

Gulf Power Company
500 Bayfront Parkway
Post Office Box 1151
Pensacola FL 32520-0770
Telephone 904 444-5365

Jack L. Haskins
Manager of Rates and Regulatory Matters
and Assistant Secretary

**ORIGINAL
FILE COPY**

The Southern Electric System

May 21, 1990

Mr. Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee FL 32399-0870

Dear Mr. Tribble:

RE: Docket No. 891345-EI

Enclosed are an original and fifteen (15) copies of Gulf Power Company's Rebuttal Testimony from the following witnesses to be filed in the above docket.

- | | |
|----------------------------|--------------------------|
| D. L. McCrary-4449-90 | J. L. Haskins 04458-90 |
| J. E. Hodges, Jr. 4450-90 | M. W. Howell 04459-90 |
| E. B. Parsons, Jr. 4451-90 | R. H. Jackson 04460-90 |
| A. E. Scarbrough 4452-90 | C. E. Jordan 04461-90 |
| M. R. Bell 4453-90 | C. R. Lee 04462-90 |
| W. P. Bowers 4454-90 | R. J. McMillan 04463-90 |
| R. D. Bushart 4455-90 | Dr. R. A. Morin 04464-90 |
| E. C. Conner, Jr. 4456-90 | M. T. O'Sheasy 04465-90 |
| D. P. Gilbert 04457-90 | |

Sincerely,

Jack L. Haskins

lw

Enclosures

cc: Beggs and Lane
G. Edison Holland, Jr., Esquire
Jeffrey A. Stone, Esquire

- ACK
- AFA 3
- APP _____
- CAF _____
- CMU _____
- CTR only
- EAG** _____
- LEG 1
- LIN 6
- OPC 8
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE

04449 MAY 21 1990

PSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition of Gulf Power Company)
for a Rate Increase)
_____)

Docket No. 891345-EI

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 21st day of May, 1990 by U. S. Mail or hand delivery to the following:

Jack Shreve, Esquire
Public Counsel
Florida House of Representatives
The Capitol
Tallahassee FL 32399-1300

Suzanne Brownless, Esquire
Florida Public Service Commission
101 East Gaines Street
Tallahassee FL 32399-0863

Major Gary A. Enders
HQ USAF/ULT
Stop 21
Tyndall AFB FL 32403-6001

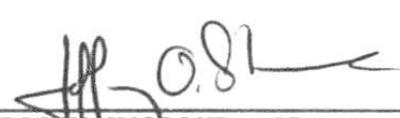
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Pensacola, FL 32576
904 432-2451
Attorneys for Gulf Power Company

**ORIGINAL
FILE COPY**

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

DOCKET NO 891345-EI

**REBUTTAL TESTIMONY
AND EXHIBITS
OF
D. L. McCRARY**



**DOCUMENT NUMBER-DATE
04449 MAY 21 1990
FPSC-RECORDS/REPORTING**

1 GULF POWER COMPANY

2 Before the Florida Public Service Commission
3 Rebuttal of
4 D. L. McCrary
5 In Support of Rate Relief
6 Docket No. 891345-EI
7 Date of Filing May 21, 1990

8 Q. Please state your name, address and place of employment.

9 A. My name is Douglas L. McCrary. My address is 500
10 Bayfront Parkway, Pensacola, Florida 32501. I am the
11 President and CEO of Gulf Power Company.

12 Q. Are you the same Douglas L. McCrary who submitted
13 prefiled direct testimony in this Docket?

14 A. Yes, I am.

15 Q. Do you have exhibits to your testimony to which you will
16 refer.

17 A. Yes.

18 Counsel: We ask that Mr. McCrary's Exhibit comprised
19 of 1 schedule, be marked for identification as
20 Exhibit _____. (DLM-2)

21
22 Q. What is the purpose of your rebuttal testimony?

23 A. The primary purpose is to rebut the testimony of
24 Commission Staff witness Roberta Bass that Gulf Power
25 Company should be penalized for mismanagement. I have

DOCUMENT NUMBER-DATE

04449 MAY 21 1990

FPSC-RECORDS/REPORTING

1 been involved in utility management for over 30 years. I
2 am as proud of our successful efforts to rid Gulf Power
3 of a relatively few dishonest and unethical individuals
4 and to restore the good name of this utility and its
5 employees as any effort in which I have been involved.
6 This Company and its employees have been penalized
7 enough. We have made mistakes, but we have not
8 mismanaged. We invite the Commission to review our
9 efforts and judge our successes.

