Eric Fryson

From:	Notarnicola, Pat [PNotarnicola@ouc.com]
Sent:	Monday, January 30, 2012 2:41 PM
To:	Filings@psc.state.fl.us
Cc:	Browder, Chris; Eichen, Deborah; Sunanon, Claston; Kinas, Richard
Subject:	Orlando Utilities Commission's Fuel Emergency Plan
Attachments	: 1-30-2012PSCLettertoAnnColewithOUCFuelEmergencyPlaninclean&LegislativeFormat.pdf
Attachments:	110316 EM – Orlando Utilities Commission's Fuel Emergency Plan

Electronic Filing

a. Person responsible for the electronic filing:

W. Christopher Browder Office of General Counsel Orlando Utilities Commission 100 W. Anderson Street Orlando, Florida 32801 (407)434-2167 cbrowder@ouc.com

b. Docket No. 110316 EM

In Re: Orlando Utilities Commission's Fuel Emergency Plan

c. Document being filed on behalf of Orlando Utilities Commission

d. there is a total of 17 pages

e. The document attached for electronic filing is Orlando Utilities Commission's Fuel Emergency Plan in both clean and legislative format in response to PSC Request for Electric Utilities' Long-Term Energy Emergency Plans

s/ W. Christopher Browder

Pat Notarnicola Legal Assistant to W. Christopher Browder Orlando Utilities Commission Reliable Plaza 100 West Anderson Street P. O. Box 3193 Orlando, FL 32801 Phone: 407-434-2161 Fax: 407-434-2220 Email: pnotarnicola@ouc.com

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DOCUMENT NUMBER-DATE

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OFFICE OF GENERAL COUNSEL Orlando Utilities Commission

> W. Christopher Browder Vice President & General Counsel

January 30, 2012

Wayne A. Morris Zoila P. Easterling Carlos L. Woody Terrie L. Tressler

> Kathleen Plajstek Paralegal

VIA ELECTRONIC FILING AND FEDERAL EXPRESS

Ms. Ann Cole, Director Office of Commission Clerk Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Re: Docket No. 110316 EM Approval of Revised Long-Term Energy Emergency Plan Orlando Utilities Commission

Dear Ms. Cole,

1 copy e-filed -on

Pursuant to Rule 25-6.0185, F.A.C., Orlando Utilities Commission (OUC) hereby submits for filing in the above-reference docket seven (X) copies of its revised Fuel Emergency Plan in both clean and legislative format. OUC's changes are generally minor, but do include the addition of duties related to OUC's role in fuel planning and dispatch under its Interlocal Agreement with the City of Vero Beach, Florida.

We appreciate your assistance in this effort. Please call if you have any questions. I can be reached at 407-434-2167.

Very truly yours,

W. Christopher Browder Vice President & General Counsel

Service -

WCB:pan Enclosures

CC: Robert Doty Debbie Eichen Claston Sunanon Richard Kinas

DODUMENT NUMBER - DATE

ORLANDO UTILITIES COMMISSION Office of General Course 0599 JAN 30 ≥ Reliable Plaza at 100 West Anderson St | P O Box 3193 | Orlando, FL 32802 | 407.423.9100 Tel | 407.434.2220 Fax | www.ouc.com FPSC - COMMISSION CLERK

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FUEL EMERGENCY

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1 PURPOSE

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

2 SCOPE

This document is applicable to all individuals who directly or indirectly support the NERC Registered Functions, for which OUC is identified (DP, GO, GOP, LSE, PA, RP, TO, TOP, TP, and TSP) or for which OUC is (or is a member of) the acting agent (FMPP BA, PSE, IA).

This document also describes the fuel supply and management duties of OUC to the City of Vero Beach in under the Purchase and Sale of Electric Energy and Capacity, Gas Transportation Capacity and Asset Management Services Agreement between OUC and the City of Vero Beach dated April 21, 2008 ("Agreement").

