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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to Resolve )  
Territorial Dispute with Gulf Coast )  
Electric Cooperative, Inc. By ) Docket No. 930885-EU  
Gulf Power Company )

REBUTTAL TESTIMONY AND EXHIBITS

OF

WILLIAM S. DYKES

ON BEHALF OF

GULF COAST ELECTRIC COOPERATIVE, INC.

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December 20, 1996

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE  
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OF  
WILLIAM S. DYKES  
ON BEHALF OF  
GULF COAST ELECTRIC COOPERATIVE, INC.

December 20, 1996

- 1 Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 2 A William S. Dykes, Box 8370, Southport, Florida 32409.
- 3 Q WHAT IS YOUR CURRENT EMPLOYMENT?
- 4 A I am the Manager of Engineering for the Southport District office of Gulf Coast  
5 Electric Cooperative, Inc. ("Gulf Coast").
- 6 Q ARE YOU THE SAME WILLIAM S. DYKES WHO TESTIFIED IN PHASE I OF  
7 THIS PROCEEDING?
- 8 A Yes, I am.
- 9 Q WHAT GEOGRAPHIC AREAS DOES THE SOUTHPORT OFFICE SERVE?
- 10 A Primarily Washington, Bay, Calhoun, and part of Walton Counties.
- 11 Q HOW LONG HAVE YOU BEEN EMPLOYED BY GULF COAST AND WHAT  
12 POSITIONS HAVE YOU HELD?

1 A I have been employed by Gulf Coast for 20 years. I started as a Mapping Technician,  
2 was promoted to Staking Engineer, then to Supervisor of Engineering in 1986. In  
3 1992 the title was upgraded to Manager of Engineering. A copy of my job description  
4 is attached as Exhibit \_\_\_ (WSD-R1).

5 Q WHAT ARE YOUR DUTIES?

6 A My duties include system planning for the Southport distribution system, daily  
7 operational and maintenance functions, load forecasting, and monitoring our  
8 substations.

9 Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

10 A The purpose of my testimony is to demonstrate that, contrary to the claims made by  
11 Mr. Weintritt in his direct testimony, there have been numerous occasions where Gulf  
12 Power has duplicated the facilities of Gulf Coast in providing service to consumers  
13 and where Gulf Coast has taken exception to Gulf Power's actions, although it has  
14 not been cost effective to litigate every territorial dispute. In addition, I will show that  
15 Gulf Power may not have abided by the territorial guidelines in the FERC Tariff  
16 [Exhibit \_\_\_ (WCW-4)] when they were in effect. I also intend to demonstrate that  
17 the number of disputes filed with the FPSC is no indication as to the number of times  
18 Gulf Power has duplicated the facilities of Gulf Coast.

19 Q HOW DO YOU INTEND TO MAKE THESE DEMONSTRATIONS?

20 A By referring to a number of events that have occurred during the course of my  
21 employment with Gulf Coast.

22 Q WHAT KINDS OF SITUATIONS DO YOU INTEND TO DISCUSS?

1 A I intend to review several examples where (1) Gulf Power duplicated the existing  
2 facilities of Gulf Coast in order to serve new consumers, (2) Gulf Power took action  
3 that resulted in the transfer of service from Gulf Coast to Gulf Power, (3) Gulf Power  
4 selectively referred consumers to Gulf Coast to avoid cost and possible complexities,  
5 even though Gulf Power was much closer to the applicant, and  
6 (4) Gulf Power extended its lines into areas already served by Gulf Coast, in order to  
7 serve new consumers, and crossed Gulf Coast's lines several times in doing so.

8 Q PLEASE DESCRIBE EXAMPLES OF WHERE GULF POWER DUPLICATED  
9 EXISTING GULF COAST FACILITIES TO SERVE NEW CONSUMERS.

10 A Perhaps one of the most obvious examples of duplication of service occurred in 1993,  
11 while this proceeding was in progress, involving service to Alliance Realty located on  
12 Highway 77, in south Washington County. This is shown on Gulf Power map No.  
13 2320, filed as part of Exhibit \_\_\_ (AWG-6) to Mr. Gordon's testimony. I have  
14 attached an excerpt from that map as Exhibit \_\_\_ (WSD-R2). As indicated thereon,  
15 Gulf Coast had an existing line on the east side of the highway. Gulf Power's line was  
16 on the other side of the highway. In December 1993, Gulf Power constructed a  
17 primary (25 kV) single-phase extension approximately 121 ft. over Highway 77 and  
18 over the existing primary (25 kV) line of Gulf Coast to provide service to Alliance  
19 Realty. Gulf Coast's existing primary line was on the same side of the road as Alliance  
20 Realty and was within approximately 35 feet of the point of connection to Alliance  
21 Realty. By merely installing a transformer and constructing a service drop, Gulf Coast  
22 could have served the consumer at lower cost than was incurred by Gulf Power in

1 constructing an overhead primary extension to provide service. This site is located at  
2 mile marker 08.330 in the Greenhead community of south Washington County. The  
3 date that this occurred is established by a letter received from Gulf Power Engineer  
4 Donnell Collins dated December 1, 1993, a copy of which is attached as Exhibit \_\_\_\_  
5 (WSD-R3). Construction occurred a few days later.

6 Another similar situation occurred in 1984 in the Youngstown area on  
7 Highway 231 in Bay County. This is shown on Gulf Power map No. 2828, included  
8 in Mr. Gordon's Exhibit \_\_\_\_ (AWG-3), excerpts of which I have attached as Exhibit  
9 \_\_\_\_ (WSD-R4). As shown on this exhibit, according to the details shown on the map  
10 by Gulf Power, Gulf Power constructed 100 feet of underground primary under Gulf  
11 Coast's existing line to serve a new consumer. Again, since Gulf Coast could have  
12 provided service to the consumer with just a service drop and transformer, the cost  
13 incurred by Gulf Power to serve the consumer was considerably higher than would  
14 have been incurred by Gulf Coast.

15 Yet another similar situation occurred on Sweetbriar Road in Bay County in  
16 the 1977 time frame. This location is shown, although incorrectly, on Gulf Power  
17 Map No. 2633, also included in Mr. Gordon's Exhibit \_\_\_\_ (AWG-3), an excerpt of  
18 which is provided as Exhibit \_\_\_\_ (WSD-R5). Gulf Coast served a home at 7501  
19 Sweetbriar Road, occupied at the time by a Mr. Samuel Wirrick, at a point where I  
20 have located a solid rectangle (point 1). This is the same consumer that Gulf Power  
21 has designated with a Transformer Location Number ("TLN") number of 46/95. For  
22 some reason, possibly either for non-payment or by consumer request, Gulf Coast had

1 disconnected service to the consumer who was located within approximately 100 feet  
2 of the Gulf Coast line on the same side of the road. Gulf Power then extended its  
3 existing primary line from a point (approximately point 3) to this existing consumer,  
4 traversing some 1,200 feet, thus duplicating Gulf Coast's existing facilities which had  
5 been constructed to serve the house, and taking this consumer from Gulf Coast. In  
6 actuality, Gulf Power's transformer pole is located not at the 46/95 spot but  
7 approximately at point 2 where I have shown a solid triangle. It is also noteworthy  
8 that this would have violated the terms of the FERC tariff referred to in Mr.  
9 Weintritt's testimony as Exhibit \_\_\_\_ (WCW-4), that precluded Gulf Coast and Gulf  
10 Power from taking over services to a consumer served by the other.

11 Q WHAT DO YOU CONCLUDE FROM THESE EXAMPLES?

12 A All of these occurred in areas where Gulf Coast clearly had adequate facilities to serve  
13 the consumer. At considerably higher cost than would have been incurred by Gulf  
14 Coast, Gulf Power constructed lines duplicating the existing facilities of Gulf Coast.  
15 I can only conclude that Gulf Power has little regard as to whether it uneconomically  
16 duplicates the facilities of Gulf Coast, when it desired to serve a customer.

17 Q CAN YOU REFER TO ANY SITUATIONS WHERE GULF COAST HAS  
18 CONSTRUCTED FACILITIES WHICH DUPLICATED THE EXISTING  
19 FACILITIES OF GULF POWER?

20 A Yes. One particular instance comes to mind. In 1988, Gulf Power referred a Mr. C.O.  
21 Young to Gulf Coast for service. Mr. Young was seeking electric service at a location  
22 on the east side of Highway 231 south of Youngstown, at point 1 shown on the

1 excerpt of Gulf Power Map No. 2830 NW [included in Mr. Gordon's Exhibit \_\_\_\_  
2 (AWG-6)], which I have designated as Exhibit \_\_\_\_ (WSD-R6). At the time, Gulf  
3 Power had and currently shows a 3-phase line on the west side of Highway 231. At  
4 the time, Gulf Coast's line ended at approximately point 2. Gulf Power could have  
5 easily served Mr. Young who had obviously made Gulf Power his choice and to  
6 whom Gulf Power was closer in terms of facilities, by constructing a single-phase tap  
7 across Highway 231 and the adjacent railroad track. Instead, Gulf Power stated that  
8 it did not want to obtain the railroad crossing permit, and apparently with the idea of  
9 avoiding the cost and complexity of the road and railroad crossings, Gulf Power  
10 referred Mr. Young to Gulf Coast for service. Gulf Coast was required to construct  
11 a single-phase line approximately 2,300 feet to the site to finally provide service where  
12 Mr. Young had requested it.

