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JUN 02 2021

**MISS. PUBLIC SERVICE
COMMISSION**

RICKY J. COX
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June 2, 2021

VIA E-MAIL

Katherine Collier, Esq.
Executive Secretary
Mississippi Public Service Commission
501 North West Street, Suite 201A
Jackson, MS 39201

Re: Petition of Mississippi Power Company for a Certificate of Public Convenience and Necessity Authorizing the Construction, Acquisition, Extension, Operation and Maintenance of Transmission and Related Facilities and Rights-of-Way in George County, Mississippi

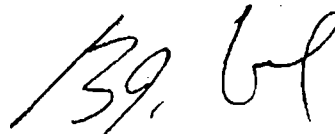
Dear Katherine:

On behalf of Mississippi Power Company please find the attached Petition for Facilities Certificate and supporting documents for filing with the Commission. Please issue notice by publication as may be required by law or the Commission's rules. Pursuant to the Commission's Order of March 12, 2020, this filing is only being made electronically. Delivery of physical copies shall be made only upon further order of the Commission.

Certain exhibits contain confidential and proprietary commercial and financial information and trade secret information of MPC, its agents and/or its vendors under Sections 25-61-9, 25-61-11, 75-26-3, and 79-23-1, as applicable, of the *Mississippi Code of 1972, as amended*, which we are filing with the Commission, Staff, and their respective consultants under separate confidential cover pursuant to the Commission's Public Utilities Rules of Practice and Procedure.

Thank you for your assistance in this matter.

Sincerely,



Ricky J. Cox

RJC:hr

Attachments

10306592.1

ALABAMA | FLORIDA | GEORGIA | MISSISSIPPI | WASHINGTON, DC

****MPSC Electronic Copy ** 2021-UA-106 Filed on 06/02/2021 ****

Katherine Collier, Esq. (katherine.collier@psc.ms.gov)

June 2, 2021

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JUN 02 2021

MISS. PUBLIC SERVICE
COMMISSION

BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION

MISSISSIPPI POWER COMPANY
EC-120-0097-00

DOCKET NO. '21-UA-106

**IN RE: PETITION OF MISSISSIPPI POWER COMPANY FOR A
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
AUTHORIZING THE CONSTRUCTION, ACQUISITION,
EXTENSION, OPERATION AND MAINTENANCE OF
TRANSMISSION AND RELATED FACILITIES AND RIGHTS-OF-
WAY IN GEORGE COUNTY, MISSISSIPPI**

PETITION FOR FACILITIES CERTIFICATE

COMES NOW, Mississippi Power Company (“Company” or “MPC”) and, pursuant to the Mississippi Public Utility Act and the Public Utilities Rules of Practice and Procedure (“Rules”), respectfully petitions the Mississippi Public Service Commission (“Commission”) for a certificate that the present and future public convenience and necessity requires or will require the construction, acquisition, extension, operation and maintenance of transmission and related facilities and rights-of-way in George County, Mississippi, as described herein for use in connection with the Company’s service to its customers in its certificated areas in the twenty-three (23) counties of southeastern Mississippi. In support of this petition, the Company would show as follows:

INTRODUCTION

1. MPC is a public utility as defined in Section 77-3-3(d)(i) of the *Mississippi Code of 1972, as amended*, and is engaged in the business of providing electric service to and for the public for compensation in twenty-three (23) counties of southeastern Mississippi, having its principal place of business at Gulfport, Mississippi. Petitioner’s mailing address is Post Office Box 4079, Gulfport, Mississippi, 39502-4079.

2. MPC holds a Certificate of Public Convenience and Necessity issued in Docket No. U-99, as supplemented from time to time, authorizing its operations in certain areas in the twenty-three (23) counties of southeastern Mississippi and is rendering service in accordance with its service rules and regulations and in accordance with schedules of rates and charges, all of which are a part of its tariff that has been previously approved by order of this Commission.

3. MPC is a Mississippi corporation. A copy of its corporate charter, articles of incorporation, the names and addresses of its board of directors and officers, the name of all persons owning fifteen percent (15%) or more of its stock, and a copy of its current balance sheet and income statement are on file with the Commission and are hereby incorporated by reference.

PROPOSED TRANSMISSION PROJECT

4. During its routine planning activities, the Company identified an approximately 17.8 mile project necessary to maintain and enhance reliability performance of the Company's transmission facilities and maintain compliance with North American Electric Reliability Corporation ("NERC") standards. Specifically, the Project consists of the rebuilding and reconductoring of the 17.8 miles of MPC's existing Lucedale – Vestry 115 kV section of transmission line from 397.5 ACSR to 1033.5 ACSR (251 MVA/ 1259 amps). This section of line was initially identified during MPC's pole inspection program performed in late 2019 due to the need to replace a large quantity of wood poles along this section of line. In addition to the pole replacements, the need to increase the capacity of this section of line was identified based on the results of MPC's 2021 transmission planning analysis.

