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CHAPTER 8 NEED FOR POWER

The environmental report should include consideration of the benefits of the proposed action [10 CFR 51.45(c)]. To accurately characterize the benefits associated with the proposed action, the NRC must assess the need for power (NRC 2003). NRC guidance NUREG-1555 provides detailed instructions for NRC to use in reviewing the need for power. However, the guidance also identifies the NRC expectation that states may perform an evaluation of the need for power. NUREG-1555 indicates that if the state's evaluation is (1) systematic, (2) comprehensive, (3) subject to confirmation, and (4) responsive to forecasting uncertainty, no additional independent review by NRC is needed. This chapter describes the state of Florida process for determining need for power, the evaluation that it performed for Turkey Point Units 6 & 7, and how the evaluation meets the NRC criteria for not performing an additional review.

8.1 STATE OF FLORIDA PROCESS FOR DETERMINING NEED FOR POWER

Florida has a traditional system for regulating electric service in which utilities have a defined service territory and customers within a service territory purchase their electricity from the local utility. The state regulates rates and services of the utilities, electric grid reliability, and planning for and meeting electric needs. FPL is a regulated Florida electric utility and Figure 8.1-1 shows FPL's service territory. Descriptions of the FPL service territory, FPL's power system and resources, and the role of Florida Reliability Coordinating Council (FRCC) are provided in Subsections 8.1.3, 8.1.4, and 8.1.5, respectively.

The state has charged the Florida Public Service Commission (FPSC) with the responsibility of regulating electric utilities (FS 2007a, FS 2007b). In addition, the state has established the Florida Office of Public Counsel (FOPC) to advocate for utility customers before regulatory agencies such as the FPSC. Both state agencies have roles in the process of determining need for power. Finally, the FRCC, one of the North American Electric Reliability Corporation (NERC) regional councils, plays a role.[1]

The FPSC is the sole forum for determination of the need for power within Florida. By statute and by its own regulations, there are two key components to FPSC's evaluation of need for power:

- Ten-year site plans
- Determinations of need

The following sections describe each component and how each has addressed the need for power from Turkey Point Units 6 & 7.

1. There is no independent system operator or regional transmission organization within Florida.

8.1.1 TEN-YEAR SITE PLANS

Florida 10-year site plans are comparable to what other states call integrated resource plans. Florida requires the following:

(1) Each electric utility shall submit a 10-year site plan which shall estimate its power-generating needs and the general location of its proposed power plant sites [FS 186.801(1)]. The FPSC has made this an annual submittal requirement for utilities having generating capacity of 250 megawatts or greater and requires addressing fuel requirements [FAC 25-22.071(1)(a)].

(2) The FPSC must make a preliminary study of the plan and classify it as “suitable” or “unsuitable.” The FPSC study must review:

a. The need, including the need as determined by the Commission, for electrical power in the area to be served

b. The effect on fuel diversity with the State

c. Anticipated environmental impact of each proposed site

d. Possible alternatives to the proposed plan

e. Views of appropriate local, state, and federal agencies

f. The extent to which the plan is consistent with the state comprehensive plan

g. State information on energy availability and consumption [FS 186.801(2)]

(3) Utilities shall compile and submit to the FPSC aggregate data derived from individual plans. The FRCC prepares and submits these data for the utilities to the state of Florida and NERC.

As an example, in 2008 11 utilities submitted 10-year site plans. The FPSC held a public workshop to facilitate discussion of the plans. The FPSC made supplemental requests of reporting utilities and reviewed data from other sources, including the following documents prepared by the FRCC:

The 2008 *Regional Load and Resource Plan* contains aggregate data on demand and energy, capacity and reserves, and proposed new generating unit and transmission line additions for Peninsular Florida as well as statewide (FPSC 2008a).

The 2008 *Reliability Assessment* is an aggregate study of generating unit availability, forced outage rates, load forecast methodologies, and gas pipeline availability (FPSC 2008a).

The *Long Range Transmission Reliability Study* is an assessment of the adequacy of Peninsular Florida's bulk power and transmission system. The study includes both short-term (2009–2012) detailed analysis and long-term (2013–2017) evaluation of developing trends that would require transmission additions or other corrective action (FPSC 2008a).

The FPSC found the plans to be suitable and, in reporting on its annual review, addressed energy demand; energy generation; fuel price, supply, and transportation; transmission plans; and state, regional, and local comments. The FPSC uses the annual review report to meet its statutory requirement for reporting to the Florida legislature and for providing electricity forecasts to the Florida Energy and Climate Commission (FPSC 2008a).

FPL annually submits 10-year plans to the FPSC. The FPL plan includes an estimate of the utility's electric power generating needs, a projection of how those needs will be met, and disclosure of information pertaining to the utility's preferred and potential power plant sites.

Chapter I of the FPL 10-year plan provides an overview of FPL's current generating facilities and other resources including purchased power, demand side management (DSM), and FPL's transmission system. Chapter II presents FPL's load forecasting methodology and its forecast of seasonal peaks and annual energy usage. Chapter III discusses FPL's integrated resource planning process and outlines FPL's projected resource additions based on FPL's integrated resource planning work. Chapter IV discusses environmental information as well as preferred and potential site locations for additional electric generation facilities. Chapter V addresses 12 "discussion items" which pertain to additional information that is to be included in a site-plan filing. Table 8.1-2 presents excerpts from the table of contents of the 2010 plan.

Site plans are long-term planning documents and should be reviewed in this context. A site plan contains tentative information, especially for the latter years of the 10-year time horizon, and is subject to change at the discretion of the utility. Detailed evaluation of the need for power takes place during the second of the Florida three-component system, determination of need. Although not specifically presented in the FPL 2010 10-year plan because the reporting period ends in 2019, the plan notes that FPL had petitioned the FPSC for a determination of need for two new nuclear units at its existing Turkey Point power plant site. Subsection 8.1.2 addresses the FPL petition and the FPSC determination of need in detail.

8.1.2 DETERMINATION OF NEED

In 1973, the Florida Legislature enacted the Power Plant Siting Act (PPSA). The PPSA provides clear timelines and regulatory requirements for utilities seeking to build new power plants and directly associated facilities (such as transmission lines) in the State. Pursuant to the requirements of Chapter 25-22.080 (F.A.C. 1997) and contained within the Florida PPSA, an applicant for a new plant that exceeds 75 MW of steam generating capacity must file a petition for

a Determination of Need with the FPSC. As provided in F.S. Section 403.519, the FPSC is the sole forum for determining the need for construction of an electrical power plant in the state. This section of the statute further provides that in making its determination, the FPSC should take into account the need for electric system reliability and integrity, the need for adequate electricity at a reasonable cost, the need for fuel diversity and supply reliability, whether the proposed plant is the most cost-effective alternative available, and whether renewable energy sources and technologies as well as conservation measures are used to the extent reasonably available (FS 2007b).

In October 2007, FPL submitted to the Florida Public Service Commission (FPSC) its Petition to Determine Need for Units 6 & 7 (FPL 2007a) and the supporting documents, including the Need Study for Electrical Power (FPL 2007b) and the testimony of 15 witnesses. Table 8.1-1 presents the table of contents of the FPL Petition to Determine Need.

In the Petition to Determine Need for Units 6 & 7, FPL, proposed to add two new units, Units 6 & 7, at its existing Turkey Point generating plant site. These proposed units would collectively add between 2200 and 3040 MW (approximately 2234 MW with selection of two AP1000 reactors) baseload generating capacity to FPL's service area.

Several interested parties intervened in the need determination proceeding, including the FOPC, the independent ratepayer advocate appointed by the Legislature; five utilities, Florida Municipal Electric Association (FMEA), Florida Municipal Power Agency (FMPA), JEA, Orlando Utilities Commission (OUC), and Seminole Electric Cooperative, Inc.; and a private citizen.

