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FLORIDA PUBLIC SERVICE COMMISSION

JUL 6 1994

In Re: Petition to resolve
Territorial dispute with Gulf
Coast Electric Cooperative, Inc.
By Gulf Power Company.

CLERK, SUPREME COURT
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Chief Deputy Clerk
DOCKET NO. 930885-EU

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SECOND DAY - EVENING SESSION

CLERK, SUPREME COURT
By _____
Chief Deputy Clerk

VOLUME 5

PAGES 589 through 678

PROCEEDINGS: HEARING
BEFORE: CHAIRMAN J. TERRY DEASON
COMMISSIONER SUSAN F. CLARK
COMMISSIONER JULIA L. JOHNSON
DATE: Thursday, October 20, 1994
PLACE: FPSC Hearing Room 106
101 East Gaines Street
Tallahassee, Florida
REPORTED BY: LISA GIROD JONES, RPR, CM
APPEARANCES:

(As heretofore noted.)

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and Associates*

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1 PROCEEDINGS

2 (Transcript continued in sequence from Volume 4.)

3 MS. LILES: Mr. Chairman, Gulf Power Company
4 calls Mr. Hodges.

5 JOHN E. HODGES, JR.

6 was called as a witness on behalf of Gulf Power Company,
7 and having been duly sworn, testified as follows:

8 DIRECT EXAMINATION

9 BY MS. LILES:

10 Q Mr. Hodges, would you please state your name and
11 business address for the record?

12 A My name is John E. Hodges, Jr., 500 Bayfront
13 Parkway, Pensacola, Florida 32501.

14 Q Are you the same John E. Hodges who has
15 previously filed rebuttal testimony in this docket?

16 A Yes, I have.

17 Q Do you have any changes or corrections to make
18 to your testimony at this time?

19 A No.

20 Q If I were to ask you the questions reflected in
21 your rebuttal testimony today, would your answers be the
22 same?

23 A Yes.

24 MS. LILES: We ask that Mr. Hodges' testimony be
25 inserted into the record as though read and that his

1 exhibit be marked for identification.

2 CHAIRMAN DEASON: Without objection, the
3 testimony will be inserted, and the prefiled exhibits will
4 be identified as Exhibit No. 34.

5 (Exhibit No. 34 marked for identification.)

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1 GULF POWER COMPANY
2 Before the Florida Public Service Commission
3 Rebuttal Testimony of
4 John E. Hodges, Jr.
5 Docket No. 930885-EU
6 Date of Filing June 3, 1994
7
8
9

10 Q. Please state your name and business address.

11 A. John E. Hodges, Jr., 500 Bayfront Parkway, Pensacola,
12 Florida 32501.
13

14 Q. What is your occupation?

15 A. I am Vice President - Customer Operations for Gulf
16 Power Company in Pensacola, Florida.
17

18 Q. Please describe your educational background and
19 experience.

20 A. I graduated from Florida State University in April
21 1966, with a Bachelor of Science in Management. After
22 graduation I was employed with Gulf Power's Marketing
23 Department in Panama City. I have held positions of
24 increasing responsibilities, including Western Division
25 Manager in Pensacola. My responsibilities include
marketing, distribution, warehousing, transportation,
and our district offices throughout our service area.

1 Q. Do you have an exhibit to which you will refer in your
2 testimony?

3 A. Yes. I have one exhibit, consisting of 2 schedules.

4 Counsel: We ask that Mr. Hodges's exhibit be
5 marked for identification as Exhibit
6 34 (JEH-1).
7

8 Q. What is the purpose of your rebuttal testimony?

9 A. My testimony will respond to the prefiled direct
10 testimony of H. W. Norris, with regard to Gulf Power
11 Company's willingness to assist in the location of the
12 correctional facility. I also address the basis on
13 which the customer should select an electrical supplier
14 in this dispute.
15

16 Q. Will you be addressing the policy issues raised in Mr.
17 Norris' and Mr. Gordon's testimony relating to the
18 purpose and intent of the cooperatives in general, and
19 the Coop's historical service to the area in dispute,
20 and the Coop's economic development efforts to increase
21 its load factor.