13 Q IN THIS CASE, DO YOU BELIEVE GULF POWER COULD HAVE PROVIDED  
14 SERVICE AT LOWER COST THAN GULF COAST?

15 A Based on my experience, while there would have been some complications associated  
16 with the road and railroad crossing, I believe Gulf Power could have extended its  
17 facilities to serve Mr. Young at considerably less cost than Gulf Coast incurred.

18 Q DO YOU KNOW OF ANY SIMILAR SITUATIONS WHERE MAJOR ROADS  
19 AND/OR RAILROAD RIGHT-OF-WAYS WERE INVOLVED WHERE GULF  
20 POWER EXTENDED SERVICE?

21 A Yes. In fact at about the same time Mr. C.O. Young had requested service, Gulf  
22 Power extended a three-phase primary line from the west side of Highway 231, at the

1 intersection of Bayou George Dr., across the 4-lane highway and the railroad right-of-  
2 way and approximately 3,600 feet down Bayou George Dr. to serve the Sweetwater  
3 Village subdivision, that contained about 600 lots. This is shown on Gulf Power map  
4 No. 2633 [also included in Mr. Gordon's Exhibit \_\_\_ (AWG-3)], an excerpt of which  
5 is attached as Exhibit \_\_\_ (WSD-R7). At the time, Gulf Coast had primary facilities  
6 within 100 feet of the entrance to the subdivision. Incidentally, the original entrance  
7 to Sweetwater Village is not as depicted on Gulf Power's map which I used to  
8 prepare my Exhibit \_\_\_ (WSD-R7), but rather was a point further south on Bayou  
9 George Dr. where the road makes a sharp turn to the east. Where the road continues  
10 on through the sharp bend is the entrance to Sweetwater Village and Gulf Coast's  
11 existing line is shown as a dotted line just east of this point.

12 Gulf Coast initiated meetings with Gulf Power before Gulf Power began  
13 construction in an effort to discuss (1) the geographic location of the subdivision with  
14 respect to the existing facilities of Gulf Coast and Gulf Power and the avoidance of  
15 duplication of Gulf Coast's facilities, (2) the load requirements of the subdivision, (3)  
16 the type of electrical service the developer was requesting, and (4) the overall  
17 economics of service for the subdivision. In fact, this meeting was initiated by Mr.  
18 H.W. Norris, General manager of Gulf Coast, at the time. For the convenience of Gulf  
19 Power, we traveled some 100 miles to meet with Gulf Power officials in their  
20 Pensacola offices.

21 Q WHAT WAS THE RESULT OF THE MEETING?



1 A Gulf Power would not negotiate with Gulf Coast on any aspect of the Company's  
2 plans to serve the Sweetwater Subdivision and expressed no concern as to whether  
3 it would be duplicating the facilities of Gulf Coast in extending service to the  
4 subdivision. After the meeting, Gulf Power proceeded with construction of the line  
5 from Highway 231 down Bayou George Dr. and into the development. It appears that  
6 Gulf Power desires to serve higher density subdivisions and avoid costly and complex  
7 service to isolated individual customers such as Mr. C.O. Young, whom I discussed  
8 earlier.

9 Q DO YOU RECALL ANY OTHER SIMILAR SITUATIONS WHERE GULF  
10 POWER DUPLICATED GULF COAST'S EXISTING LINES TO PROVIDE  
11 SERVICE?

12 A There is an unusual situation that occurred at a development originally known as Deer  
13 Run Ranchetts on Highway 77 in south Washington County. This area is now known  
14 as Sunset Pines and is shown on Gulf Power map No. 2321 [included in Mr. Gordon's  
15 Exhibit \_\_\_ (AWG-6)], an excerpt of which is attached as Exhibit \_\_\_ (WSD-R8). In  
16 1989, in response to a request from the developer, Gulf Coast crossed from the east  
17 side of the highway to the west side and crossed an existing Gulf Power line to serve  
18 this subdivision development. This subdivision lies in an area that had historically been  
19 Gulf Coast's traditional service area. In fact, Gulf Coast's line along the roadway had  
20 been in place since 1950 and Gulf Coast served consumers on both sides of Highway  
21 77. In 1971, Gulf Power constructed a three-phase primary line north along the  
22 eastern side of Highway 77 for the purpose of serving the Sunny Hills subdivision.

1 Gulf Coast viewed this as an invasion of its historic service area by Gulf Power and a  
2 duplication of Gulf Coast's three-phase line along the east side of Highway 77.

3 While it may appear today that Gulf Coast duplicated Gulf Power's facilities  
4 to serve the Deer Run Ranchetts (Sunset Pines) subdivision, Gulf Coast was merely  
5 continuing to extend service in an area that it had historically served. Gulf Power built  
6 its line on the west side of Highway 77, duplicating Gulf Coast's facilities. Given these  
7 circumstances, it did not appear appropriate for Gulf Coast to defer to Gulf Power to  
8 serve this subdivision.

9 Q WHAT CONCLUSION CAN YOU DRAW FROM THIS SITUATION?

10 A Gulf Coast has extended its facilities in an orderly fashion to provide service within  
11 its historic service area. Gulf Power has extended its facilities beyond its traditional  
12 service area and into areas already adequately served by Gulf Coast in an effort to  
13 capture the more lucrative loads and growth that it perceives to be occurring in south  
14 Washington and Bay Counties. Some of these extensions have been costly to Gulf  
15 Power and ultimately to its customers. For example, in the case of the Gulf Power line  
16 built south from the intersection of Hwy 279 and Hwy 77 along the west side of Hwy  
17 77 to serve the Leisure Lakes subdivision, a matter resolved in another territorial  
18 dispute which will be discussed in greater detail later in my testimony, the FPSC  
19 ordered Gulf Power not to serve any new consumers from the new three-phase line  
20 it had built, since it had uneconomically duplicated the facilities of Gulf Coast. In fact,  
21 within just the last few weeks Gulf Power removed the line.

1 Gulf Power's past actions raise serious concerns as to whether Gulf Power can  
2 be relied upon to fairly enforce territorial dispute procedures. A specific boundary  
3 would prevent the unnecessary duplication of service that has occurred in south  
4 Washington and Bay Counties and avoid any uncertainty as to enforcement of  
5 territorial dispute resolution procedures.

6 Q ARE THERE ANY OTHER AREAS WHERE GULF POWER HAS DUPLICATED  
7 GULF COAST'S FACILITIES?

8 A I recall three specific examples. In 1971, along Highway 279 in south Washington  
9 County, just south of the Town of Vernon, Gulf Power built several miles of line and  
10 paralleled Gulf Coast's existing line that had been in place since 1950. This is shown  
11 on Gulf Power maps 2218 NW, 2218 SE, 2220, 2221, 2320, and 2321 [included in  
12 Mr. Gordon's Exhibit \_\_\_ (AWG-6)]. In this case, Gulf Power crossed Gulf Coast's  
13 existing line approximately 27 times during the original construction and thereafter  
14 on Highway 279 and Highway 77, as part of the extension to serve Sunny Hills. It is  
15 noted that the cost to construct such crossings exceeds the cost were no such  
16 crossings are involved.

17 Another example took place in an area known as Saddlebags, within the Sunny  
18 Hills subdivision. During the early stages of development of Sunny Hills, Gulf Coast  
19 had a line that traversed some of the proposed lots and the planned golf course. In  
20 1980, Gulf Coast relocated this line to the dedicated roadway right-of-way along  
21 Washington Blvd., Deltona Blvd., and Elkcam Blvd. This is shown on Gulf Power  
22 maps numbered 2618 and 2518, copies of which were attached to Mr. Gordon's

1 testimony as part of Exhibit \_\_\_ (AWG-6). In 1984, Gulf Power built a single-phase  
2 line along the opposite side of the road right-of-way, paralleling Gulf Coast's existing  
3 line for a distance of approximately 3 miles to serve what today is only a handful of  
4 consumers that were in close proximity to Gulf Coast's existing line. In the process,  
5 Gulf Power crossed Gulf Coast's line six (6) times.

6 The third incident also took place along Highway 77 in south Washington  
7 County in an area known as Leisure Lakes. This incident was litigated before the  
8 FPSC as a territorial dispute in 1983 in Docket No. 830484-BU. Leisure Lakes lies  
9 three (3) miles west of Highway 77. Access to Leisure Lakes is via an unpaved road  
10 extending west from Highway 77. At the time the Leisure Lakes development began  
11 in 1983, Gulf Coast served the general area encompassed within the Leisure Lakes  
12 development from lines extending from the western side of Leisure Lakes. Gulf Coast  
13 also had a three-phase line in place along the eastern side of Highway 77. Even  
14 though Gulf Coast was closer to this development, located within its historic service  
15 area, Gulf Power constructed a substation and a three-phase line from a point north  
16 of Leisure Lakes, beginning at the intersection of Highway 279 and Highway 77 south  
17 to the access road to the development west of Highway 77, paralleling Gulf Coast's  
18 existing three-phase line the entire distance. Gulf Power then built a three-phase tap  
19 down the access road, westward into the Leisure Lakes area. Gulf Coast filed a  
20 petition with the Florida PSC to resolve a territorial dispute on this matter. The result  
21 was that service rights were awarded to Gulf Coast on the basis that Gulf Power had  
22 unnecessarily and uneconomically duplicated Gulf Coast's existing facilities. In the

1 FPSC's Order No. 13668, Gulf Power was prohibited from serving any consumers  
2 from the line built south along Highway 77. Later, Gulf Coast acquired Gulf Power's  
3 three-phase tap that extended west from Highway 77 into Leisure Lakes.

