



March 5, 2003

030000-P4

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:

On October 1, 2002, Gulf Power filed Form PSC/EAG 13, Schedule 1, showing the estimated overhead/underground residential differential cost data for Gulf as of that date. The information on Schedule 1 indicated that Gulf was required to re-file the typical subdivisions costs pursuant to Rule 25-6.078(2), Florida Administrative Code, since the estimated cost differential varied from the Commission-approved cost differential by plus or minus 10 percent. At that time, the cost differential was estimated to have increased by 14 percent. In the process of preparing the detailed supporting data and analyses for the re-filing of Gulf's cost differential, Gulf has determined that two of the material and/or labor units utilized in the cost differential should be revised to reflect work process changes. Using the updated information for these two units changes the cost differential variance from 14 percent to minus 1 percent. Given that the revised variance is less than the 10 percent threshold which triggers a re-filing of the cost differential, Gulf does not propose to re-file its cost differential on April 1, 2003. Gulf will be re-filing its cost differential on April 1, 2004, as required by Rule 25-6.078(2), Florida Administrative Code.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Ritenour".

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

Enclosures

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

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To ECR/KUMMER

DOCUMENT NUMBER-DATE
02299 MAR-7 8
FPSC-COMMISSION CLERK

**ELECTRIC UTILITY OVERHEAD/UNDERGROUND
RESIDENTIAL DIFFERENTIAL COST DATA**

FOR GULF POWER COMPANY

**Florida Public Service Commission
Form PSC/EAG 13
(10/97)**

**PSC/EAG FORM 13 FOR REPORTING
THE OVERHEAD/UNDERGROUND RESIDENTIAL DIFFERENTIAL COST DATA
RULES 25-6.074 THROUGH 25-6.083**

<u>Schedule No.</u>	<u>Title</u>	<u>Page</u>
1-4	Low Density - 210 Lot Subdivision	
1	Overhead vs. Underground Summary Sheet	2
2	Cost Per Service Lateral Overhead Material and Labor	N/A
3	Cost Per Service Lateral and Underground Material and Labor	N/A
4	Low Density - 210 Lot Subdivision Typical Layout for both Overhead and Underground Designs	N/A
5-11	High Density - 176 Lot Subdivision	
5	Overhead vs. Underground Summary Sheet (Company Owned Service Laterals)	N/A
6	Cost per Service Lateral Overhead Material and Labor (Company Owned Service Laterals)	N/A
7	Cost per Service Lateral Underground Material and Labor (Company Owned Service Laterals)	N/A
8	Overhead vs. Underground Summary Sheet (Customer Owned Service Laterals from Meter Centers)	N/A
9	Cost Per Dwelling Unit Overhead Material and Labor (Customer Owned Service Laterals from Meter Centers)	N/A
10	Cost Per Dwelling Unit Underground Material and Labor (Customer Owned Service Laterals from Meter Centers)	N/A
11	High Density - 176 Lot Subdivision Layouts for both Overhead and Underground Designs	N/A
12	Average Underground Feeder Costs	N/A
13	Actual Operating and Maintenance Distribution Expenses for Overhead and Underground	N/A
14	Signature Page	3

Notes:

- Mark all schedules from 2 through 13 which do not apply to the current filing as not applicable. Attach additional sheets for clarification and justification if necessary.
 - The signature page, Schedule 14, must be filed with every filing.
- PSC/EAG Form 13 (10/97)

**Gulf Power Company
 Overhead VS Underground
 Summary Sheet
 Cost Per Lot
 210 Lot Single Family Residential**

April 1, 2000 Filing
 Revised July 27, 2000

Item	Overhead	Underground	Differential
Labor	\$ 339.80	\$ 780.00	\$ 440.20
Material	\$ 373.70	\$ 564.00	\$ 190.30
Total	\$ 713.50	\$ 1,344.00	\$ 630.50

October 15, 2002 Filing+B5

Item	Overhead	Underground	Differential
Labor	\$ 458.00	\$ 855.00	\$ 397.00
Material	\$ 374.00	\$ 600.00	\$ 226.00
Total	\$ 832.00	\$ 1,455.00	\$ 623.00

Difference -1%

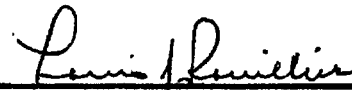
I certify that I am the person responsible for submitting Form PSC/EAG 13 and that I have examined the attached schedule(s); that to the best of my knowledge, information and belief, all statements of fact contained in the schedule(s) are true.

I am aware that Section 837.06, Florida Statutes, provides:

Whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his official duty shall be guilty of a degree, misdemeanor of the second degree, punishable as provides in s. 775.082 and s. 775.083.

October 03, 2002

Date



Signature

Louis J. Rouillier

Name

Distribution Manager
Gulf Power Company