22 A. As addressed in our Motion to Limit the Scope of
23 Issues, or in the Alternative, to Extend Time for
24 filing Rebuttal Testimony, filed on June 3, these
25 issues go beyond the scope of the petition filed by

1 Gulf Power. Nevertheless, given a reasonable period of
2 time in which to respond, Gulf Power is prepared to
3 fully address these issues and believes that, given the
4 strong movement in the electric utility industry toward
5 a competitive environment, it may be appropriate for
6 the Commission to address these issues as well.

7 From an historical perspective, the Coop spends an
8 inordinate amount of time describing the construction
9 of its distribution facilities in the area. As Mr.
10 Weintritt states in his testimony, Gulf Power has
11 likewise historically provided distribution service in
12 the area. What is conveniently ignored by the Coop is
13 that were it not for significant investment by Gulf
14 Power in a generation and transmission system designed
15 to meet all the electrical needs of Northwest Florida,
16 the cooperatives located in the area would have been
17 unable to supply the needs of their customers. This
18 was true until the late 70's and early 80's when the
19 Coop began to build duplicative generation and
20 transmission facilities through AEC. The rural
21 cooperatives have fulfilled the purpose for which they
22 were intended; i.e., providing distribution service to
23 rural areas which the investor owned utilities could
24 not serve without subsidy from the remaining
25 ratepayers. Historical service at the comparatively

1 low cost distribution level provides no basis upon
2 which to claim an exclusive right to serve. Gulf Power
3 can provide service to the prison at a lower cost from
4 every perspective: generation, transmission and
5 distribution.

6 I will address the issue of the economic development
7 loans and the Coop grant later in my testimony. From a
8 policy perspective, however, the obtaining of economic
9 development loans and the granting of Coop member money
10 under the guise of economic development, for the
11 express purpose of building load and competing with an
12 investor owned utility flies in the face of the whole
13 purpose and intent of the rural electrification effort.
14 Again, as stated in our motion, we are prepared to
15 address these significant policy questions in detail,
16 should the Commission decide to expand the scope of
17 this docket.

18
19 Q. Mr. Norris indicates that Gulf Power has done nothing
20 to promote economic development in the area, and
21 specifically with respect to the prison. Is this
22 correct?

23 A. No. Gulf Power Company has supported economic
24 development in the rural and urban areas of Northwest
25 Florida. Rather than by loans and grants, Gulf Power

1 has done so by the service of its employees in
2 leadership roles through area Chambers of Commerce
3 throughout Northwest Florida, and their committees
4 regarding economic development.

5
6 Q. Does Gulf Power have an employee in Washington County
7 whose responsibilities include economic development?

8 A. Yes, John F. Dougherty, III is Gulf Power's District
9 Manager for the Washington County area. His job
10 responsibilities include participation in, and
11 encouragement of economic development activities in the
12 area.

13
14 Q. What leadership roles has John Dougherty held which
15 promote economic development in Washington County?

16 A. The following are the most significant positions held
17 by John Dougherty to promote economic development in
18 Washington County:

19 Washington County Chamber of Commerce - Board of
20 Directors (14 years), President (3 years)
21 Washington County Committee of 100 - Chairman (11
22 years)
23 Chipley Area Development Corporation -
24 Secretary/Treasurer
25 Vernon Area Development Corporation - Member

1 Washington County Industrial Authority -
2 Chairman
3 Florida Economic Development Council- Member (12
4 years)
5 Chipley Redevelopment Authority - Chairman
6 Chipley Uptown Redevelopment Association -
7 Director
8

9 Q. Did Gulf Power Company offer to assist in the location
10 of the correctional facility in Washington County?

11 A. Yes. John Dougherty, received an inquiry about
12 providing financial assistance for the correctional
13 facility from Washington County Commissioner, Hulan
14 Carter. Mr. Dougherty offered Gulf Power's assistance
15 in a community-wide fundraising effort, but would not
16 agree to entering into an one-on-one bidding contest
17 with the Coop.
18

19 Q. On Page 27 lines 10 and 11 of his direct testimony, Mr.
20 Norris describes Gulf Power as "unwilling to do
21 anything to help get the prison located in Washington
22 County". Is this portrayal accurate?

