

V. SOUTH FLORIDA REGIONAL PLANNING COUNCIL

V-1) What are the anticipated safety and security risks associated with the modernization of the plant, during decommissioning of Units 1 through 4, construction of the modernized plant and post-retrofit operations? Describe the potential local and regional hazards and appropriate responses. Provide a copy of the current Emergency Action Plan.

RESPONSE:

FPL is an industry leader in facility safety and security and will remain as an industry leader to ensure the safety of its employees, facilities, and the communities in which they do business. FPL will conduct the construction and operation of PEEC with the top safety and security management practices. Coordination, communication, and educational measures will be put into place for the dismantlement of the existing Port Everglades Units 1 through 4, and the construction and operational activities of PEEC.

Based on discussions with SFRPC staff, it is FPL's understanding that sufficient information regarding local and regional hazards and FPL's emergency action plan for the PEEC Project was supplied in the SCA.

V-2) The SCA states that during the dismantlement and construction phase of this project, FPL will continue to provide warm-water refuge for the manatees consistent with the Manatee Protection Plan established pursuant to the existing Plant's Industrial Wastewater (IWW) Permit. Please explain the expected consequences for manatees during the various phases of construction that impact thermal discharge output levels.

RESPONSE:

FPL has designed, installed, and successfully operated a manatee temporary heating system (MTHS) at both the RBEC and CCEC sites to provide warm water for manatees during the winter when the plants are not operational. FPL is in the process of designing a customized MTHS for Port Everglades utilizing the design criteria and performance standards from these previously installed systems. The final MTHS plan will be designed in consultation with FWS and FWC and included in Environmental and Biological Monitoring Plans as was the case with the two previous plants. The MTHS will be designed and operated to avoid adverse impacts to manatees during the various phases of construction.

V-3) Describe how workers will be identified and hired. How do the applicant's hiring methods ensure workers within the region are utilized to ensure economic impacts are realized locally?

RESPONSE:

Due to the large labor markets in Broward, Palm Beach, and Miami-Dade County, the labor demands for the Project (construction and operation) are anticipated to be met by workers living in the Project area, with skilled labor also supported from outside the Project area.

FPL will promote employment of local workers by distributing Project information to the community, including the benefits to the community, information about types of jobs and skills required and local

training opportunities. Notice of Project employment opportunities will appear in local media and FPL will sponsor or participate in area job fairs.

In addition, the Project will have a strong indirect effect on the demand for goods and services. This multiplier effect will also generate additional jobs, earnings and tax revenue for the area as described in SCA Section 7.1.2. As described in this section, PEEC construction activities were determined to have a projected economic benefit of \$858 million during the construction period, including direct, indirect, and induced benefits. The direct and indirect labor income benefits are projected to be \$375 million and value added benefits are projected to be \$483 million.

The economic benefits of the construction of PEEC will result in approximately 7,105 direct and indirect jobs. The industries associated with these jobs are:

- 4,373 jobs in knowledge-based services (Information Services, Finance & Insurance, Real Estate, Professional Services, Administrative, Educational Services, Health & Social Services, Arts, Entertainment & Recreation and Other Services).
- 1,934 jobs in construction.
- 298 jobs in retail trade.
- 227 jobs in visitor industry (includes accommodation and food services).
- 156 jobs in wholesale trade and transportation services (includes wholesale trade, transportation and warehousing).
- 74 jobs in manufacturing.
- 43 jobs in government and other industries.

V-4) The Goals and Policies of the Strategic Regional Policy Plan for South Florida, in particular those indicated below, should be observed when making decisions regarding this project.

Goal 2: Increase employment opportunities and support the creation of jobs with better pay and benefits for the Region's workforce.

Policy 2.4 Ensure that decisions with regard to the location of infrastructure investments by local governments are made with priority for the lowest income neighborhoods.

RESPONSE:

Comment acknowledged. FPL will comply with these applicable provisions of the Strategic Regional Policy Plan (SRPP). Specially, due to the large labor markets in Broward, Palm Beach, and Miami-Dade County, the labor demands for the Project (construction and operation) are anticipated to be met by workers living in the Project area, with skilled labor also supported from outside the Project area. FPL will promote employment of local workers by distributing Project information to the community, including the benefits to the community, information about types of jobs and skills required and local training opportunities. Notice of Project employment opportunities will appear in local media and FPL will sponsor or participate in area job fairs. In addition, the Project will have a strong indirect effect on the demand for goods and services. This multiplier effect will also generate additional jobs, earnings and tax revenue for the area.

