

LAW OFFICES  
**CHANDLER, LANG & HASWELL, P.A.**  
POST OFFICE BOX 23879  
GAINESVILLE, FLORIDA 32602-3879

JAMES F. LANG  
JOHN H. HASWELL  
C. WHARTON COLE

TELEPHONE 904/376-5226  
TELECOPIER 904/372-8858  
211 N.E. FIRST STREET  
GAINESVILLE, FL 32601-5367

WILLIAM H. CHANDLER  
1920-1992

May 24, 1994

**VIA HAND DELIVERY**

Blanca Bayo, Director  
Division of Records and Reporting  
101 E. Gaines Street  
Tallahassee, Florida 32301

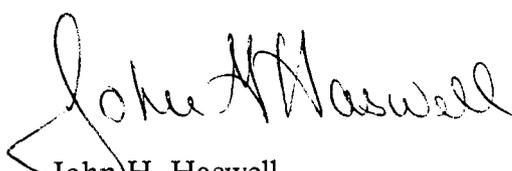
**RE: PETITION TO RESOLVE TERRITORIAL DISPUTE WITH GULF  
COAST ELECTRIC COOPERATIVE, INC. AND GULF POWER COMPANY**

Dear Mrs. Bayo:

Please find attached an original and 15 (fifteen) copies of direct testimony for Sid Dykes, Archie Gordon and Jeff Parrish along with their exhibits and Exhibit #4 of Hub Norris. Mr. Norris' Testimony is being filed under separate cover.

Should you have any questions please feel free to call.

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAD/ik \_\_\_\_\_  
LEO \_\_\_\_\_  
Enc: \_\_\_\_\_  
CFC \_\_\_\_\_  
H. W. Norris  
Pat Floyd  
Jeff Stone  
OTH \_\_\_\_\_

Very truly yours,  
  
John H. Haswell

*Margins*  
*Placed*  
*4/29/94*  
*05099-94*

<i>Dykes</i>	<i>Gordon</i>	<i>Parrish</i>
DOCUMENT NUMBER-DATE	DOCUMENT NUMBER-DATE	DOCUMENT NUMBER-DATE
05096 MAY 24 1994	05097 MAY 24 1994	05098 MAY 24 1994
FPSC-RECORDS/REPORTING	FPSC-RECORDS/REPORTING	FPSC-RECORDS/REPORTING

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WILLIAM H. CHANDLER  
1920-1992

May 25, 1994

Blanca Bayo, Director  
Division of Records and Reporting  
101 E. Gaines Street  
Tallahassee, Florida 32301

**Re: PETITION TO RESOLVE TERRITORIAL DISPUTE WITH GULF COAST  
ELECTRIC COOPERATIVE, INC. AND GULF POWER COMPANY  
REVISED COPY OF TESTIMONY - WILLIAM S. DYKES**

Dear Mrs. Bayo:

Please find enclosed the revised copy of William S. Dykes' testimony. The testimony delivered May 24th included the original and 15 copies and attached were Exhibits WSD-1 and WSD-2, FPSC Docket No. 9508-0000-0000.

It is my understanding the Exhibits will be attached to the revised copies of the testimony. Thank you for your assistance on this matter and my apology for the inconvenience. Should you have any questions please feel free to call.

Very truly yours,

John H. Haswell

JHH/ik

• Alabama Electric Cooperative, Inc.  
Post Office Box 550  
Andalusia, Alabama 36420  
(205) 222-2571



May 25, 1994

Ms. Blanca Bayou  
Director  
Division of Records and  
Reporting  
Florida Public Service  
Commission  
101 East Gaines St.  
Tallahassee, FL 32301

Dear Ms. Bayou:

Enclosed is an original and 15 copies of Jeff Parish's testimony in Docket No. 930885-EU which has been revised to include line numbering and the 1 1/4 inch left margin for binding.

I understand that it is not necessary to include the attachments and the affidavit as this was attached to the document previously sent to you and will be added to this revised testimony.

If there is anything else we need to do, please let us know.

Sincerely,

A handwritten signature in cursive script that reads "Carol Welch".

Carol Welch  
Division Secretary  
Bulk Power and Delivery

Enclosures

orig

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: PETITION TO RESOLVE TERRITORIAL )  
DISPUTE WITH GULF COAST ELECTRIC )  
COOPERATIVE, INC. AND GULF POWER )  
COMPANY )

DOCKET NO : 930885-FII

PREFILED DIRECT TESTIMONY OF

WILLIAM S. DYKES

ON BEHALF OF GULF COAST  
ELECTRIC COOPERATIVE, INC.

