observance of previous four steps.

- b. Mandatory Measures:
 - (1) Begin rotating blackouts.

D. ENVIRONMENTAL PLANNING

Upon the declaration of an energy emergency the Environmental Planning Department will be responsible for the following actions:

- 1. Step A -To obtain the most expeditious relief, so as to be able to burn available fuels having a higher content of sulfur, TEC would petition the Governor of Florida. Following an open public meeting on the action, a Hearing Officer would issue a recommended order to the Governor which would form the basis for his decision on whether to petition the President for authority to suspend the SIP requirements of the CAA.

At the public hearing, the following information will most likely be required by TEC:

- a. The nature and extent of the energy emergency;
- b. Current and projected unemployment impacts associated with the energy emergency;
- c. Current and projected loss of necessary energy supplies for residential use associated with the energy emergency;
- d. Alternative strategies including conservation, alternative fuels and power wheeling for emergency and the consequences of these strategies on unemployment and on residential energy supply;
- e. Amount of energy savings expected to result from temporary suspension of portions of the implementation plan.
- f. To the extent possible, pollutant emission levels both before and after the proposed temporary suspension of portions of the implementation plan; and
- g. To the extent possible, preliminary assessment of the air quality and health effect impacts of the proposed temporary suspension of portions of the implementation plan.

Attachments: Petition Form

BEFORE THE STATE OF FLORIDA

OFFICE OF GOVERNOR

In The Matter of:)
Petition for Declaration)
of Energy Emergency and)
Other Relief;)

TAMPA ELECTRIC COMPANY

Petitioner)

Petitioner, TAMPA ELECTRIC COMPANY, pursuant to Chapters 120, 377 and 252, Florida Statutes, and Section 110(f) of the Clean Air Act Amendments of 1977, U.S.C. § 7401 et seq., hereby requests that the Governor of the State of Florida petition the President of the United States to determine that a national or regional energy emergency exists of such severity that (1) a temporary suspension of portions of Chapter 62-2, Florida Administrative Code (FAC) is necessary and (2) other means of responding to the energy emergency may be inadequate. In support of these request, Petitioner states:

IDENTIFICATION OF PARTIES

1. The name and address of Petitioner is TAMPA ELECTRIC COMPANY, Post Office, Box 111, Tampa, Florida 33601.
2. (Identify any other known parties).

BACKGROUND

3. Petitioner is the owner and operator of various steam electric power plants located in Hillsborough County, Florida, that are subject to regulation by the Department of Environmental Protection (DEP) and the Environmental Protection Commission of Hillsborough County (EPCHC) and the provisions of the Florida State Implementation Plan (SIP) contained in Chapter 62-2, FAC, regulating sources of air pollution.
4. Electric generating units owned by Petitioner located at the Francis J. Gannon Generating Station and Big Bend Generating Station in Hillsborough County, Florida, currently utilize coal as a primary energy source. Electric generating units owned by Petitioner and located at the Hookers Point Generating Station in Hillsborough County, Florida, currently utilize oil as a primary source. Electric generating units owned by Petitioner located at the Polk Power Station in Polk County, Florida, currently utilize gasified coal as a primary energy source. Electric generating units

owned by Petitioner located at the Phillips Power Station in Highland County, Florida currently utilize oil as a primary energy source.

5. Petitioner currently serves approximately ____ residential customers and a substantial number of industrial customers located both in Hillsborough County and portions of Pinellas and Polk County, Florida.

FACTS SUPPORTING RELIEF

(Insert here the facts which support the Petition for Declaration of an Energy Emergency. The following is an example of how those facts could be presented).

6. Petitioner obtains its ____ sulfur content fuel supplies from _____. Petitioner has been advised that due to (insert here reasons for supply unavailability) a continuing supply of ____ sulfur content fuels will not be available and Petitioner will be required to supply its current fuel needs with fuel containing up to ____ sulfur content.
7. Petitioner's total net generating capability is _____megawatts. Approximately ____ percent of that total is produced by ____ generating units which presently must burn ____ sulfur contents fuels or below. On ____, 19__, Petitioner had approximately ____ (barrels or tons) of ____ sulfur content fuel on hand. Projected burn rates predict that this inventory will be consumed within ____ days. Should Petitioner be unable to continue to replenish its ____ sulfur content fuel inventories, major curtailments of electric service would be required in the absence of permission to burn higher sulfur content fuel.
8. A low sulfur fuel shortage could significantly impact residential energy use of its ____ residential customers and its industrial customers on interruptible service arrangements.
9. Petitioner's ability to mitigate the impacts of a low sulfur fuel curtailment in the near term is limited by (insert here any discussion of seasonally high loads expected for the particular month and the inability to burn natural gas). It is not presently possible to determine the extent to which the expected shortfall can be mitigated through purchases of power and conservation.
10. Air quality modeling results for the Petitioner's units presently burning low sulfur fuels show that ____ percent sulfur content fuel could be burned at the _____ Stations without exceeding the State of Florida Ambient Air Quality Standards and the National Ambient Air Quality Standards. Increases in particulate matter emissions from the present limits of ____ pounds per million BTU's of heat input would not cause significant impact levels for total suspended particulate matter to be exceeded in the Hillsborough County non attainment area.