The Project will allow for the redevelopment of the existing plant property and existing infrastructure; the cooling water systems, existing gas delivery infrastructure, and access to the FPL transmission system. Additional infrastructure will not be required for the Project.

As described in SCA Section 7.1.2 and in Response V-3 above, the construction of PEEC will have significant local benefits. In addition, the operation of PEEC will provide considerable taxes available to local governments for the development of infrastructure. For PEEC, annual property taxes will accrue to the City of Hollywood, Broward County, the Broward County School District, and other taxing authorities. These funds are then distributed to the various entities within the governmental jurisdictions. The operation of PEEC is expected to generate \$372 million in property tax revenue from 2017 to 2046. The property tax revenues for the PEEC Project are estimated over the assumed life of PEEC to be approximately \$114 million to the City of Hollywood, approximately \$126 million to Broward County's general fund, approximately \$122 million to the school district, and approximately \$10 million to other taxing authorities (SFWMD and Florida Inland Navigation District).

Goal 3: Promote the health, safety, and welfare of South Florida's residents.

Policy 3.7 Reduce exposure to environmental contaminants and hazards in the Region's ground, air, and water.

RESPONSE:

Comment acknowledged. FPL will comply with all applicable environmental regulations and permitting standards for construction and operational activities of PEEC. These regulations and permitting standards will be followed to reduce and/or avoid potential exposure to environmental contaminants and hazards in the Region's ground, air, and water.

Most importantly, as described in the SCA, the Project allows for the redevelopment of Units 1 through 4 and will result in more efficient power generation without using any additional land, water resources, or transmission line rights-of-way (ROWs). PEEC will have a much sleeker profile, with the height of the new structures (stacks) at less than 150 feet compared to the approximately 343 foot height of the existing stacks. Moreover, PEEC will reduce air emissions by approximately 90 percent and will reduce the rate of carbon dioxide (CO₂) emissions by approximately 50 percent.

PEEC will use water more efficiently than the existing Port Everglades Plant with an approximately 50 percent reduction in cooling water flows and heat rejection. The existing Port Everglades Plant has operated for over 50 years using a once-through cooling system and related studies found no adverse impact to benthos outside the discharge canal.

Goal 7: Protect, conserve, and enhance the Region's water resources.

Policy 7.11 Encourage the implementation and further development of water conservation measures.

RESPONSE:

Comment acknowledged. The amount of cooling water used by PEEC will be more efficient than the existing Port Everglades Plant with approximately 50 percent of the flow and 50 percent of the heat rejected. The existing Port Everglades Plant has operated for over 50 years using a once-through cooling system the studies found no adverse impact to benthos outside the discharge canal. The process and service water will also be much less since the amount of electricity generated using steam is about one-half for PEEC when compared to the existing Port Everglades Plant Units 1 through 4.

Goal 9: Develop clean, sustainable, and energy-efficient power generation and transportation systems.**Policy 9.2 Encourage the development of renewable, clean fuels and energy-efficient enterprises to serve our communities and national markets.****RESPONSE:**

FPL will comply with this applicable provision of the SRPP. Specifically, the Project proposes to modernize the existing power plant into a modern, highly efficient, lower-emission next generation clean energy center. The Project will be more energy efficient and will provide cleaner energy for FPL's customers.

Goal 14: Preserve, protect, and restore Natural Resources of Regional Significance.

Policy 14.7 Restore, preserve, and protect the habitats of rare and state and federally listed species. For those rare and threatened species that have been scientifically demonstrated by past or site specific studies to be relocated successfully, without resulting harm to the relocated or receiving populations, and where in-situ preservation is neither possible nor desirable from an ecological perspective, identify suitable receptor sites, guaranteed to be preserved and managed in perpetuity for the protection of the relocated species that will be utilized for the relocation of such rare or listed plants and animals made necessary by unavoidable project impacts. Consistent use of the site by endangered species, or documented endangered species habitat on-site shall be preserved on-site.

