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January 29, 2024

VIA: ELECTRONIC FILING

Mr. Adam J. Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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

Emergencies

Dear Mr. Teitzman:

In compliance with Rule 25-6.0185, we attach Tampa Electric Company's Long-Term Energy Emergency Plan for Fuel Supply Shortage.

Also attached is one copy of the above document in type and strike format, indicating the changes.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

MNM/bml Attachment

cc: TECO Regulatory

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

EFFECTIVE DATE: 01/31/2024

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ATTACHMENTS

Attachment I - Long-term Energy Emergency Plan Summary

I. PURPOSE

The purpose of this Long-Term Energy Emergency Plan for Fuel Supply Shortage (hereafter referred to as the Fuel Supply Emergency Plan) is to document the plan for responding to a Tampa Electric Company ("TEC") fuel shortage emergency. This plan applies to fuel emergencies as defined in Section II and works in cooperation with the *Capacity and Energy Emergency Plan*, which covers abrupt, short-term capacity/energy emergencies.

TEC strives to maintain adequate fuel supplies to enable the company to serve customers reliably. The company accomplishes fuel adequacy through a diverse fuel supply portfolio, multiple suppliers, various agreement terms, multiple gas pipelines or backup fuel at each power station, alternative transportation paths, gas pipeline paths accessing multiple production basins with various receipt points, and flexible storage capacity for the various fuel supply commodities such as natural gas, oil, coal and petroleum coke. Natural gas is a just-in-time fuel which means storage is limited and generation resources consume the fuel when needed via pipeline delivery. TEC constantly monitors natural gas commodity and pipeline availabilities. Natural Gas is projected to be approximately 85 percent of the future generation mix and the most likely fuel to drive a Fuel Supply Shortage at TEC. TEC has a contract in place for gas supply storage capacity located in Alabama. The storage contract would supply TEC with approximately 10 days of gas supply at 200,000 MMBtu per day in the event of a loss of supply from its traditional sources.

TEC uses oil primarily as a back-up fuel and retains inventories that complement the fuel's practical use in an emergency situation. For the solid fuels (i.e., coal and petroleum coke), TEC strives to maintain 60 days of inventory on the ground at Big Bend Station. Solid fuel is projected to be less than 5 percent of the future generation mix and not likely to cause a Fuel Supply Shortage at TEC.

II. DEFINITION

A fuel supply emergency exists when (a) evidence indicates that within 30 days or less TEC will be unable to receive fuel supplies sufficient to satisfy forecasted fuel supply demands of TEC's generating units and (b) such situation places a significant portion of the system at-risk of electric disruption.

III. APPLICABILITY

This plan applies to a fuel supply emergency, potentially of an unknown duration, that: (a) cannot be remedied by alternative sources of fuel, capacity and/or energy, and (b) will potentially result in widespread outages if no action is taken.

The plan addresses both a TEC fuel supply emergency, fuel supply shortages for other Florida utilities, and a fuel supply emergency declared by the Governor of the state of Florida ("Governor"), as noted in Sections IV and VII herein.

IV. NOTIFICATION, RESPONSIBILITY & DECLARATION

A. Notification Groups

The identification of each group applies also to any group member's designee.

- a. *Group 1* is the Vice President of Energy Supply; Director of Origination and Trading, Director of Resource Planning and Unit Commitment; and the Director of the Energy Control Center.
- b. *Group 2* is the Vice President of Customer Experience, Vice President of Regulatory Affairs, and the Vice President of Electric Delivery.

B. Fuel Supply Shortage (Potential Fuel Supply Emergency)

Whenever the monthly Unit Commitment plan or an alternate forecast predicts a fuel supply shortage is imminent, the Manager of Gas and Power Trading will notify Group 1 that a potential fuel emergency exists. Also, the Vice President of Energy Supply will convene Group 2, if appropriate, to assess the fuel supply emergency. Group 2, if appropriate, will brief the President and CEO of Tampa Electric ("President") on the potential fuel supply emergency. The President shall be responsible for declaring a fuel supply emergency, which sets in motion the actions documented in this plan.

C. Fuel Supply Emergency Declared

Whenever the President declares a fuel supply emergency, Group 2 shall orchestrate within their areas the applicable portions of this plan. Additionally, the Vice President of Electric Delivery, shall, at a minimum, notify the applicable Florida Reliability Coordinating Council ("FRCC") contact of the existence of such emergency. Similarly, whenever the Governor declares a statewide fuel supply emergency, the Vice President of

Energy Supply shall, at a minimum, notify the President and other members of Group 2. Group 2, as directed by the President, shall orchestrate within their areas the applicable portions of this plan.

The Director of the Energy Control Center will be the company coordinator responsible for tactical implementation of the action plans detailed in Section VI of the Fuel Supply Emergency Plan.