DOCUMENT NUMBER-DATE  
05096 MAY 24 1996  
FPSC-RECORDS/REPORTING

1                   **PREFILED DIRECT TESTIMONY OF WILLIAM S. DYKES**

2           Q.     Please state your name and business address.

3           A.     William S. Dykes, P.O. Box 8370, Southport, Florida 32409.

4  
5           Q.     What is your current employment?

6           A.     I am the Manager of Engineering for the Southport District office of Gulf  
7                   Coast Electric Cooperative, Inc.

8  
9           Q.     What geographic areas does the South Port office serve?

10          A.     Primarily Washington, Bay, Calhoun, and part of Walton Counties.

11  
12          Q.     How long have you been an employee of Gulf Coast?

13          A.     For eighteen years. I started as a Mapping Technician, was promoted to  
14                   Staking Engineer, then to Supervisor of Engineering, in 1986. In 1992 the  
15                   title was upgraded to Manager of Engineering.

16  
17          Q.     What are your duties?

18          A.     My duties include system planning for the Southport distribution system,  
19                   daily operational and maintenance functions, load forecasting, and  
20                   monitoring our substations. Alabama Electric Cooperative, Inc., our  
21                   wholesale power supplier, handles transmission planning and is directly  
22                   responsible for the maintenance of the substations.

23  
24          Q.     Are you a professional engineer?

25          A.     I have submitted my notification of intent to qualify for the examination.

1           The Cooperatives consulting engineer, Archie W. Gordon, is a professional  
2           engineer and he and I maintain close contact for review of my work.

3

4           Q.    What is the purpose of your testimony?

5           A.    To address the issues identified by the staff of the Florida Public Service  
6           Commission in this docket, particularly those issues relating to the location  
7           and extent of Gulf Coast Facilities prior to the decision of the Department  
8           of Corrections to locate a prison site in our service area in South Washington  
9           County, the construction of facilities to provide primary service to the  
10          correctional facility site, the cost associated with that construction, and  
11          generally about our system in the area.

12

13          Q.    Do you have any exhibits that you are sponsoring?

14          A.    Yes. Exhibit \_\_\_\_\_(WSD-1) is an exhibit showing our facilities in the  
15          general area of the DOC site prior to the construction of any new facilities.  
16          Exhibit \_\_\_\_\_(WSD-2) is an exhibit showing what was constructed to  
17          provide primary service to the site along the entrance road as shown the  
18          exhibit.

19

20          Q.    Would you tell us generally about Exhibit \_\_\_\_\_(WSD-1), what it shows  
21          and describe the facilities that existed prior to the time the Cooperative  
22          learned that the DOC would locate a correctional facility in the area.

23          A.    Gulf Coast has electric distribution lines on both County Road 279 and State  
24          Road 77, which have existed since 1949-50. The facilities that serve the  
25          disputed area, which is the area lying between County Road 279 and State

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2           engineer and he and I maintain close contact for review of my work.

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19

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21          and describe the facilities that existed prior to the time the Cooperative  
22          learned that the DOC would locate a correctional facility in the area.

23       A.    Gulf Coast has electric distribution lines on both County Road 279 and State  
24          Road 77, which have existed since 1949-50. The facilities that serve the  
25          disputed area, which is the area lying between County Road 279 and State

1 Road 77 near their intersection, are served from our Crystal Lake substation  
2 which is approximately 5.4 miles South of the intersection of 279 and 77.  
3 The Crystal Lake substation has a normal rating of 7,500 KVA, which can  
4 easily handle the 375 KVA load of the correctional institution. Our circuit  
5 out of the substation that serves the area in question is 3 phase 25 KV line of  
6 2/0ACSR conductor and runs North up 77 to just South of Wausau.

7

8 Q. Were any of your facilities physically located on the property that became  
9 the site of the correctional facility?

10 A. Yes. Gulf Coast has maintained service on the site itself since approximately  
11 1950. One of our service locations shows an in-service date of 1950. Before  
12 County Road 279 was even built to the intersection of 77 our lines ran West  
13 from 77 along Red Sapp Road, cutting directly through what is the now the  
14 correctional facility site (the disputed area). This service was installed as  
15 single phase service, cuts across the disputed area along Red Sapp Road and  
16 turns North up 279.