3 FUEL EMERGENCY PLAN

This plan is designed to protect the health, safety, and welfare of the people in the OUC service area, which includes the City of St. Cloud by virtue of the Interlocal Agreement entered into by and between OUC and the City of St. Cloud effective 01 May 1997, during such periods when a fuel supply shortage emergency exists. This plan will be invoked at the OUC's initiative and will be coordinated with the emergency plans of other utilities in the State of Florida through the Florida Reliability Coordinating Council (FRCC).

This plan is also designed to describe OUC's role in the fuel supply shortage emergency planning for the City of Vero Beach under the terms and conditions of the Agreement. As part of the Agreement, which became effective January 1, 2010, OUC became a partial requirements supplier of wholesale capacity and energy to the City of Vero Beach (Supplemental Wholesale Capacity and Energy).

In addition, under the terms of the Agreement OUC is responsible for (i) purchase and delivery of natural gas fuel required for the Vero Beach power plants to produce energy and for dispatch by OUC and unit start-up, (ii) arranging for delivery of fuel oil as determined by mutual agreement between OUC and Vero Beach. In addition, under the Contract OUC assumed dispatch control of the Vero Beach Power Plant to serve load and wholesale obligations, including, start-up and shutdown. Vero Beach is responsible for plant operations and maintenance of the Vero Beach Power Plant.

<u>Vero Beach is served on equal priority with OUC's native load.</u> An energy emergency exists when OUC has inadequate generating capability by reason of a fuel supply shortage and is thereby prevented from operating at required levels to supply its <u>native load or wholesale equal</u> to <u>native load</u> energy obligations. An energy emergency differs from a generating capacity shortage emergency in that energy requirements cannot be met over an extended period. The

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period of advance warning and expected duration of an energy emergency is usually measured in terms of weeks or months, as opposed to minutes or hours for a generating capacity shortage.

This plan covers:

- Notifications
- Fuel conservation actions
- Plan termination guidelines
- Public information and appeals
- Fuel payback procedure
- · Coordination with the City of Vero Beach

3.1 Notifications

The Manager of Fuel Services is responsible for continuously monitoring the adequacy of the fuel inventory and keeping the Director of Fuels and Power Marketing, <u>Contracts & Settlement</u> updated. When fuel supplies are decreasing, or are anticipated to decrease below a level adequate to provide for continuous, uninterrupted service to OUC customers, the Director of the Fuels, Power Marketing, <u>Contracts & Settlement</u> Division will notify the Vice President of the Power Resources Business Unit.

The Vice President of the Power Resources Business Unit will assess the fuel situation and if he/she determines that a fuel supply emergency exists, the <u>OUC's</u> General Manager, CEO, and all <u>OUC</u> Vice Presidents, and the Plant Manager with the City of Vero Beach will be notified. Following internalthese notifications, the Chair of FRCC Reliability Assessment Group (RAG) will be notified of the impending emergency.

If, as a result of the FRCC notification, a fuel supply alert is designated by the Florida Public Service Commission and the Governor of the State of Florida declares a fuel supply emergency pursuant to Chapter 377.703 Florida Statutes or other appropriate statutory authority, then the U.S. Department of Energy (DOE) shall be notified of the fuel emergency and the fuel conservation actions (Section 3.2) will be initiated by OUC.

3.2 Fuel Conservation Actions

Upon designation by the Governor of the State of Florida that a fuel supply emergency exists, steps A-D will be implemented and followed. Should it become necessary in the implementation of this plan to bypass any of these steps and immediately proceed with more severe measures, the actions under the bypassed steps shall be implemented as appropriate.