V. GENERAL

A. Inventory Planning and Fuel Supply Forecasting

By no later than the end of September of the prior year, Resource Planning, with the support of the Director of Origination and Trading, will forecast the upcoming calendar year's fuel inventory for each generating plant in TEC's system. Such forecasts will be updated at least monthly, by Unit Commitment, throughout the calendar year.

Whenever such forecasting, including ad hoc forecasts, predicts a fuel supply shortage that has the potential to result in a fuel supply emergency, the Manager of Gas and Power Trading will notify Group 1, who will convene and assess the situation. The Director of the Energy Control Center shall then implement the appropriate portions of Sections V(B) and V(C) below and continue to monitor the situation. If the fuel supply shortage situation is deteriorating and does not appear to be remediable, the Director of the Energy Control Center shall caucus with Group 1 then convey the deteriorating fuel condition to Group 2, which moves this plan forward towards potentially implementing Section VI below.

B. Emergency Coordination of Fuel Supplies

During a potential or actual fuel supply emergency, Trading and Origination and Unit Commitment will monitor and forecast fuel availabilities and inventory levels at least daily and will conduct regularly scheduled meetings between the applicable fuels, operations, regulatory, and business areas. Trading and Origination will also identify all potential fuel supply sources and delivery options and, if needed, purchase and accelerate delivery of fuel supplies even if of a lesser quality or higher cost. TEC will reimburse or replace, as appropriate, any fuel or energy supplied on an emergency basis by other entities.

C. System Operation and Interchange

The following actions may be taken to mitigate the effects of a fuel supply concern prior to implementing any of the demand-side reductions in Section VI:

- TEC may halt or limit the company generation resources from producing energy for non-firm sales.
- TEC may purchase energy from other systems which are able and willing to supply interchange energy for reliability to conserve fuel or minimize the use of fuels that are in short supply regionally.
- TEC may operate its units out of economic dispatch or, as environmental permits allow, on an alternative fuel in order to conserve the type of fuel that is in short supply.
- TEC may implement alternative fuel transportation measures if the fuel supply emergency is associated with restrictions in traditional fuel transport methods. This could include, but is not limited to, buying incremental gas transportation, storage, or supply products, scheduling interruptible gas transportation, or borrowing gas from a pipeline.
- TEC may implement a system-wide alert, as appropriate.
- TEC may secure transmission service to enable purchase power from out of State to flow into the system.

VI. ACTION PLAN

A. Overview

This action plan is a systematic approach to curtailing electricity usage during a fuel supply emergency. The action plan has four progressive phases. Each phase becomes more severe and addresses energy service reductions to an increasing number of customers.

Phase 1, is entirely voluntary for customers and would be implemented when there are projected to be 30 days or less of fuel supply availability; the exception being the implementation of demand-side management, as needed.

Phase 2 is implemented when the projected fuel supply reaches 20 days.

Phase 3 is implemented at 10 days; and

Phase 4 is implemented at 7 days of available supply remaining. Prior to implementing any phases of the action plan, TEC will exhaust all practical steps and methods of extending and conserving fuel. While this plan provides a step-by-step response to an emergency condition, circumstances at the time may require variations from the plan. See Attachment I for a complete summary of steps for each phase of the plan.

B. Phase 1 (30 days)

- Initiate communication with customers and make appeals to all customers for voluntary reduction in the use of electricity in observance of an impending fuel supply shortage. Appeals will be made through news conferences, news releases, paid advertising, and other available means. Listed below are energy conservation recommendations to be stressed in the appeals:
 - a. Lower heating thermostats to 65 degrees or less during heating hours and raise cooling thermostats to at least 80 degrees during cooling hours in all conditioned spaces where this action will result in less energy consumption and does not damage equipment or structure. This excludes customers with physician-advised medical exemptions.
 - b. Reduce all indoor lighting levels as close to minimum safety and task levels as practical (particularly commercial and industrial customers).
 - c. Eliminate all unnecessary outdoor lighting.
 - d. Eliminate display lighting, decorative lighting, and any lighting purely for aesthetics.
 - e. Reduce parking lot lighting to the extent practical and where safety is not compromised.
 - f. TEC, upon customer request, will give suggestions to individual customers regarding conservation measures applicable to specific installations. However, each customer is responsible for ensuring the implementation of any suggestion is not detrimental to the customer's facilities.