17

18 Q. Did you have any facilities on 279 in the area?

19 A. Yes. We have single phase service on 279 from the intersection of Red Sapp  
20 Road North towards Vernon, and we serve many customers in the area.  
21 Those facilities and the facilities on Highway 77 appear on both of my  
22 exhibits and in greater detail on exhibits that will be submitted by Mr. Norris  
23 and Mr. Gordon.

24

25 Q. So prior to your ever hearing about the DOC site location, Gulf Coast had

1 established service facilities on what is now the disputed area?

2 A. Yes, for at least the last forty years. We have facilities on the West side, East  
3 side, and the property itself.  
4

5 Q. Have you had any incidents on the circuit that serves the disputed area in the  
6 last year?

7 A. As we pointed out in our interrogatory questions, we have had no lock outs  
8 on the circuit, except for a deliberate vandalizing of our Crystal Lake  
9 transformer, which occurred after we answered the interrogatories.  
10

11 Q. Lets take a look at what happened after the Department of Corrections  
12 decided to locate a correctional facility on the land at and adjacent to the  
13 intersection of 279 and 77.

14 A. Exhibit \_\_\_\_\_(WSD-2) which is basically our answer to staff's production  
15 of document request (1) (a) shows the boundaries of the DOC property. As  
16 you can see, Red Sapp Road runs right through the property, including our  
17 single phase distribution facilities. Those facilities, incidentally, serve  
18 customers on to 279 and we have two service locations just off the site on  
19 Lake McDaniel.  
20

21 Q. Did you have anything to do with the Department of Corrections request for  
22 Gulf Coast to be the power supplier to the site?

23 A. No. My first direct contact with the DOC was a meeting with the DOC,  
24 their consulting engineers and myself on June 23, 1993 in Panama City at the  
25 offices of William M. Bishop Consulting Engineers.

1 Q. What happened at that meeting?

2 A. The DOC and its engineers requested Gulf Coast to provide temporary  
3 construction service to the site and then permanent service. We went over  
4 the plans on how to do that.

5

6 Q. Could you have provided temporary and permanent service to the site by  
7 using your existing service facilities on Red Sapp Road?

8 A. Yes, we could have, depending on how the DOC laid out their construction  
9 site. We could supply temporary service from our existing lines, and could  
10 have added a short span of three phase from our existing facilities on  
11 Highway 77 for the permanent service.

12

13 Q. I take it the Department of Corrections requested or needed three phase  
14 service?

15 A. Yes. For their permanent service they requested three phase, but during  
16 construction, they could use and are using single phase service.

17

18 Q. Did you build the permanent three phase service in from State Road 77?

19 A. No. The Department of Corrections requested that we build the three phase  
20 service in from County Road 279 along an entrance road as shown on their  
21 plans and specifications.

22

23 Q. So even though you could have served the Department of Corrections from  
24 77 from your existing facilities with a short three phase extension, they asked  
25 you to provide that service on their entrance road on 279?

- 1       A.     Yes, the choice of the route was theirs. Keep in mind we already had service  
2             on the site. We planned and have used our existing service to provide  
3             temporary construction service while the correctional institution is being  
4             built. By using our existing facilities we have been able to feed the site both  
5             from the West and the East. We will eventually remove the Red Sapp line  
6             and that portion of our system has been relocated on 279.  
7
- 8       Q.     So no matter who served the site, whether it was Gulf Coast or Gulf Power,  
9             your Red Sapp line would have to be relocated to County Road 279.
- 10      A.     Yes. That line provides service to members West and North of the disputed  
11             area, and whether Gulf Coast or Gulf Power served the correctional facility  
12             the line would have to be moved.  
13
- 14      Q.     If Gulf Power was the power supplier, would Gulf Power have to pay the  
15             cooperative to move the Red Sapp line?
- 16      A.     Yes. Someone would have to pay us to move it. I assume that might involve  
17             a condemnation suit by Gulf Power, or at least an agreement on the cost  
18             involved.  
19
- 20      Q.     Whatever cost you incur to move and relocate the line would be incurred by  
21             any other power supplier?
- 22      A.     Yes.  
23
- 24      Q.     What was your cost to relocate the Red Sapp line?
- 25      A.     The cost to relocate the Red Sapp line was calculated on the difference

1 between what it would cost us or any power supplier to relocate our single  
2 phase service and the additional cost to make the line three phase for DOC's  
3 requirements. That additional cost was \$14,582.54, which was the figure we  
4 reported to the PSC in our answers to staff interrogatories.

