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ORIGINAL



August 21, 2001

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

Re: Docket No. 010441-EI

Enclosed is Gulf Power Company's rebuttal testimony from the following to be filed in the above docket:

1. M. W. Howell 10380-01
2. Theodore S. Spangenberg, Jr. 10381-01

Sincerely,

Susan D. Ritenour

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

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SEC _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to resolve territorial dispute)
with Gulf Power Company in Washington) Docket No.: 010441-EU
County by West Florida Electric Cooperative)
Association, Inc.)
_____)

Certificate of Service

this 21st I HEREBY CERTIFY that a copy of the foregoing has been furnished
day of August 2001 by U.S. Mail or hand delivery to the following:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

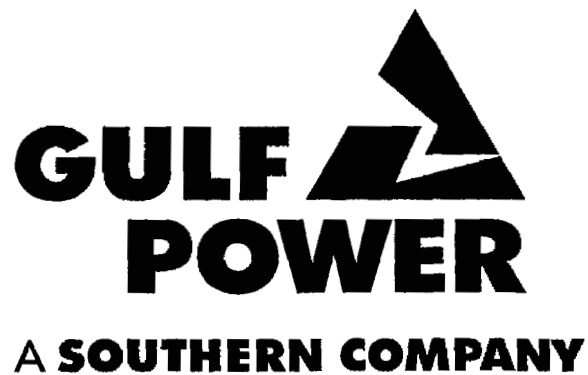
DOCKET NO. 010441-EU

PREPARED REBUTTAL TESTIMONY

OF

M. W. HOWELL

AUGUST 22, 2001



DOCUMENT NUMBER-DATE

10380 AUG 22 01

FPSC-COMMISSION CLERK

1 GULF POWER COMPANY

2 Before the Florida Public Service Commission

3 Prepared Rebuttal Testimony of

4 M. W. Howell

5 Docket No. 010441-EU

6 Territorial Dispute in Washington County – Enron Compression Services

7 Date of Filing: August 22, 2001

8 Q. Please state your name, business address and occupation.

9 A. My name is M. W. Howell, and my business address is One Energy Place,
10 Pensacola, Florida 32520. I am Transmission and System Control
11 Manager for Gulf Power Company.

12 Q. Are you the same M. W. Howell who has previously filed Direct Testimony
13 dated July 30, 2001 in this docket?

14 A. Yes.

15 Q. What is the purpose of your rebuttal testimony in this proceeding?

16 A. I will rebut portions of the prefiled testimony of Jeff Parish with regard to
17 Alabama Electric Cooperative's (AEC) request for transmission service
18 under Southern's Open Access Transmission Tariff.

19 Q. What is the major concern with the testimony of Mr. Parish?

20 A. The testimony attempts to paint a very negative picture of Gulf Power
21 Company (Gulf) and The Southern Company (Southern), which is contrary
22 to the real facts. The testimony states that Gulf and Southern appear
23 reluctant to provide transmission service, and it ignores the fact that
24 Southern has written Mr. Parish to inform him that the system will provide
25

1 transmission service if Gulf is denied the right to serve the new customer.
2 Our central concerns regarding the transmission service have been to
3 obtain sufficient information from AEC to process the request and to
4 ensure that the request complies with the requirements of the wholesale
5 transmission tariff established by the Federal Energy Regulatory
6 Commission (FERC).

7
8 Q. What is the relevance to the current territorial dispute of the testimony's
9 discussion of a dispute in the early 1980's?

10 A. None. Again, the wrong color of paint has been used. Rather than the
11 negative characterization in the testimony, the facts are that AEC planned
12 to construct over 60 miles of transmission lines in Northwest Florida in
13 order to serve customers then receiving service from Gulf. Since there
14 were already adequate transmission facilities to provide electric service,
15 these proposed AEC facilities clearly violated the Florida Public Service
16 Commission's (FPSC) policy and state law preventing the uneconomic
17 duplication of facilities. AEC's view of this history is not consistent with the
18 facts and in no way relates to the current issue before this Commission.

19
20 Q. Have Gulf and Southern provided additional transmission service to AEC
21 since the 1980's mentioned above?

22 A. Yes. Mr. Parish acknowledges in his testimony that new transmission
23 service has routinely been provided when requested.

24
25

1 Q. What does the AEC request for transmission service in Alabama have to
2 do with the current dispute before the FPSC?

3 A. Absolutely nothing. Southern offered to provide AEC with the requested
4 service, but the customer did not choose to pursue a relationship with the
5 cooperative and AEC. Thus, that request is completely unrelated to the
6 issue now before the FPSC.

7

8 Q. Why were these historical issues raised in the testimony?

9 A. They serve simply as attempted smoke screens to erroneously imply that
10 Southern is reluctant to provide transmission service.

11

12 Q. Is Southern willing to provide transmission service to AEC to serve the
13 Enron facility if the FPSC determines that Gulf should not serve the
14 customer?

15 A. Yes, if AEC satisfies the requirements of the transmission tariff. We have
16 made that clear to AEC on numerous occasions. We are required by the
17 FERC to ensure that tariff requirements are met prior to providing
18 transmission service. AEC is well familiar with this. The inadequacy of
19 their request, the multiple changes by AEC to their request, the ambiguity
20 of their askings, and their request to delay evaluation of their request,
21 have all exacerbated resolving this issue of transmission service.
22 Nonetheless, Southern has been quite clear that it is willing to provide
23 transmission service to AEC consistent with the requirements of the tariff
24 in the event that West Florida Electric Cooperative has a customer to
25 serve requiring such transmission service.

1 Q. Does that conclude your testimony?

2 A. Yes.

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AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

Docket No. 010441-EU

Before me the undersigned authority, personally appeared M. W. Howell, who being first duly sworn, deposes, and says that he is the Transmission and System Control Manager of Gulf Power Company, a Maine corporation, that the foregoing is true and correct to the best of his knowledge, information, and belief. He is personally known to me.

M. W. Howell

M. W. Howell
Transmission and System Control Manager

Sworn to and subscribed before me this 21st day of August,
2001.

Rollanda R. Cothran

Notary Public, State of Florida at Large