23 A. Absolutely not. John Dougherty, as Chairman of the
24 Washington County Economic Development Council, worked
25 for over a year in an attempt to locate a site for the

1 correctional facility. His efforts were made through
2 the Washington County Chamber of Commerce in an attempt
3 to get community-wide support for the location of this
4 facility.

5
6 Q. In addition to participating in a community-wide effort
7 to locate the correctional facility, what did Gulf
8 Power offer?

9 A. The basic things Gulf Power offered were the most
10 reliable electric service to the Department of
11 Corrections at the lowest cost to the Department and,
12 ultimately, to the taxpayers of the State.

13
14 Q. How would you characterize Mr. Norris's statement in
15 his direct testimony on page 17, line 26 that the rural
16 development funds "should be returned" if the
17 cooperative does not serve the prison.

18 A. It sounds like the Coop is attempting to buy the
19 business with a \$45,000 grant. If the cooperative does
20 not get the business, they want the money back. Gulf
21 Power is attempting to earn the business with lower
22 standard rates and higher reliability from existing
23 facilities.

24

25

- 1 Q. On page 23, lines 3 and 4, Mr. Norris refers to "a
2 letter from the county selecting Gulf Coast as the
3 power supplier." Who is the customer in this dispute
4 and on what basis should it be selecting its electrical
5 supplier?
- 6 A. The Florida Department of Corrections is the customer
7 in this dispute. In this case, the selection leading
8 to this dispute was made by Washington County. The
9 customer should make its selection based on which
10 supplier can provide the most reliable electric service
11 at the least cost to it. In both instances,
12 reliability and cost, that supplier is Gulf Power
13 Company.
- 14
- 15 Q. Did Gulf Power correspond and meet with the Florida
16 Department of Corrections concerning its proposal for
17 electric service?
- 18 A. Yes. On April 9, 1993, Vic Jones, Gulf Power's General
19 Manager of Eastern Division, sent a letter to Marvin
20 Moran of the DOC submitting a proposal for electric
21 service for the new prison. A copy of this letter is
22 attached as Schedule 1 of my exhibit. On July 30, 1993
23 Vic Jones, Bill Weintritt, Power Delivery Manager, and
24 Stan Sexton of Gulf Power Marketing met with Ron
25 Kronenberger, Assistant Secretary of the DOC, to

1 discuss circumstances pertaining to the provision of
2 electric service.

3 Q. Did Gulf Power respond to the letter of March 15, 1994
4 from the Washington County Board of County
5 Commissioners provided as Mr. Norris's Exhibit No. 5?

6 A. Yes. Travis J. Bowden, President of Gulf Power, sent a
7 letter to Jim Morris, Chairman Washington County Board
8 of County Commissioners, assuring him of our support of
9 their efforts. A copy of this letter is attached as
10 Schedule 2 of my exhibit. John Dougherty, G. A.
11 Mallini, Customer Services General Manager, and I also
12 met with Commissioner Morris. We informed him that
13 Gulf Power would not hinder the location of the
14 correctional facility, but that likewise, items such as
15 the \$308,000 interest free loan should not be dependent
16 on the Coop providing electrical service. We explained
17 that the decision as to electrical supplier in this
18 dispute should be made by the DOC based on reliability
19 of service and cost to the DOC. I felt that upon
20 completion of our meeting, Commissioner Morris had a
21 far better understanding of our position and the need
22 to have this dispute determined by the Commission.