4 Q DO YOU KNOW OF ANY CASES WHERE GULF COAST HAS REFUSED TO  
5 PROVIDE SERVICE WHERE REQUESTED?

6 A Gulf Coast has an "area coverage" policy that has been in effect for many years.  
7 Under this policy, a copy of which is attached as Exhibit \_\_\_ (WSD-R9), we will  
8 extend overhead service without charge to "permanent establishments." Service to  
9 non-permanent establishments and underground service may require contributions-in-  
10 aid of construction ("CIAC"). In instances where the requested service is remote from  
11 Gulf Coast's existing facilities, and in an area not historically served by Gulf Coast,  
12 and in an area generally served by Gulf Power, we would refer that applicant to Gulf  
13 Power.

14 Q CAN YOU CITE SOME EXAMPLES OF SUCH CASES?

15 A Yes. In August of 1996, Mr. Tommy Richardson requested service at his property  
16 located in northwest Bay County near the Bay County/Washington County line. Upon  
17 investigation, we determined that we would have to build 6.5 miles of single-phase  
18 line to provide the requested service. We also determined that an existing Gulf Power  
19 line was within two (2) miles of the site where service was requested. I then contacted  
20 Gulf Power (specifically, Mr. Tommy Forbes) and referred the service to Gulf Power.  
21 Mr. Forbes told me that Gulf Power would extend service but would require a  
22 \$10,000 CIAC to do so. I contacted Mr. Richardson and explained that the site was

1 closer to Gulf Power's service area and that Gulf Power should extend service. While  
2 Gulf Coast never refused to provide service to Mr. Richardson, it was felt that  
3 constructing a line to the location would have been an unnecessary and uneconomic  
4 duplication of Gulf Power's existing facilities.

5 In another similar situation, Ms. Kathleen Parker applied to Gulf Coast on  
6 May 6, 1996, for electric service in south Washington County, at a location  
7 approximately 4,000 feet south of Duma Jack Road. As indicated in my letter to Bill  
8 Weintritt of Gulf Power of May 13, 1996, a copy of which is attached as Exhibit \_\_\_\_  
9 (WSD-10), we determined that it would be more appropriate for Gulf Power to  
10 provide service, due to the considerably greater distance required for Gulf Coast to  
11 provide service, the fact that we would have to cross Gulf Power's line, and on the  
12 basis that the location seemed to be more in an area traditionally served by Gulf  
13 Power. As indicated in the letter, we referred the application to Gulf Power. The  
14 location where service was requested is depicted on Exhibit \_\_\_\_ (WSD-R11). As also  
15 indicated in the letter, Gulf Power agreed to extend service to Ms. Parker.

16 Q WHAT CONCLUSIONS DO YOU DRAW FROM THESE SITUATIONS?

17 A I believe that Gulf Coast acted responsibly in referring the two applicants for service  
18 to Gulf Power, as in both cases it prevented Gulf Coast from needlessly duplicating  
19 the existing facilities of Gulf Power.

20 Q HAVE THERE BEEN ANY INSTANCES WHERE SERVICE ONCE RENDERED  
21 BY GULF COAST HAS BEEN TRANSFERRED TO GULF POWER?

1       A       Yes. On November 3, 1988, Mr. James Spikes requested service for a convenience  
2       store, known as "Big Bucks Store" located near the intersection of Deer Point Dam  
3       Road and County Road 2311 in Bay County. This location is shown on Gulf Power  
4       map No. 2533. I have provided an excerpt from this map which I have attached as  
5       Exhibit \_\_\_\_ (WSD-12). Service was provided to the building site on the same date  
6       service was requested by extending a line from Gulf Coast's existing line running  
7       north along the west side of County Road 2311. After the Store was completed, we  
8       were contacted by Mr. Spikes again sometime before January 25, 1989 and advised  
9       that he had decided to take permanent service from Gulf Power. I personally  
10      contacted Mr. Spikes and discussed the matter with him. When I met with Mr. Spikes,  
11      he had a print-out generated by Gulf Power showing power costs at various usage  
12      levels. He also raised several issues and asked questions that led me to believe he was  
13      being prompted by Gulf Power. It was apparent to me that Mr. Spikes had been  
14      solicited by Gulf Power to disconnect service from Gulf Coast and to allow Gulf  
15      Power to provide service. As requested by Mr. Spikes, but reluctantly, Gulf Coast's  
16      service facilities were removed on January 27, 1989.

17      Q       DOES THIS CONCLUDE YOUR TESTIMONY?

18      A       Yes, it does.

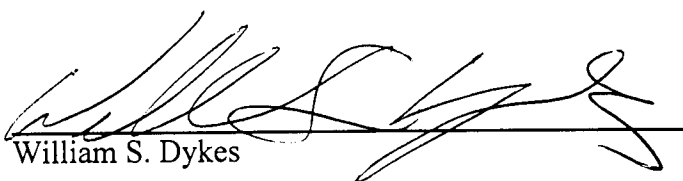
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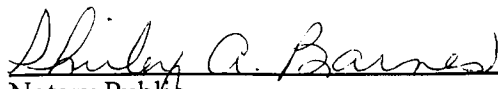
AFFIDAVIT  
OF  
WILLIAM S. DYKES

STATE OF FLORIDA )  
 ) ss  
COUNTY OF BAY )

William S. Dykes, being first duly sworn, on oath, deposes and says that the foregoing prepared Rebuttal Testimony and Exhibits in Docket No. 930885-EU were prepared by him or under his supervision and that the information contained in such testimony and exhibits is true and correct to the best of his knowledge, information, and belief.

  
William S. Dykes

Subscribed and sworn to before me this 19<sup>th</sup> day of December, 1996.

  
Notary Public

My Commission expires: \_\_\_\_\_



SHIRLEY A. BARNES  
MY COMMISSION # CC460040 EXPIRES  
May 8, 1999  
BONDED THRU TROY FAIN INSURANCE, INC.



GULF COAST ELECTRIC COOPERATIVE  
POSITION DESCRIPTION

**POSITION:**  
Manager, Engineering (Southport)

**REPORTS TO:**  
District Manager

**DEPARTMENT:**  
Engineering

**DIRECTS:**  
Staking Engineer (Southport)

**EFFECTIVE:**  
07/1992

**GRADE:**  
M1

**PURPOSE OF POSITION:**

To ensure that Gulf Coast Electric Cooperative's electric distribution system is based on cost effective, sound engineering principles through the coordination of construction and maintenance needs.

**MINIMUM JOB SPECIFICATIONS:**

All requirements are subject to possible modification to reasonably accommodate individuals with disabilities. Some requirements may exclude individuals who pose a direct threat or significant risk to the health and safety of themselves or other employees.

Require Bachelor's Degree/Equivalent in Electrical Engineering or a related field. Require a minimum of three years experience in the operation or engineering sections of an electrical distribution system. Prefer previous supervisory experience involving planning of work programs, budgeting, directing programs requiring frequent people contacts, responsibility for measuring the results of the program.

Require demonstrated expertise of electrical distribution and transmission systems, various phases of operating an electrical distribution system; of all national and local electric codes. Require ability to acquire proficiency in the REA construction specifications and procedures; become knowledgeable of retail rate schedules and structures and the Cooperative's policies and procedures. Require the ability to obtain and maintain a valid Florida commercial driver's license and DOT certification.

Require satisfactory pass of Gulf Coast Electric Cooperative's employment entrance examination and drug screen.

Require excellent verbal and written communication skills; excellent interpersonal skills for effective interaction with personnel/public.

Prefer a registered professional engineer.

**WORKING CONDITIONS:**

General office environment, some business travel, considerable time spent in the field; require the flexibility to work during emergency situations.

Page Two  
Manager, Engineering (Southport)