In addition to the pre-filed testimony, the public was provided the opportunity to provide testimony at two public hearings. Topics of interest voiced in the public testimony portion of the hearings included system reliability and integrity; fuel diversity; environmental compliance costs; conservation, DSM and renewables; and cost-effectiveness.

FPSC Staff reviewed the information provided by FPL, the intervening parties, and public testimony, and performed an independent analysis of the information presented in FPL’s petition, which concluded that the FPSC should determine that there was a need for FPL’s proposed new nuclear units at Turkey Point. After conducting several days of hearings and upon a full review of an extensive administrative record, the FPSC determined that there was a need for FPL’s proposed new nuclear units at Turkey Point and granted FPL’s petition by a final order in April 2008 (FPSC 2008b). In its final order, the FPSC found:

Need for Electric System Reliability and Integrity

> “FPL has a need for 8350 MW of additional capacity beginning in the 2011 through 2020 period. Turkey Point 6 and 7 will provide only a portion of FPL’s need for capacity. … If FPL’s load forecast dramatically declines or the amount of DSM or renewable generation available

substantially increases, the most likely result will be the cancellation of some gas-fired combined cycle plants that have not yet been certified. Based on this record, FPL has shown that it has a reliability need for either the 1100 MW or 1520 MW units (referring to the AP1000 or ESBWR designs respectively considered) in 2018 and 2020."

Need for Fuel Diversity

"…[T]he addition of nuclear generation will maintain FPL's fuel diversity and security. In 2006, FPL generated approximately 50% of its power from natural gas, approximately 21% from nuclear power, and 18% from coal. Without the addition of Turkey Point 6 and 7, FPL's fuel mix is projected to climb to approximately 75% from natural gas while the amount of nuclear generation would drop to approximately 16%. The addition of 2200 to 3040 MW of capacity (referring to the 2 - AP1000 or 2 - ESBWR designs respectively considered) associated with Turkey Point 6 and 7 would increase nuclear generation to approximately 26% and natural gas to 65% by the year 2021, the first full year of operation for both units."

Need for Baseload Generating Capacity

"…[B]y 2010 FPL will have approximately 15,235 MW of existing or certified base-load generation capacity which consists of coal (902 MW), gas-fired combined cycle (10,979 MW), and nuclear generation facilities (3354 MW). As mentioned previously, FPL's peak load is expected to increase by over 6000 MW by the year 2020. FPL's base-load needs are also projected to increase by approximately the same amount. Even with the addition of Turkey Point 6 and 7, FPL's base-load needs will continue to be met primarily with natural gas-fired combined cycle generators."

Need for Adequate Electricity at a Reasonable Cost

"…[W]e believe the cost estimate information presented in the record is appropriate. Accordingly, we find that construction of Turkey Point 6 and 7 will not only provide adequate electricity, but also ensure the most reasonable costs to ratepayers."

No Mitigating Renewable Energy Sources and Technologies or Conservation Measures

"…[W]e find that there are no additional cost-effective conservation measures available that might mitigate FPL's need for Turkey Point 6 and 7. FPL has identified an incremental increase of 1899 MW of DSM summer peak demand reduction by the year 2020, as well as over 280 MW of renewable energy from purchased power contracts. As previously discussed, FPL has demonstrated a reliability need in excess of these values for the years 2018 through 2020. A reduction in peak demand or an increase in renewable generation would likely result in the deferral of uncertified natural gas units. In addition, it is unrealistic to assume that FPL could achieve the amount of energy savings through DSM in ten years, that took 26 years to

accomplish. As such, we find that there are no additional renewable energy sources or conservation measures which could effectively mitigate FPL's need for Turkey Point 6 and 7."

Most Cost-Effective Source of Power

"Turkey Point 6 and 7 will provide the most cost-effective source of power…. The results of FPL's break-even analysis indicate that Turkey Point 6 and 7 are projected to produce savings in 17 of the 18 scenarios considered. Such results indicate a high likelihood of FPL's ratepayers realizing net benefits over the life of the project. Turkey Point 6 and 7 are projected to produce annual fuel savings of over $1 billion dollars starting in 2021 and about $94 billion over the life of the units when compared to a combined cycle alternative. As environmental compliance costs increase, so do the benefits associated with Turkey Point 6 and 7 because nuclear generation is considered a "non-emitting" technology for GHG (Greenhouse Gas) emissions. Nuclear power plants have an initial licensed operating life of 40 years with the potential to renew the operating license for another 20 years. Therefore, the fuel and environmental benefits of Turkey Point 6 and 7 could continue beyond the analysis presented in this proceeding."

Regarding the information provided by FPL and its forecasting methodologies, the FPSC stated in its order granting FPL's Petition to Determine Need for Turkey Point Units 6 & 7 Electrical Power Plant:

"We reviewed FPL's forecast assumptions, regression models, and the projected system peaks demands, and find that they are appropriate for use in this docket. The forecast assumptions were drawn from independent sources which we have relied upon in prior cases. The regression models used to calculate the projected peak demands conform to accepted economic and statistical practices. Finally, the projected peak demands produced by the models appear to be a reasonable extension of historical trends" (FPSC 2008b).

The Florida Public Service Commission approval of the Petition for Need Determination can be found at their website (FPSC 2008b).

8.1.3 DESCRIPTION OF SERVICE AREA

As provided in its Ten Year Power Plant Site Plan, FPL's service area contains approximately 27,650 square miles and has a population of approximately 8.7 million people. FPL served an average of 4,499,067 customer accounts in 35 counties during 2009 (FPL Apr 2010). FPL's service area is shown in Figure 8.1-1. These customers were served from a variety of resources including: FPL-owned fossil and nuclear generating units, nonutility-owned generation, DSM, and interchange/purchased power (FPL Apr 2010). FPL's customer categories include:

- Residential

- Commercial
- Industrial
- Railroad and railways, and street and highway lighting
- Other public authorities
- Sales for resale (wholesale)

8.1.4 FPL-OWNED RESOURCES

The existing FPL generating resources are located at 16 generating sites distributed geographically around its service territory and also include partial ownership of one unit located in Georgia and two units in Jacksonville, Florida (Figure 8.1-1). The current FPL-owned generating facilities consist of 4 nuclear units, 3 coal units, 14 combined-cycle units, 17 fossil steam units, 48 combustion gas turbines, 1 simple-cycle combustion turbine, and 1 photovoltaic facility (FPL Apr 2010).

FPL's bulk transmission system comprises 6727 circuit miles of transmission lines. Integration of the generation, transmission, and distribution system is achieved through FPL's 585 substations in Florida (FPL Apr 2010).

The existing FPL power system, including generating plants, major transmission stations, and transmission lines, is shown in Figure 8.1-2. Figure 8.1-3 shows FPL's interconnection ties with other utilities.

8.1.5 FLORIDA RELIABILITY COORDINATING COUNCIL

FPL is a member of the Florida Reliability Coordinating Council (FRCC). The FRCC is one of the (NERC) regional councils and has approximately 25 members. These members include investor-owned utilities, such as FPL, cooperative systems, municipal utilities, power marketers, and independent power producers (FRCC 2007). There are no Independent System Operators or Regional Transmission Organizations operating in Florida (FERC 2009). The FRCC annually produces an annual Load and Resource Plan, which is a compilation of operating entities' 10-year site plans projecting the next 10 years, addressing, among other subject matter, regional firm peak demand, available capacity, and reserve margin. This information is provided to the FPSC each July, and a Commission workshop is held in August for a more intensive review by the Commission.