23

24

25

1 Q. Does this conclude your testimony?

2 A. Yes, with the proviso that we have not received the
3 Coop's responses to our discovery requests. Based on
4 those responses, I may need to supplement my testimony.

1 Q (By Ms. Liles) Mr. Hodges, please summarize
2 your testimony.

3 A This testimony covers Gulf Power Company's
4 willingness to assist in the location of the correctional
5 facility and the basis on which the customer should select
6 an electrical supplier in this dispute. The Gulf Coast
7 Electrical Cooperative has ignored Gulf Power Company's
8 historic commitment to the Northwest Florida area.
9 Without Gulf Power's significant investment in this area's
10 generation and transmission systems, cooperatives could
11 not have supplied the needs of their customers.

12 The co-ops began duplicating, through AEC, Gulf
13 Power's generation and transmission facilities beginning
14 in the late fifties and greatly expanded into the
15 eighties. The co-ops' use of grants and loans to compete
16 with investor-owned utilities is against rural electric
17 cooperatives' intent and purposes. Gulf Power offers the
18 lowest total cost of generation, transmission and
19 distribution. We are proud of our economic development
20 track record. Gulf Power's policy encourages economic
21 development with broad community involvement. We have
22 supported rural and urban economic development with
23 employee leadership roles in area chambers of commerce and
24 their committees, specifically John F. Dougherty, Gulf
25 Power's district manager for the Washington County area.

1 Gulf Power's response to Washington County's
2 inquiry about Gulf Power's financial assistance for the
3 prison was that Gulf Power offers a commitment to a
4 community-wide effort but does not agree to a one-on-one
5 contest bidding. Mr. Dougherty, as chairman of the
6 Washington County Economic Development Council, worked
7 through the Washington County Chamber of Commerce for over
8 a year to help locate a site for a correctional facility
9 and to get community-wide support for the project. The
10 Co-op, however, provided both a grant and a loan in a
11 direct attempt to influence the selection of electric
12 service. The Co-op even states that the funds be paid
13 back if they're not granted the business.

14 Gulf Power focuses on earning the business. We
15 earn the business with lower rates, energy services and
16 higher reliability, rather than trying to buy the business
17 with grants and loans. The selection leading to this
18 dispute was delegated by the Florida State Department of
19 Corrections to Washington County. The selection should be
20 based on who can provide lower electric rates and higher
21 reliability to the customer.

22 In this case, the customer is the Department of
23 Corrections and ultimately the taxpayers of this state.
24 Gulf Power corresponded and met with both the Department
25 of Corrections and Washington County representatives

1 concerning the electrical service. Vic Jones, our eastern
2 division manager, met with Ron Kronenberger to discuss the
3 circumstances pertaining to the provisions of electric
4 service. Travis Bowden, president of Gulf Power, sent a
5 letter to Jim Morris, chairman of the Washington County
6 Commissioners, assuring Gulf Power's support to their
7 efforts. John Dougherty and I met with Jim Morris
8 emphasizing that the Department of Corrections' decision
9 should not be influenced by the Co-op's grant and loan,
10 but rather by the reliability and cost of service to DOC.

11 After that meeting Mr. Morris stated he is a
12 businessmen and understands Gulf Power's position. He was
13 not aware of the FPSC policy on this issue and had no
14 problem with the process as long as Washington County gets
15 the new jobs. Gulf Power should serve the Washington
16 County Correctional Institute because it has earned the
17 business and can serve it at the lowest incremental cost.

18 Q Does that conclude your summary?

19 A Yes.

20 Q We tender this witness for cross.

21 COMMISSIONER CLARK: I guess there's none.

22 MR. FLOYD: Just a moment.

23 CROSS EXAMINATION

24 BY MR. FLOYD:

25 Q Mr. Hodges, is it your position that Gulf Power

1 can serve all the consumers in your service area with
2 reliable electrical energy?