3.2.1 Step A

Step A involves the following actions:

- Curtail all use of electrical energy at all OUC buildings and facilities
- Turn off all unnecessary lights at all OUC buildings and facilities

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- Turn off or adjust the thermostat on all air conditioning (A/C) or heating as required at all OUC buildings and facilities
- Curtail energy consumption of customers subscribed to OUC's curtailable rate as specified in the curtailable rate schedule of OUC's Administrative Policy Manual
- Discontinue all non-firm sales of electric energy (which increases the use of fuel in short supply) to other utility companies
- Operate all existing OUC generating sources and the Vero Beach Power Plant to minimize the use of the fuel in short supply
- Purchase power from other utilities, where possible, to conserve the fuel in short supply
- Request authorization from the proper authorities to ease environmental and other regulations where such actions will be effective in increasing the supply of alternate fuels. Coordinate with the Plant Manager, City of Vero Beach, do the same at the Vero Beach Power Plant
- Request the City of Orlando and the City of St. Cloud to make the same reduction in energy use as OUC

3.2.2 Step B

If the actions of the preceding step A have not been adequate to mitigate the energy emergency and a continued downward trend in energy supplies is anticipated, the <u>additional</u> measures in step B will be implemented. Step B involves the following actions:

- · All the previously implemented steps shall be continued
- Make public appeals to all <u>OUC and St. Cloud</u> customers, both residential and commercial, to reduce their consumption of electrical energy
- <u>OUC's and St. Cloud's</u> Large commercial and industrial customers will be contacted individually and requested to reduce their consumption of electrical energy
- Make request to <u>OUC's and St. Cloud's</u> customers to reduce all outdoor decorative lighting and lighting used for advertisement except for the minimum required to indicate commercial facilities open after dark
- Reduce all <u>OUC's and St. Cloud's</u> street lighting to a minimum level necessary for life and property protection, per agreement with the City of Orlando and Orange County.
- OUC's Vice President of the Power Resources Business Unit will communicate to the Plant Manager, City of Vero Beach, that the actions in Step B have be initiated for OUC's and St. Cloud's service areas. Vero Beach will then determine if implementation of its Capacity Emergency Plan should be initiated.

3.2.3 Step C

If the actions of the preceding steps A and B have not been adequate to mitigate this energy emergency and a continued downward trend in fuel supplies is anticipated, the following <u>additional</u> measure in step C will be implemented

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- All the previously implemented steps shall be continued
- Maximize the use of purchase power
- Implement a 5% voltage reduction for OUC's and St. Cloud's service area.

3.2.4 Step D

If the energy emergency continues to worsen, then the following <u>additional</u> measures in step D will be implemented as a last resort:

- · All the previously implemented steps shall be continued
- To the extent legally permissible, through the use of legal authority, enforce the reduction
 of energy consumption, including those rights per the Agreement, to the degree necessary
 to protect public health and welfare
- If fuel is available from other utilities, it may be purchased at an agreed upon price or Fuel Payback Plan (Section 3.5)
- As a last resort, implement rotating blackouts on selected feeders as designated on the most current Load Shed Priority List which is on file in the Energy Control Center (ECC) (See OUC document CEP-PRC-014 (Manual Load Shed Procedure))
- OUC's Vice President of the Power Resources Business Unit will communicate to the Plant Manager, City of Vero Beach, that the actions in Step D have be initiated for OUC's and St. Cloud's service areas. Vero Beach will then determine whether additional steps in its Capacity Emergency Plan should be initiated.

3.3 Plan Termination Guideline

When the fuel supply shortage eases, the<u>OUC's</u> General Manager and CEO will request the measures taken under this plan be relaxed to the appropriate step until a return to normal operations can be achieved. The<u>OUC's</u> General Manager and CEO will terminate the plan when fuel supplies return to normal levels and can be maintained at those levels. <u>OUC's Vice</u> President of the Power Resources Business Unit will communicate the termination of the fuel emergency to the Plant Manager, City of Vero Beach.