Table 8.1-1
Table of Contents, Florida Power and Light Company Ten Year Power Plant Site Plan

Executive Summary

I. Description of Existing Resources
- A. FPL-Owned Resources
- B. Firm Capacity Power Purchase
- C. Non-Firm (As Available) Energy
- D. Demand Side Management (DSM)

II. Forecast of Electric Power Demand
- A. Overview of the Load Forecasting Process
- B. Comparison of FPL's Current and Previous Load Forecasts
- C. Long-Term Sales Forecasts
- D. Net Energy for Load
- E. System Peak Forecasts
- F. Hourly Load Forecast

III. Projection of Incremental Resource Additions
- A. FPL's Resource Planning
- B. Incremental Resource Additions
- C. Issues Impacting FPL's Recent Planning Work
- D. Demand Side Management (DSM)
- E. Transmission Plan
- F. Renewable Resources
- G. FPL's Fuel Mix and Price Forecasts

IV. Environmental and Land Use Information
- A. Protection of the Environment
- B. FPL's Environmental Statement
- C. Environmental Management
- D. Environmental Assurance Program
- E. Environmental Communication and Facilitation
- F. Preferred and Potential Sites

V. Other Planning Assumptions and Information

Introduction

Discussion Items #1–12

Table 8.1-2
Table of Contents, Florida Power and Light Company Petition to Determine Need for Turkey Point Nuclear Units 6 & 7

I.	Introduction and Overview
II.	Primarily Affected Utility (Rule 25-22.081(1)(a))
III.	FPL's Resource Mix, Conservation, and Clean Energy (Rule 25-22.081(1)(a))
IV.	The Need for Turkey Point 6 & 7 (Rule 25-22.081(1)(c) and (2)(a))
V.	Proposed Electrical Power Plant (Rule 25-22.081(1)(b) and (2)(b))
VI.	Generating Alternatives and Fuel Diversity (Rule 25-22.081(1)(d) and (2)(a))
VII.	Non-Generating Alternatives (Rule 25-22.081(1)(e))
VIII.	Adverse Consequences of Delay (Rule 25-22.081(1)(f))
IX.	Discussions With Other Electric Utilities Regarding Partial Ownership of Turkey Point 6 & 7 (Rule 25-22.081(2)(d))
X	Relationship Between Need Determination and Annual Cost Recovery Reviews Under Rule 25-6.0423
XI.	Disputed Issues of Material Fact and Ultimate Facts Alleged
Conclusion	