- g. To the extent practical and safe, discontinue use of supplemental energy demanding equipment such as second and third refrigerators, unnecessary freezers, electric pumps, and so on.
- 2. Initiate curtailment of TEC energy use and provide communication to employees.
- 3. Purchase and expedite the transportation of proper fuels.
- 4. End non-firm sales to wholesale customers, purchase available wholesale power, implementing demand-side management as needed, and optimize the use of available fuel.
- 5. TEC representatives will meet with all firm wholesale customers and apprise them of the fuel situation. At this meeting, TEC will strongly suggest that the individual firm wholesale customers make a public appeal immediately to their respective energy service customers to conserve energy.
- 6. Regulatory, Environmental, and Corporate Communications will coordinate notifying the appropriate agencies.
- 7. Grid Operations and Portfolio Optimization will review the maintenance schedule and reduce spinning reserves, where possible, to optimize use of available fuel.

C. Phase 2 (20 days)

- TEC will make a public announcement that a fuel supply emergency exists and that TEC must implement the second phase of several energy conservation measures and continue to promote load conservation.
- 2. Initiate communication with governmental organizations, including a request to the Governor to suspend the State Implementation Plan of the Clean Air Act.
- 3. Purchase and expedite the delivery of any satisfactory burnable coal to the extent possible.
- 4. Commercial, Industrial, and Governmental customers will be requested to take the following steps:

- a. Eliminate the use of lighting for indoor and outdoor advertising devices and displays and building flood lighting, except for lighting business identification signage.
- b. Reduce weekly energy consumption by 20 percent at all retail businesses, institutional facilities, public and private schools, office buildings, and industrial plants, except for vital health and safety institutions. (A 20 percent energy reduction on a 40-hour operating week, e.g., 8 hours per day Monday through Friday, is equivalent to one day's worth of energy.) Vital health and safety institutions, although excluded from the request specifically, will be expected to implement any reductions that minimally impact operations.
- c. Eliminate non-essential outdoor lighting.
- 5. Request TEC's environmental department to petition governing authorities to temporarily remove environmental constraints from generating units that inhibit the use of available fuel in a manner that mitigates the fuel supply emergency.
- 6. Continue curtailment of TEC energy use.
- 7. Continue or implement demand-side management, continue to purchase available wholesale power, and request maximum output from co-generators and wholesale power purchases.
- 8. TEC representatives will meet with all firm wholesale customers and request a 20 percent voluntary reduction.
- 9. Continue to modify system dispatch to optimize use of available fuel, including fuel transfers.

D. Phase 3 (10 days)

In this phase, TEC would take additional actions under this plan to further reduce electric demand, including the following actions, as appropriate:

 Continue media communications promoting load conservation. Particularly, residential customers will be requested to curtail their use of high energy demand devices and appliances such as clothes dryers, dishwashers, pool pumps, and the like.

- 2. Request that all Commercial, Industrial, and Governmental customers decrease their energy requirements by up to an additional 20 percent, for a total reduction of up to 40 percent as of this phase. A 40 percent energy reduction on a 40-hour operating week is equivalent to two days' worth of energy. Request that all window, display lighting and A/C Units be turned off during non-use hours limitation.
- 3. Minimize firm sales by requesting a 40% voluntary reduction, purchase all available non-emergency reserve power, and continue demand-side management.
- 4. Continue curtailment of TEC energy use.
- 5. Purchase and expedite delivery of any satisfactory burnable oil to the extent possible.
- 6. Alert Customer Experience to initiate outbound communication to Medical Watch Customers. This provides at least three days' notice in advance of a disconnection if the Firm Load Curtailment Plan must be implemented during Phase 4. Customer Experience will maintain an updated list of Medical Watch customers, so they can immediately begin outbound communication.

E. Phase 4 (7 days)

Notify the applicable FRCC personnel that the fuel supply for electric generation has reached a crisis level. TEC will then utilize the *Capacity and Energy Emergency Plan* for the remainder of Phase 4. The implementation of Phase 4 will be accompanied by a revised TEC news release.

F. Relaxation of Action Plan

Whenever the fuel supply emergency ceases or improves to the point where a lower phase of action is sufficient to continue electric service at the current level, the President, public, and the FRCC will be notified by the Vice President, Electric Delivery. The relaxation will befit the current fuel supply situation and may involve implementing in reverse sequence of the phases described in Section VI.

G. Essential Services

In Phase 4, the Firm Load Curtailment Plan may be implemented. If so, essential services shall be given priority on electric service for as long as the situation allows, provided that alternative sources of electric generation/supply are not available to such essential services. Essential services are electric services that are essential to the health, safety, or welfare of the community.

The following types of customers may be included in this category:

- Critical TEC facilities
- Hospitals and similar medical facilities
- Police and fire stations
- Certain vital military bases
- Navigational aids
- Water and sanitation facilities
- Critical communications facilities
- Essential emergency governmental facilities and services
- Certain food storage and distribution centers

Residential customers being served in accordance with TEC's *Medically Essential Service Tariff* will receive individual notification well in advance of any disconnect. These customers are advised during the application process to either install back-up power or to make adequate plans in case of an outage. TEC will assist these customers as appropriate.