5. As part of MPC's routine Transmission Wood Pole Inspection, Treatment, & Replacement Program, MPC identified seventy-one (71) wood poles that are in need of replacement on MPC's Lucedale – Vestry section of the Lucedale – Watson 115 kV transmission

line to due to decay or insufficient sound wood. Considering that the Lucedale-Vestry 115 kV transmission line was built in 1961, the high reject pole percentage is within reason for the age of the wood poles currently in service along this section of line. The identified pole replacements must be performed as soon as possible given the condition of the poles in order to avoid any pole failures which could result in damage to the existing transmission facilities and prolonged unplanned outages to the transmission line and customers served by the transmission line.

6. In addition to the pole replacements, MPC's 2021 transmission planning analysis identified this same section of line as being overloaded by 2026 under the contingency of: (a) the loss of MPC's D'Iberville NW - Wade 230 kV line in conjunction with (b) an outage of Entergy's Waterford Unit 3. The line contingency analyzed requires that the Lucedale – Vestry 115 kV section of line be reconductored prior to 2026.

7. In an effort to reduce the overall risk to the transmission system resulting from multiple outages in different years on the Lucedale - Watson 115 kV transmission line, the Company is proposing to take advantage of the mobilization associated with the pole replacement project and the outage required for such pole replacement by advancing the reconductoring project identified in the transmission planning analysis and bundling it with the pole replacement project (collectively, the "Project"). Combining these two activities into one Project will save additional mobilization and labor costs and reduce the outage time the line will need to be out of service while performing the work identified for the Project. By moving forward with the rebuild of this section of line now and replacing the identified poles contemporaneously with the upgrade of the transmission line, MPC anticipates \$1,000,000 in estimated avoided cost savings, which includes the cost of mobilizing personnel and equipment and the installation of a temporary board road along the transmission right-of-way for construction purposes.

8. In terms of timing, MPC's 2020 transmission planning analysis identified the need for the reconductor portion of the Project by June 1, 2024, as noted in MPC's 2021 Capital Plan and Energy Delivery Plan. Additionally, MPC's 2021 transmission planning analysis identified the need for the reconductoring portion of the Project prior to 2026, in order to address thermal overloads as part of NERC TPL-001-4 Requirement 2.7.1 for a P3 (N-1-G) event. This section of line will be upgraded from 397.5 ACSR to 1033.5 ACSR at 100°C.

9. The proposed Project will consist of the reconductoring and rebuilding of 17.8 miles of MPC's Lucedale - Vestry 115 kV section of transmission line. The completion of the Project identified herein is required to address aging infrastructure needs identified as part of MPC's routine pole inspection program and address projected transmission line overloads identified as part of MPC's transmission planning analysis. The completion of the Project will allow MPC to continue to provide reliable transmission service to its customers and communities and maintain compliance with NERC standards as described herein.

10. The Project is scheduled to begin in year 2021, subject to and following Commission approval, and is expected to be completed by December 31, 2022. As noted, this Project is included in MPC's 2021 Capital Plan and Energy Delivery Plan filed with the Commission.

11. The total estimated cost to construct the facilities described herein is \$18,200,000, with \$2,500,000 estimated to be spent in 2021 and the remaining \$15,700,000 to be spent in 2022. The Project's total estimated cost includes estimated labor costs of \$11,500,000, material costs of \$3,000,000, overheads of \$3,500,000, and design and surveying costs of \$200,000.

12. Based on the foregoing and the testimony provided herewith, the Company now seeks Commission approval to construct, acquire, extend, operate and maintain the transmission

and related facilities and rights-of-way necessary to complete the Lucedale – Vestry 115kV transmission Project described herein.

SUPPORTING DOCUMENTATION AND INFORMATION

13. Schedule 3, Appendix “A” of the Commission’s Rules establishes certain requirements applicable to facility certification petitions. The following information is being provided to meet the requirements of that Schedule:

A. A detailed description of the project;¹ the estimated costs of the project;² the schedules of construction for the project; and an outline map of the utility’s existing certificated area showing the general location of the facilities with references to Section, Township and Ranges³ are provided in the attached pre-filed testimony of Mr. Patrick W. Leathers, Power Delivery Operations Manager for MPC, upon which the Company will rely at the hearing of this matter.⁴

B. Approvals from health or pollution control authorities as are required in connection with the construction, extension and operation of the facilities will be secured.⁵

C. The construction of these facilities will increase the Company’s total rate base by \$18,200,000 and have a 0.22% impact on the Company’s retail rates.

¹ Mississippi Public Utilities Rules of Practice and Procedure (Rules), Schedule 3, Appendix “A”, Item 4.

² Rules, Schedule 3, Appendix “A”, Item 6.