3.4 Public Information and Appeals

All communications with the public, media, and local agencies shall be made by the Media Relations Coordinator. The following city and local agencies will be contacted:

- Mayor of Orlando
- Chairmen of Orange and Osceola County Commissions
- · Police chiefs from Orlando, Orange County, St. Cloud, and Osceola County
- · Fire chiefs from Orlando, Orange County, St. Cloud, and Osceola County

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- · Directors of Wastewater Departments for Orange and Osceola County
- Orange and Osceola Counties Civil Emergency Management Departments

All public appeals to both large and small customers <u>of OUC and St. Cloud</u> will be accompanied by the following suggestions on how they can conserve energy:

- Turn off all unnecessary lights
- · Reduce or curtail the use of A/C and electric heat
- If A/C is essential, set thermostat at 80 to 85 degrees
- · If electric heat is essential, set thermostat at 60 to 65 degrees
- · Curtail all use of clothes dryers, dishwashers, and hot water
- Set hot water thermostat at 120 degrees

These communications should be coordinated with the Public Information Committee of the FRCC so as to be as non-conflicting as possible.

3.5 Fuel Pay Back Plan

If, during the emergency, a physical transfer of fuel should become practical or 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 practical.

3.6 Blackstart Fuel Provisions

The Manager of Fuel Services is responsible for continuously monitoring the adequacy of the fuel inventory and keeping the Director of Fuels, and Power Marketing, Contracts & Settlement updated. The Black-start units are dual fuel, natural gas or diesel. The Manager of Fuel Services is responsible for ensuring that adequate amounts of diesel fuel are available in the event that natural gas becomes unavailable.

4 ACRONYMS\DEFINITIONS

Unless otherwise specified, please refer to the OUC Compliance Glossary for all related acronyms and definitions.

5 REFERENCE DOCUMENTS

Document Title	Document ID	
Manual Loadshed Procedure	CEP-PRC-014	

This document is classified as Sensitive; prior to internal or external distribution, an attempt should be made to validate an entity's need-to-know.

6 REVISION HISTORY

Version	Authority	Action	Date
1.0	CIAC	Initial release	06/30/08
1.1	CIAC	Changed scope, added "Plan" to Section 3 title, and added date to Reference Documents, Changed OUC logo, Added Section 3.6, SME review by Sue Ori on 01/26/09	01/26/09
-	Brad Chase	Completed annual review as CIAC member. No changes.	12/07/09
-	Keith Rizer	Completed annual review as SME. No changes.	12/07/09
1.1.1	Sue Ori	Completed annual review as SME. Added new bullet to Section 3.2.2 ("All the previously implemented steps shall be continued"	12/08/09
1.2	CIAC	Officially released as V1.2	12/21/09
1.2.1	Sue Ori	Completed annual review as SME. Added underline of the word "additional" in Section 3.2.4. Moved one sentence in Section 3.2.2 from the intro paragraph into bulleted list.	11/29/10
-	Debbie Eichen	Completed annual review as CIAC member. No additional changes.	11/30/10
1.3	CIAC	Approved for release as V1.3.	12/06/10
1.3.1			

Review Cycle: Yearly

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This plan covers:

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- · Public information and appeals
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3.1 Notifications

The Manager of Fuel Services is responsible for continuously monitoring the adequacy of the fuel inventory and keeping the Director of Fuels Power Marketing, Contracts, and Settlement updated. When fuel supplies are decreasing, or are anticipated to decrease below a level adequate to provide for continuous, uninterrupted service to OUC customers, the Director of the Fuels, Power Marketing, Contracts, and Settlement Division will notify the Vice President of the Power Resources Business Unit.

The Vice President of the Power Resources Business Unit will assess the fuel situation and if he/she determines that a fuel supply emergency exists, OUC's General Manager, CEO, and all OUC Vice Presidents, and the Plant Manager with the City of Vero Beach will be notified. Following these notifications, the Chair of FRCC Reliability Assessment Group (RAG) will be notified of the impending emergency.

