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JAMES F. LANG  
JOHN H. HASWELL  
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September 5, 2001

TELEPHONE 352/376-5226  
FAX 352/372-8858  
211 N.E. FIRST STREET  
GAINESVILLE, FL 32601-5367

\*ADMITTED IN FL AND TX

WILLIAM H. CHANDLER  
1920 - 1992

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RE: In Re: Territorial Dispute Between West Florida Electric Cooperative Association, Inc. and Gulf Power Company in Washington County, Florida  
Docket No.: 010441-EU

Dear Ms. Bayo:

I am enclosing herewith the original and seven (7) copies of the amended Notice of Taking Telephonic Deposition of Enron Compression Services Company filed on behalf of West Florida Electric Cooperative Association, Inc.

I am also enclosing a copy of this letter as an acknowledgement copy and would appreciate it if you would file stamp it and return it to me in the enclosed self-addressed/stamped envelope as an acknowledgement of the date the above amended Notice of Taking Deposition was filed. Please call me if you have any questions regarding this matter.

Very truly yours,



John H. Haswell

JHH/daj  
Enclosures

- cc: Frank E. Bondurant, Esquire  
Attorney for West Florida Electric Cooperative Association, Inc.
- William S. Rimes, Executive Vice President and CEO  
West Florida Electric Cooperative Association, Inc.
- Gary F. Clark, Vice President, Member Services  
West Florida Electric Cooperative Association, Inc.
- Jeff Parish, Vice President, Bulk Power and Delivery  
Alabama Electric Cooperative, Inc.
- Jeffrey A. Stone, Esquire  
Attorney for Gulf Power Company
- Russell A. Badders, Esquire  
Attorney for Gulf Power Company

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR 1 \_\_\_\_\_  
ECR \_\_\_\_\_  
LEG 1 \_\_\_\_\_  
OPC \_\_\_\_\_  
PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
SER \_\_\_\_\_  
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DOCUMENT NUMBER-DATE

11088 SEP-6 3

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Territorial Dispute Between  
West Florida Electric Cooperative  
Association, Inc. and Gulf Power  
Company in Washington County,  
Florida.

Docket No.: 010441-EU

Date Filed: August \_\_\_\_\_, 2001

**AMENDED NOTICE OF TAKING TELEPHONIC DEPOSITION DUCES  
TECUM OF ENRON COMPRESSION SERVICES COMPANY**

TO: Bill L. Bryant, Jr., Esquire  
Katz, Kutter, Haigler, et al  
106 East College Avenue Floor 12  
Tallahassee, Florida 32301-7748

PLEASE TAKE NOTICE that on the 11th day of September, 2001, at 11:00 A.M. Central Time, 12:00 P.M. Eastern Time, at Room 3824, Enron Building, 1400 Smith Street, Houston, Texas, West Florida Electric Cooperative Association, Inc. will take the deposition of:

**Chris Hilgert, a director of  
Enron Compression Services Company**

The deposition will be conducted by telephone. The deponent will appear in person at the location stated above to be sworn in by the court reporter, and the parties may participate by telephone conference call. West Florida shall provide a call in number and access code to all parties by 12:00 P.M. Eastern Standard Time, September 10, 2001.

Examination is requested pursuant to Florida Rules of Civil Procedure 1.310(b)(6) on the subject of all contracts, documents, transactions, and communications between and among Enron Compression Services Company, Gulf Power Company, Florida Gas Transmission, Inc., and West Florida Electric Cooperative Association, Inc. regarding or in anyway related to Florida Gas Transmission's Station 13 and the additional service and/or equipment identified by ECS as Station 13-A from 1995 to date. In response to this notice, ECS shall designate one or more officers, directors, or managing partners, or other persons, who consent to do so, to testify on behalf of ECS, and may state the matters on which each person designated shall testify.

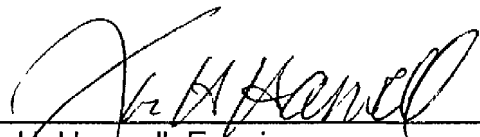
Upon oral examination before Barrister Records, Inc. Court Reporters, a Notary Public, or some other officer duly authorized by law to take depositions in the State of Texas. The oral examination will be concluded on September 11, 2001. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable Rules of Civil Procedure. Except as to the form of

DOCUMENT NUMBER - DATE

11088 SEP-65

FPSC-COMMISSION CLERK

questions, all objections are reserved until the pre-hearing conference or hearing.

  
\_\_\_\_\_  
John H. Haswell, Esquire  
CHANDLER, LANG, HASWELL & COLE, P.A.  
211 N.E. 1st Street  
Post Office Box 23879  
Gainesville, FL 32602  
(352) 376-5226 telephone  
(352) 372-8858 facsimile  
Florida Bar No. 162536

and

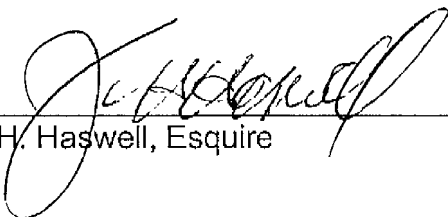
Frank E. Bondurant, Esquire  
Post Office Box 854  
Marianna, Florida 32447  
(850) 526-2263 telephone  
(850) 526-5947 facsimile

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to: Jeffrey A. Stone, Esquire and Russell A. Badders, Esquire, Beggs & Lane, 3 West Garden Street, 700 Blount Building (32501), Post Office Box 12950, Pensacola, Florida 32576-2950; Robert Elias, Esquire and Marlene Stern, Esquire, Legal Division, Florida Public Service Commission, Capital Circle Office Center, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by Hand Delivery (Federal Express) this

5<sup>th</sup> day of ~~August~~, 2001.

*Sept*

  
\_\_\_\_\_  
John H. Haswell, Esquire

cc: Bill L. Bryant, Jr.