5  
6 Q. Where did you relocate the line to?

7 A. The only logical location, following prudent utility practices and to comply  
8 with the DOC requirements was up CR 279, from our line at the intersection  
9 of 279 and 77 to the West end of Red Sapp Road.

10  
11 Q. Did you have to cross any of Gulf Power's lines to construct the relocated  
12 facilities?

13 A. Yes. We crossed existing GP lines at the intersection of 279 and 77, and  
14 crossed their line at the entrance road to the correctional facility. I should  
15 point out that the GP line that we crossed on 77 was a section of Gulf  
16 Power's lines running South down 77 toward a substation that GP built to  
17 serve Leisure Lakes. That area is shown on an exhibit of Mr. Norris.  
18 Exhibit\_\_\_\_\_ (HN-\_\_\_\_\_). At the conclusion of a territorial dispute with  
19 Gulf Power, some years ago, the PSC ordered Gulf Power to cease serving  
20 Leisure Lakes and awarded the territory to Gulf Coast. Gulf Power took out  
21 the substation but left its line on 77, although it does not serve anybody.

22  
23 Q. If you served the disputed area from 77 on your Red Sapp line would your  
24 lines cross Gulf Powers?

25 A. Actually Gulf Power crossed our Red Sapp tap off of our three phase line on

1           77 back in 1971, but, so we had an existing crossing there anyway.

2

3           Q.    What would Gulf Power have had to do to serve the DOC site?

4           A.    Following DOC requirements, they would have had to construct new  
5           facilities down the entrance road to the point of primary service, just as we  
6           did. Their cost would be the same as ours, except for the width of CR 279.

7

8           Q.    Was the fact that you had single phase service on the site itself an economic  
9           advantage in meeting DOC needs for construction service?

10          A.    Yes. We would have had to build in all the temporary service that was  
11          needed. Because our lines were already there, we had been able to provide  
12          temporary service from three sources, from the East end of Red Sapp, and  
13          the West end, as well as from the entrance road.

14

15          Q.    Would you characterize your service to the DOC from 279 as merely a  
16          "service drop"?

17          A.    No. The DOC requirements were substantially more than a simple service  
18          drop. In addition, the requirements for temporary service were quite  
19          extensive and the DOC was very particular as to the location that the  
20          temporary service could be built on.

21

22          Q.    Could Gulf Power have provided temporary service at the same cost as Gulf  
23          Coast?

24          A.    Not in my judgement. We had existing facilities on the site. Consequently  
25          we did not have to build in totally new temporary service. Gulf Power would

1           have to do that.

2

3           Q.     What about customer support facilities of Gulf Coast Electric Cooperative?

4           A.     Our distribution services facilities are located at the Gulf Coast District  
5           Office in Southport, Florida approximately 7.5 miles South of the Crystal  
6           Lake substation. The total distance to the disputed area is 12.9 miles. The  
7           district facility includes 13 personnel in its field services and construction  
8           force along with four service and trouble trucks, three insulated bucket  
9           trucks and two digger-pole trucks along with full communication facilities  
10          and supporting engineering staff. Alabama Electric Cooperative, Inc.  
11          maintains transmission line crews in Chipley.

12

13          Q.     What happens if the Crystal Lake substation goes out?

14          A.     We can feed the site from our Southport substation. In fact, we had an  
15          incident recently when someone deliberately shot out our transformer at  
16          Crystal Lake. In forty minutes we had service restored by switching to our  
17          Southport substation. That issue was not as important in this particular case  
18          because the Department of Corrections has or will have its own back up  
19          generation on site as part of its design criteria for a correctional facility. So  
20          no matter which power supplier provides service to the site, the DOC will  
21          have its own generators in case of an outage.

22

23          Q.     Gulf Power claims its system is more reliable because it has two sources of  
24          feed to the site. Is that claim really true?

25          A.     No it is not. As I just said, if our Crystal Lake substation goes down, we can

1 feed from Southport. Our only true exposure is 5.4 miles of distribution line  
2 from the Crystal Lake substation to County Road 279. If that line went  
3 down, we would not be able to feed the area from another source, however,  
4 it is unlikely the outage would be for more than one to three hours,  
5 depending on the cause of the outage, since our crews are not more than  
6 thirty minutes away.