REQUEST FOR RELIEF

Based upon the foregoing, Petitioner respectfully requests that the Governor:

- a) immediately designate a Hearing Officer to conduct any necessary informal public hearings;

- b) issue an Executive Order declaring the existence of an energy emergency pursuant to Chapters 377 and 252, Florida Statutes, and suspending the procedural requirements of Chapter 120, Florida Statutes and regulations thereunder, as they may apply to any of his further actions in the energy emergency;
- c) petition the President of the United States to determine that the shortage of _____ fuel has created a regional or national energy emergency and to authorize the Governor to suspend, as a matter of federal law, rules governing _____ emissions of the State Implementation Plan as may be necessary to allow _____ fired power plants owned by Petitioner to burn available fuels; and
- d) upon a subsequent satisfactory showing, suspend, as a matter of state and federal law, the applicability of any rules governing _____ emissions of Chapter 62-2, FAC, or any other rules, ordinances, or regulations of the State of Florida or its political subdivisions, as may be necessary to permit _____ fired electric power plants owned by Petitioner to burn available fuels.

TAMPA ELECTRIC COMPANY

By: _____

E. FIRM LOAD CURTAILMENT COORDINATOR

Upon declaration of a long term energy emergency the Firm Load Curtailment Coordinator will be responsible for the following:

Steps A, B and C - Stay knowledgeable of actions taken and results obtained by Steps A, B and C.

Step D - The implementation of this step will result in the interruption of electrical service to our customers on a rotating basis. The periods of interruption to electrical service will be rotated among the service areas so that no one area is without electricity for an unduly long period of time.

Whenever possible during such emergencies, the Company will give priority for service to critical customers such as hospitals, emergency shelters, vital parts of military installations and major airports, major TV stations, and water and sewer facilities where no emergency power source is available.

The TEC Load Curtailment Plan will be used in determining which circuits or loads should be curtailed for a Long Term Energy Emergency. Application of this Plan will be made by company operating personnel in the exercise of their judgment according to circumstances existing at the time of the emergency. The selection will be based upon giving minimal disruption of convenience and general social and economic well being of the Tampa Electric Company service area, considering practical implementation procedures and effectiveness as well as community and governmental response. These actions can result in some customers' service being interrupted more than others.

If the energy shortage should be long enough and severe enough, it may become necessary to implement additional interruptions of service that can result in moderate or even severe disruption to the community.

For more detailed information, refer to the Tampa Electric Company Load Curtailment Handbook.

F. FUELS

Upon declaration of a long term energy emergency the Fuels Department will be responsible for the following:

1. Formulate emergency fuel procurement strategies, policies, and guidelines based upon analysis of internal and external variables impacting on TEC's fuel operations and update them as emergency conditions change.
2. Continuously monitor fuel market conditions in order to assess current market conditions and future trends and report market information to management.
3. Assure a constant fuel supply to generation plants in accordance with environmental and performance standards as long as possible under the constraints caused by the fuel emergency.

4. Investigate alternate sources of supply, in accordance with the procurement arrangements set forth by the emergency strategy, to allow the Company to respond to changes in regulation, operating requirements, or market conditions.
5. Manage existing fuel inventories in a way that assures the most efficient use of fuels under the constraints caused by the fuel emergency.
6. Provide fuel and transportation availability information and forecast for planning and control of operations under the fuel emergency conditions.
7. The actions taken by TEC (except for the Fuels Department) under the Long Term Energy Emergency Plan are primarily oriented toward causing demand side reductions in energy use and coordinating the exchange of available energy with other utilities through existing interchange agreements. However, the Fuels Department will investigate the feasibility of physical transfers of fuel. Then, if during the emergency, a physical transfer of fuel should become practical and necessary due to some physical limitation of the electrical system, the bilateral transfers will be accomplished through mutual agreement between the utilities involved. The principle upon which these transfers will be based is that the original owner or procurer of the fuel shall be made whole in terms of the cost, quantity, and quality of fuel transferred as soon after the emergency as practicable.
8. Develop information, reports, and testimony relating to TEC's emergency fuel procurement activities for management, customers, and governmental agencies.

