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## STATE OF FLORIDA



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## Hublic Service Commission

February 8, 2010

Steven R. Griffin Beggs & Lane P.O. Box 12950 Pensacola, FL 32591 STAFF DATA REQUEST NO. 1

Re: DOCKET NO. 100024-EI - Petition for approval of standard interconnection agreement for non-export, parallel operators, by Gulf Power Company.

Dear Mr. Griffin:

By this letter, the Commission staff requests that Gulf Power Company (GULF) provide responses to the following data requests.

- 1. What criteria will the Company use in determining whether to approve a customer's request to self insure?
- 2. How does Gulf currently treat a customer's request to interconnect a backup generator? Is a fee currently being charged? If so, what is the fee and what is it based on?
- 3. Are customers with backup generation required to sign an interconnection agreement with Gulf? If not, explain why not.
- 4. Why is the proposed tariff needed?
- 5. How many requests have been made for this type of interconnection? What type of customer is making the request?
- 6. If the proposed tariff is approved by the Commission, will all customers with backup generation be required to sign the interconnection agreement?

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- 7. How does the proposed tariff relate to Gulf's Interruptible Standby Service tariff?
- 8. Are participants in Gulf's Interruptible Standby Service tariff required to sign an interconnection agreement?
- 9. Are participants in Gulf's Interruptible Standby Service tariff prevented from delivering energy to the grid?
- 10. If the proposed tariff is approved by the Commission, will participants in the Interruptible Standby Service tariff be required to sign the interconnection agreement?
- Does Gulf intend for the proposed tariff to preclude non-export parallel operator generators from ever selling power to Gulf at as-available rates or from participating in the Interruptible Standby Service tariff?
- 12. Why has Gulf included the requirement that the non-export parallel operator shall not export power into the Company's supply grid?
- 13. Why was the capacity size limit of no more than 10 megavolt-amperes AC power chosen?
- 14. Please explain why, as stated in the tariff, "A customer that parallels the Company for 100 milliseconds or less to accomplish a "hot" transfer is not considered to be a NPO".
- 15. Gulf stated that it has experienced an increase in the number of customers seeking interconnection for standby generation. How do such customers use this generation? How often should these generators be started by the customer? Are there any reliability concerns with customers testing the generators?
- 16. Refer to provision 7 of the proposed tariff. How does Gulf intend to notify the customers of any contribution in aid of construction? Will the customer be made aware of these costs before signing the agreement?
- 17. How many NPOs has Gulf interconnected to date? Have these customers been charged a fee? If so, what was the fee based on?

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- 18. Refer to provision 2. At what point could the customer contact the Company to get information about approved protection devices?
- 19. Refer to provision 23. Who will conduct the Protection and Control system study? At what point in the process will the customer be informed of the results. What is the purpose of each of the elements listed in the tariff? Since this provision is the minimum standards section, and minimum standards are not specific in the tariff, should this list be included?
- 20. Are the costs for processing the interconnection agreement included in the possible CIAC contribution? If not, where are these costs being recovered?
- 21. Please provide an example of the customer interconnection costs for a typical NPO. Please break the costs down between those costs covered by the customer and CIAC costs paid to the utility.

Please file the original and five copies of the requested information by Monday, February 22, 2010, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6187 if you have any questions.

Sincerely,

Martha C. Brown Senior Attorney

Marka C. Brown

MCB/th

cc: Susan Ritenour, Gulf Power Company Office of Commission Clerk