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October 4, 1999

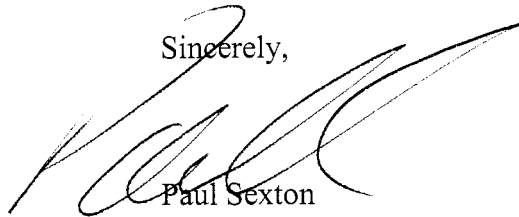
Ms. Blanca Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket 981890-EU
Generic Investigation into the Aggregate Electric Utility
Reserve Margins Planned for Peninsular Florida

Dear Ms. Bayo:

Enclosed for filing please find the original and fifteen copies of the Prehearing Statement of the Florida Reliability Coordinating Council, Inc.

Sincerely,



Paul Sexton

AFA	<u>2</u>	
APP	_____	
CAF	_____	
CMU	_____	
CTR	_____	PS:gs
EAG	<u>5 to 18</u>	
LEG	<u>1</u>	
MAS	<u>5</u>	Enclosure
OPC	_____	
PAI	<u>2</u>	cc: Ken Wiley
SEC	<u>1</u>	Parties of Record
WAW	_____	
OTH	_____	

DOCUMENT NUMBER-DATE

11941 OCT-4 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Generic Investigation Into) Docket No. 981890-EU
The Aggregate Electric Utility)
Reserve Margins Planned for)
Peninsular Florida) Submitted for filing: October 4, 1999

PREHEARING STATEMENT OF THE FLORIDA RELIABILITY COORDINATING COUNCIL, INC.

The Florida Reliability Coordinating Council, Inc., (FRCC), by and through its undersigned counsel, files its Prehearing Statement pursuant to Order No. PSC-99-0760-PCO-EU, issued April 20, 1999. As directed by Order No. PSC-99-0760-PCO-EU, the FRCC sets forth the following information:

(a) The names of all known witnesses that may be called by the FRCC, and the subject matter of their testimony:

Table with 2 columns: Witness (Mario Villar) and Subject Matter of Testimony (FRCC's reliability assessment work during 1999. Testimony on the Commission's 19 issues. Rebuttal to the Staff's testimony addressing the same issues.)

(b) A description of all known exhibits that may be used by the FRCC, whether they may be identified on a composite basis, and the witness sponsoring each:

Table with 3 columns: Exhibit (Document No. 1-7), Description (Summary of Capacity, Demand and Reserve Margin; 1999 FRCC Analysis of Summer Reserve Margin; 1999 FRCC Analysis of Winter Reserve Margin; Description of cases in FRCC's Reserve Margin Analysis; 1999 FRCC Analysis of Summer Reserve Margin (w/Scenarios); 1999 FRCC Analysis of Winter Reserve Margin (w/Scenarios); Comparison of Reliability Criteria), and Sponsoring Witness (Mario Villar).

DOCUMENT NUMBER-DATE

1194 | OCT-4 99

FPSC-RECORDS/REPORTING

Document No. 8	Used by U.S. Reliability Councils History and Projections of Winter 2000 Reserves	“
Document No. 9	History and Projections of Winter 2002 Reserves	“
Document No. 10	1999 FRCC LOLP Projections	“
Document No. 11	1999 FRCC LOLP Projections with Sensitivities	“

(c) A statement of the FRCC’s basic position in the proceeding:

FRCC’s Position: The FRCC’s reserve margin standard for Peninsular Florida is reasonable and should be accepted by the Commission. Commission action to prescribe a reserve margin standard for Peninsular Florida is neither necessary nor appropriate. The Commission should not adopt any policies regarding reserve margins or the evaluation of reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. Commission action to implement any policies regarding reserve margins or the evaluation of reserve margins should occur only after rules reflecting those policies have been adopted. The FRCC does not have positions on issues that affect individual utilities.

(d) A statement of each question of fact the FRCC considers at issue, the FRCC 's position on each such issue, and which of the FRCC 's witnesses will address the issue:

There are no independent questions of fact at issue in this proceeding. Any fact issues contained in the 19 issues identified in Order No. PSC-99-1274-PCO-EU are either predicates to policy issues, or the direct result of the application of policies.

(e) A statement of each question of law the party considers at issue and the party's position on each such issue:

Issue 1: Whether this proceeding constitutes a formal proceeding pursuant to Sections 120.569, and 120.57, Florida Statutes:

FRCC’s Position: No.

Issue 2: If this proceeding constitutes a formal proceeding pursuant to Sections 120.569, and 120.57, Florida Statutes, who bears the burden of proof?