³ Rules, Schedule 3, Appendix “A,” Item 3.

⁴ Rules, Schedule 3, Appendix “A,” Item 10.

⁵ Rules, Schedule 3, Appendix “A,” Item 5.

D. A list of “interested persons” as defined in Rule 2.115 is attached hereto as Exhibit “A.”⁶

E. The Company will acquire the materials and provide the labor to construct these facilities in full conformity with the Mississippi Public Utility Act and the Rules of this Commission, including the “Hire Mississippi” rule adopted in August 2017.⁷

F. MPC has provided herewith all the information relevant to its Petition and, therefore, requests a waiver of each and every other filing requirement that may be prescribed by the Commission’s Rules.

14. MPC The name, address and telephone number of the MPC employee from whom further information regarding these projects may be obtained is:

Mr. Shawn S. Shurden
Senior Counsel and Regulatory Affairs Manager
Mississippi Power Company
2992 West Beach Boulevard
Post Office Box 4079
Gulfport, MS 39502-4079
Phone: (228) 865-5046
ssshurde@southernco.com

with a copy to:

Ricky J. Cox, Esq.
Balch & Bingham LLP
1310 25th Avenue
Post Office Box 130
Gulfport, MS 39501
Phone: (228) 214-0411
rcox@balch.com

⁶ Rules, Schedule 3, Appendix “A,” Item 9.

⁷ See Rule 30 of the Mississippi Public Utilities Rules of Practice and Procedure.

CONCLUSION

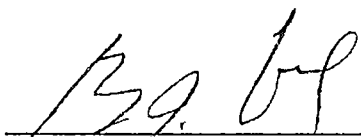
15. The present and future public convenience and necessity requires or will require the construction, extension, operation and maintenance of the equipment and facilities in such locations as described above for the Project and in the testimony accompanying this petition, all in connection with the Company's service to its customers in southeast Mississippi.

WHEREFORE, PREMISES CONSIDERED, Mississippi Power Company prays that this petition be received and filed; that notice thereof be given by the Commission in the manner and form prescribed by law, returnable to a date certain; that this Commission consider the same as soon after that date as reasonably possible; and that after having fully considered all the relevant evidence, this Commission enter an order granting Mississippi Power Company a certificate that the public convenience and necessity require or will require the Company to construct, acquire, extend, operate and maintain the electric facilities described herein and for such other and further relief as the Commission deems appropriate.

Respectfully submitted on this, the 2nd day of June, 2021.

MISSISSIPPI POWER COMPANY

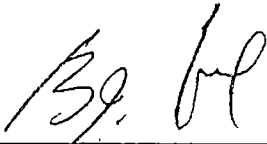
BY: BALCH & BINGHAM LLP

BY: 
Ricky J. Cox

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STATE OF MISSISSIPPI
COUNTY OF HARRISON

PERSONALLY appeared before me, the undersigned authority in and for the said County and State, within my jurisdiction, the within named RICKY J. COX, who after being duly sworn on oath acknowledged that he is an Attorney for MISSISSIPPI POWER COMPANY and that for and on behalf of the said Mississippi Power Company and as its act and deed, he signed and delivered the above and foregoing instrument of writing for the purposes mentioned on the day and year therein mentioned, after first having been duly authorized by said Mississippi Power Company so to do.



RICKY J. COX

SWORN TO AND SUBSCRIBED BEFORE ME, this the 2 day of June, 2021.



NOTARY PUBLIC



My Commission Expires _____

CERTIFICATE OF SERVICE

I, RICKY J. COX, counsel for Mississippi Power Company in the above and foregoing filing with the Mississippi Public Service Commission on even date herewith, do hereby certify that in compliance with RP 6 of the Mississippi Public Service Commission's Public Utilities Rules of Practice and Procedure, as modified and suspended by that certain Order Temporarily Suspending Rules and Encouraging Use of the Commission's Electronic Filing System issued on March 12, 2020:

(1) An electronic copy of the filing has been filed with the Commission via e-mail to the following address:

efile.psc@psc.state.ms.us

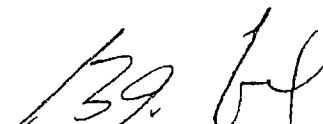
(2) An electronic copy of the filing was served via e-mail only to the following "interested persons" as defined by RP 2.115 of the Commission's Rules:

Sally Burchfield Doty, Esq.
Mississippi Public Utilities Staff
501 North West Street, Suite 301B
Jackson, MS 39201
sally.doty@psc.ms.gov

C. Ross Hammons, Esq.
Mississippi Public Service Commission
501 North West Street, Suite 201A
Jackson, MS 39201
ross.hammons@psc.ms.gov

(4) MPC has complied with or requested a waiver of all other requirements of the Commission's Rules.

This the 2nd day of June, 2021.



RICKY J. COX