3 A Yes.

4 Q And based on that, you conclude, don't you, that
5 Gulf Coast Electric Cooperative, as a Co-op, has fulfilled
6 its purpose?

7 A Are we talking about new business?

8 Q Yes, sir, with respect to a new customer that
9 may come in tomorrow, the next day, two weeks from now,
10 any new customers that come in.

11 A I believe any new customer that comes in to
12 Northwest Florida that Gulf Power Company can serve,
13 without duplicating service of the Co-op, should be a Gulf
14 Power customer.

15 Q All right, sir. And your conclusion, then, in
16 your direct testimony, and in your deposition testimony,
17 was that as to the new customers, Gulf Coast Electric
18 Cooperative, based on that, has fulfilled its purpose,
19 correct?

20 A I'm not sure I understand the question.

21 MS. LILES: Could you refer him to a particular
22 page and line number of his testimony?

23 MR. FLOYD: Sure. Let me.

24 Q Does anyone not have a copy of the deposition?

25 (Pause) I am asking you concerning the -- on Page 22 of

1 your deposition, Lines 12 through 25, and with respect to
2 your direct testimony -- excuse me, your rebuttal
3 testimony, that the purpose for which Co-ops are intended
4 has been fulfilled?

5 MS. LILES: Again, what page in his rebuttal
6 testimony are you referring to?

7 MR. FLOYD: On rebuttal testimony, Page 3, Lines
8 20 through 25.

9 MS. LILES: Is your question -- what is your
10 question?

11 Q (By Mr. Floyd) My question is: Let me ask you
12 this with respect to your direct testimony. Is it your
13 position that the rural cooperatives have fulfilled the
14 purpose for which they were intended? And was that the
15 statement that you gave in your direct testimony, Page 3,
16 Lines 20 through 22?

17 A You want me to refer to the direct testimony
18 now?

19 Q I'm sorry, the rebuttal testimony. You don't
20 have any direct testimony, do you, sir?

21 A Are you on Line 20?

22 Q Lines 20 through 22. Was this your statement in
23 the rebuttal testimony: "The rural cooperatives have
24 fulfilled the purpose for which they were intended"?

25 MS. LILES: I would like to point out that the

1 sentence continues on down to Line 25 and the quote ends
2 midway through the sentence.

3 Q (By Mr. Floyd) Was that your statement there,
4 Mr. Hodges?

5 A Yes, with the understanding that the claim that
6 the Co-op has the exclusive right to serve in a particular
7 area, I have -- I believe they have fulfilled their
8 purpose. The investor-owned utilities are certainly
9 willing to provide that service.

10 Q And that ability to provide the service to all
11 those people in that area, in your service area, is the
12 basis of your conclusion that the Co-op has fulfilled the
13 purpose for which they were intended, correct?

14 A In Gulf Power Company's case we are willing and
15 able to service any load in our territory.

16 Q Right. And that is the basis for your
17 determination that Gulf Coast Electric Cooperative has
18 fulfilled its intended purpose, correct?

19 A Correct.

20 Q And your position is further that as Gulf Power,
21 that Gulf Power as an investor-owned utility, should take
22 over the providing of service to any new customers in
23 these rural areas?

24 MS. LILES: Are you referring to something in
25 his testimony?

1 MR. FLOYD: I am just asking him. If he gives
2 the wrong answer, I'll quickly refer him to that part of
3 his testimony that was different.

4 WITNESS HODGES: We are certainly not unwilling
5 to do that, but primarily on any new customer load we
6 would certainly do our best to serve it.