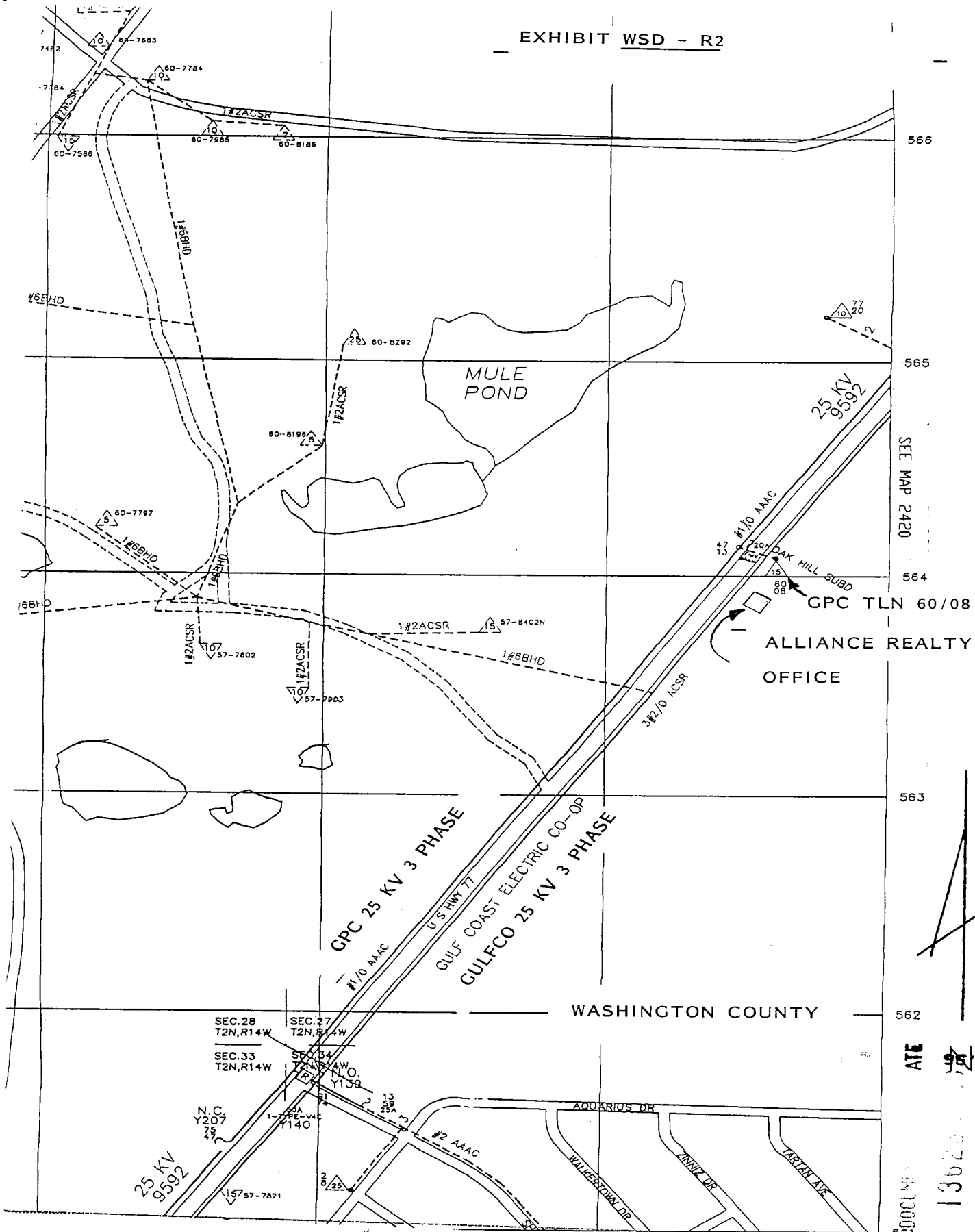
Require the physical ability in stooping, kneeling, crouching, reaching, standing, walking, fingering, grasping, talking, hearing, defined light work. Require visual acuity in machine operation (a) and (c). Exposure to outside environmental conditions on a frequent basis.

**WORKING RELATIONSHIPS:**

Internal: Two way communication with immediate supervisor to receive direction, instruction, approval; to provide work related information in a timely manner; with other departments to provide technical engineering assistance.

External: Demonstrate an awareness that the job exists to effectively serve each and every member, and at every opportunity to achieve increased member and public understanding for support of the cooperative.

EXHIBIT WSD - R2



566  
565  
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SEE MAP 2420

GPC TLN 60/08

ALLIANCE REALTY OFFICE

WASHINGTON COUNTY

13081

10000

Gulf Power Company  
601 Jackson Avenue E  
P O Box 604  
Chipley, Florida 32428  
Telephone 904 638-0270

EXHIBIT WSD - R3

Page 1 of 2



Gulf Power

*the southern electric system*

December 1, 1993

Gulf Coast Electric Cooperative  
Engineering Department  
Attention: Sid Dykes  
P. O. Box 8370  
South Port, Fl. 32409

RE: Utility Permit

Dear Mr. Dykes:

As of this date, an application is being made to the Florida Department of Transportation requesting permission to construct, operate, and maintain 25 KV distribution aerial crossing State Road 77 in Chipley, Washington County, per attached drawing.

Please review the proposed construction and if you should have any objections, please notify both this Company and the appropriate Florida Department of Transportation Maintenance Engineer within 7 days from the date of this letter.

Sincerely,

Donnell Collins  
Senior Distribution  
Engineering Representative

Enclosure

DC/eg

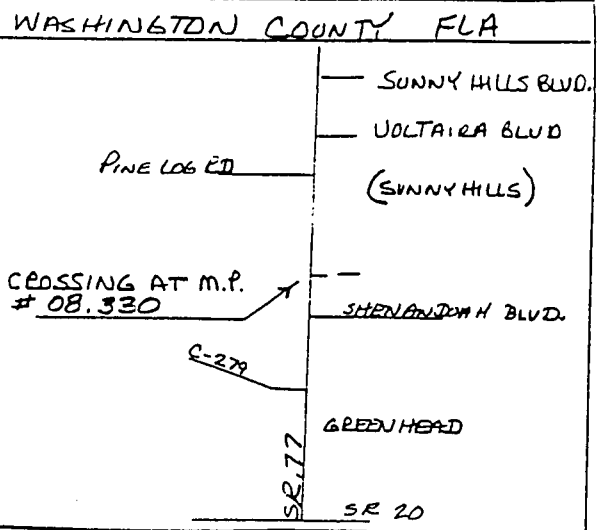
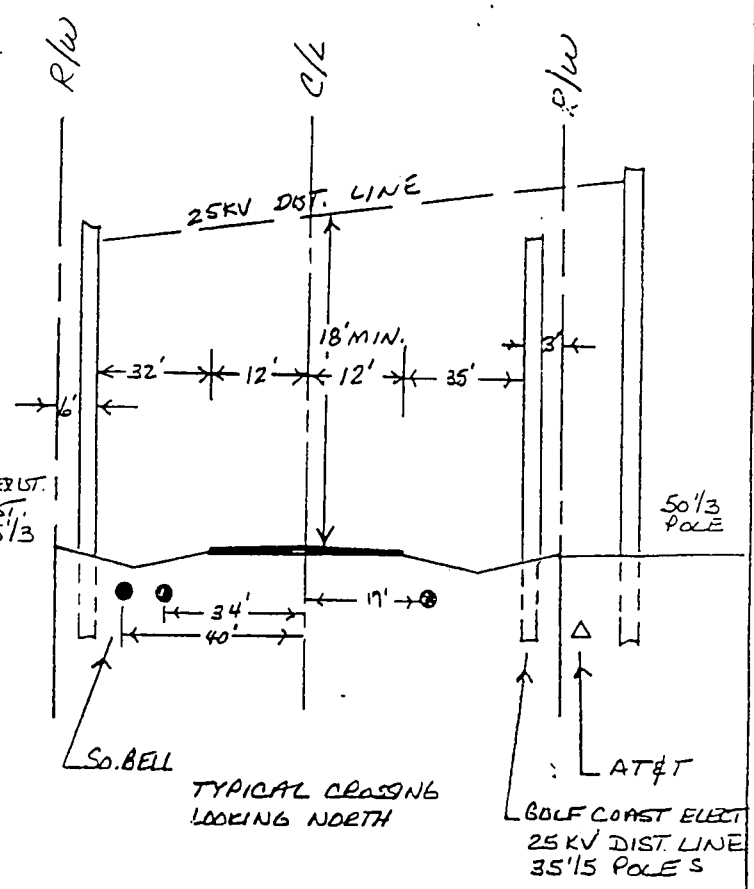
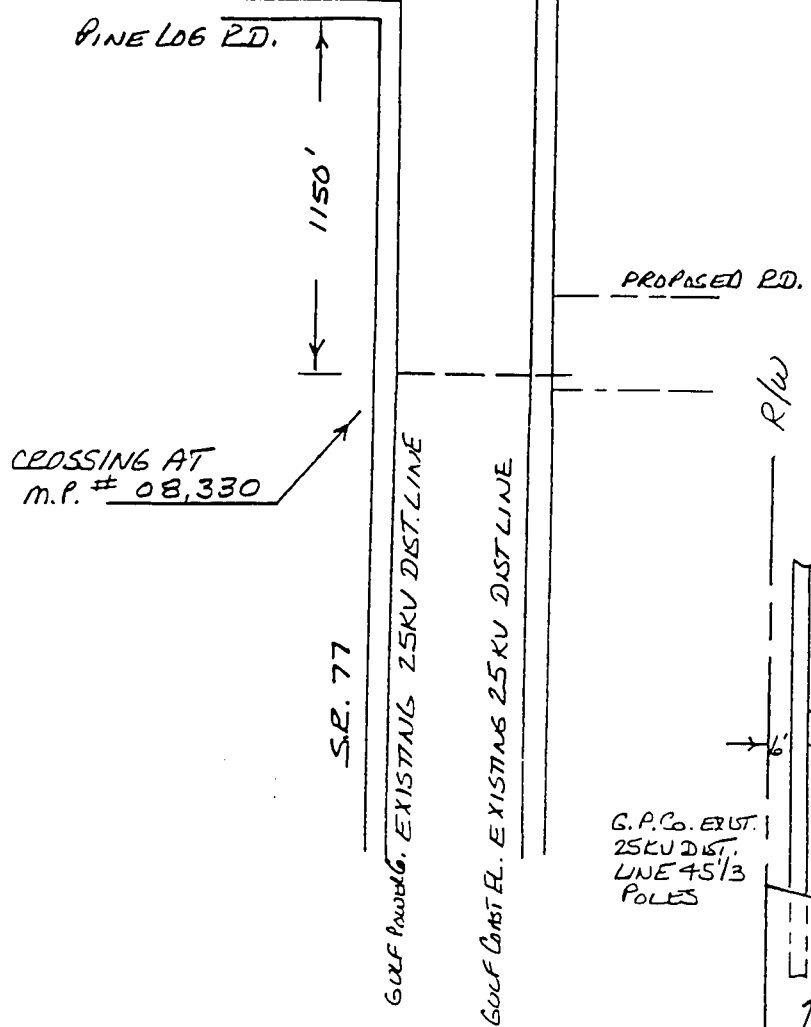