10 On what standard should we be judged? Have the
11 wrongs been righted? We believe they have. Have the
12 ratepayers suffered? We do not believe so, and have
13 removed from this case any identifiable costs associated
14 with these wrongs. Finally, and the ultimate standard,
15 have we provided to our customers low cost, reliable
16 electric service? Undeniably, we have. This should be
17 the focus of this rate case.

18 I have read with interest and will also address
19 testimony of the witnesses from the Office of Public
20 Counsel, Messrs. Rosen, Schultz, and Larkin. They reject
21 out of hand the inclusion of the Company's investment and
22 expenses related to Plant Scherer, which we, with the
23 knowledge and consent of this Commission invested in for
24 the benefit of our customers. It was then, and is now, a

25

1 good investment. These witnesses recommend, without
2 basis, disallowance of millions of dollars of O & M
3 expenses. As directed by this Commission in our last
4 rate case, we have spent that amount necessary to provide
5 the required level of service to our customers. Despite
6 the slight increase in customer complaints in 1989 noted
7 in the testimony of Staff Witness Kathryn Dyal Brown,
8 which I attribute largely to the adverse publicity we
9 have received, we have enjoyed a relatively low level of
10 complaints over the past five years. I attribute our
11 excellent history to the low rates and high reliability
12 which our customers have and with appropriate rate relief
13 will continue to enjoy.

14
15 Q. Mr. McCrary, you take issue with the management penalty
16 recommended by Ms. Bass. Would you please elaborate?

17 A. Yes. Ms. Bass acknowledges the many positive steps we
18 have taken to correct the wrongs which have been
19 discovered since I became President just over seven years
20 ago. She nevertheless concludes that because it has
21 taken so long to discover and correct each of the wrongs
22 that top management "condoned" the activities and that a
23 management penalty is appropriate.

24 I strongly disagree. The numerous corrective steps
25 we have taken are outlined in Schedule 1 to my direct

1 testimony. What is not reflected are the dates on which
2 the most offensive of the acts occurred, the dates they
3 were discovered, and the action taken. I have summarized
4 these in Schedule 1 to this testimony.
5

6 Q. What does this exhibit show?

7 A. -First, the majority of the activities occurred or began
8 prior to my coming to Gulf Power as President in May of
9 1983.

10 -Second, the initial discovery of illegal activity on the
11 part of Mr. Croft took place shortly after I came to the
12 Company and immediate, decisive action was taken.

13 -Third, it was this initial decisive action which
14 precipitated virtually all of the subsequent internal and
15 external investigations.

16 -Fourth, when improper conduct was confirmed, immediate
17 action was taken. The major offenders involved are no
18 longer with the Company. In all cases, I feel it was the
19 correct action.
20

21 Q. But, certain of the actions, particularly those contained
22 in the plea agreement, while beginning prior to your
23 becoming president, occurred over a number of years
24 subsequent.

25 A. Yes, they did, and had I known of them, appropriate and

1 immediate action would have been taken. It is easy to
2 criticize our failure to ascertain the actions of a
3 senior management official acting alone or in concert
4 with one or two employees. And yet one would not
5 ordinarily suspect that a senior vice president and
6 fellow Board member had been engaged in unethical and
7 illegal activities.

8 My discovery of such activity did not occur until
9 August or September of 1988. We believe the government
10 had been aware of certain of these activities at least
11 since 1985. The Company has no power to subpoena
12 documents or compel employees or vendors to testify under
13 oath. The government has this enormous power, and yet,
14 even they took some four to five years to develop
15 sufficient evidence upon which to base an indictment. In
16 fact, despite our best efforts, because of the limited
17 number of people involved and our inability to compel
18 their testimony, we are yet unable to verify all of the
19 overt acts contained in the Criminal Information
20 associated with the Plea Agreement. I believe it is
21 wholly unjustified and unfair to criticize and penalize
22 the Company for our failure to discover that these acts
23 were taking place any earlier than we did.

24
25 Q. Mr. McCrary, did the top management of the Company allow

1 a culture to exist which condoned the illegal activity
2 and allowed it to occur?