7 Q (By Mr. Floyd) In fact, your policy today is
8 that you will serve any customer that requests service
9 from you?

10 A That is our policy.

11 Q And your intent is to serve any customer that
12 requests service from you?

13 A That is our intent.

14 Q And that is in fact what you did with respect to
15 this Alliance Realty off of 77 during this year of 1994?

16 A I don't --

17 Q They requested it and you served it, correct?

18 A I don't have any knowledge of that.

19 COMMISSIONER CLARK: Mr. Hodges, would
20 Mr. Weintritt have knowledge of that?

21 WITNESS HODGES: Yes.

22 COMMISSIONER CLARK: Is he the best person to
23 ask?

24 WITNESS HODGES: Yes.

25 Q (By Mr. Floyd) Now, this same policy with

1 respect to serving any customer -- (pause) I'm sorry, you
2 don't have any knowledge of that one on 77, the crossing
3 of the lines there?

4 A No. (Pause)

5 Q Okay, sir, and isn't it Gulf Power's position
6 also that Gulf Coast's historical service at the
7 comparatively low cost distribution level in South
8 Washington County provides no basis upon which to claim a
9 right to serve customer?

10 A What area are you referring to in my
11 deposition?

12 Q I'm referring to South Washington County. In
13 your deposition, I'm referring to -- I have, obviously,
14 items in the deposition that back this up. I'm just
15 asking you right now what your position is, if you have a
16 position on that?

17 MR. CRESSE: Mr. Chairman, in the interest of
18 saving time we're willing to stipulate that we will serve
19 all customers in accordance with the tariff filed and
20 approved by the Florida Public Service Commission and
21 under its rules and regulations. Maybe that will help
22 Mr. Floyd fulfill his commitment yesterday on time for
23 cross examination this afternoon.

24 MS. BROWN: Mr. Chairman, we're going to have
25 just one or two questions about this also, and at least

1 one remark that Mr. Hodges made in his deposition, and I
2 don't want us to be precluded from asking it.

3 CHAIRMAN DEASON: Mr. Floyd?

4 MR. FLOYD: Mr. Chairman, I'll try to move on
5 quickly. I noted that one of their witnesses that they
6 asked questions of, that they were not going to have any
7 questions of, took an hour --

8 CHAIRMAN DEASON: I'm not worried about that.
9 I'm just concerned about whether you still need to ask
10 questions in this area. You heard the stipulation,
11 proposed stipulation; are you willing to accept that, or
12 do you need to ask questions? And if you do, please
13 proceed asking the questions.

14 Q (By Mr. Floyd) The question that I asked was, is
15 it your position also -- and this is different from what
16 Mr. Cresse is talking about. Is your it position also
17 that Gulf Coast's historical service at the comparatively
18 low cost distribution level in South Washington County
19 provides no basis upon which to claim a right to serve?

20 A Are you speaking about the right to serve in the
21 exclusive area?

22 Q I'm talking about in South Washington County.

23 A Well, I want to correctly answer your question.
24 I'm having a hard time understanding it, Mr. Floyd.

25 Q Okay, well let me ask you, look to Page 30 of

1 your deposition, Lines 10 through 16, and let me ask you
2 if you were asked this question and you gave this answer:

3 QUESTION: "What I got out of this, you correct
4 me if I'm wrong or misunderstanding this, what you are
5 suggesting here is that historical distribution of service
6 should not be the basis on which one claims a service area
7 regardless of the cost involved, you should go all the way
8 back to transmission and generation?"

9 ANSWER: "That's the way I understand it, yes."
10 That was the answer you gave?

11 A The answer is still yes.

12 Q Mr. Hodges, sometime after the present site was
13 selected by the Washington County Correctional facility,
14 by the Department of Corrections, and after Gulf Coast
15 Electric had offered to grant the \$45,000 to Washington
16 County to help with the purchase of this property, your
17 district manager, John Dougherty, contacted you and asked
18 you, Gulf Power, to grant Washington County -- to grant to
19 Washington County the same amount that the Co-op was
20 willing to give, around \$45,000, to be provided as
21 financial assistance to Washington County; is that
22 correct?