Figure 8.1-1 FPL Service Territory

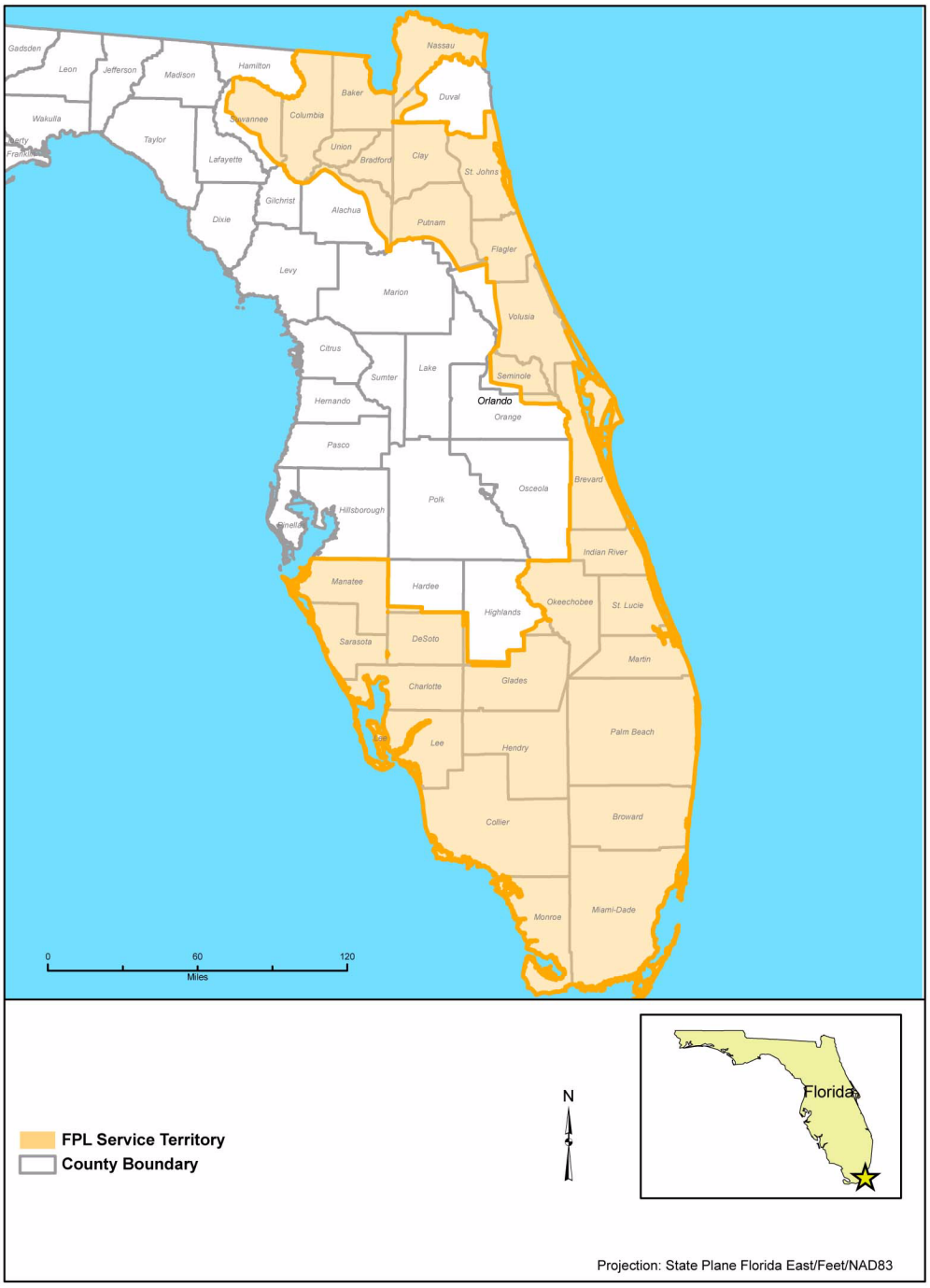


Figure 8.1-2 FPL Substation and Transmission System Configuration

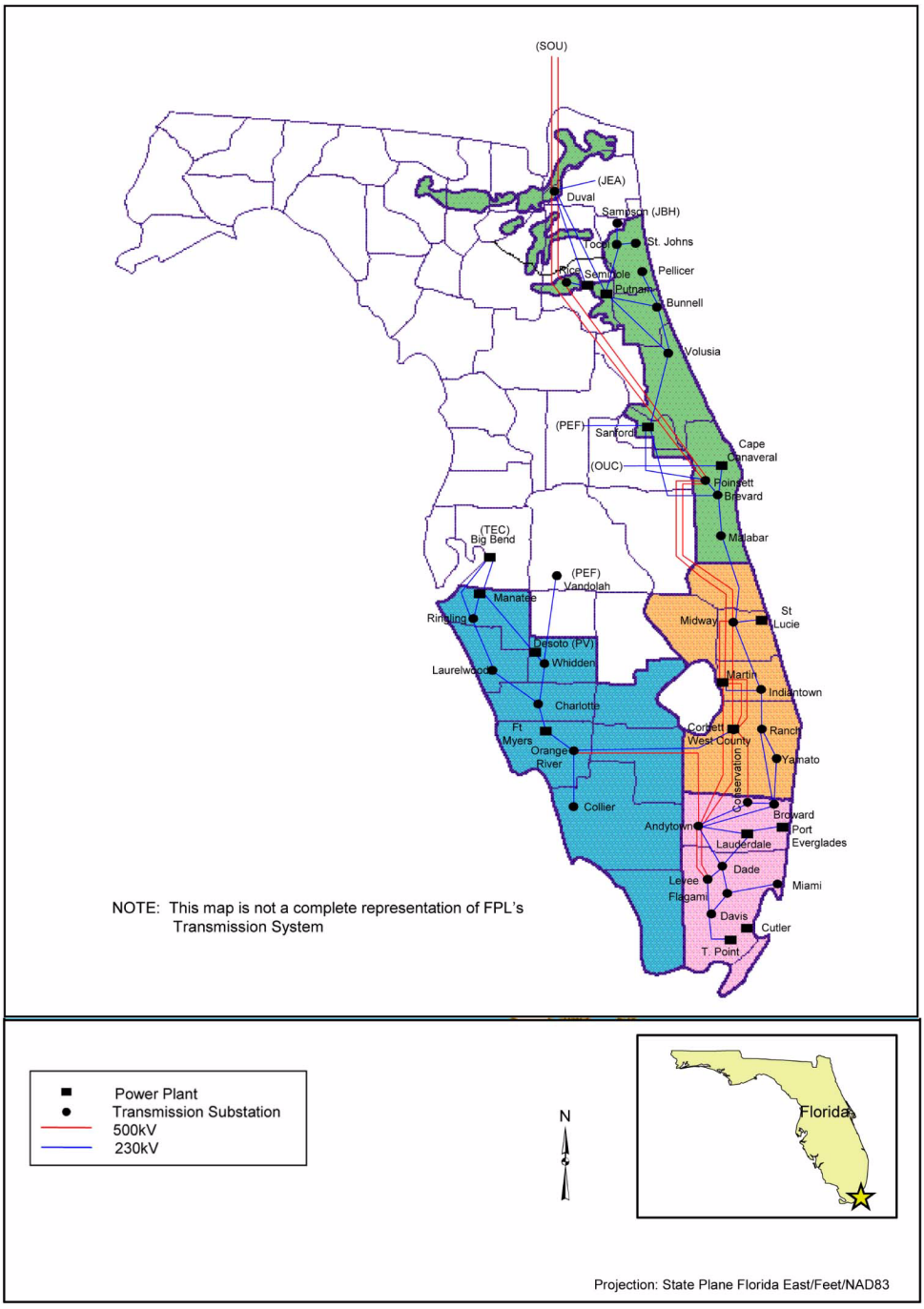
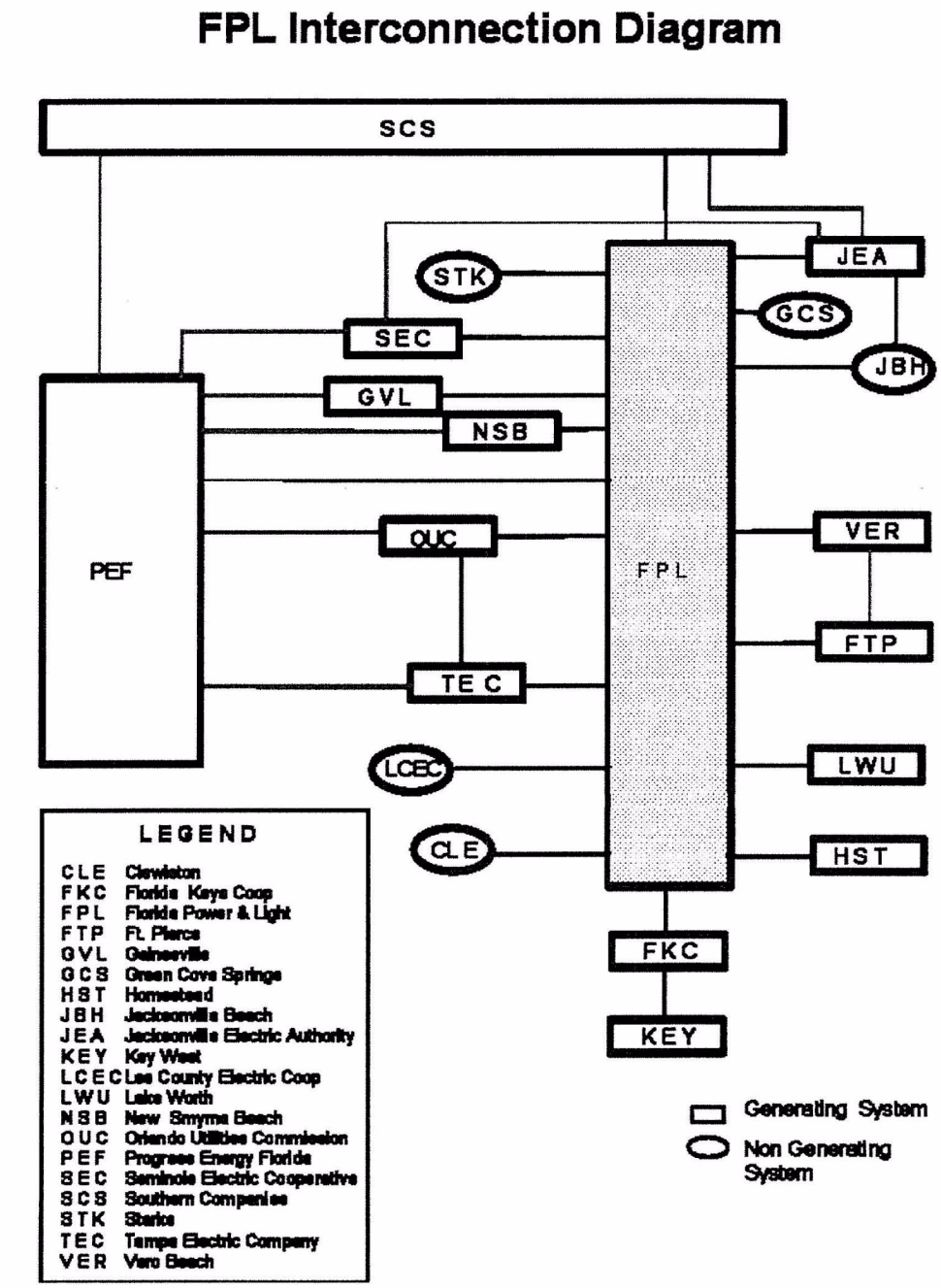


Figure 8.1-3 FPL Interconnection Diagram



8.2 POWER DEMAND

This section describes the NRC requirements and how the Florida Statutes along with the approved Petition to Determine Need for Units 6 & 7 Electrical Power Plant fulfills those requirements that are provided in NUREG-1555, Sections 8.2 through 8.4.

8.2.1 ENVIRONMENTAL STANDARD REVIEW PLANS (ESRPS)

The ESRP 8.2.1 (Power and Energy Requirements), ESRP 8.2.2 (Factors Affecting Growth of Demand), ESRP 8.3 (Power Supply) and ESRP 8.4 (Assessment of Need for Power) data and informational needs are fulfilled by the state processes required by Florida Statutes (F.S.) Chapter 186 with Rules 25-22.070, 25 22.071, and 25-22.072, Florida Administrative Code (F.A.C.) along with F.S. Section 403.519 and the Petition to Determine Need for Turkey Point Units 6 & 7 Electrical Power Plant, all of which are described below.

8.2.2 POWER AND ENERGY REQUIREMENTS

As described in FPL's Ten Year Power Plant Site Plan (FPL Apr 2010), there are four fundamental steps to FPL's resource planning process. These are summarized as follows:

Step 1: Determine the magnitude and timing of FPL's new resource needs

Step 2: Identify which resource options and resource plans can meet the determined magnitude and timing of FPL's resource needs (i.e., identify competing options and develop competing resource plans)

Step 3: Evaluate the competing options and resource plans regarding system economics and non-economic factors

Step 4: Select a resource plan and commit, as needed, to near-term options

The first step, often referred to as a reliability or resource adequacy assessment for the utility system, is essentially a determination of the amount of capacity or megawatts of load reduction, new capacity additions, or a combination of both load reduction and new capacity additions that are needed and when. This step starts with an updated load forecast. Several databases are also updated with the new information regarding forecasted loads, delivered fuel price projections, current financial and economic assumptions, and power plant capability and reliability assumptions, among other information. FPL also includes key assumptions regarding three specific resource areas: (1) near-term construction capacity additions, (2) firm capacity power purchases, and (3) DSM implementation.