FRCC’s Position: If this is a formal proceeding under Sections 120.569, and 120.57, Florida Statutes, the Commission bears the burden of proof on all issues. Nevertheless, the Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. However, to the extent that the Commission intends in this proceeding to rely on or formulate any statement meeting the definition of a rule under Section 120.52(15), Florida Statutes, that has not been adopted pursuant to the rulemaking procedures of Section 120.54, Florida Statutes, Section 120.57(1)(e)2., Florida Statutes, places the burden on the Commission to prove that the statement:

- a. Is within the powers, functions, and duties delegated to the Commission by the Legislature;
- b. Does not enlarge, modify, or contravene the specific provisions of law implemented;
- c. Is not vague, establishes adequate standards for Commission decisions, and does not vest unbridled discretion in the Commission;
- d. Is not arbitrary or capricious;
- e. Is not being applied to the substantially affected party without due notice;
- f. Is supported by competent and substantial evidence; and
- g. Does not impose excessive regulatory costs on any regulated person.

Section 120.57(1)(e)2., Florida Statutes, requires the Commission to address each of these criteria, both on the record at hearing, and in any final order.

(f) A statement of each policy question the party considers at issue, the party's position on each such issue, and which of the party's witnesses will address the issue:

FRCC's Position: There are no issues of policy that are properly part of this proceeding. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. However, the issues identified in Order No. PSC-99-1274-PCO-EU are policy questions involving statements of general applicability and should be recognized as such. Therefore, any policy that the Commission considers as a result of this proceeding should only be implemented pursuant to the rulemaking requirements of Section 120.54, Florida Statutes. Even so, the 19 issues identified in Order No. PSC-99-1274-PCO-EU are not properly formulated, as reflected in the comments of the Commissioners at their July 27, 1999, Agenda Conference. The issues should therefore be revised. Pending such revision, the FRCC has the following positions on the issues as stated in Order No. PSC-99-1274-PCO-EU:

Issue 1: What is the appropriate methodology, for planning purposes, for calculating reserve margins for individual utilities and for Peninsular Florida?

FRCC's Position: The appropriate methodology, for Peninsular Florida reliability planning purposes, is a methodology which has been shown by utility experience to work and which utilizes reasonable principles and assumptions. Reserve margins for Peninsular Florida should be calculated using an industry accepted reserve margin formula utilizing information which captures, without double counting, all electrical system data for the peninsula. The FRCC currently calculates firm reserve margin using this accepted reserve margin formula for projected winter and summer firm peak demands. The Commission should not adopt any policies regarding the calculation of reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 2: What is the appropriate methodology, for planning purposes, for evaluating reserve margins for individual utilities and for Peninsular Florida?

FRCC's Position: The evaluation of reserve margins for the peninsula should be conducted by the FRCC on an annual basis as part of the region's reliability assessment process. The Commission should not adopt any policies regarding the evaluation of reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. FRCC has no position as to the proper methodology for evaluating reserve margins for individual utilities. (Villar)

Issue 3: How should the individual components of an individual or peninsular Florida percent reserve margin planning criterion be defined:

A. Capacity available at time of peak (Ex. QF capacity, firm and non-firm purchases and non-committed capacity). Should equipment delays be taken into account?

FRCC's Position: The value to use for "capacity available at the time of peak" should be the aggregated firm supply side resources of the Peninsular utilities at the time of peak. This value should include: utilities' installed generation, firm capacity contracts with qualifying facilities, and net firm import capability. The FRCC uses this definition, which is reasonable and appropriate. Equipment delays should be considered by the individual utilities involved in determining the seasonal capacity values of new generation facilities being added. The Commission should not adopt any policies regarding the components of reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

B. Seasonal firm peak demand. Over what period (hourly, 30 min., 15 min.) should the seasonal firm peak demand be determined? What is the proper method of accounting for the diversity of the individual utilities' seasonal firm peak demands and load uncertainty? Is sufficient load uncertainty data available and being used? How are interruptible, curtailable, load management and wholesale loads treated at the end of their tariff or contract termination period? How should demand and/or energy use reduction options be evaluated and included in planning and setting reserve margins?

FRCC's Position: The value to use for the "seasonal firm peak demand" should be an hourly peak value for firm load served by the region. The FRCC believes that, for analysis purposes, the proper way to look at load is from a diversity perspective. The FRCC has utilized a non-coincident (load diversity) factor adjustment in its 1999 Reserve Margin Analyses because it is a legitimate, quantifiable and recognized planning factor. The amount of demand side management (DSM) to be included in the reserve margin analysis should be the amount projected by each utility for all DSM programs which have been approved by the Commission. The Commission should not adopt any policies regarding the components of reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

C. Should a percent reserve margin planning criterion be determined on an annual, seasonal, monthly, daily, or hourly basis?