23 A I am not sure it was after the official offer
24 had been made by the Co-op, but sometime during those
25 discussions between the Co-op and the county, John

1 Dougherty did contact me.

2 Q And he knew at that time the amount that Gulf
3 Coast had offered or promised to provide in the way of the
4 grant, the \$45,000; didn't he?

5 A I think the initial contact, he didn't know the
6 exact figure. There was some question to whether it was
7 going to be 45- or 50-.

8 Q And he came to you and asked you that question
9 if you would be willing to provide that like Gulf Coast
10 was going to do it, correct?

11 A That's correct.

12 Q Mr. Dougherty was involved on behalf of Gulf
13 Power on a day-to-day basis with the economic activity in
14 Washington County, correct?

15 A Correct.

16 Q And he was one of your front line people as far
17 as economic development goes in Washington County?

18 A He is our point man.

19 Q And he had advised you, had he not, quite some
20 time before this conference where he asked you about
21 providing the \$45,000 grant, and advised you about
22 Washington County seeking a prison, and kept you informed
23 on their progress in locating one in Washington County,
24 two or three years before this, right?

25 A I'm not sure it was two or three years before

1 that. We had several prisons -- prison opportunities
2 throughout our service territory. I don't believe the
3 Washington County prison was talked about three years
4 ahead of the issue.

5 Q The fact that they were seeking one is what I'm
6 referencing.

7 A No, I am not aware of that.

8 Q Now, this money that you were asked by
9 Mr. Dougherty -- who is the district manager of the
10 Washington County area, correct? Mr. Dougherty is the
11 district manager?

12 A He is our district manager, Chipley.

13 Q Now, this money that you were asked by
14 Mr. Dougherty to give to Washington County to help them
15 with getting the prison would be charged, if you gave it,
16 directly to your stockholders, correct?

17 A That's correct.

18 Q And Gulf Power doesn't have any policy that
19 prohibits it from making grants or loans for economic
20 development, not as long as it's the stockholders' money;
21 is that correct?

22 A We don't have a policy making grant to community
23 organizations. We do not make grants directly to
24 potential customers.

25 Q Let me refer you to your deposition, Page 35,

1 Lines 2 through 5, and ask you if you were asked this
2 question and gave this answer:

3 QUESTION: "So Gulf Power doesn't have any
4 policy that prohibits it from making grants or loans as
5 long as its stockholders' money?"

6 ANSWER: "That's correct." Was that your
7 answer?

8 A That's the same answer I gave you just a minute
9 ago.

10 Q Mr. Hodges, and you have given grants in other
11 prison sitings in areas where you exclusively serve; have
12 you not?

13 A Not specifically for prison siting, no.

14 Q You've provided financial assistance in
15 connection with assisting to locate a prison in an area
16 that you exclusively serve; haven't you?

17 A Not to my knowledge.

18 Q What about with Century Correctional Institute,
19 in Century, Florida?

20 A We were a member of a community development
21 organization, Committee of 100 in Escambia County, that
22 assisted the prison location along with a new industrial
23 park in Pensacola. We made a contribution and actually
24 gave an employee leadership in the fundraising campaign to
25 that organization, but we did not make a contribution

1 directly toward the prison site.

2 Q How much money did you collect in the way of
3 financial assistance, did you provide in connection with
4 that; do you know?

5 A With the organization I just mentioned?

6 Q Yes, sir.

7 A I believe our pledge was somewhere around
8 \$25,000 a year for a five-year period.

9 Q So \$125,000 total?

10 A For a five-year period. That also -- that -- we
11 didn't agree to give the \$25,000 unless the rest of the
12 community raised their goal. And if they met their goal,
13 then we would give. And I don't remember exactly what our
14 proposal said, but I believe we would only give
15 approximately half of that, and then when the community
16 reached their goal, we would give the other half. That
17 was an enticement to the community to raise all the money
18 and get as much participation from other businesses as
19 possible.