VII. GOVERNOR DECLARED EMERGENCY

Whenever the Governor's declaration does not have a direct effect on TEC's electric generation resources, only portions of this plan will be implemented as appropriate to the situation.

VIII. ASSISTANCE

If other utilities in the state would benefit from the company's assistance, TEC would take whatever steps are prudent and appropriate to provide such assistance. The determination of prudency would include the evaluation of

TEC's fuel projections and the status of TEC's system resources. This assistance would include, but not be limited to

- Making surplus fuel available for the other utility's use
- Maximizing the safe transfer of electricity across applicable system interfaces
- Maximizing voltage support to the utility's system as practical

Version History

Date	Version Number	Summary of Change	Reason for Change	Changed By
01/18/2010	2010A	Yearly review	Update document with organizational changes	Andrew Kennedy
01/21/2011	2011A	Yearly review		
10/10/2011	2012A	Yearly review	Update document	Andrew Kennedy
12/07/2012	2013A	Yearly review	Updated document	Andrew Kennedy
01/18/2014	2014A	Yearly review	Updated document	Andrew Kennedy
01/23/2015	2015A	Yearly review		
02/01/2016	2016A	Yearly review	Updated document	Brent Caldwell
02/01/2017	2017A	Yearly review	Updated document	Brent Caldwell
01/31/2021	2021A	Yearly review	Updated Brent Caldwell document	
01/31/2024	2024A	Yearly review	Updated John Heisey document	

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
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.		
	Natural Gas	Purchase additional gas and transportation.	Purchase additional gas and transportation. Maximize gas storage.		

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
2.	Communicate with TEC Employees	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.
3.	Communicate with Public and Media	Notify officers and key departments about plans to contact the public and media, if the total fuel supply continues to decrease in Step B.	Issue news release. Provide daily status briefing. Promote load conservation.	Issue news release. Provide daily status briefing. Promote load conservation.	Issue news release. Provide daily status briefing. Promote load conservation.
4.	Communicate with Governmental Organizations	Coordinate with Corporate Communications in notifying appropriate agencies.	Request appropriate agencies of the critical need to take actions such as waive/modify environmental restrictions Update		

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
			governmental agencies.		
5.	Wholesale Market Power Sales and Purchases	Stop non-firm sales to wholesale customers. Purchase economic wholesale power to the extent possible. TEC will request Firm wholesale customers to make a public appeal immediately to their respective energy service customers to conserve energy.	Arrange non- emergency power purchases, reserve transmission services and tag transaction(s). Request maximum output and availability from co-generators and wholesale power purchases. Request voluntary 20% KWH reduction from firm wholesale customers.	Purchase all available non-emergency power, reserve available transmission service, and tag transaction(s). Request 40% voluntary KWH reduction from firm wholesale customers.	Implement TEC Capacity and Energy Emergency Plan
6.	Waive/Modify Environmental Restrictions		Request to Governor to suspend State Implementation Plan of the Clean Air Act.		

Attachment I

	A	ACTION	30 Days	20 Days	10 Days	7 Days
			PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
	١	Curtail TEC Non-essential Energy Use:	Curtail non-essential energy uses.	Curtail non-essential energy uses.	Curtail non-essential energy uses.	
	(Curtail TEC Offices and Operations Center:	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. Cancel use of TECO Plaza Halls or atrium.	Implement TEC Capacity and Energy Emergency Plan
{		Promote Load Conservation:	Educate customers. Advertise conservation.	Commercial, Industrial & Governmental Customers: Request 20% KWH reduction. Adjust thermostat settings +/-5°, depending on the season.	Commercial, Industrial, & Governmental: Request 40% KWH reduction. Set thermostats to 65° or to 80° (based on season). Encourage alternate energy usage. Reduce operating hours if necessary.	Implement TEC Capacity and Energy Emergency Plan.

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
	Lighting		Request elimination of non-essential outdoor, sport and advertising lighting.	Residential: Curtail use of A/C, heating, hot water heaters, dryers, dish washers, etc. Eliminate window and display lighting. Request commercial establishments limit: a) A/C and heating during nonuse hours and in unoccupied areas b) Non-essential use of hot water.	
9.	Utilize Demand- Side Management	Implement as needed.	Implement as needed.	Implement as needed.	Implement TEC Capacity and Energy Emergency Plan.

10. Modify System Operations

Review maintenance schedule to optimize use of available fuel. Minimize spinning reserve while maintaining Operating Reserves. Modify unit dispatch. Cycle units off-line.

Implement TEC Capacity and Energy Emergency Plan.