These key assumptions, plus other updated information, are applied in determining the magnitude and the timing of FPL's resource needs. These determinations are accomplished by

system reliability analyses that are typically based on a dual planning criteria of a minimum peak period reserve margin of 20 percent (FPL applies this to both summer and winter peaks) and a maximum loss-of-load probability of 0.1 day per year. Both of these criteria are commonly used throughout the regulated utility industry.

The result of this first fundamental step of the resource planning process is a projection of how many new megawatts of resources are needed to meet both reserve margin and loss-of-load probability criteria and, thus, maintain system reliability, and when the megawatts are needed. Information regarding the timing and magnitude of these resource needs is used in the second fundamental step: identifying resource options and resource plans that can meet the determined magnitude and timing of FPL's resource needs.

During Step 2, feasibility analyses of new capacity options are conducted to determine which new capacity options appear to be the most competitive on FPL's system. These analyses also establish capacity size (MW) values, projected construction/permitting schedules, and operating parameters and costs. In similar analyses, feasibility evaluations of new DSM options and/or continued growth in existing DSM options are typically conducted. Resource plans are created by combining individual resource options so that the timing and magnitude of FPL's new resource needs are met. The creation of these competing resource plans is typically carried out using spreadsheet, dynamic programming, and/or linear and non-linear programming techniques. At the conclusion of this second fundamental resource planning step, a number of different combinations of new resource options (i.e., resource plans) of a magnitude and timing necessary to meet FPL's resource needs are identified.

In Step 3, FPL performs, among other evaluations, economic analyses of the competing resource plans focusing on total system economics. These analyses are performed using the following:

- Various spreadsheets/models such as the P-M Area model, which is used by FPL to develop the fuel cost budget and to conduct other production cost-related analyses

- FPL's DSM cost-effectiveness spreadsheet model for analyzing the cost-effectiveness of individual DSM measures/programs, and then utilizes its linear programming model to develop DSM portfolios

- FPL's nonlinear programming model for analyzing the potential for lowering system peak loads through additional load management capacity

The standard basis for comparing the economics of competing resource plans is their relative impact on FPL's electricity rate levels, with the intent of minimizing FPL's leveled system average rate (i.e., a Rate Impact Measure or RIM methodology).

The results of the above three steps are used to develop the future generation plan, which would include incremental resource additions/changes.

Key inputs to these planning steps are discussed below.

Load Forecast

Long-term (20-year) forecasts of sales, net energy for load (NEL)[1], and peak loads are typically developed on an annual basis for resource planning work at FPL, and new forecasts were developed by FPL every year for use in the Ten Year Power Plant Site Plan for FPL's ongoing analyses. These forecasts are a key input to the models used in FPL's integrated resource planning process. The primary drivers to typically develop these forecasts are economic conditions and weather.

The projections for the national and Florida economies are obtained from IHS Global Insight. Global Insight is a privately held company that provides comprehensive economic data to entities such as FPL for application and in-depth analysis. Population projections are obtained from the Bureau of Economic and Business Research of the University of Florida. These inputs are quantified and qualified using statistical models in terms of their impact on the future demand for electricity.

Two sets of weather variables are developed and used in FPL's forecasting models:

- Cooling and Heating Degree-Hours are used to forecast energy sales
- Temperature data is used to forecast summer and winter peaks

The Cooling and Heating Degree-Hours are used to capture the changes in the electric usage of weather-sensitive electric appliances such as air conditioners and electric space heaters. A composite temperature hourly profile is derived using hourly temperatures across FPL's service territory. Miami, Fort Myers, Daytona Beach, and West Palm Beach are the locations from which temperatures are obtained. In developing the composite hourly profile, these regional temperatures are weighted by regional energy sales. This composite temperature is used to derive Cooling and Heating Degree-Hours which are based on starting point temperatures of 72°F and 66°F, respectively. Similarly, composite temperatures and hourly profiles of temperatures are used for the summer and winter peak models.

1. NEL is determined as the sum of all energy sales plus utility use and losses.

Long-Term Sales Forecasts

Long-term forecasts of electricity sales were developed for each of the six revenue classes for the most recent forecasting period of 2011–2026. The first five classes represent retail sales and the sixth represents wholesale sales. These six revenue classes, based on customer categories listed in Subsection 8.1.3, are:

- Residential
- Commercial
- Industrial
- Railroad and railways, and street and highway lighting
- Other public authorities
- Sales for resale (wholesale)

These forecasts were adjusted to match the NEL forecast. The results of these sales forecasts for the years 2011–2026, along with historical data, are presented in Table 8.2-1.

Energy Sales Forecasts

Rural and Residential Sales

Residential electric usage per customer is estimated by using an econometric model. The model contains Cooling Degree-Hours, Heating Degree-Hours, lagged Cooling Degree-Hours, lagged Heating Degree-Hours, real price of electricity (a 12-month moving average), Florida real household disposable income, a variable designed to reflect the impact of empty homes, and a dummy variable for the specific month of November 2005. The price of electricity plays a role in explaining electric usage because electricity, like all other goods and services, will be used in greater or lesser quantities depending on its price. To capture economic conditions, the model includes Florida's real personal disposable income. The degree of economic prosperity can, and does, affects residential electricity sales. The impact of weather is captured by the Heating and Cooling Degree-Hours. Residential energy sales are forecast by multiplying the residential use per customer forecast by the number of residential customers forecasted. A dummy variable for November 2005 was included because an analysis of residuals identified that data point as an outlier.

Commercial Sales

The commercial sales forecast is also developed using an econometric model. Commercial sales are a function of the following variables: Florida real household disposable income, commercial real price of electricity (a 12-month moving average), Cooling Degree-Hours, Heating Degree-Hours, lagged Cooling Degree-Hours, a variable designed to reflect the impact of empty homes, seasonal dummy variables for the months of February and December, a dummy variable for the specific month of January 2007, and an autoregressive term. Cooling degree-hours are used to capture weather-sensitive load in the commercial sector.

Industrial Sales

The industrial category is comprised of two groups; very small accounts (those with less than 20 kW of demand) and large, traditionally industrial customers. The forecast is developed using a separate econometric model for each group of industrial customer. The small industrial sales model utilizes the following variables: Florida Housing Starts, Cooling Degree-Hours, lagged Cooling Degree-Hours, industrial real price of electricity, and an autoregressive and seasonal autoregressive terms. The large industrial sales model utilizes the following variables: Florida Housing Starts, industrial real price of electricity, dummy variables for October and November 2004, and an autoregressive term.

Railroad and Railways Sales and Street and Highway Lighting Sales

The projections for railroad and railways sales are based on historical average use per customer because the number of customers is projected to remain the same. This class consists solely of Miami-Dade County's Metrorail system.

The forecast for street and highway lighting sales is developed using historical usage patterns and multiplying these usage levels by the number of forecasted customers.

Other Public Authority Sales

Other public authority sales are developed using historical usage characteristics.

Sales for Resale (Wholesale)

Resale (wholesale) customers are municipalities and/or electric co-operatives. These customers differ from jurisdictional customers in that they are not the ultimate users of the electricity they buy. Instead, they resell this electricity to their own customers.

Currently, there are four customers in this class: the Florida Keys Electric Cooperative (Florida Keys), City of Key West, Florida Metro- Miami-Dade County, and Lee County Electric

Cooperative. Starting in June 2014, Seminole Electric Cooperative will also be a customer in this category.