3 A. Absolutely not. It was not top management but an
4 individual "top manager" that apparently created a
5 "culture" whereby a very few individuals reporting to him
6 or acting under his direction deemed it appropriate to
7 circumvent Company policies and procedures. To this day,
8 I do not believe that those involved were aware that they
9 were engaging in illegal activity. They were or
10 certainly should have been aware that the activity
11 violated Company policy.

12 Did I as "top management" know of or condone such
13 activity? The answer is an unequivocal no! As I stated
14 earlier, Jake Horton was a trusted member of senior
15 management and a trusted member of the Board. Despite
16 the difficulties inherently involved in investigating
17 "one of your own," I believe the investigative documents
18 provided the Commission in this docket and in Docket
19 890832-EI, the special investigative docket, clearly
20 reflect that the audit committee of the Gulf Board acted
21 in a timely, thorough manner.

22
23 Q. Mr. McCrary, the Company and you have placed a great deal
24 of the blame for the illegal activities on Mr. Horton.
25 Is this fair?

1 A. I have heard the accusations that we are attempting to
2 place the blame on a dead man. To our knowledge, he is
3 not to blame for all activities of Mr. Croft,
4 Mr. Brazwell or the others involved in the illegal
5 activities of the early 80's. He was, however, without
6 doubt, the instigator of and the central figure involved
7 in virtually all of the overt acts contained in the
8 Criminal Information filed by the Government which formed
9 the basis for the Plea Agreement. We did not write that
10 document, nor did we write the government's Statement of
11 Facts. It is the government which places the
12 responsibility squarely on Mr. Horton and those few
13 employees acting at his direction. The facts are that he
14 is responsible and that neither I nor the Board were
15 aware of any of these activities until late 1988.
16 Neither we nor the government became aware of the illegal
17 activities involving the Dick Leonard Group until after
18 Mr. Horton's death. It is patently unfair to criticize
19 or penalize the Company for failure to detect the
20 collusion which was occurring under the circumstances.

21
22 Q. If penalizing the Company is inappropriate, what action
23 should the Commission take?

24 A. I would not be so presumptuous as to recommend a
25

1 particular course of action. I would request that the
2 Commission take note of the Government's recognition of
3 our own internal efforts to investigate wrongdoing and
4 our cooperation with the Government's investigation. We
5 have likewise, to the extent possible, attempted since
6 1984 to keep the Commission and Office of Public Counsel
7 informed of our efforts. The Company and its employees
8 have suffered enough for acts they did not commit. With
9 the substantial criminal fine and the cloud under which
10 we have all lived for the past seven years, we have given
11 "our pound of flesh." Mismanagement would have involved
12 "sweeping these events under the rug." I firmly believe
13 that had I not acted with swift, decisive action in the
14 Kyle Croft matter, little, if any, of the other matters
15 would ever have been discovered. That would have been
16 mismanagement.

17 I am not asking the Commission to condone what has
18 happened. I am asking that it refrain from taking the
19 sensationalist viewpoint with which this matter has been
20 portrayed in the media. Look at the very few people
21 involved, the very limited amount of money, and the
22 effort we have nevertheless made to correct the
23 situation. The situation has been corrected and I am
24 firmly convinced that nothing of the magnitude of what
25 has occurred is likely to occur again. As I stated in my

1 direct testimony, we are attempting to start over. The
2 healing process is well under way. This Commission
3 should encourage the process, not hinder it.
4

5 Q. Mr. McCrary, what has been the reaction of your customers
6 to the events of the past several years?

7 A. Unlike the media, I believe most of our customers have
8 continued to focus on our continuing high-quality, low
9 cost service. They know that we have been an excellent
10 provider of the services they demand. They also know we
11 have been a good corporate citizen in Northwest Florida
12 and that we have pledged to continue this effort.
13

14 Q. To what then do you attribute the increase in customer
15 complaints to the Commission in 1989?

16 A. I attribute it to the adverse publicity we received
17 during the year. One cannot reasonably expect to go
18 through the extensive media coverage we have received
19 without some increase in the level of complaints. The
20 fact is that our rates have not changed and the high
21 quality of service we provide continued throughout 1989.
22 I believe the customer complaint data for the first three
23 months of 1990, contained in Ms. Brown's testimony,
24 indicates that the number of complaints are returning to
25 their historic low level. Even with the increase in

1 1989, her testimony indicates that consumer complaints
2 received by the Commission related to Gulf Power Company
3 are in very small numbers. Of the ones that are
4 received, only a few are justified. Our consumer
5 complaints show a definite downward trend since 1981, and
6 1988 was the third year in a row in which Gulf Power
7 maintained the lowest number of complaints per thousand
8 customers of any of the four major electric utilities and
9 the lowest number of justified complaints per 1,000
10 customers.