7

8 Q. Are the Gulf Power sources of power free from reliability problems or risks?

9 A. No. The Vernon substation of Gulf Power is off the transmission corridor  
10 on a tap of approximately 4,500 feet. Their Sunnyhill substation is on a  
11 much longer tap of 7.39 miles. The source of power, if served by Gulf Power  
12 from Vernon is a long distribution line going North into Vernon, then East  
13 and South down 279. That is approximately 13.64 miles of line exposed to  
14 the elements. The other distribution feeder that Gulf Power would serve  
15 from, runs from the Sunnyhill's substation through the back of Sunnyhills  
16 to State Road 77, then South down 77 to the intersection of 279  
17 approximately 7.58 miles. The Sunnyhill's feeder line is isolated, not readily  
18 accessible, and actually runs across ponds. Their poles are in the water. I  
19 would respectfully suggest that if there are any risks from a reliability  
20 standpoint, they are on Gulf Power system, not ours.

21

22 Q. Mr. Weintritt stated that the Coop built the new three phase line on 279  
23 beyond the point necessary to reach the Department of Corrections point of  
24 service. Why did you do that?

25 A. Obviously Mr. Weintritt does not appreciate the need for us to relocate our

1 Red Sapp line to continue to provide service to our customers on 279. We  
2 would indeed be foolish to build three phase only to the point of service and  
3 leave the rest single phase, especially when three phase service was needed  
4 further up the road at a three phase lift station, for DOC staff housing.  
5  
6 Q. Is this DOC site in an urban or rural area?  
7 A. It is in a rural area with no urban services.  
8  
9 Q. What is the geographical description of the disputed area?  
10 A. There are no outstanding geographic features. The land is basically flat. The  
11 primary man made geographic features are Highway 77 bordering the East  
12 side of the property, and Highway 279 which runs from the intersection of  
13 77 North and West along the Southerly and Westerly boundaries of the  
14 property. Immediately Northwest of the property is the Lake McDaniel.  
15  
16 Q. In the area shown by your two exhibits, how many customers are there of  
17 Gulf Coast?  
18 A. 122.  
19  
20 Q. In the same area how many customers are there of Gulf Power?  
21 A. Approximately 59.  
22  
23 Q. What is the expected customer load, energy and population growth in the  
24 disputed area?  
25 A. The expected customer load in the disputed area would of course be the

1           projected load of the correctional facility. It is forecasted to be  
2           approximately 30 KVA in 1994, and 372 KVA thereafter for at least the next  
3           four years. The KWH forecast is 21,600 in 1994 and 1,961,400 in 1995-1998.  
4           The population growth of course would simply constitute the inmate  
5           population and staff.

6  
7           Q.    Can Gulf Coast provide adequate and reliable service to the disputed area?

8           A.    Yes, it can, and it has for many years.

9  
10          Q.    Does this conclude your testimony?

11          A.    Yes it does for the time being. However, Gulf Power has not yet responded  
12          to our interrogatories and request for production of documents. Upon  
13          receipt of those and depending on other discovery it may be necessary for me  
14          to supplement my testimony.