FPSC Docket No. 930885 - EU

Exhibit WSD - R3

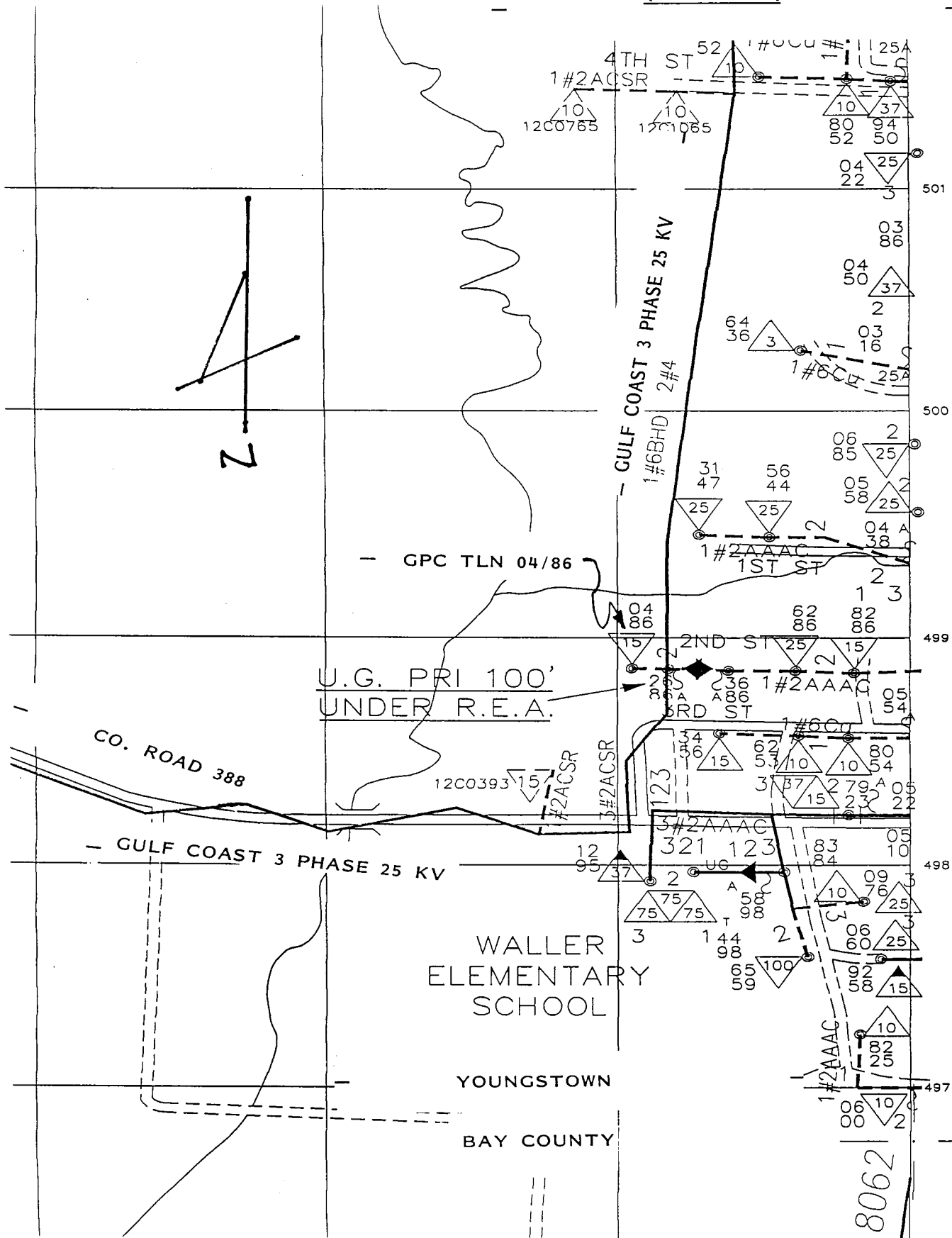
WORKZONE SAFETY  
 FDOT SERIES 600  
 INDEX NO. 609 SH. 10E1