Net Energy for Load

An econometric model is developed to produce an NEL forecast. The key inputs to the model are the real price of electricity, heating and cooling degree-hours, and Florida real household disposable income. In addition, the model also includes variables for mandated energy efficiency and a variable designed to capture the impact of empty homes, along with seasonal dummies.

The NEL forecast is developed by multiplying the NEL per customer forecast by the total number of customers forecasted. Once the NEL forecast is obtained, total billed sales are computed using a historical ratio of sales to NEL. The sales by class forecast previously discussed are then adjusted to match the total billed sales. The forecasted NEL values 2011–2026, along with historical peak loads, are presented in Table 8.2-1.

8.2.3 FACTORS AFFECTING GROWTH OF DEMAND

As previously addressed, both FPL's Ten Year Power Plant Site Plan (FPL 2008), and the Need Study for Electrical Power (FPL 2007b) were based on FPL's integrated resource planning process. This process was used to determine the timing and magnitude of need for construction and operation of Turkey Point Units 6 & 7. The Need Study for Electrical Power was also part of FPL's filing with the FPSC for approval of Turkey Point Units 6 & 7 (which was approved by the FPSC). Consideration and application of basic factors affecting growth and demand for power, as detailed in the Site Plan and Need Study, are summarized in this section.

System Peak Forecasts

The rate of absolute growth in FPL system peak load has been a function of a growing customer base, varying weather conditions, continued economic growth, changing patterns of customer behavior (including an increased stock of electricity-consuming appliances), and more efficient heating and cooling appliances. FPL developed the peak forecast models to capture these behavioral relationships. The forecasting methodology of summer, winter, and monthly system peaks is presented below. The forecasted values for summer and winter peak loads for the years 2011–2026, along with historical summer and winter peak loads, are presented in Table 8.2-2.

System Summer Peak

The summer peak forecast is developed using an econometric regression model. This econometric model uses the following explanatory variables: total average customers, the real price of electricity, Florida real personal income, average temperature on peak day, and a heat

buildup weather factor consisting of the sum of the cooling degree-hours during the peak day and 3 days before.

System Winter Peak

The winter peak forecast is developed using the same econometric regression methodology as is used for summer peak forecasts. The winter peak model is a per customer model that contains the following explanatory variables: the square of the minimum temperature on the peak day and heating degree-hours for the day before as well as for the morning of the winter peak day. The model also includes an economic variable—Florida real personal income.

FPL forecasts continued growth of customers in its service territory. At the time that FPL filed for FPSC approval of Units 6 & 7, they were projecting an annual average increase of approximately 85,000 new customers for the next 14 years. Annualized retail customer growth was projected to be 2.1 percent for 2008 and an average of 1.7 percent for the next 12 years. In addition to significant projected customer growth, significant increases in per customer electrical load and energy were also forecast. Energy use per customer was forecast to increase 1.7 percent in 2008, with a compound annual average growth rate of 1.2 percent thereafter. Combining the growth in customers and the growth in energy use per customer yields a growth in energy sales estimated at 3.8 percent in 2008, and then an average of 2.9 percent for the next 13 years.

FPL also projected that summer peak demand would grow from approximately 21,700 MW in 2011 to approximately 30,200 MW in 2026. Similarly, the winter peak was forecast to grow from approximately 21,400 MW in 2011 to approximately 26,300 MW in 2026.

As stated in Subsection 8.1.2, in the FPSC's order approving FPL's Petition to Determine Need, it found:

> "We reviewed FPL's forecast assumptions, regression models, and the projected system peaks demands, and find that they are appropriate for use in this docket. The forecast assumptions were drawn from independent sources which we have relied upon in prior cases. The regression models used to calculate the projected peak demands conform to accepted economic and statistical practices. Finally, the projected peak demands produced by the models appear to be a reasonable extension of historical trends" (FPSC 2008b)

In the May 3, 2010 filing for the Nuclear Power Plant Cost Recovery Clause, FPL informed the FPSC of a revised in-service date for Turkey Point Units 6 & 7. The revised in-service dates of 2022 for Unit 6 and 2023 for Unit 7 were derived from sequencing the preparation and construction phase activities. In addition, although FPL's demand growth rate has slowed from the time of the need filing, FPL currently projects that it will have a need for new resources beginning in 2016 and increasing every year thereafter.

Demand Side Management

As described in FPL's Ten Year Power Plant Site Plan (FPL Apr 2010), FPL has required and implemented cost-effective DSM programs since 1978. These programs include both conservation/energy efficiency and load management programs. FPL's DSM efforts through 2009 have resulted in a cumulative summer peak reduction of approximately 4257 MW at the generator and an estimated cumulative energy saving of approximately 51,055 gigawatt hour at the generator. Accounting for reserve margin requirements, FPL's DSM efforts through 2009 have eliminated the need to construct the equivalent of approximately 13 new 400 MW generating units. FPL offers a wide variety of DSM programs and a DSM-based renewable energy option to its customers. In addition, FPL is actively engaged in DSM research and development.

DSM Programs

The DSM programs include residential and business programs. At the time FPL filed for FPSC approval of the determination of need for Turkey Point Units 6 & 7, residential DSM programs included:

- Residential Building Envelope: Offers incentives to customers to install energy efficient roof and ceiling insulation measures.
- Duct System Testing and Repair: Provides reduced cost air-conditioning duct system testing to identify leaks, and encourages the repair of those leaks by qualified contractors.
- Residential Air-Conditioning: Offers incentives to customers to purchase higher efficiency heating, ventilating, and air-conditioning equipment.
- Residential Load Management (On Call Program): Offers load control of major appliances/ household equipment to residential customers in exchange for monthly electric bill credits.
- Residential New Construction (BuildSmart): Encourages the design and construction of energy-efficient homes by offering education to contractors on energy efficiency measures, and providing construction design reviews and home inspections.
- Residential Low-Income Weatherization: Combines energy audits and incentives to encourage low-income housing administrators to retrofit homes with energy efficiency measures.
- Residential Conservation Service: Offers a walkthrough energy audit, a computer generated Class A audit, and a customer-assisted energy audit.

Business DSM programs at that time included:

- Business HVAC: Offers business customers financial incentives to upgrade to higher efficiency HVAC equipment that exceed the minimum efficiencies mandated by the DOE.

- Business Efficient Lighting: Offers business customers financial incentives to install high-efficiency lighting measures at the time of replacement.

- Business Building Envelope: Offers financial incentives to business customers to install high-efficiency building envelope measures such as roof/ceiling insulation and reflective roof coatings.

- Business Custom Incentive: Serves as a “catch-all” program for cost-effective business efficiency measures that are not included in other FPL programs.

- Business On Call: Offers load control of central air-conditioning units to both small nondemand-billed and medium demand-billed business customers in exchange for monthly electric bill credits.

- Commercial Industrial Demand Reduction: Reduces peak demand by allowing the direct control of customer loads of 200 kW or greater during periods of extreme demand or capacity shortages.

- Business Energy Evaluation: Offers free standard level energy evaluations onsite and online, as well as more detailed shared costs evaluations.

- Commercial/Industrial Load Control: Reduces peak demand by controlling customer loads of 200 kW or greater during periods of extreme demand or capacity shortages in exchange for monthly electric bill credits. (This program was closed to new participants in 2000.)

- Business Water Heating: Encourages the installation of energy-efficient heat recovery units or heat pump water heaters.

- Business Refrigeration: Encourages the installation of controls and equipment to reduce the usage of electric strip heat for defrosting purposes.

- Cogeneration and Small Power Production: Facilitates FPL compliance with regulatory requirements concerning qualifying facilities and small power producers. One role of the program is to assist customers in the evaluation of potential cogeneration projects, including self-generation.