15

16                    TO BE SWORN TO AT HEARING

17

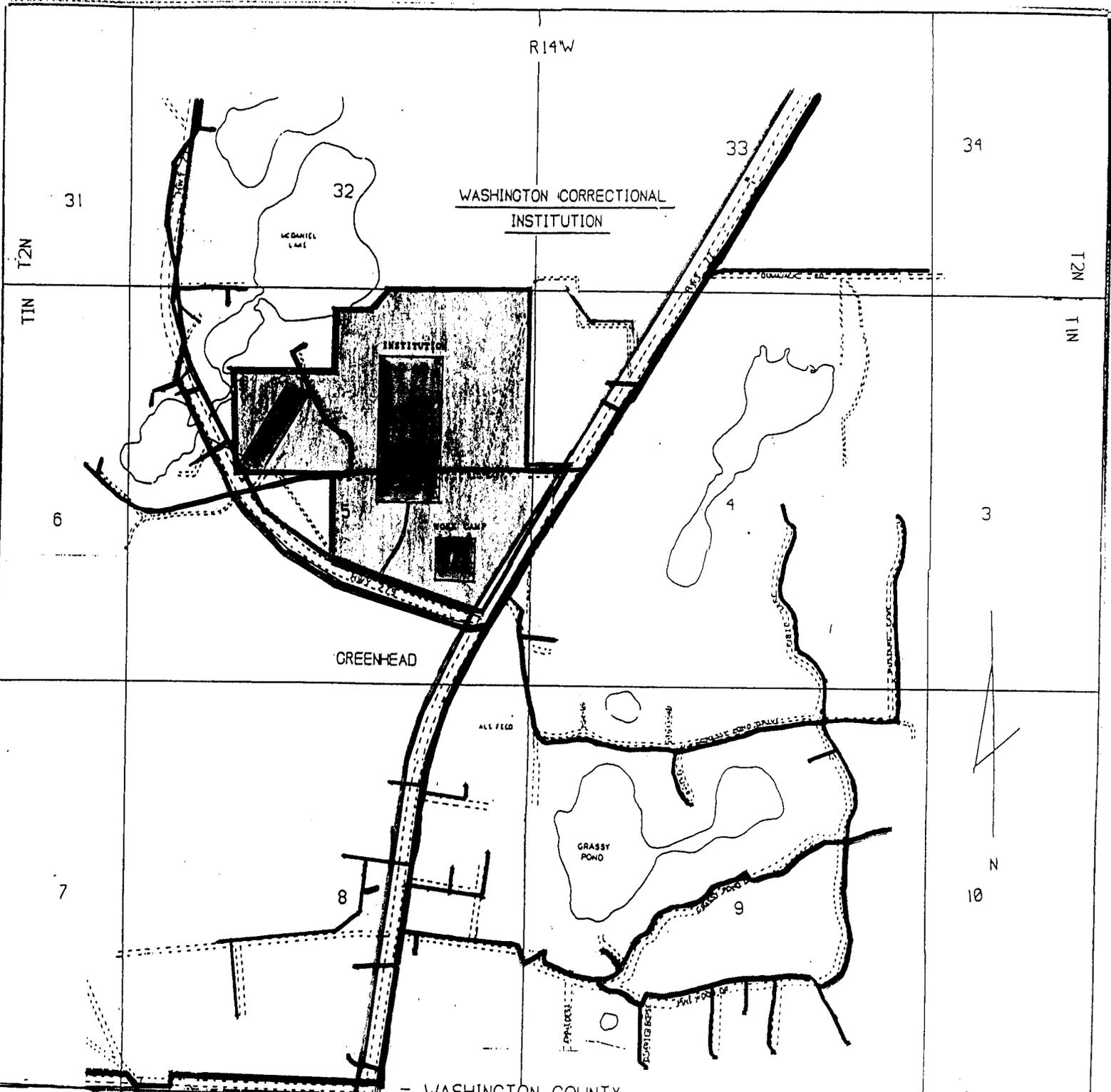
18



- WASHINGTON COUNTY  
FLORIDA

FPSC Docket No. 930885 -EU  
Exhibit (WSD - 1)

<b>GULF COAST ELECTRIC COOP INC.</b> <small>74 BOX 229 NEWAMHONGA, FL 32465 PHONE 904-366-2667          9121 HWY 77 SOUTHPORT, FL 32199 DISTRICT OFFICE</small>	
INFORMATION <b>WSD EXHIBIT #1</b>	
MAP	DATE



FPSC Docket No. 930885 -EU  
 Exhibit (WSD - 2)  
 - WASHINGTON COUNTY  
FLORIDA

GULF COAST ELECTRIC COOP INC.  
 P.O. BOX 328 NEWANTONIA, FL 32465 PHONE 889-568-2667  
 9124 HWY 77 SOUTHPORT, FL 32198 DISTRICT OFFICE