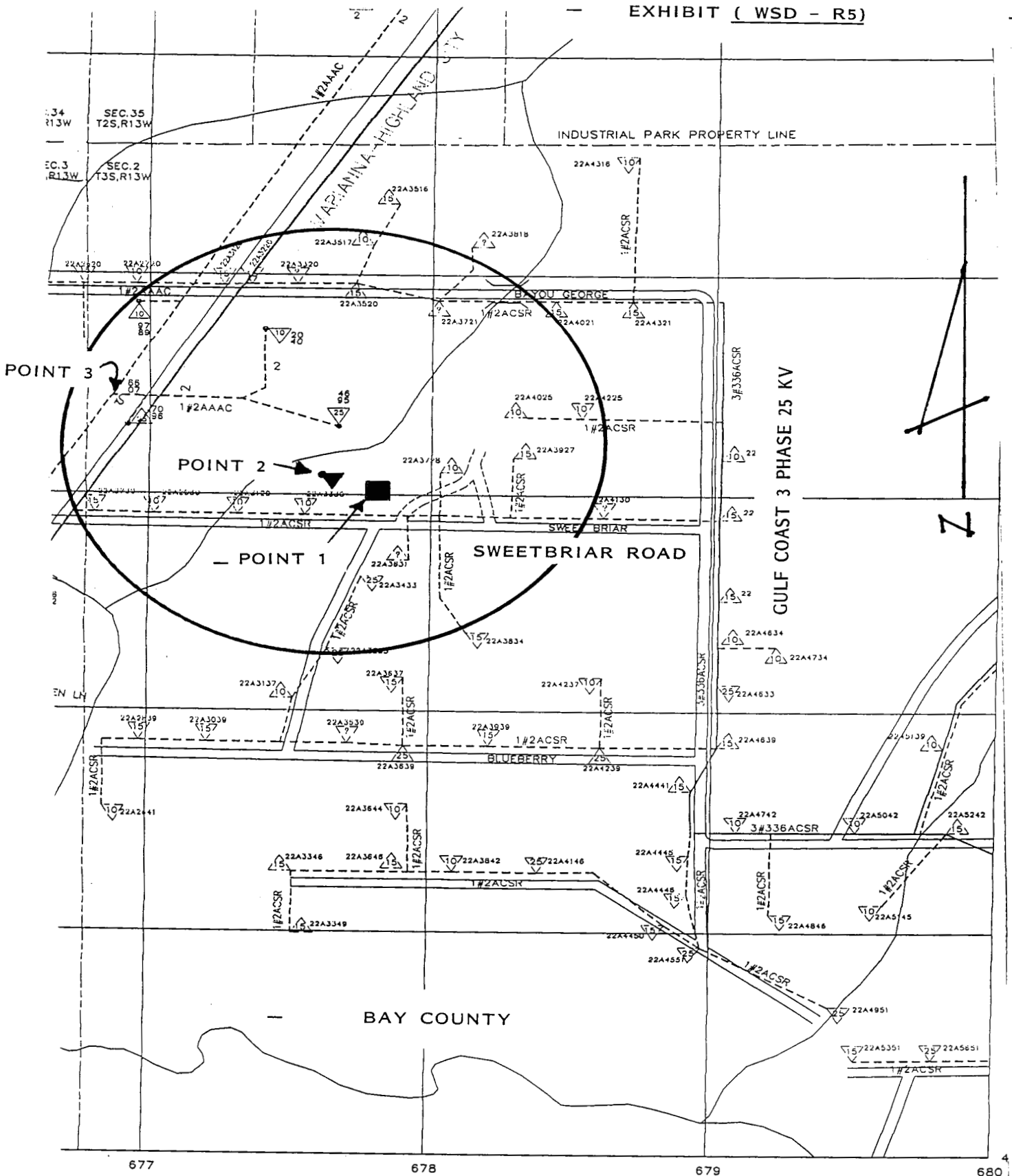
EXHIBIT WSD - R3  
 Page 2 of 2



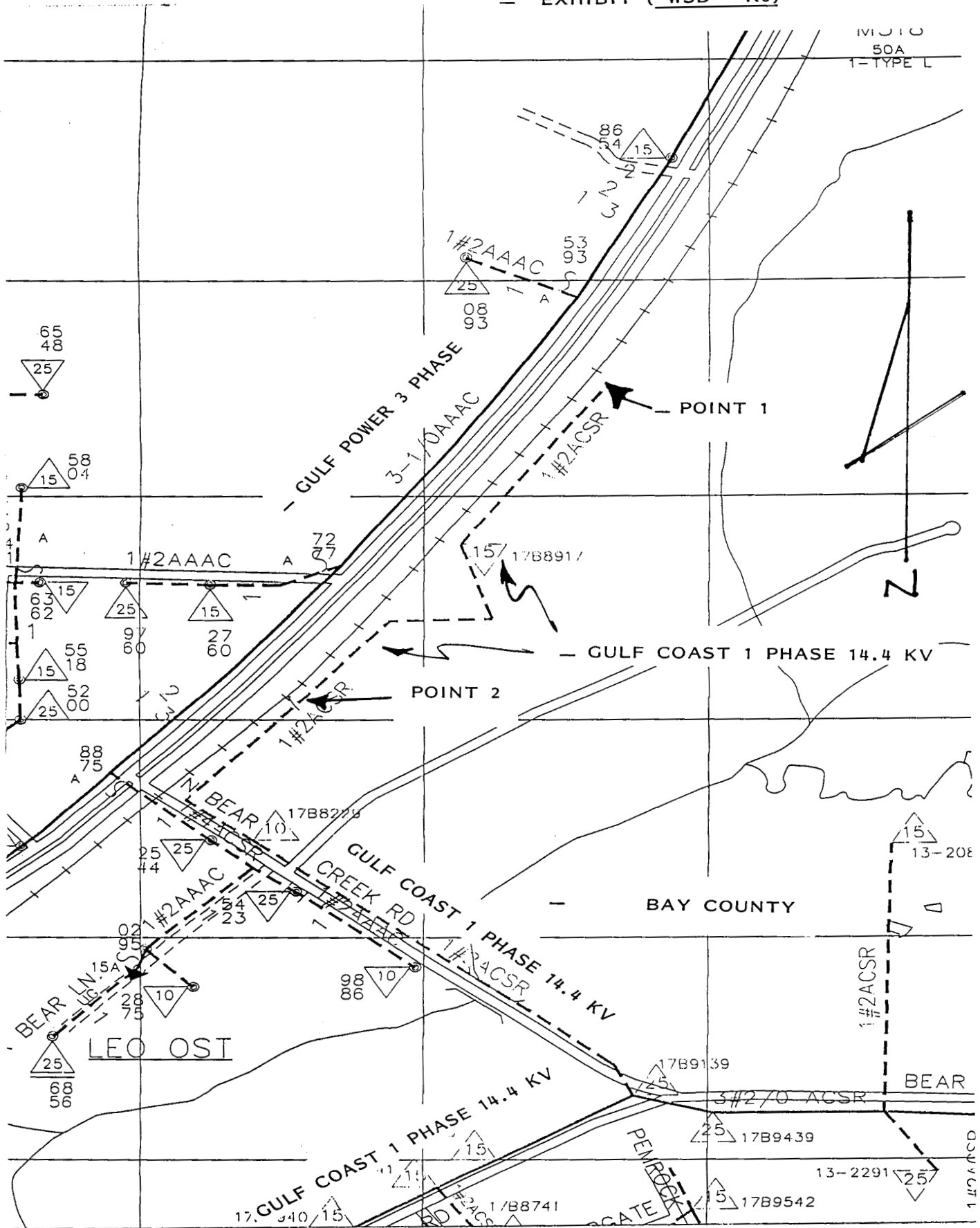
FPSC Docket No. 930885 - EU  
 Exhibit WSD - R3

|                       |  |
|-----------------------|--|
| DR. <u>D. COLLINS</u> | SUBJECT <u>APPLICATION FOR STATE ROAD PERMIT</u>               |
| TR.                   | DETAIL <u>25KV DISTRIBUTION AERIAL LINE CROSSING SR. 77 AT</u> |
| DATE <u>11-30-93</u>  | <u>M.P. # 08.330 SECTION 610B0</u>                             |
| SCALE <u>NONE</u>     | SH <u>1</u> OF <u>1</u> SHEETS                                 |
| <b>DSO 037892</b>     |  |

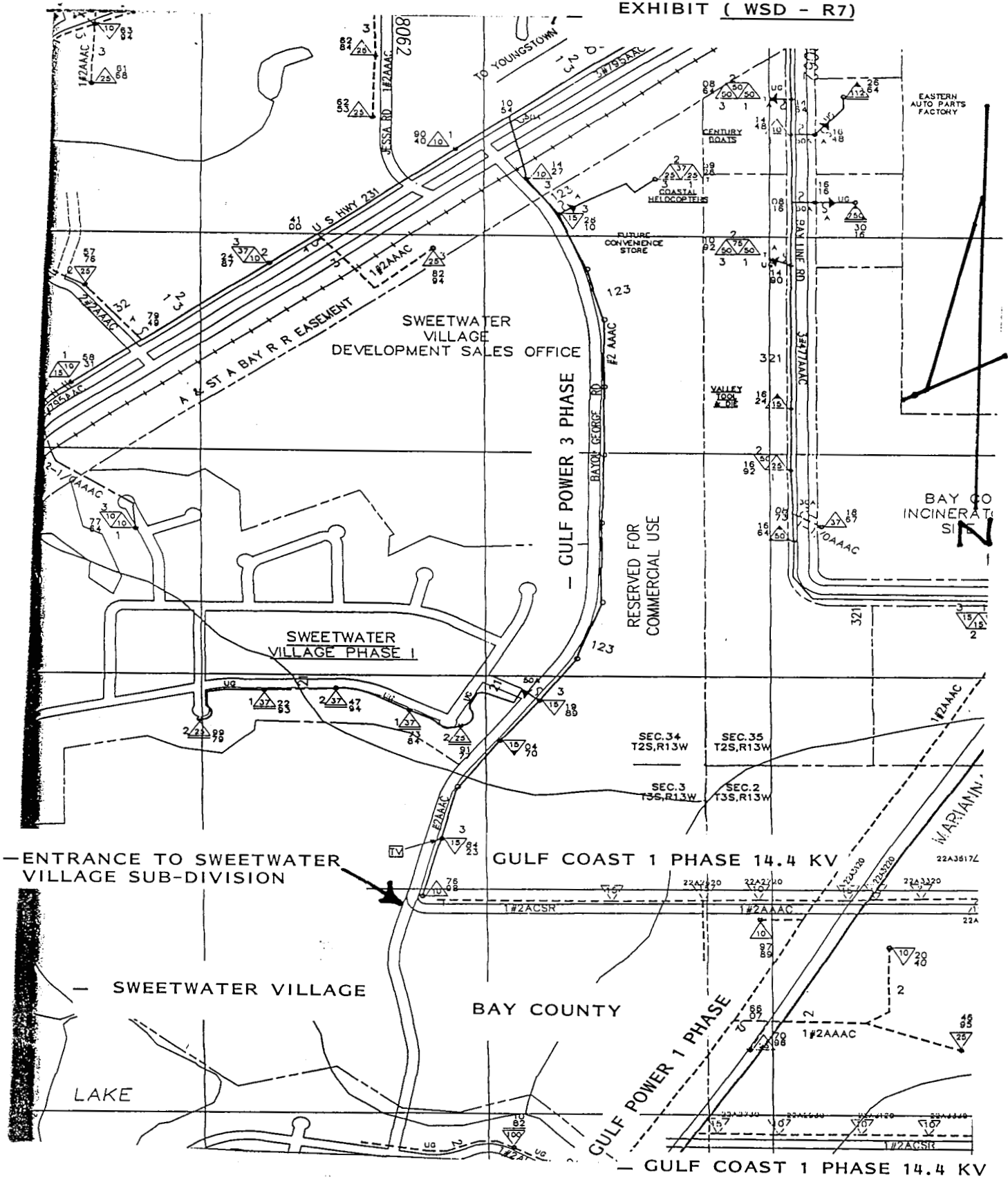




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50A  
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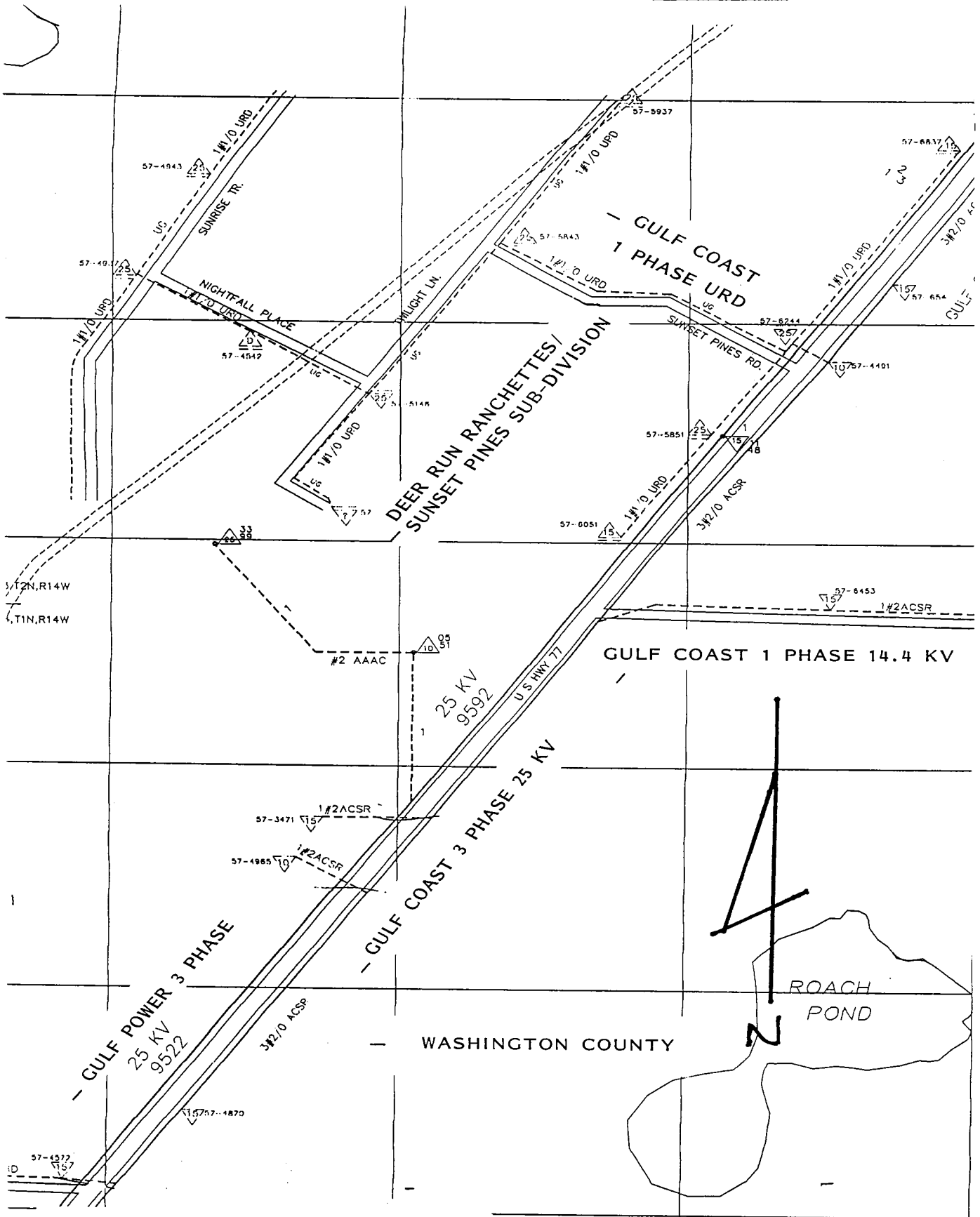