11

12 Q. To what would you attribute this excellent performance?

13 A. Customer satisfaction in the utility business generally
14 means that customers feel like they are getting proper
15 value for their energy dollar. This can usually be
16 summarized in two basic measures, reliability of electric
17 service and prices being charged for that service.

18

19 Q. From a policy standpoint, how does a utility go about
20 providing reliable service?

21 A. There are two basic components to providing reliable
22 service; these are adequate capital facilities
23 constructed to supply the customers' load and a proper
24 level of attention continuously given to maintain those
25 facilities in proper working condition. The high level

1 of customer satisfaction we enjoy, as evidenced by the
2 consumer complaint activity, specifically the lack
3 thereof, and our own internal measures of customer
4 satisfaction, indicate that we are building the proper
5 amount of capital facilities, as expected by our
6 customers, and the facilities are being properly
7 maintained. Were that not occurring, we know that our
8 customers would not hesitate to let the Commission know
9 this by way of consumer complaints.
10

11 Q. What does this level of consumer complaints indicate with
12 regard to customer satisfaction with the cost of electric
13 service?

14 A. Given that our level of service reliability has generally
15 been good over the years, the cost of our product is
16 probably the principal reason that we have seen the
17 number of consumer complaints to this Commission
18 decreasing over the years. I would also give credit to
19 the employees of our Company who dedicate themselves to
20 helping our customers whenever problems arise and in
21 assisting our customers in managing their energy use. As
22 I discussed in my direct testimony, the price of our
23 product is low in relative terms and low compared to
24 those of other utilities. It has also been on the
25 decline for several years now. When consumers are

1 getting a bargain, the tendency is not to complain. Our
2 customers are receiving a high service value, and their
3 subconscious realization of that is the principal reason
4 they are not burdening the Commission Office of Consumer
5 Affairs with complaints.
6

7 Q. Mr. McCrary, are there any of the specific areas of
8 Ms. Bass' testimony which you wish to address?

9 A. Yes. I would like to speak to the questions raised
10 relative to our continuing to do business with one of the
11 vendors implicated in the kickback schemes and our doing
12 business with one of our directors.
13

14 Q. Would you please speak to the issue of continuing to do
15 business with this vendor.

16 A. Yes. Since initially learning of the existence and
17 magnitude of these various schemes, we have evaluated the
18 merits of continuing to do business with those vendors
19 involved.

20 In each instance, to the best knowledge of the
21 Company, the vendor had acted upon the express
22 instruction of a former Company employee. While this
23 does not justify the vendors' actions, it did, along with
24 the total cooperation provided to the Company and
25 authorities, make the Company reluctant to immediately

1 terminate relations. Nevertheless, by December 31, 1988,
2 the Company had severed its ties with all but one of the
3 vendors.

4 The one remaining vendor is Mr. Dave Cook of West
5 Florida Landscaping. To the best knowledge of the
6 Company, Mr. Cook never profited from the improper
7 actions requested of him by the few former Company
8 employees involved. He has been extremely cooperative
9 with and helpful to the federal authorities and the
10 Company. West Florida Landscaping continues to be the
11 low bidder for some of the Company's grounds maintenance
12 work. The work performed is of superior quality at an
13 extremely reasonable price. I see absolutely nothing to
14 be gained by terminating the Company's relationship with
15 Mr. Cook at this time.

16
17 Q. Mr. McCrary, the issue has also been raised with respect
18 to Gulf's doing business with its directors,
19 specifically, Mr. J.K. Tannehill. Would you please
20 comment?

21 A. Yes. Over the years, Gulf has engaged in various
22 business transactions with companies whose employees
23 serve on Gulf's Board of Directors. To my knowledge, in
24 every instance known to the Company, these transactions
25 have been arms length and based on established purchasing

1 policies and procedures. Numerous legal and regulatory
2 conflict of interest disclosure requirements provide all
3 concerned with ample protection against wrongdoing. The
4 Company's own internal policies and by-laws provide
5 additional protections.