FRCC's Position: A reserve margin planning standard should be based on the hourly winter and summer seasonal peaks for peninsular Florida. The Commission should not adopt any policies regarding the components of reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 4: How should generating units be rated (MW) for inclusion in a percent reserve margin planning criterion calculation?

FRCC's Position: For peninsular Florida reserve margin calculations, the rating for each generating unit should be the rating given by the utility and used in its Ten Year Site Plan calculations. The Commission should not adopt any policies regarding the components of reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 5: How should individual utility's reserve margins be integrated into the aggregated reserve margin for Peninsular Florida?

FRCC's Position: Individual reserve margins themselves should not be integrated into the aggregated reserve margin for Peninsular Florida. However, the data for each component of a reserve margin calculation that is used by a utility in calculating its reserve margin should be used by the FRCC (after ensuring that all relevant data is captured and that no double counting has taken place) in calculating an aggregate reserve margin for Peninsular Florida. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 6: Should there be a limit on the ratio of non-firm load to MW reserves? If so, what should that ratio be?

FRCC's Position: No. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 7: Should there be a minimum of supply-side resources when determining reserve margins? If so, what is the appropriate minimum level?

FRCC's Position: This issue should be addressed only on a case-by-case basis by the Commission for each utility. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 8: What, if any, planning criteria should be used to assess the generation adequacy of individual utilities?

FRCC's Position: Each utility should decide what the appropriate criteria are for its system, subject to Commission oversight. The Commission should not adopt any policies regarding the assessment of the generation adequacy of individual utilities outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 9: Should the import capability of Peninsular Florida be accounted for in measuring and evaluating reserve margins and other reliability criteria, both for individual utilities and for Peninsular Florida?

FRCC's Position: Yes. However, only firm imported purchases and exported sales should be accounted for in reserve margin calculations and analyses. Firm imported purchases and exported sales should also be included in LOLP analyses. For LOLP analyses only, potential non-firm purchases of an amount up to the difference between the import capability total and the total of firm imports can be included, depending upon the projected likelihood of such capacity assistance being available. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 10: Do the following utilities appropriately account for historical winter and summer temperatures when forecasting seasonal peak loads for purposes of establishing a percent reserve margin planning criterion?

FRCC'S Position: The FRCC takes no position on individual utility issues.

- A. City of Homestead
- B. City of Lake Worth Utilities
- C. City of Lakeland
- D. City of Tallahassee
- E. Florida Power and Light Company
- F. Florida Power Corporation
- G. Florida Municipal Power Agency
- H. Gainesville Regional Utilities
- I. Jacksonville Electric Authority
- J. Kissimmee Utility Authority
- K. Orlando Utilities Commission
- L. Reedy Creek Improvement District
- M. Seminole Electric Cooperative
- N. Tampa Electric Company
- O. Utilities Commission of New Smyrna Beach

Issue 11: Has the Florida Reliability Coordinating Council's 15 percent reserve margin planning criterion, or any other proposed reserve margin criterion, been adequately tested to warrant using it as a planning criterion for the review of generation adequacy on a Peninsula Florida basis? If the answer is no, what planning criterion should be used?

FRCC's Position: Yes. The FRCC's 15% reserve margin planning criterion is the same as the reserve margin criteria used for years by Florida's generating utilities with Commission approval, is the consensus standard of experienced utility planners and engineers, and it is the only standard that has been shown by utility experience to work and utilize reasonable principles and assumptions. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 12: What percent reserve margin is currently planned for each of the following utilities and is it sufficient to provide an adequate and reliable source of energy for operational and emergency purposes in Florida?

FRCC'S Position: The FRCC takes no position on individual utility issues.

- A. City of Homestead
- B. City of Lake Worth Utilities
- C. City of Lakeland
- D. City of Tallahassee
- E. Florida Power and Light Company
- F. Florida Power Corporation
- G. Florida Municipal Power Agency
- H. Gainesville Regional Utilities
- I. Jacksonville Electric Authority
- J. Kissimmee Utility Authority
- K. Orlando Utilities Commission
- L. Reedy Creek Improvement District
- M. Seminole Electric Cooperative
- N. Tampa Electric Company
- O. Utilities Commission of New Smyrna Beach

Issue 13: How does the reliability criteria adopted by the FRCC compare to the reliability criteria adopted by other reliability councils?