INFORMATION  
**WSD EXHIBIT #2**

MAP \_\_\_\_\_ DATE \_\_\_\_\_

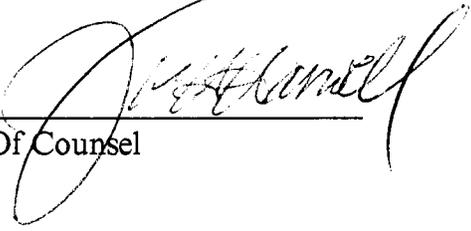
**CERTIFICATE OF SERVICE**

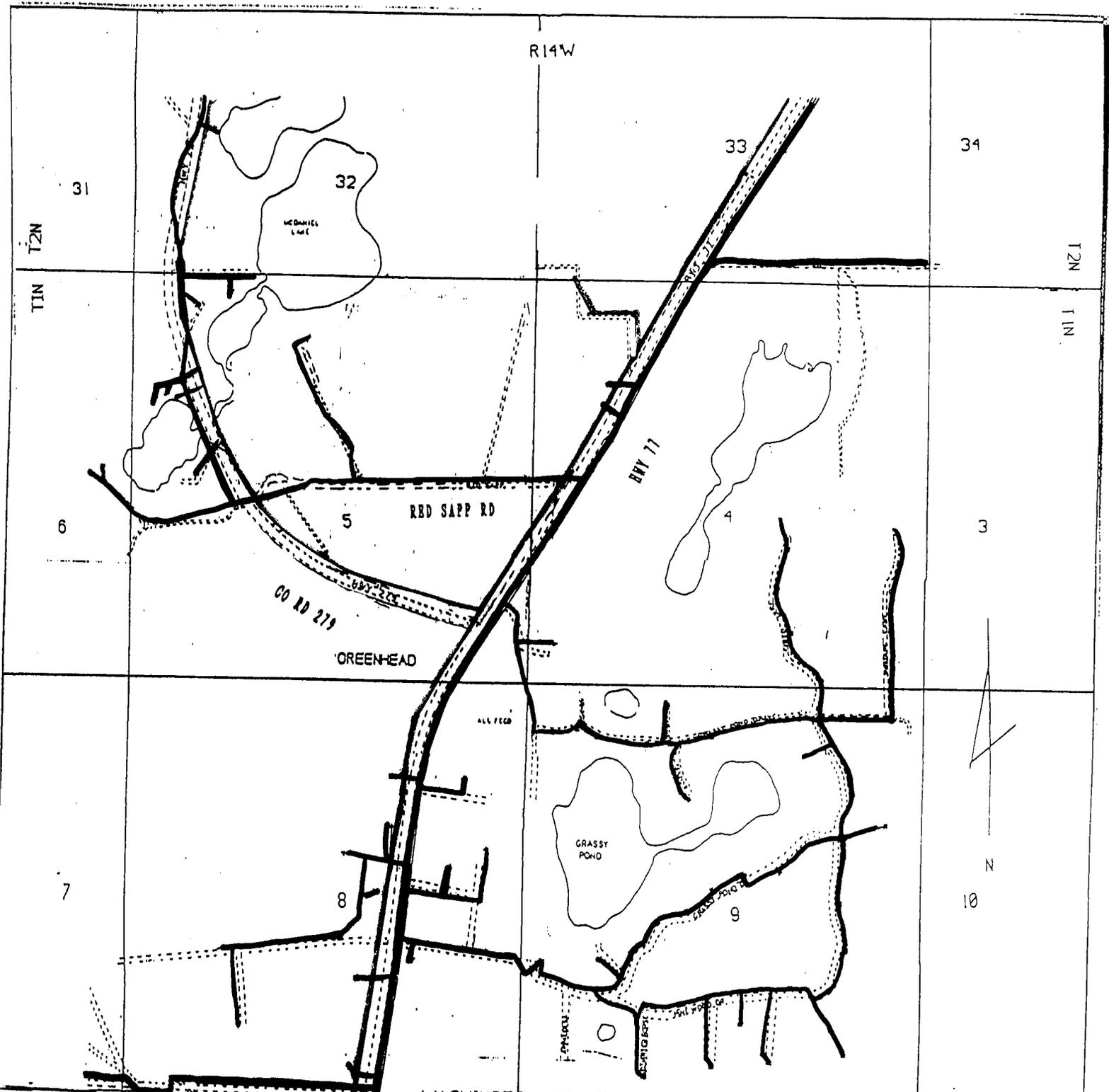
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished  
to:

Jeffrey A. Stone, Esq.  
Teresa E. Liles, Esq.  
Edison Holland, Esq.  
P.O. Box 12950  
Pensacola, FL 32576

Martha Carter Brown, Esq.  
Florida Public Service Commission  
Legal Services  
101 E. Gaines Street #212  
Tallahassee, Florida 32399-6562