EXCERPT FROM MAP #2633

FPSC Docket No. 930885 - EU  
Exhibit WSD - R7



EXCERPT FROM MAP #2321

FPSC Docket No. 930885 - EU  
Exhibit WSD - R8

GULF COAST ELECTRIC COOPERATIVE INCORPORATED

WEWAHITCHKA, FLORIDA

BOARD POLICY NO. 301

AREA COVERAGE

I. OBJECTIVE:

To fulfill the Cooperative's area coverage responsibility to the unserved persons within its service area, and to make available high quality, low cost, electric service to all those eligible to become members of, and to receive service from the Cooperative; and to provide this service as efficiently as possible with the least amount of inconvenience to the members and the public.

II. SCOPE:

Any person, firm or organization desiring electric service from the Cooperative shall sign an application for service and membership in the Cooperative. Upon receipt of such application for service, the Cooperative shall act in accordance with the following criterion:

If the applicant requests electric service at a location not previously served with electricity and the location is within the areas wherein the Cooperative has the legal right to serve, and the service is of a permanent nature, the Cooperative will proceed with the construction of the necessary facilities as soon as practicable, and service will be rendered after the consumer has met all city and county inspection requirements. Service to permanent residences

BOARD POLICY NO. 301 - Continued

will be rendered at regularly established rates and minimum charges without any required contribution in aid of construction. The Cooperative shall provide service to permanent, fulltime residence without any cost in aid of construction.

Temporary services, cottages, camps, pumps, or other non-permanent, non-fulltime residences shall be required to pay cost in aid of construction in excess of one span of primary and one span of secondary required to furnish the service.

Commercial and industrial services shall be provided at no cost in aid of construction provided, in the opinion of the Cooperative, the service usage will permit recovery of cost within a reasonable period. Otherwise, all cost in excess of one span of primary and one span of secondary shall be paid in cost in aid of construction.

The Cooperative may waive all cost in aid of construction charges when, in the Cooperative's opinion, future growth will generate sufficient revenue to recover the cost of construction within a reasonable period.

III. RESPONSIBILITY:

The Manager is responsible for seeing that the provisions of this policy are carried out.

EFFECTIVE DATE: October 20, 1970

REVISED DATE: May 19, 1987

REVISED DATE: March 17, 1992

FPSC Docket No. 930885 - EU

Exhibit WSD - R9 Page 2 of 2



# GULF COAST ELECTRIC COOPERATIVE, INC.

P.O. BOX 220, HIGHWAY 22 • WEWAHITCHKA, FL. 32465 • PHONE (904) 639-2216 • FAX (904) 639-5061

DISTRICT OFFICE

P.O. BOX 8370, HIGHWAY 77 • SOUTHPORT, FLORIDA 32409 • PHONE (904) 265-3631 • FAX (904) 265-3634

May 13, 1996

Mr. Bill Weintritt  
Gulf Power Company  
1230 East 15th Street  
Post Office Box 2448  
Panama City, Fl 32402-2448

Dear Bill:

On May 6, 1996 a request for electrical service was made here by Kathleen Parker located in Washington County some 4000 ft. south of Duma Jack Road.

Upon meeting with Ms. Parker at the site, we found it would require us to build approximately 6800 ft. of primary line and cross over GPC lines at Pinehurst Road and Duma Jack Road, where GPC could serve this property by building approximately 5000 ft of primary line.

I called your office May 8, 1996 to discuss sending this customer to GPC for the above service and was referred to Donnell Collins because of your absence. In talking with Donnell, we agreed that GPC would serve Ms. Parker and then notified her of this. The decision was mutually agreed upon the afternoon of the 8th to prevent any further inconvenience for Ms. Parker.

If you have any questions in regards to this matter please call me at 265-3631.