DSM goals were first set for FPL by an FPSC Order in 1994 (FPSC Oct 1994). The latest DSM goals were set for FPL by an FPSC Order in 2009 (FPL Apr 2010). In this latest order, the Commission established an FPL goal significantly higher (approximately 225 percent) than the amount of DSM that was projected in 2009 to meet 100 percent of FPL's remaining resource needs through 2019. The FPSC ordered FPL to have a cumulative summer MW DSM goal of 1498 by 2019. FPL expects to provide a description of its approved DSM programs in its 2011 Site Plan (FPL Apr 2010). FPL assumed a continuation of DSM signups at currently projected trends (see Table 8.2-2). In determining its future capacity, FPL forecasts that it will achieve its DSM plan through the above DSM programs.

Greater DSM would not eliminate the need for baseload power from Units 6 & 7. As stated in Subsection 8.1.2, in the FPSC's order approving FPL's Petition to Determine Need, it found:

> "…[W]e find that there are no additional cost-effective conservation measures available that might mitigate FPL's need for Turkey Point 6 and 7. FPL has identified an incremental increase of 1899 MW of DSM summer peak demand reduction by the year 2020, as well as over 280 MW of renewable energy from purchased power contracts. As previously discussed, FPL has demonstrated a reliability need in excess of these values for the years 2018 through 2020. A reduction in peak demand or an increase in renewable generation would likely result in the deferral of uncertified natural gas units. In addition, it is unrealistic to assume that FPL could achieve the amount of energy savings through DSM in ten years, that took 26 years to accomplish. As such, we find that there are no additional renewable energy sources or conservation measures which could effectively mitigate FPL's need for Turkey Point 6 and 7."

DSM Research and Development Programs

FPL's research and development programs include the Conservation Research and Development (CRD) Program and the Residential Thermostat Load Control Pilot Project. The CRD Program is an umbrella research project under which new DSM technologies are analyzed. Several FPL DSM programs have emerged from the CRD Program which has also resulted in the addition of cost-effective measures to existing programs. FPL operates the CRD Program based on DSM plan approval, or for 6 years, whichever occurs first, with a spending cap of $2,500,000 for the period.

In June 2007, FPL filed a petition with the FPSC for the Residential Thermostat Load Control Pilot Project. Under the project, FPL is proposing to evaluate whether the benefits of the existing On-Call Program can be expanded through use of a new generation of communication and control technologies that put residential customers in charge of decisions that could lower energy costs, while allowing customers to override FPL control of their heating and air-conditioning appliances. The FPSC approved FPL's request in August 2007.

Table 8.2-1
FPL History and Forecast of Energy Consumption, Capacity, and Peak Demand

Year	Energy Consumption (gigawatt-hours)									
	Residential	Commercial	Industrial	Railroads and Railways	Street and Highway Lighting	Other Public Authorities	Total Sales	Sales For Resale	Utility Use and Losses	Net Energy for Load
Historical										
2001	47,588	37,960	4,091	86	419	67	90,212	970	7,222	98,404
2002	50,865	40,029	4,057	89	420	63	95,523	1,233	7,443	104,199
2003	53,485	41,425	4,004	93	425	64	99,496	1,511	7,386	108,393
2004	52,502	42,064	3,964	93	413	58	99.095	1.531	7,467	108,093
2005	54,348	43,468	3,913	95	424	49	102,296	1,506	7,498	111,301
2006	54,570	44,487	4,036	94	422	49	103,659	1,569	7,909	113,137
2007	55,138	45,921	3,774	91	437	53	105,415	1,499	7,401	114,315
2008	53,229	45,561	3,587	81	423	37	102,919	933	7,092	111,004
2009	53,950	45,025	3,245	80	422	34	102,755	1,155	7,394	111,303
2010	56,343	44,544	3,130	81	431	28	104,557	2,049	7,768	114,373
Forecast										
2011	53,364	44,188	3,152	82	442	30	102,257	2,142	6,776	111,175
2012	54,932	44,496	3,082	91	452	30	103,083	2,142	7,292	112,517
2013	56,399	45,134	3,037	92	463	30	105,155	2,047	7,445	114,647
2014	58,257	46,214	3,018	92	475	30	108,085	4,935	8,014	121,035
2015	59,326	47,089	3,013	92	487	30	110,038	5,566	8,006	123,610
2016	60,382	47,869	3,015	92	500	30	111,888	5,599	8,106	125,593
2017	61,118	48,660	3,004	92	514	30	113,418	5,625	8,208	127,251
2018	61,828	49,456	2,992	92	529	30	114,928	5,672	8,310	128,910
2019	62,480	50,385	2,987	92	544	30	116,518	5,717	8,443	130,679
2020	63,575	51,512	2,981	92	560	30	118,749	5,770	8,601	133,121
2021	64,716	52,695	2,973	92	576	30	121,081	5,821	8,979	135,881
2022	66,123	54,033	2,952	92	592	30	123,823	5,872	9,177	138,872
2023	67,592	55,353	2,945	92	609	30	126,621	5,923	9,379	141,923
2024	69,121	56,665	2,975	92	627	30	129,510	5,973	9,587	145,070
2025	70,702	58,104	3,006	92	645	30	132,578	6,022	9,806	148,406
2026	72,010	59,344	3,019	92	663	30	135,157	6,077	9,994	151,229

Table 8.2-2 (Sheet 1 of 2)
Projection of FPL's Resource Needs Through 2026 (Assuming No EPU, Turkey Point 6 & 7, or Other Capacity Additions)[a]
Summer

August of the Year	Projections of FPL Unit Capacity (MW)	Projections of Firm Purchases (MW)	Projections of Scheduled Maintenance (MW)	Projection of Total Capacity (MW)	Peak Load Forecast (MW)	Summer Demand Side Management Forecast (MW)	Forecast of Firm Peak (MW)	Forecast of Summer Reserves (MW)	Forecast of Summer Reserve Margins w/o Additional (%)	MW Needed to Meet 20% Reserve Margin[b] (MW)
2011	22,445	2,056	350	24,151	21,679	1,981	19,698	4,452	22.6	(513)
2012	23,206	1,956	1,064	24,098	21,853	2,141	19,712	4,386	22.2	(443)
2013	23,655	1,956	1,176	24,435	22,155	2,317	19,838	4,597	23.2	(629)
2014	24,867	1,956	1,176	25,647	23,452	2,534	20,918	4,728	22.6	(545)
2015	24,867	2,046	350	26,563	24,172	2,710	21,462	5,100	23.8	(808)
2016	24,867	740	350	25,257	24,605	2,871	21,734	3,523	16.2	824
2017	24,867	740	350	25,257	25,025	3,016	22,009	3,248	14.8	1,154
2018	24,867	740	350	25,257	25,266	3,149	22,117	3,139	14.2	1,284
2019	24,867	740	350	25,257	25,690	3,271	22,419	2,837	12.7	1,647
2020	24,867	740	350	25,257	26,193	3,371	22,822	2,434	10.7	2,130
2021	24,867	740	350	25,257	26,830	3,471	23,359	1,897	8.1	2,775
2022	24,867	740	350	25,257	27,523	3,571	23,952	1,304	5.4	3,486
2023	24,867	740	350	25,257	28,208	3,671	24,537	719	2.9	4,188
2024	24,867	740	350	25,257	28,849	3,771	25,078	178	0.7	4,838
2025	24,867	490	350	25,007	29,525	3,871	25,654	(648)	-2.5	5,779
2026	24,867	160	350	24,677	30,213	3,904	26,309	(1,633)	-6.2	6,895

Table 8.2-2 (Sheet 2 of 2)
Projection of FPL's Resource Needs Through 2026 (Assuming No EPU, Turkey Point 6 & 7, or Other Capacity Additions)[a]
Winter