G. GOVERNMENTAL / REGULATORY AFFAIRS

Upon the declaration of a long term energy emergency, Governmental Affairs Department and Regulatory Affairs Departments will be responsible for the following actions:

1. Step A
 - a. Coordinate with the V.P., Corporate Communications those messages communicated to TEC and with media and public prior to the release of such communications to provide public officials with sufficient advance time to prepare proper responses for public inquiry.
 - b. Assist Vice President, Energy Supply with governmental contact to waive Environmental Restrictions.
 - c. Notify selected public officials of Energy Emergency. Relate message developed in 1a. above. Advise of TEC Emergency Plan and steps to be taken.

2. Step B
 - a. Contact appropriate city and county officials (including but not limited to school officials) and Tampa Sports Authority to implement 7.b. (Mandatory Load Conservation) to prohibit night time sporting activities and to close lighted parks, tennis courts, golf courses, etc.
 - b. Update officials on public communications.
3. Step C
 - a. Contact local (city and county), state and federal agencies to implement 7.b. curtailment of air conditioning and heating, non essential use of hot water and elimination of window and display lighting.
 - b. Update public officials.
4. Step D
 - a. Contact city and county to reduce street and area lighting (7.b.)
 - b. Advise public officials of customer load curtailment (9.) and its potential impact on their activities.
5. Step E
 - a. Communicate all notices to governmental organizations on continuing basis.

H. ENERGY DELIVERY ENGINEERING AND CONSTRUCTION

Upon the declaration of a long term energy emergency, the Energy Delivery Engineering and Construction Department will be responsible for the following:

1. Step A
 - a. No action required
2. Step B
 - a. Develop emergency line ratings for the lines requested by system Operations so as to allow maximum power transfer capability to TEC.

I. ENERGY SUPPLY

Upon the declaration of a long term energy emergency, the Energy Supply Department will be responsible for the following actions:

1. Step A
 - a. Eliminate or reduce convenience lighting except where required for safe work conditions.
 - b. Eliminate unnecessary air conditioning of unoccupied areas.
 - c. Review plant operations to determine unnecessary uses of energy, eliminating or reducing uses where practical.
 - d. Identify areas where additional reductions can be made if worsening situations dictate.
2. Step B
 - a. With critical review of lighting and plant operations, continue elimination and reduction of unnecessary lighting and air conditioning.
 - b. Reset required air conditioning and heating thermostats to 80° and 65°, respectively.
 - c. Discontinue use of lunchroom kitchens.
 - d. Turn off water heaters.
 - e. Turn off 25% of exterior lights.
 - f. Discontinue lighting during daylight hours where possible.
3. Step C
 - a. Continued review of energy uses making reductions where possible.
 - b. Reduce all lighting, interior and exterior, to the minimum required for safety.
 - c. Eliminate all non essential air conditioning and heating load.
4. Step D
 - a. Low load situation should allow removing units from service resulting in a reduction in associated station service. An attempt should be made to accomplish as much reduction as possible.
 - b. Review plants for orderly shutdown of units.
5. Step E
 - a. Proceed with orderly shutdown of units as fuel is exhausted.

J. CORPORATE COMMUNICATIONS

Upon the declaration of a long term energy emergency, the Corporate Communications Department will be responsible for the following actions:

1. Step A
 - a. Communicate with TEC employees.
 - (1) Issue Newsletter/Groupwise bulletin that explains why the fuel shortage has occurred, provides an overview of the Emergency Plan and communicates details in Step A.
 - (2) Provide updates and contact as needed via Groupwise and/or Intranet to employees.
 - b. Communicate with public and news media.
 - (1) Issue news release to the media. It will explain why the fuel shortage has occurred, communicate actions TEC is taking to deal with the problem and will provide specific conservation information to customers. This information will also be provided to Customer Inquiry representatives.
 - (2) Provide daily briefings to media on status of emergency.
 - (3) Promote load conservation by the public via advertisements that will provide customers with specific information on how to conserve electricity.
2. Step B
 - a. Communicate with TEC employees.
 - (1) Issue Newsletter/Groupwise bulletin that will update employees on actions taken to date, the results and that communicates details in Step B.
 - (2) Continue with updated Groupwise and Intranet communications.
 - b. Communicate with public and news media.
 - (1) Issue news statement about the continued downward trend in fuel supply. Statement will also explain Company actions to solve the problem and will communicate conservation information as outlined in this Step. This information will also be provided to Customer Inquiry representatives.
 - (2) Continue advertisements that provide customers with specific information on how to conserve electricity.

3. Step C

a. Communicate with TEC employees.

- (1) Issue Newsletter/Groupwise bulletin to communicate details of Step C.
- (2) Continue with updated Groupwise and Intranet communications.

b. Communicate with public and news media.