6 The details of Gulf's business relationship are
7 provided in the testimony of Mr. Lee. As he indicates,
8 Gulf was doing business with Stock Equipment Company for
9 many years prior to Mr. Tannehill's coming on Gulf's
10 Board in 1985. Stock Equipment has historically provided
11 quality, competitively priced production equipment to
12 Gulf Power. Purchases from Stock Equipment, before and
13 after Mr. Tannehill's having come on the Board, have been
14 in strict accordance with company purchasing policies and
15 procedures. I am informed that the level of purchases by
16 Gulf from Stock have, in fact, gone down since
17 Mr. Tannehill became a member of the Board.

18 Mr. Tannehill is a very knowledgeable, effective
19 member of Gulf's Board of Directors. His expertise in
20 corporate management and his knowledge of the utility
21 industry have been invaluable to Gulf Power Company.
22 Were the companies of every Board member to be prohibited
23 from doing business with Gulf Power, the ability of the
24 Company to attract competent, effective Board members
25 would be severely impaired. This would not be in the

1 best interest of Gulf or its customers.

2

3 Q. Staff and Public Counsel's witnesses have recommended
4 that all expenses associated with Gulf's participation in
5 Plant Scherer be disallowed. How do you respond?

6 A. As clearly shown in Mr. Howell's rebuttal testimony, such
7 a position is extremely short-sighted. This Commission
8 has been involved in our decision-making process with
9 respect to Plant Scherer virtually every step of the
10 way. To now deny recovery of this investment in rate
11 base would violate the regulatory compact upon which we
12 relied in making the investment. The indisputable fact
13 is the Plant Scherer investment was and is in the best
14 interest of our customers. It would be wholly
15 inequitable to deny our shareholders a return on their
16 investment in the short term and expect the Company to
17 retain the Plant for the long term benefit of the
18 customers. I have thoroughly reviewed our decisions over
19 the past fifteen years with respect to our capacity
20 planning. It is clear to me that in each instance we
21 have acted in the best interest of our territorial
22 customers.

23

24 Q. You have also criticized the proposed disallowances of
25 O & M expenses. Would you please elaborate?

A. Yes. Our witnesses can and have justified those expenses

1 which are at issue. I know our overall level of expenses
2 is extremely reasonable. In our Company, a great deal of
3 emphasis has been placed on keeping our rates as low and
4 competitive as possible. We have succeeded, at least
5 partially, because of our efforts to keep O & M expense
6 increases to a minimum. Just as important, however, has
7 been meeting the mandate of this Commission to spend at
8 the level necessary to meet our statutory obligation to
9 provide quality, reliable service. We have done this,
10 and as a result, our earnings and thus our financial
11 integrity are suffering. Our existing residential rates
12 are already 18.7 percent below those of the highest
13 investor owned utility rates in the state and 6.6 percent
14 below the next lowest. This is a clear indication of the
15 reasonableness of our expenses, investments, and
16 consequently our revenue requirements. If the
17 recommendations of the Public Counsel witnesses to be
18 adopted, our residential rates would be 22.4 percent
19 below the highest and 10.8 percent below the next
20 lowest. The unreasonableness of the position taken by
21 the Public Counsel witnesses is apparent.

22
23 Q. Do you have any further comments with respect to the
24 matters before the Commission?

25 A. Yes. We have a great deal of respect for this regulatory
 body and the process. We are entitled to, and believe we

1 will receive, a fair and unbiased evaluation of our
2 case. It is clear from my testimony and that of the
3 other Company witnesses in this case that Gulf Power does
4 deserve to receive the revenue increase that has been
5 requested. Plants Daniel and Scherer are critical to
6 Gulf's provision of low cost, reliable electric service
7 to Gulf's customers. An almost equal amount of
8 transmission, distribution and other plant has been added
9 since our 1984 rate case. This investment and the
10 associated O & M expenses constitute the greater part of
11 our need for rate relief. No utility should be expected
12 to add this amount of investment without requiring an
13 increase in rates to support it.