RESPONSE:

Comment acknowledged. The terrestrial systems on the PEEC site were cleared and previously impacted in connection with the construction of the Port Everglades Plant in the late 1950s and early 1960s. Construction of the PEEC upon these previously impacted areas, which have been used for power plant operations for more than 50 years, will not cause adverse ecological impacts. No adverse impacts to federal or state listed terrestrial plants and animals are expected in association with the construction at the Site, due to the existing developed nature of the Site and the lack of suitable habitat for listed species.

The existing Port Everglades Plant has been a refuge for the endangered manatee during the wintertime for decades. With the completion of PEEC, the Site will continue to serve as a refuge for this important Florida species long into the future. During the dismantlement and construction period, FPL will continue to provide a warm-water refuge for the manatees consistent with the Manatee Protection Plan established pursuant to the existing Plant's IWW Permit.

Goal 18: Ensure regional coordination, preparation, and response to emergencies.

Policy 18.14 Achieve flexible, comprehensive, and coordinated emergency planning for a variety of emergencies.

Policy 18.5 Enhance public awareness and education regarding appropriate responses to a variety of emergencies.

Policy 18.6 Promote the federal, state, and regional coordination of a public information and awareness program concerning various types of hazards and appropriate responses.

RESPONSE:

System Reliability

In 2006, FPL implemented a plan to upgrade thousands of poles and transmission structures from wood to concrete or steel over several years. FPL has reduced the average number of service interruptions to customers by approximately 15 percent since 2007. In 2011, FPL completed the strengthening of its electric infrastructure serving virtually every existing 911 and emergency operations center in its service territory as well as other critical facilities identified with the help of local community leaders. In 2012, FPL plans to invest more than \$200 million to continue strengthening the electric grid that serves critical infrastructure facilities such as hospitals and 911 centers and important community needs such as grocery stores, gas stations and pharmacies, as well as for major highway crossings.

FPL will continue to take significant steps to strengthen its electrical infrastructure and to enhance its emergency response capabilities. Included in this ongoing work are pole inspections, system infrastructure hardening, vegetation management, and emergency preparedness initiatives. FPL is continuing to invest in efforts to strengthen the infrastructure against severe weather, maintain its strong everyday reliability, and enhance its abilities to respond to emergencies.

Emergency Preparedness and Coordination

FPL has been an industrial leader in emergency preparation and management. FPL maintains a comprehensive emergency disaster preparedness plan for both operation emergencies and natural disasters. The existing Port Everglades Plant currently has an Emergency Action Plan; this plan will be updated based on the design and operation of PEEC. This comprehensive plan includes coordination, education, and training efforts in emergency response.

FPL conducts annual exercises to prepare for emergency response and restoration in the event that an emergency occurs in FPL's service territory. FPL's comprehensive storm plan focuses on readiness, restoration and recovery. In April 2011, every FPL unit was required to revalidate the readiness and functionality of the emergency response equipment put in place after September 11, 2001. In addition, FPL completed a full review of its ability to respond to "station blackout" conditions resulting in a complete loss of power to critical systems, an evaluation of flooding protection and response capabilities, and conducted an analysis of every plant's ability to deal with seismic and other extreme natural events.

The FPL emergency response plans for each energy center include tracking outages, assessing damage, communicating with customers and employees, and initiating service restoration. Using simulations, FPL annually tests its emergency response plans and tactics, applying lessons learned. To make the

simulations as real as possible, FPL generates damage estimates for each fictional scenario. These estimates are based on scientific models developed from decades of data and real-life factors such as fuel supplies, school openings, and extreme weather events.

FPL's Area Command Center coordinates in the event of an emergency, providing policy and strategic guidance. FPL Work Bases are pre-selected staging sites and service centers that house the thousands of restoration crews and support personnel engaged in executing the restoration plan. The FPL Logistics Team provides support to the Work Bases, securing services such as materials, food, water, and housing.

Public Information

In the event of an emergency, customers are advised to monitor local radio, television, newspapers, FPL's website (www.FPL.com), FPL's Mobile Command Center (mobile.FPL.com), Twitter (www.twitter.com/insideFPL), Facebook (www.facebook.com/FPLconnect), YouTube (www.youtube.com/FPL) and FPL's blog (www.FPLblog.com) for updated restoration expectations and other progress reports.