January of the Year	Projections of FPL Unit Capacity (MW)	Projections of Firm Purchases (MW)	Projections of Scheduled Maintenance (MW)	Projection of Total Capacity (MW)	Peak Load Forecast (MW)	Winter Demand Side Management Forecast (MW)	Forecast of Firm Peak (MW)	Forecast of Winter Reserves (MW)	Forecast of Winter Reserve Margins w/o Additional (%)	MW Needed to Meet 20% Reserve Margin[b] (MW)
2011	23,987	2,089	1,276	24,800	21,443	1,711	19,732	5,067	25.7	(1,121)
2012	24,383	2,089	2,942	23,530	21,491	1,802	19,689	3,840	19.5	97
2013	23,618	1,964	1,372	24,210	21,683	1,909	19,774	4,435	22.4	(481)
2014	24,973	1,964	1,382	25,555	22,584	2,065	20,519	5,036	24.5	(932)
2015	26,317	1,964	550	27,731	23,048	2,182	20,866	6,864	32.9	(2,691)
2016	26,317	1,123	550	26,890	23,302	2,288	21,014	5,876	28.0	(1,673)
2017	26,317	740	550	26,507	23,543	2,382	21,161	5,345	25.3	(1,113)
2018	26,317	740	550	26,507	23,794	2,464	21,330	5,176	24.3	(910)
2019	26,317	740	550	26,507	24,044	2,536	21,508	4,999	23.2	(697)
2020	26,317	740	550	26,507	24,305	2,596	21,709	4,797	22.1	(455)
2021	26,335	740	550	26,525	24,595	2,656	21,939	4,585	20.9	(197)
2022	26,335	740	550	26,525	24,898	2,716	22,182	4,342	19.6	94
2023	26,335	740	550	26,525	25,246	2,776	22,470	4,054	18.0	440
2024	26,335	740	550	26,525	25,606	2,836	22,770	3,754	16.5	800
2025	26,335	490	550	26,275	25,972	2,896	23,076	3,198	13.9	1,417
2026	26,335	160	550	25,945	26,316	2,916	23,400	2,544	10.9	2,136

(a) Assumes no new generation capacity additions after the following FPSC-approved projects: West County 3 (2011 in-service date), Cape Canaveral modernization (2013), and Riviera modernization (2014). These projections are consistent with information filed with the Florida Public Service Commission on April 1, 2011 in FPL's 2011 Ten-Year Site Plan, and on May 2, 2011 in FPL's 2011 NCRC filing.

(b) FPL has resource needs beginning in the Summer of 2016 and increasing every year thereafter. (FPL's resource needs are driven by its Summer reserve margin criterion of 20% which is projected to be violated years earlier than its Winter reserve margin criterion of 20% would be as shown above. Through the year 2026, FPL's projected resource need is approximately 6,900 MW driven by the Summer reserve margin criterion.

8.3 SATISFACTION OF NRC CRITERIA

The following analysis describes how the state and regional evaluations satisfy the NRC criteria for Units 6 & 7 that the evaluation of the need for power was: (1) systematic, (2) comprehensive, (3) subject to confirmation, and (4) responsive to forecasting uncertainty (NUREG-1555).

8.3.1 SYSTEMATIC

The state of Florida and the FRCC approaches to determining need for power include processes that are systematic. The state of Florida has established its processes by statute, creating the FPSC to oversee need-for-power planning by public utilities such as FPL and the Office of Public Counsel to serve as a public interest advocate before the FPSC. The need-for-power planning must be reflected in annually updated Ten Year Power Plant Site Plans and, for Units 6 & 7 specifically, is subjected to a further detailed analysis at the Petition for a Determination of Need stage before the FPSC. These processes, created through statutes and implemented by regulations, provide for a transparent, systematic means by which interested parties may participate in a legal process that assures the state of Florida adequately addresses the expected electricity demands within the state.

The FRCC process is a national one, set up by the NERC to comply with the Energy Information Administration (EIA) data-gathering requirements. The FRCC gathers the data on an annual basis, compiles it, and submits it to the NERC as a region-specific composite. The NERC submits the data to the EIA as a national composite together with region-specific information. The statutory, regulatory, and administrative requirements that make up the Florida and FRCC processes comprise methodical state and regional processes for systematically reviewing the need for power that FPL is responsible for satisfying.

8.3.2 COMPREHENSIVE

Florida imposes requirements on FPL for annual comprehensive integrated resource planning and Petition for a Determination of Need that includes:

- Demand and energy forecast for at least a 10-year period
- Supplier's or producer's program for meeting the requirements shown in its forecast in an economic and reliable manner, including demand-side and supply-side options
- Brief description and summary of cost-benefit analysis, if available, of each option that was considered, including those not selected

- Supplier's or producer's assumptions and conclusions with respect to the effect of the plan on the cost and reliability of energy services, and a description of the external environmental and economic consequences of the plan to the extent practicable

FPL follows industry practices in performing its integrated resource planning, breaking its analyses down by types of customers, identifying economic inputs to modeling, performing more detailed analyses for short-term forecasts, and accounting for supply and demand uncertainties. This is further described in Subsection 8.2.3.

FRCC regional planning includes:

- Historical and projected peak demand and energy
- Existing capacity
- Historical and projected demand and capacity
- Historical and projected capacity purchases, sales, and transfers
- Bulk electric transmission system description
- Projected changes to bulk electric transmission system

The Florida and FRCC need-for-power planning processes comprise comprehensive state and regional processes that encompass all of the components that the NRC would cover if the NRC had to perform a detailed review, covering the subject completely. These processes take into account a vast amount of data from varied sources and are subject to judicial review and challenge.

8.3.3 SUBJECT TO CONFIRMATION

FPL need-for-power planning is subject to FPSC, FOPC, and public and other stakeholder review, particularly regarding its petition for need for Units 6 & 7. These processes each result in publicly reviewable data and forecasts in the Ten Year Power Plant Site Plans and Petition for a Determination of Need. The Florida need-for-power planning processes are also confirmable by comparing FPL forecasts to FRCC composite forecasts.

The Florida and FRCC need-for-power analyses are subject to corroboration at the level of the generator or supplier (e.g., FPL) and, by way of comparison, to overall regional data.

8.3.4 RESPONSIVE TO FORECASTING UNCERTAINTY

As described previously, FPL's integrated resource planning incorporates a number of steps to select a resource plan to address forecasted capacity needs. FPL incorporates key assumptions in the reliability assessment of its system and, in developing long-term load forecasts, uses statistical modeling to quantify and qualify data inputs, such as economic projections and population trends in terms of their impact on the future demand for electricity. FPL uses econometric modeling that enables it to perform analyses of the sensitivity of results to changes in model inputs and to create high- and low-range forecasts. This econometric modeling is described in Subsection 8.2.3. Uncertainty analysis is also used in establishing planning reserve margins, themselves an acknowledgement of uncertainty.

The results of FPL's most recent planning effort are represented in FPL's Ten Year Power Plant Site Plan (FPL Apr 2010) and Need Study for Electrical Power (FPL 2007a) that have been approved by the FPSC. Importantly, the Florida Statutes require that FPL submit a Ten Year Power Plant Site Plan annually. This requires FPL to annually review its forecasted power needs and data inputs to its resource planning. Consequently, under this robust requirement, forecasting uncertainty is addressed on an annual basis by FPL, with adjustment forecasts made annually, as required, based on the most recent and up-to-date historical data.

It should be noted that despite the downturn in the economy, and negative growth in Florida's population during 2009, FPL experienced a near record Summer peak of 22,351 MW, and an all-time peak of 24,339 MW during the 2009-2010 Winter peak period. These peaks were driven by extreme weather. (FPL Apr 2010)

8.3.5 CONCLUSION

NRC guidance identified the expectation that if the states perform an evaluation of need for power and the evaluation is (1) systematic, (2) comprehensive, (3) subject to confirmation, and (4) responsive to forecasting uncertainty, no additional NRC review is needed. This chapter demonstrates that the state of Florida process meets these criteria. Therefore, no additional review by the NRC is needed.

Chapter 8.0 References

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