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

EFFECTIVE DATE: 01/31/20214

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I. PURPOSE

The purpose of this Long-Term Energy Emergency Plan for Fuel Supply Shortage (hereafter referred to as the Fuel Supply Emergency Plan) is to document the plan for responding to a Tampa Electric Company (<u>"TEC"</u>) fuel shortage emergency. This plan applies to fuel emergencies as defined in Section II and works in cooperation with the *Capacity and Energy Emergency Plan*, which covers abrupt, short-term capacity/energy emergencies.

TEC strives to maintain adequate fuel supplies to enable the company to serve customers reliably. The company accomplishes fuel adequacy through a diverse fuel supply portfolio, multiple suppliers, various agreement termstenors, multiple gas pipelines or backup fuel at each power station, alternative transportation paths, gas pipeline paths accessing multiple production basins with various receipt points, and flexible storage capacity for the various fuel supply commodities such as natural gas, oil, coal and petroleum coke. Natural gas, is a just-in-time fuel which, meansing storage is limited and generation resources consume the fuel when needed via pipeline delivery. Therefore, TEC constantly monitors natural gas commodity and pipeline availabilities constantly. Natural Gas is projected to be approximately 85% percent of the future generation mix and the most likely fuel to drive a Fuel Supply Shortage at TEC. TEC has adoes contract in place for gas supply storage capacity located in Alabama and Mississippi. The storage contract would supply TEC with approximately ten 10 days of gas supply at 200,000 MMBtu per day in the event of a total loss of supply from its traditional sources.

TEC uses oil primarily as a back-up fuel and retains inventories that complement the fuel's practical use in an emergency situation. For the solid fuels (i.e., coal and petroleum coke), TEC strives to-maintain 45 to 60 days of inventory on the ground at Big Bend Station. Solid fuel is projected to be less than 5% percent of the future generation mix and not likely to cause a Fuel Supply Shortage at TEC.

II. DEFINITION

A fuel supply emergency exists when (a) evidence indicates that within 30 days or less TEC will be unable to receive fuel supplies sufficient to satisfy forecasted fuel supply demands of TEC's generating units and (b) such situation places the entirea significant portion of the system at-risk of electric disruption.

III. APPLICABILITY

This plan applies to a fuel supply emergency, potentially of an unknown duration, that: (a) cannot be remedied by alternative sources of fuel, capacity and/or energy, and (b) will potentially result in widespread outages if no action is taken.

The plan addresses both a TEC fuel supply emergency, fuel supply shortages for other Florida utilities, and a fuel supply emergency declared by the Governor of the state of Florida ("Governor"), as noted in Sections IV and VII herein.

IV. NOTIFICATION, RESPONSIBILITY & DECLARATION

A. Notification Groups

The identification of each group applies also to any group member's designee.

- a. *Group 1* is the Vice President of, Energy Supply; Director of, of Natural Gas and Wholesale Power Origination and total trading, Director of, Natural Gas & Wholesale Power TradingResource Planning and Unit Commitment; and the Director of, the of TransmissionEnergy Control Center.
- b. *Group 2* is the Vice President of, Customer Service Experience, Vice President of Regulatory Affairs, and the Vice President of Electric Delivery.

B. Fuel Supply Shortage (Potential Fuel Supply Emergency)

Whenever the monthly Unit Commitment plan or an alternate forecast predicts a fuel supply shortage is imminentexists, the Fuels ManagementManager of, Gas and Power Trading will notify Group 1 that a potential fuel emergency exists. Also, the Vice President of, Energy Supply will convene Group 2, if appropriate, to assess the fuel supply emergency. Group 2, if appropriate, will brief the President and CEO of Tampa Electric ("President") on the potential fuel supply emergency. The President shall be responsible for declaring a fuel supply emergency, which sets in motion the actions documented in this plan.

C. Fuel Supply Emergency Declared

Whenever the President declares a fuel supply emergency, Group 2 shall orchestrate within their areas the applicable portions of this plan. Additionally, the Vice President of Electric Delivery, shall, at a minimum, notify the applicable Florida Reliability Coordinating Council ("FRCC") contact of the existence of such emergency. Similarly, whenever the Governor declares a statewide fuel supply emergency, the Senior Vice President of, Energy Supply shall, at a minimum, notify the President and other members of Group 2. Group 2, as directed by the President, shall orchestrate within their areas the applicable portions of this plan.

The Director of the Energy Control Center of Transmission will be the company coordinator responsible for tactical implementation of the action plans detailed in Section VI of the Fuel Supply Emergency Plan.

V. GENERAL

A. Inventory Planning and Fuel Supply Forecasting

By no later than the end of OctoSeptember of the prior year, Resource PlanningFuels Management, with the support of Generation Asset Managementthe Director of, Origination and Trading, will forecast the upcoming calendar year's fuel inventory for each generating plant in TEC's system. Such forecasts will be updated at least monthly, by Unit Commitment, throughout the calendar year.