14 The Commission should base its decision on the facts
15 before it, not on unsubstantiated rumor and innuendo.
16 Again, however, should any continuing or future
17 investigation by an authorized government entity produce
18 any hard evidence which shows that any amount of revenue
19 increase granted to Gulf in this Docket was based on data
20 that was inflated because of any illegal activity on the
21 part of Gulf Power Company or its employees, that portion
22 of the increase will be immediately refunded, with
23 interest, to our customers as soon as practical after
24 such a conclusion has been reached. That is my personal
25 and corporate guarantee to this Commission. As I stated

1 earlier, this Company is embarking on a new course. This
2 new course will build on the strengths of the past, low
3 rates and reliable service, and will emphasize character
4 and integrity. In every area of our business, high
5 quality customer service will be a top priority. If we
6 are to achieve these worthwhile goals, we must have the
7 revenues to support them. Based on the merits of the
8 case before this Commission, I firmly believe we are
9 deserving of the requested increase.

10

11 Q. Does this conclude your testimony?

12 A. Yes.

13

14

15

16

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25

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

Docket No. 891345-EI

Before me the undersigned authority, personally appeared
D. L. McCrary, who being first duly sworn,
deposes and says that he/she is the President of Gulf Power
Company and that the foregoing is true and correct to the best of
his/her knowledge, information and belief.

D. L. McCrary

Sworn to and subscribed before me this 11th day of
May, 1990.

Candace Klingesmith
Notary Public, State of Florida at Large

My Commission Expires: ~~MY COMMISSION EXPIRES MAY 18, 1991~~

NAME & TITLE	OFFENSE	VERBOS	APPROX. OFFENSE DATE	DIRECTED BY	DATE DISCOVERED	DISCIPLINARY ACTION
Ryle Croft Supv.	(1), (3), (5), (6), (11)	Richard Leeper West Fla. Landscaping	80-84	Self	1/84	Discharged - Resigned - 1/30/84 CONVICTED: 05/11/88 SENTENCED: 3 yrs. & \$10,000 fine
Carolyn Simmon Supv.	(8), (9), (10)	Gulf Gen. Warehouse	82-84	Croft	1/84	Demoted from Warehouse Supervisor to Special Staff Assistant - 02/03/84
Lamar Braznell Supv.	(1), (3), (6), (7), (11)	Richard Leeper West Fla. Landscaping	80-84	Croft Self	2/84, 6/88	Resigned - 2/13/84 CONVICTED: 06/24/88, Tax Evasion '81, '82, '83 SENTENCED: 9 yrs. & \$30,000 fine
Bill Davis Supv.	(3), (6)	Escambia Elec. Rबर & Stone Welding	82-84	Self	4/84	Discharged - 04/05/84
Art Peters	(6), (7), (11)	Richard Leeper	80-83	Self, Croft, Braznell	6/86, 6/88	Discharged - 6/13/86 Misconduct
Ron Harris	(6), (7), (11)	Richard Leeper	80-83	Self, Croft, Braznell	6/86, 6/88	Discharged - 6/23/86 Refused to take drug test
John Matthews	(6), (7), (11)	Richard Leeper	80-83	Self, Croft, Braznell	6/87, 6/88	Discharged - 6/06/87 Poor performance & alcoholism
Jaime Horton Sr. VP	(3), (7), (9), (10)	Various	81-88	Self	9/88	Audit Committee recommended separation from Company - 6/01/89
Ray Yarbrough Dir.	(3)	Appleryard (old)	81-84	Horton	8/84, 9/88	Letter of reprimand - 5/1/89 Demoted to Reg. Appl. Sales & Service/changed reporting relationship - 6/01/89 Retired - 11/01/89
Doug Knowles Supv.	(1), (3), (4), (7)	Dick Leonard	84-88	Horton	5/89	Resigned - 10/30/89

OFFENSE CATEGORY:

- (1) Approved invoice knowing work had not been done.
- (2) Approved invoices without verifying that work was actually done.
- (3) Knowingly approved or directed approval of invoices which did not accurately reflect services or materials actually purchased.
- (4) Asked vendor to make political contribution and bill to Company as other services.
- (5) Used Company equipment and labor for personal benefit.
- (6) Theft of Company money or assets.
- (7) Lied to internal auditor, investigator, or Company officers.
- (8) Approved disposal of line power transformers containing PCB's by Gulf Power.
- (9) Unauthorized use of company assets.
- (10) Knowingly allowed misuse of Company assets or equipment.
- (11) Extorted or attempted to extort money from Company vendor.