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3.2 Fuel Conservation Actions

Upon designation by the Governor of the State of Florida that a fuel supply emergency exists, steps A-D will be implemented and followed. Should it become necessary in the implementation of this plan to bypass any of these steps and immediately proceed with more severe measures, the actions under the bypassed steps shall be implemented as appropriate.

3.2.1 Step A

Step A involves the following actions:

- Curtail all use of electrical energy at all OUC buildings and facilities
- · Turn off all unnecessary lights at all OUC buildings and facilities
- Turn off or adjust the thermostat on all air conditioning (A/C) or heating as required at all OUC buildings and facilities

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- Curtail energy consumption of customers subscribed to OUC's curtailable rate as specified in the curtailable rate schedule of OUC's Administrative Policy Manual
- Discontinue all non-firm sales of electric energy (which increases the use of fuel in short supply) to other utility companies
- Operate all existing OUC generating sources and the Vero Beach Power Plant to minimize the use of the fuel in short supply
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 - Coordinate with the Plant Manager, City of Vero Beach, do the same at the Vero Beach Power Plant.
- Request the City of Orlando and the City of St. Cloud to make the same reduction in energy use as OUC

3.2.2 Step B

If the actions of the preceding step A have not been adequate to mitigate the energy emergency and a continued downward trend in energy supplies is anticipated, the <u>additional</u> measures in step B will be implemented. Step B involves the following actions:

- All the previously implemented steps shall be continued
- Make public appeals to all OUC and St. Cloud customers, both residential and commercial, to reduce their consumption of electrical energy
- OUC's and St. Cloud's large commercial and industrial customers will be contacted individually and requested to reduce their consumption of electrical energy
- Make request to OUC and St. Cloud's customers to reduce all outdoor decorative lighting and lighting used for advertisement except for the minimum required to indicate commercial facilities open after dark
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3.2.3 Step C

If the actions of the preceding steps A and B have not been adequate to mitigate this energy emergency and a continued downward trend in fuel supplies is anticipated, the following <u>additional</u> measure in step C will be implemented

• All the previously implemented steps shall be continued

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- Maximize the use of purchase power
- · Implement a 5% voltage reduction for OUC's and St. Cloud's service area

3.2.4 Step D

If the energy emergency continues to worsen, then the following <u>additional</u> measures in step D will be implemented as a last resort:

- · All the previously implemented steps shall be continued
- To the extent legally permissible, through the use of legal authority, enforce the reduction of energy consumption, including those rights per the Agreement, to the degree necessary to protect public health and welfare
- If fuel is available from other utilities, it may be purchased at an agreed upon price or Fuel Payback Plan (Section 3.5)
- As a last resort, implement rotating blackouts on selected feeders as designated on the most current Load Shed Priority List which is on file in the Energy Control Center (ECC) (See OUC document CEP-PRC-014 (Manual Load Shed Procedure))
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Manual Loadshed Procedure	CEP-PRC-014

6 REVISION HISTORY

Version	Authority	Action	Date
		5	
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1.0	CIAC	Initial release	06/30/08
1.1	CIAC	Changed scope, added "Plan" to Section 3 title, and added date to Reference Documents, Changed OUC logo, Added Section 3.6, SME review by Sue Ori on 01/26/09	01/26/09
÷	Brad Chase	Completed annual review as CIAC member. No changes.	12/07/09
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-	Debbie Eichen	Completed annual review as CIAC member. No additional changes.	11/30/10
1.3	CIAC	Approved for release as V1.3.	12/06/10
1.3.1	Debbie Eichen	Completed annual review. Corrected title of Director of Fuels, Power Marketing, Contracts, and Settlement	12/02/11
1.4	CIAC	Approved for release as V1.4.	12/05/11
1.4.1	Debbie Eichen	Changes to incorporate OUC obligations for Vero Beach.	01/27/12
1.5	CIAC	Approved for release as V1.5.	01/30/12

Review Cycle: Yearly

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