Whenever such forecasting, including ad hoc forecasts, predicts a fuel supply shortage that has the potential to result in a fuel supply emergency, Fuels Managementthe Manager of, Gas and Power Trading will notify Group 1, who will convene and assess the situation. The Director of, the Energy Control Center of Transmission shall then implement the appropriate portions of Sections V(B) and V(C) below and continue to monitor the situation. If the fuel supply shortage situation is deteriorating and does not appear to be remediable, the Director of the, Energy Control Center of Transmission shall caucus with Group 1 then convey the deteriorating fuel condition to Group 2, which moves this plan forward towards potentially implementing Section VI below.

B. Emergency Coordination of Fuel Supplies

During a potential or actual fuel supply emergency, <u>TECTrading and</u> <u>Origination and Unit Commitment</u> will monitor and forecast fuel availabilities and inventory levels at least <u>weekdailly</u> and will conduct regularly scheduled

meetings between the applicable fuels, operations, regulatory, and business areas. TECTrading and Origination will also identify all potential fuel supply sources and delivery options and, if needed, purchase and accelerate delivery of fuel supplies even if of a lesser quality or higher cost. TEC will reimburse or replace, as appropriate, any fuel or energy supplied on an emergency basis by other entities.

C. System Operation and Interchange

The following actions may be taken to mitigate the effects of a fuel supply concern prior to implementing any of the demand-side reductions in Section VI:

- TEC may halt or limit the company generation resources from producing energy for non-firm sales.
- TEC may purchase energy from other systems which are able and willing to supply interchange energy for reliability to conserve fuel or minimize the use of fuels that are in short supply regionally.
- TEC may operate its units out of economic dispatch or, as environmental permits allow, on an alternative fuel in order to conserve the type of fuel that is in short supply.
- TEC may implement alternative fuel transportation measures if the fuel supply emergency is associated with restrictions in traditional fuel transport methods. <u>This could include, but is not limited to,</u> buying incremental gas transportation, storage or supply products, scheduling interruptible gas transportation or borrowing gas from a pipeline.
- TEC may implement a system-wide alert, as appropriate.
- TEC may secure transmission service to enable purchase power from out of State to flow into the system.

VI. ACTION PLAN

A. Overview

This action plan is a systematic approach to curtailing electricity usage during a fuel supply emergency. The action plan has four progressive

phases. Each phase becomes more severe and addresses energy service reductions to an increasing number of customers.

Phase 1, with the exception of the implementation of demand-side management as needed, is entirely voluntary for customers and would be implemented when there are projected to be 30 days or less of fuel supply availability; the exception being the implementation of demand-side management, as needed.

Phase 2 is implemented when the projected fuel supply reaches 20 days.

Phase 3 is implemented at 10 days; and

Phase 4 is implemented at 7 days of available supply remaining. Prior to implementing any phases of the action plan, TEC will exhaust all practical steps and methods of extending and conserving fuel. While this plan provides a step-by-step response to an emergency condition, circumstances at the time may require variations from the plan. See Attachment I for a complete summary of steps for each phase of the plan.

B. Phase 1 (30 days)

- 1. Initiate communication with customers and make appeals to all customers for voluntary reduction in the use of electricity in observance of an impending fuel supply shortage. Appeals will be made through news conferences, news releases, paid advertising, and other available means. Listed below are energy conservation recommendations to be stressed in the appeals:
 - A. Lower heating thermostats to 65 degrees or less during heating hours and raise cooling thermostats to at least 80 degrees during cooling hours in all conditioned spaces where this action will result in less energy consumption and does not damage equipment or structure. This excludes customers with physician-advised medical exemptions.
 - B. Reduce all indoor lighting levels as close to minimum safety and task levels as practical (particularly commercial and industrial customers).

- C. Eliminate all unnecessary outdoor lighting.
- D. Eliminate display lighting, decorative lighting, and any lighting purely for aesthetics.
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- F. TEC, upon customer request, will give suggestions to individual customers regarding conservation measures applicable to specific installations. However, each customer is responsible for ensuring the implementation of any suggestion is not detrimental to the customer's facilities.
- G. To the extent practical and safe, discontinue use of supplemental energy demanding equipment such as second and third refrigerators, unnecessary freezers, electric pumps, and so on.
- 2. Initiate curtailment of TEC energy use and provide communication to employees.
- 3. Purchase and expedite the transportation of proper fuels.
- 4. End non-firm sales to wholesale customers, purchase available wholesale power, implementing demand-side management as needed, and optimize the use of available fuel.
- TEC representatives will meet with all firm wholesale customers and apprise them of the fuel situation. At this meeting, TEC will strongly suggest that the individual firm wholesale customers make a public appeal immediately to their respective energy service customers to conserve energy.
- 6. Regulatory, Environmental, and Corporate Communications will coordinate notifying the appropriate agencies.
- <u>7.</u> Grid Operations and Portfolio Optimization will review the maintenance schedule and reduce spinning reserves, where possible, to optimize use of available fuel.