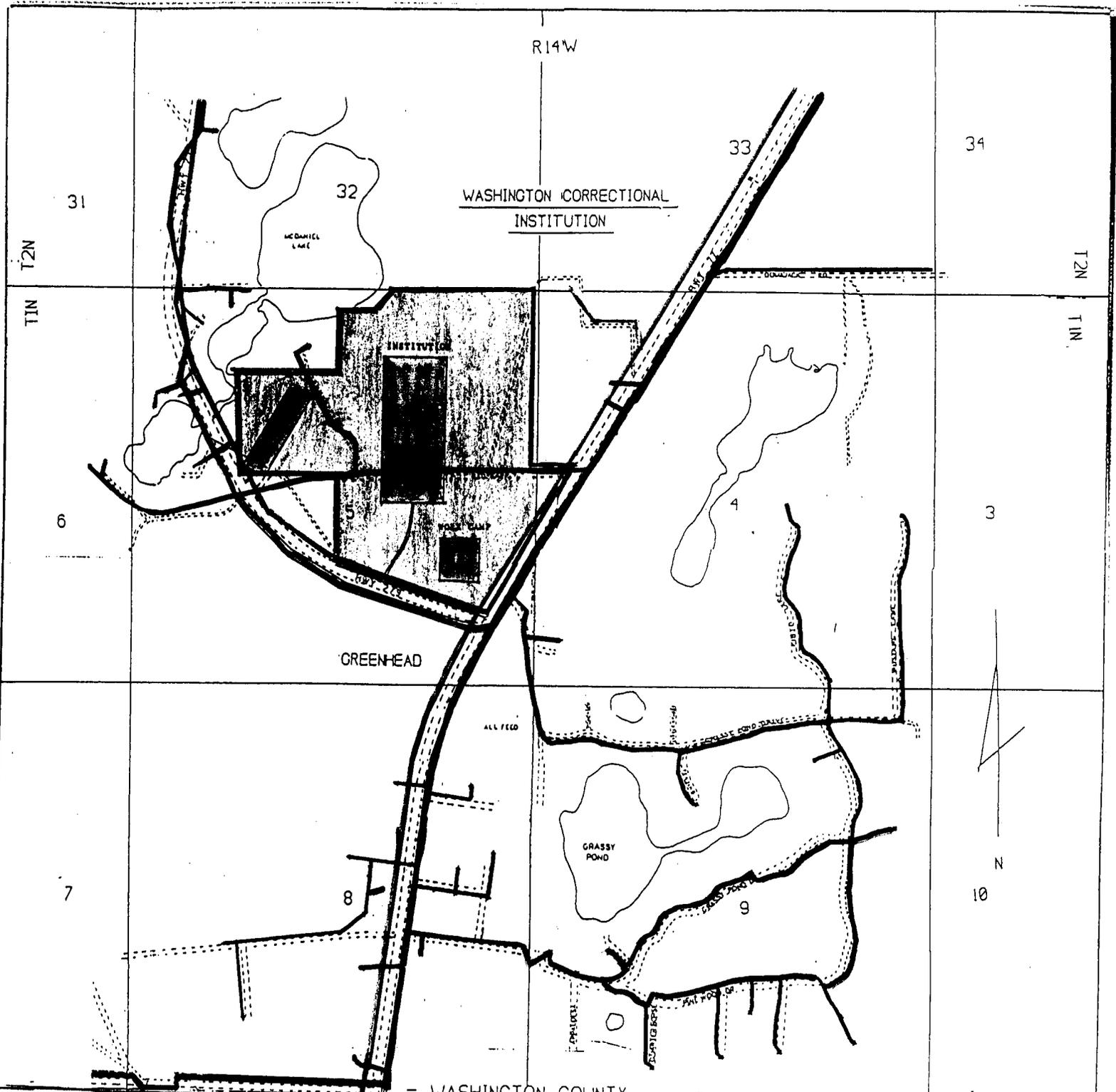
by U.S. Mail this 24 day of May, 1994.

  
\_\_\_\_\_  
Of Counsel



FPSC Docket No. 930885 - WASHINGTON COUNTY  
 Exhibit (WSO - 1) - EU FLORIDA

<b>GULF COAST ELECTRIC COOP INC.</b> <small>P.O. BOX 228 SEVENTH FL. 32405 PHONE 888-568-2667          9105 HWY 77 SOUTHPORT, FL 32449 DISTRICT OFFICE</small>	
INFORMATION <b>WSD EXHIBIT #1</b>	
MAP	DATE



R14W

WASHINGTON CORRECTIONAL  
INSTITUTION

GREENHEAD

GRASSY POND

WASHINGTON COUNTY  
FLORIDA

FPSC Docket No. 930885 -EU  
Exhibit (WSD - 2)

GULF COAST ELECTRIC COOP INC. <small>P.O. BOX 228 WEAVERTON, FL 32165 PHONE 889-589-3667          8131 HWY 77 SOUTHPORT, FL 32199 DISTRICT OFFICE</small>	
INFORMATION <b>WSD EXHIBIT #2</b>	
MAP	DATE