FRCC's Position: The FRCC standard of 15% is in line with four other reliability councils in North America and exactly matches that of ERCOT, which is a region similar to the FRCC in many respects. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 14: Should the Commission adopt a reserve margin standard for individual utilities in Florida? If so, what should be the appropriate reserve margin criteria for individual utilities in Florida? Should there be a transition period for utilities to meet that standard?

FRCC's Position: The FRCC does not have a position on this issue, as it affects individual utilities. However, should the Commission adopt a standard as a result of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes, affected utilities should be granted an appropriate transition period to meet any revised standard.

Issue 15: Should the Commission adopt a reserve margin standard for Peninsular Florida? If so, what should be the appropriate reserve margin criteria for Peninsular Florida?

FRCC's Position: No, there is no need to do so, and such an action would be improper outside of rulemaking pursuant to Section 120.54, Florida Statutes. The FRCC's methodology and standard for generation adequacy are reasonable and the Commission should rely upon the FRCC's reports as a basis for reviewing the adequacy of individual utilities' resource plans. However, if the Commission does make a decision regarding the appropriate reserve margin standard, it should accept the FRCC's 15% reserve margin standard. Nevertheless, the Commission should implement any policies regarding the appropriate reserve margins only after rulemaking pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 16: Should the Commission adopt a maximum reserve margin criterion or other reliability criterion for planning purposes; e.g., the level of reserves necessary to avoid interrupting firm load during weather conditions like those experienced on the following dates: 01/08/70, 01/17/77, 01/13/81, 01/18/81, 12/19/81, 12/25/83, 01/21/85, 01/21/86 and 12/23/89?

FRCC's Position: No. The Commission need not adopt any standard, but should review the FRCC's work for reasonableness and address the merits of that work. However, if the Commission does decide to adopt a standard, it should recognize that a maximum reserve margin standard would not provide additional reliability in case of extreme weather conditions. A maximum reserve margin does the opposite; it limits the amount of reserves that a utility could plan for. Nevertheless, the Commission should implement any policies regarding the appropriate reserve margins only after rulemaking pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 17: What percent reserve margin is currently planned for Peninsula Florida and is it sufficient to provide an adequate and reliable source of energy for operational and emergency purposes in Peninsula Florida?

FRCC's Position: The projected reserve margins, Summer and Winter, are presented in Mario Villar's Document No. 1. These projected reserve margins are sufficient to provide an adequate and reliable source of electricity for Peninsular Florida. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 18: Can out-of-Peninsular Florida power sales interfere with the availability of Peninsular Florida reserve capacity to serve Peninsular Florida consumers during a capacity shortage? If so, how should such sales be accounted for in establishing a reserve margin standard?

FRCC's Position: No. Firm capacity sales outside of the Florida peninsula are already accounted for in reliability planning and, therefore, pose no unforeseen problem during a capacity shortage. Non-firm sales can, by definition, be stopped during capacity emergencies. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. (Villar)

Issue 19: Based on the resolution of Issues 1 through 18, what follow-up action, if any, should the Commission pursue?

FRCC's Position: No follow-up action is necessary, as the FRCC has presented analyses which show that the composite electric system for peninsular Florida is projected to be reliable over the 10-year planning period. However, if the Commission decides that concerns exist which justify remedial action, the FRCC believes that the Commission should proceed to rulemaking on those concerns and strive to ensure that the specific circumstances of each individual utility are considered. The Commission should not adopt any policies regarding reserve margins outside of a rulemaking proceeding pursuant to Section 120.54, Florida Statutes. The affected utilities should be granted an appropriate transition period to meet any revised standard which may result. (Villar)

(g) A statement of issues that have been stipulated to by the parties:

FRCC's Position: FRCC is unaware of any issues that have been stipulated to.

(h) A statement of all pending motions or other matters the party seeks action upon:

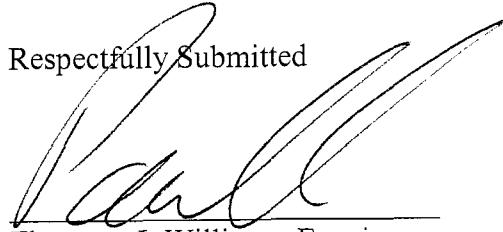
FRCC's Position: FRCC is unaware of any motions pending at this time.

(i) A statement as to any requirement set forth in this order that cannot be complied with, and the reasons therefore:

FRCC's Position: FRCC is unaware of any requirement set forth in Order No. PSC-99-0760-PCO-EU that cannot be complied with.

Dated: October 4, 1999

Respectfully Submitted




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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
U.S. Mail to the persons shown on the attached service list, this 4th day of October, 1999.



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