7.

C. Phase 2 (20 days)

- TEC will make a public announcement that a fuel supply emergency exists and that TEC must implement the second phase of several energy conservation measures and continue to promote load conservation.
- Initiate communication with governmental organizations, including a request to the Governor to suspend the State Implementation Plan of the Clean Air Act.
- 3. Purchase and expedite the delivery of any satisfactory burnable coal to the extent possible.
- 4. Commercial, Industrial, and Governmental customers will be requested to take the following steps:
 - a. Eliminate the use of lighting for indoor and outdoor advertising devices and displays and building flood lighting, except for lighting a single business identification signage.
 - b. Reduce weekly energy consumption by 20 percent at all retail businesses, institutional facilities, public and private schools, office buildings, and industrial plants, except for vital health and safety institutions. (A 20 percent energy reduction on a 40-hour operating week, e.g., 8 hours per day Monday through Friday, is equivalent to one day's worth of energy.) Vital health and safety institutions, although excluded from the request specifically, will be expected to implement all any reductions that minimally impact operationsally possible reductions.
 - c. Eliminate non-essential outdoor lighting.
- 5. Request TEC's environmental department to petition governing authorities to temporarily remove environmental constraints from generating units that inhibit the use of available fuel in a manner that mitigates the fuel supply emergency.
- 6. Continue curtailment of TEC energy use.

- 7. Continue or implement demand-side management, continue to purchase available wholesale power, and request maximum output from co-generators and wholesale power purchases.
- 8. TEC representatives will meet with all firm wholesale customers and request a 20% percent voluntary reduction.
- 9. Continue to modify system dispatch to optimize use of available fuel, including fuel transfers.

D. Phase 3 (10 days)

In this phase, TEC would take additional actions under this plan to further reduce electric demand, including the following actions, as appropriate:

- Continue media communications promoting load conservation. Particularly, residential customers will be requested to curtail their use of high energy demand devices and appliances such as clothes dryers, dishwashers, pool pumps, and the like.
- 2. Request that all Commercial, Industrial, and Governmental customers decrease their energy requirements by up to an additional 20 percent, for a total reduction of up to 40 percent as of this phase. A 40 percent energy reduction on a 40-hour operating week is equivalent to two days' worth of energy. Request that all window, and display lighting be turned off and A/C Units be turned off during non-use hours limitation.
- 3. Minimize firm sales by requesting a 40% voluntary reduction, purchase all available non-emergency reserve power, and continue demand-side management.
- 4. Continue curtailment of TEC energy use.
- 5. Purchase and expedite delivery of any satisfactory burnable oil to the extent possible.
- Alert Customer Experience to initiate outbound communication to Medical Watch Customers. This provides at least three days' notice in advance of a disconnection if the Firm Load Curtailment Plan must be implemented during Phase 4. Customer Experience will maintain

an updated list of Medical Watch customers, so they can immediately begin outbound communication.

E. Phase 4 (7 days)

Notify the applicable FRCC personnel that the fuel supply for electric generation has reached a crisis level. TEC will then utilize the *Capacity and Energy Emergency Plan* for the remainder of Phase 4. The implementation of Phase 4 will be accompanied by a revised TEC news release.

F. Relaxation of Action Plan

Whenever the fuel supply emergency ceases or improves to the point where a lower phase of action is sufficient to continue electric service at the current level, the President, public, and the FRCC will be notified by the Vice President, Electric Delivery. The relaxation will befit the current fuel supply situation and may involve implementing in reverse sequence of the phases described in Section VI.

G. Essential Services

In Phase 4, the Firm Load Curtailment Plan may be implemented. If so, essential services shall be given priority on electric service for as long as the situation allows, provided that alternative sources of electric generation/supply are not available to such essential services. Essential services are electric services that are essential to the health, safety, or welfare of the community.

The following types of customers may be included in this category:

- Critical TEC facilities
- Hospitals and similar medical facilities
- Police and fire stations
- Certain vital military bases
- Navigational aids
- Water and sanitation facilities
- Critical communications facilities

- Essential emergency governmental facilities and services
- Certain food storage and distribution centers

Residential customers being served in accordance with TEC's *Medically Essential Service Tariff* will receive individual notification well in advance of any disconnect. These customers are advised during the application process to either install back-up power or to make adequate plans in case of an outage. TEC will assist these customers as appropriate.

VII. GOVERNOR DECLARED EMERGENCY

Whenever the Governor's declaration does not have a direct effect on TEC's electric generation resources, only portions of this plan will be implemented as appropriate to the situation.