Sincerely,

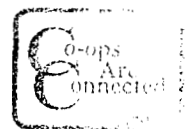
GULF COAST ELECTRIC COOP INC

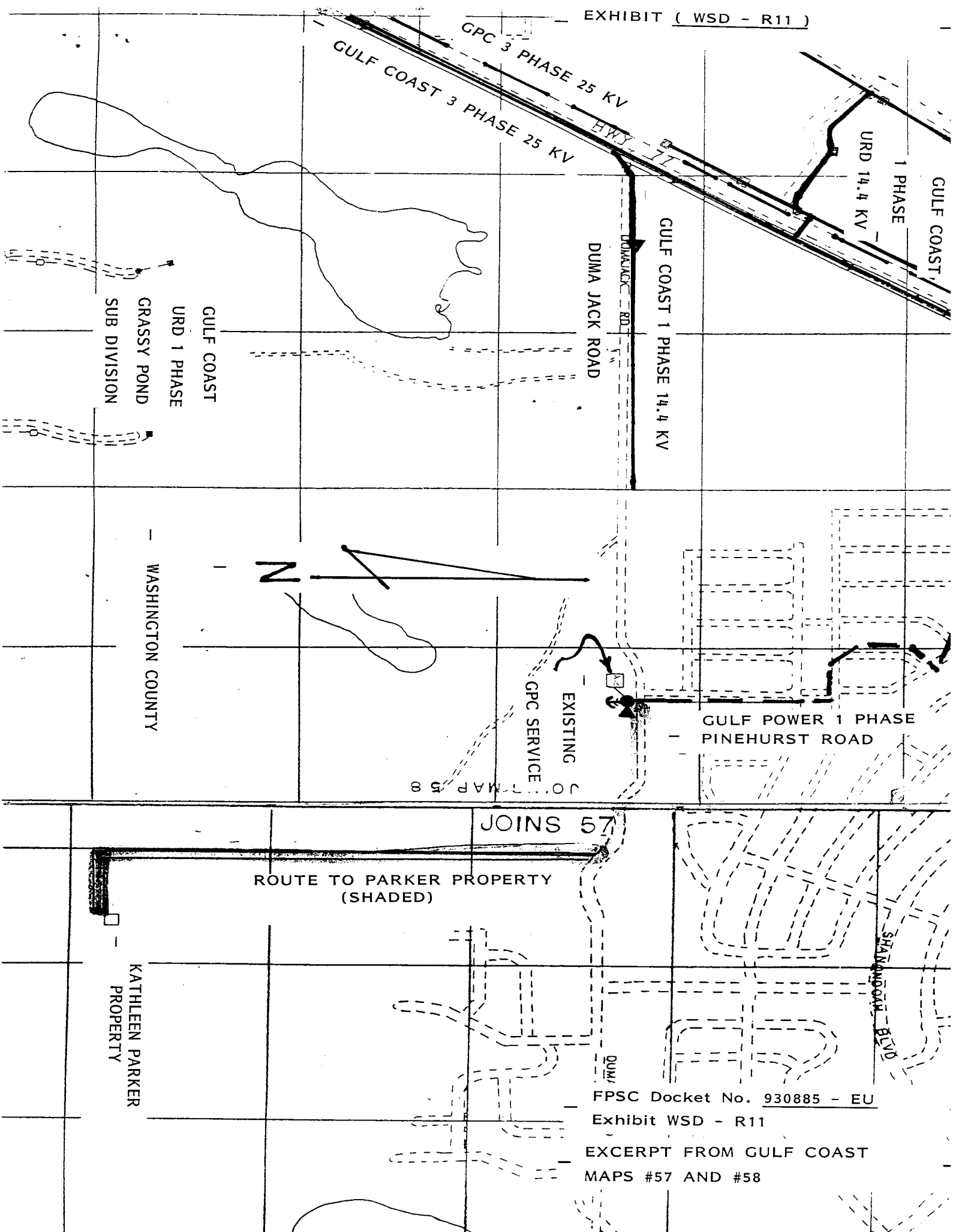
  
William S. Dykes  
Manager of Engineering  
Southport District

WSD/sd

FPSC Docket No. 930885 - EU

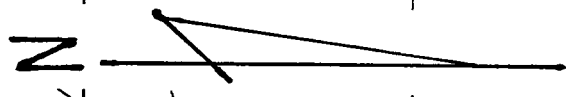
Exhibit WSD - R10





GULF COAST  
 URD 1 PHASE  
 GRASSY POND  
 SUB DIVISION

WASHINGTON COUNTY



EXISTING  
 GPC SERVICE

GULF POWER 1 PHASE  
 PINEHURST ROAD

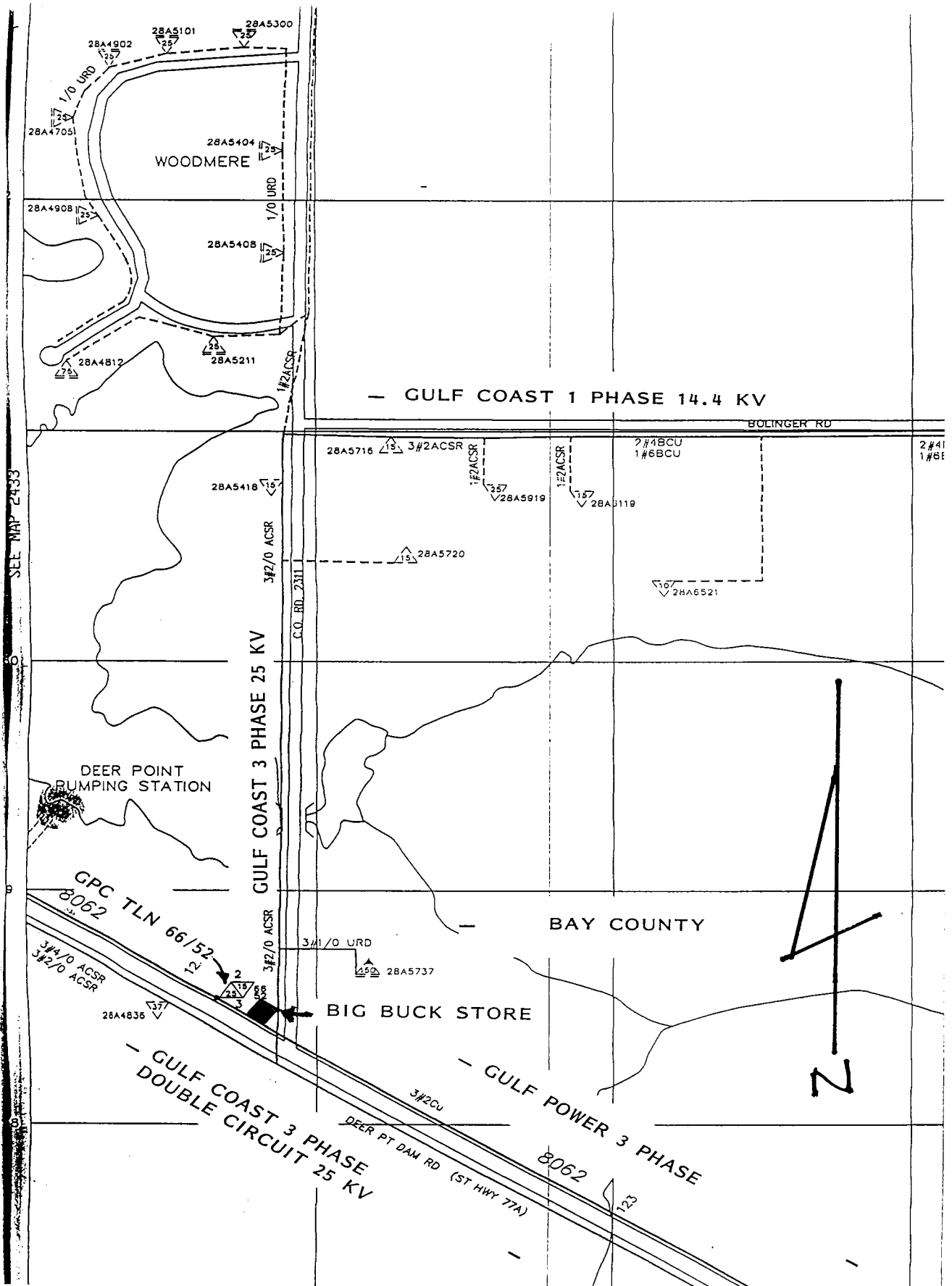
JOINS 57

ROUTE TO PARKER PROPERTY  
 (SHADED)

KATHLEEN PARKER  
 PROPERTY

FPSC Docket No. 930885 - EU  
 Exhibit WSD - R11

EXCERPT FROM GULF COAST  
 MAPS #57 AND #58




**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**In Re: Petition to Resolve** )  
**Territorial Dispute with Gulf Coast** )  
**Electric Cooperative, Inc. By** ) **Docket No. 930885-EU**  
**Gulf Power Company** )


**AFFIDAVIT  
OF  
WILLIAM S. DYKES**

STATE OF FLORIDA )  
 ) ss  
COUNTY OF BAY )

William S. Dykes, being first duly sworn, on oath, deposes and says that the foregoing prepared Rebuttal Testimony and Exhibits in Docket No. 930885-EU were prepared by him or under his supervision and that the information contained in such testimony and exhibits is true and correct to the best of his knowledge, information, and belief.

  
William S. Dykes

Subscribed and sworn to before me this 19<sup>th</sup> day of December, 1996.

  
\_\_\_\_\_  
Notary Public

My Commission expires: \_\_\_\_\_



SHIRLEY A. BARNES  
MY COMMISSION # 00460040 EXPIRES  
May 8, 1999  
BONDED THRU TROY FAIR INSURANCE, INC



**GULF COAST ELECTRIC COOPERATIVE  
POSITION DESCRIPTION**

**POSITION:**  
Manager, Engineering (Southport)

**REPORTS TO:**  
District Manager

**DEPARTMENT:**  
Engineering

**DIRECTS:**  
Staking Engineer (Southport)

**EFFECTIVE:**  
07/1992

**GRADE:**  
M1

**PURPOSE OF POSITION:**

To ensure that Gulf Coast Electric Cooperative's electric distribution system is based on cost effective, sound engineering principles through the coordination of construction and maintenance needs.

**MINIMUM JOB SPECIFICATIONS:**

All requirements are subject to possible modification to reasonably accommodate individuals with disabilities. Some requirements may exclude individuals who pose a direct threat or significant risk to the health and safety of themselves or other employees.

Require Bachelor's Degree/Equivalent in Electrical Engineering or a related field. Require a minimum of three years experience in the operation or engineering sections of an electrical distribution system. Prefer previous supervisory experience involving planning of work programs, budgeting, directing programs requiring frequent people contacts, responsibility for measuring the results of the program.

Require demonstrated expertise of electrical distribution and transmission systems, various phases of operating an electrical distribution system; of all national and local electric codes. Require ability to acquire proficiency in the REA construction specifications and procedures; become knowledgeable of retail rate schedules and structures and the Cooperative's policies and procedures. Require the ability to obtain and maintain a valid Florida commercial driver's license and DOT certification.

Require satisfactory pass of Gulf Coast Electric Cooperative's employment entrance examination and drug screen.

Require excellent verbal and written communication skills; excellent interpersonal skills for effective interaction with personnel/public.

Prefer a registered professional engineer.

**WORKING CONDITIONS:**

General office environment, some business travel, considerable time spent in the field; require the flexibility to work during emergency situations.

Page Two  
Manager, Engineering (Southport)

Require the physical ability in stooping, kneeling, crouching, reaching, standing, walking, fingering, grasping, talking, hearing, defined light work. Require visual acuity in machine operation (a) and (c). Exposure to outside environmental conditions on a frequent basis.

**WORKING RELATIONSHIPS:**

Internal: Two way communication with immediate supervisor to receive direction, instruction, approval; to provide work related information in a timely manner; with other departments to provide technical engineering assistance.

External: Demonstrate an awareness that the job exists to effectively serve each and every member, and at every opportunity to achieve increased member and public understanding for support of the cooperative.

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**


In Re: Petition to Resolve )  
Territorial Dispute with Gulf Coast )  
Electric Cooperative, Inc. by ) Docket No. 930885-EU  
Gulf Power Company )

**REBUTTAL TESTIMONY AND EXHIBITS  
OF WILLIAM S. DYKES  
ON BEHALF OF  
GULF COAST ELECTRIC COOPERATIVE, INC.**

Gulf Coast Electric Cooperative, Inc. (Gulf Coast) hereby files the attached original Rebuttal Testimony and Exhibits of William S. Dykes together with 15 copies thereof this 20th day of December, 1996.

Respectfully Submitted,

John H. Haswell, Esquire  
Chandler, Lang & Haswell, P.A.  
P. O. Box 233879  
Gainesville, FL 32602  
(352) 376-5226  
Florida Bar No. 162536


  
\_\_\_\_\_  
J. Patrick Floyd, Esquire  
408 Long Avenue  
P. O. Box 950  
Port St. Joe, FL 32456  
(904) 227-7413  
Florida Bar No. 257001

I HEREBY CERTIFY that a true copy of the following together with one copy of the Rebuttal Testimony and Exhibits of William S. Dykes have been furnished this 20th day of December, 1996 by U.S. Mail or hand delivery to the following:

Vicki Johnson, Esquire  
Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0863

Jeffrey A. Stone  
Beggs & Lane  
Post Office Box 12950  
Pensacola, Florida 32576  
Attorney for Gulf Power Co.

Roberta S. Bass  
Division of Electric & Gas  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

  
\_\_\_\_\_  
J. PATRICK FLOYD, ESQUIRE