- (1) Issue news statement about the continued downward trend in fuel supply as outlined in this Step, communicate conservation information and steps Company is taking to solve the problem. This information will also be provided to Customer Inquiry representatives.
- (2) Continue advertising that communicates conservation information listed in this Step.

4. Step D

a. Communicate with TEC employees.

- (1) Issue Newsletter/Groupwise bulletin to communicate details of Step D. Emphasize that most customers will experience rotating blackouts and why.

b. Communicate with public and news media.

- (1) Issue news statement about the continued downward trend in fuel supply and need to conserve. As outlined in this Step, announce that most customers will experience rotating blackouts, why, and what the company is doing to solve the problem. This information will also be provided to Customer Inquiry representatives.
- (2) In addition to conservation information, advertising will also explain why rotating blackouts are occurring. Ads will point out that the outages are being distributed evenly among all customers, except for hospitals, fire and police, etc., after consideration of disruption of convenience and general social and economic well being of the community.

5. Step E

a. Communicate with TEC employees.

- (1) Issue Newsletter/Groupwise bulletin that communicated details of Step E.

- b. Communicate with public and news media.
 - (1) Issue news statement to explain the continued downward trend in fuel supply. Communicate Company actions as outlined in this Step, and the need for customer conservation. This information will also be provided to Customer Inquiry representatives.
 - (2) Continue advertising that explains why rotating blackouts are occurring. Continue conservation ads.

K. WHOLESALE MARKETING AND SALES

Upon declaration of a long-term energy emergency, Wholesale Marketing and Sales will be responsible for the following actions:

1. Step A
 - a. Cut all non-firm sales to wholesale customers.
 - b. Contact all firm wholesale customers, request 5% voluntary load reduction.
2. Step B
 - a. Contact utilities and power marketers regarding firm and non-firm power purchases. Coordinate with System Operations concerning power purchase needs. Make appropriate power purchases. Reserve transmission via OASIS to bring those purchases into the TEC system.
 - b. Request all firm wholesale customers reduce their load by 15%.
3. Step C
 - a. Purchase all available non-emergency power. Coordinate purchases with System Operations.
 - b. Reduce firm sales to minimums based on individual contracts.
 - c. Contact other utilities regarding potential emergency power purchases.
 - d. Request all firm wholesale customers reduce their load by 30%.
4. Step D
 - a. Purchase all available emergency and non-emergency power. Coordinate purchases with System Operations.
 - b. Request 50% load reduction from firm wholesale customers.
 - c. Maintain firm sales minimums and notify wholesale customers of

impending load curtailment.

5. Step E

- a. Notify firm wholesale customers of their contribution to firm load curtailment.
- b. Continue purchasing all available power.

L. SYSTEM OPERATIONS

Upon the declaration of a long term energy emergency, the System Operations Department will be responsible for the following actions:

1. Step A

- a. Utilize Load Control - In order to reduce generation peaks and intermediate loads and to conserve Kwh use, increase off time of heating and air conditioning to 2 to 4 hours per day. Water heating will be off 4 to 6 hours per day.
- b. Provide the Energy Emergency Coordinator with a short term demand and energy forecast during the emergency.
- c. Run the "Commit" Program and provide the amount of each type of fuel to be used to the Fuels Department. The estimated fuel consumption should be on a daily basis for the first 30 days and then on a weekly basis for up to 75 days. Update the estimate as required.
- d. Continue to maintain 75% of Operating Margin as non spinning reserve.
- e. Review Maintenance Schedule to optimize obtainable fuels.

2. Step B

- a. Utilize Load Control - Increase off time of controlled heating and air conditioners to 6 hours per day. Water heaters will be shut off 8 to 10 hours per day.
- b. Modify unit dispatch philosophy to add units with obtainable fuels (other than #2 oil) first, and then load units which burn the fuel in short supply.
- c. Examine anticipated unit loadings of units which burn the fuel in short supply. Determine whether any units can be cycled off line and allow the same demand and energy output.
- d. Identify circuits that need emergency line ratings to allow maximum import and power transfer capability. Request Transmission Planning furnish these ratings prior to Step C of this plan.

3. Step C
 - a. Utilize Load Control - Increase heating and air conditioning off time to 6 to 8 hours per day. Water heaters will be off 12 to 14 hours per day.
 - b. Implement emergency line ratings so as to increase import capability.
 - c. Lower system distribution voltage 2 - 4 percent where it is expedient to do so.
4. Step D
 - a. Utilize Load Control - Further increase heating and air conditioning off time to 8 to 10 hours per day. Water heaters will be off 16 - 18 hours per day.
 - b. Implement plans to insure the orderly shutdown of all units burning the fuel in short supply in the event fuel is exhausted.
 - c. Implement plans to insure power availability to all Power Plants and fuel handling facilities.
5. Step E
 - a. Continue as Step D.