VIII. ASSISTANCE

If other utilities in the state would benefit from the company's assistance, TEC would take whatever steps are prudent and appropriate to provide such assistance. The determination of prudency would include the evaluation of TEC's fuel projections and the status of TEC's system resources. This assistance would include, but not be limited to

- Making surplus fuel available for the other utility's use
- Maximizing the safe transfer of electricity across applicable system interfaces
- Maximizing voltage support to the utility's system as practical

Version History

Date	Version Number	Summary of Change	Reason for Change	Changed By
01/18/2010	2010A	Yearly review	Update document with organizational changes	Andrew Kennedy
01/21/2011	2011A	Yearly review	Update document with organizational changes	Andrew Kennedy
10/10/2011	2012A	Yearly review	Update document	Andrew Kennedy
12/07/2012	2013A	Yearly review	Updated document	Andrew Kennedy
01/18/2014	2014A	Yearly review	Updated document	Andrew Kennedy
01/23/2015	2015A	Yearly review		
02/01/2016	2016A	Yearly review	Updated document	Brent Caldwell
02/01/2017	2017A	Yearly review	Updated document	Brent Caldwell
01/31/2021	2021A	Yearly review	Updated document	Brent Caldwell
01/31/2024	<u>2024A</u>	Yearly review	<u>Updated</u> <u>document</u>	John Heisey

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
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.		
	Natural Gas	Purchase additional gas and transportation.	Purchase additional gas and transportation. Maximize gas storage.		

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
2.	Communicate with TEC Employees	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.	Use appropriate internal communication platforms (e.g., electronic mail and/or bulletins) to provide updates to employees as needed.
3.	Communicate with Public and Media	Notify officers and key departments about plans to contact the public and media, if the total fuel supply continues to decrease in Step B.	Issue news release. Provide daily status briefing. Promote load conservation.	Issue news release. Provide daily status briefing. Promote load conservation.	Issue news release. Provide daily status briefing. Promote load conservation.
4.	Communicate with Governmental Organizations	Coordinate with Corporate Communications in notifying appropriate agencies.	Request appropriate agencieslegal authorities for of the critical need to take actions such as waive/modify environmental		

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
			restrictions., to be taken in this step. Update governmental agencies.		
5.	Wholesale Market Power Sales and Purchases	Stop non-firm sales to wholesale customers. Purchase economic wholesale power to the extent possible. TEC will request Firm wholesale customers to make a public appeal immediately to their respective energy service customers to conserve energy.	Arrange non- emergency power purchases, reserve transmission services and tag transaction(s). Request maximum output and availability from co-generators and wholesale power purchases. Request voluntary 20% KWH reduction from firm wholesale customers.	Purchase all available non-emergency power, reserve available transmission service, and tag transaction(s). Request 40% voluntary KWH reduction from firm wholesale customers.	Implement TEC Capacity and Energy Emergency Plan
6.	Waive/Modify Environmental Restrictions		Request to Governor to suspend State		

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
			Implementation Plan of the Clean Air Act.		
7.	Curtail TEC Non-essential Energy Use:	Curtail non-essential energy uses.	Curtail non-essential energy uses.	Curtail non-essential energy uses.	
	Curtail TEC Offices and Operations Center:	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. Cancel use of TECO Plaza Halls or atrium.	Implement TEC Capacity and Energy Emergency Plan
8.	Promote Load Conservation:	Educate customers. Advertise conservation.	Commercial, Industrial & Governmental Customers: Request 20% KWH reduction. Adjust thermostat settings +/-5°, depending on the season.	Commercial, Industrial, & Governmental: Request 40% KWH reduction. Set thermostats to 65° or to 80° (based on season)	Implement TEC Capacity and Energy Emergency Plan.

Attachment I

	ACTION	30 Days	20 Days	10 Days	7 Days
		PHASE 1 (Emergency Declared)	PHASE 2	PHASE 3	PHASE 4
	Lighting		Request elimination of non-essential outdoor, sport and advertising lighting.	Encourage alternate energy usage. Reduce operating hours if necessary. Residential: Curtail use of A/C, heating, hot water heaters, dryers, dish washers, etc. Eliminate window and display lighting. Request commercial establishments limit: a) A/C and heating during nonuse hours and in unoccupied areas b) Non-essential use of hot water.	
9.	Utilize Demand- Side Management	Implement as needed.	Implement as needed.	Implement as needed.	Implement TEC Capacity and Energy Emergency Plan.

10. Modify System Operations

Review maintenance schedule to optimize use of available fuel. Minimize spinning reserve while maintaining Operating Reserves. Modify unit dispatch. Cycle units off-line.

Implement TEC Capacity and Energy Emergency Plan.