20 Q And, sir, they were raising the money to
21 purchase the property to donate to the Department of
22 Corrections?

23 A No.

24 Q What were they raising the money for?

25 A They were raising the money for -- to be viable

1 in the economic development activities as we in that area
2 compete with Alabama, Georgia, Mississippi and other
3 areas. Part of the -- or the emphasis was not only
4 advertising, but it was looking for new industrial sites
5 in the Escambia County area. One was purchased by the
6 county. That money was used to assist in that. Actually,
7 I think the county used some of that money to pave the
8 road into the prison site in Century.

9 Q And those would be incentives provided to
10 developers to come into the area; that that's what that
11 money that you contributed, along with others, was used
12 for, correct?

13 A That money was used to prepare sites for
14 potential new industries. I don't believe anything was
15 given -- well, I know for a fact nothing was given
16 directly to any potential customer.

17 Q Mr. Dougherty informed you that he had received
18 an inquiry from Hulan Carter, who is a Washington County
19 Commissioner, about Gulf Power providing financial
20 assistance like that offered by Gulf Coast, correct?

21 A Mr. Dougherty or Mr. Jones asked if we would be
22 willing to match Gulf Coast Electric's grant. My answer
23 was we would be willing to participate in a community-wide
24 effort to raise economic development funds.

25 Q Mr. Hodges, let me refer to you Page 37, lines

1 24 through 25, and Page 38, Line 1, and ask you if you
2 gave this answer:

3 QUESTION: "So he's the one that told you he had
4 received an inquiry from Hulan Carter?"

5 ANSWER: "Yes." Mr. Carter is the one that had
6 presented an inquiry to Mr. Dougherty about getting the
7 money, correct?

8 A What line are you on?

9 Q 37, 24 through 25, 38, 1?

10 A I think that that's correct, yes, Hulan Carter.

11 Q And your response to Mr. Dougherty to the
12 question about making a grant similar to that by Gulf
13 Coast was that we won't do that; we feel like when the
14 time comes, we'll earn the business by reliable electric
15 service and low rates, correct?

16 A There was a lot more discussion going on at that
17 time. What I said was that it is not Gulf Power Company's
18 policy to bid for the job. We will -- by bidding, I mean
19 we will not buy a ticket to the ball game, and that's one
20 of the suggestions, I think, that John was suggesting to
21 me, that if we were going to play in this ball game, we
22 were going to have to match what the Co-op was willing to
23 do. I felt like that was an effort to buy the business.
24 We don't do business that way and we've never done
25 business that way, and we were not going to agree to do

1 business that way.

2 Q Mr. Hodges, let me ask you to look at Lines 12
3 through 14 and let me ask you if you would go by the same
4 policy that Mr. Cresse mentioned, if you'll just answer
5 yes or no, and if you have some explanation.

6 Isn't your statement there on Lines 12 through
7 14, Page 39, "My response was we won't do that. We feel
8 like that we'll earn the business by reliable electric
9 service and low rates." Correct? That was a statement
10 that was made there?

11 A That's correct.

12 Q Now, your position is that if Gulf Power can
13 provide service to a customer at lower rate, then another
14 utility could -- excuse me, let me rephrase that. Is it
15 your position that if Gulf Power can provide service to a
16 customer at a lower rate than another utility could, then
17 Gulf Power has earned that business?

18 A That's correct.

19 Q Now, with respect to this community-wide project
20 or funding that you refer to, that you recognize -- you
21 refer to, you recognize, don't you, that Washington County
22 Board of County Commissioners is the local governing body
23 and represents all of the people of Washington County,
24 correct?

25 A That's correct, just as all the other county

1 commissioners in our service territory do.

2 Q And you understood, didn't you, that Washington
3 County was putting in money towards the purchase of this
4 property to locate the prison in Washington County, just
5 as the Co-op had promised to assist them, correct?

6 A I'm not sure I knew that. But most counties do
7 put in money for those kind of projects.

8 Q And you don't call that a community-wide
9 project, this Washington Correctional facility?

10 A No, sir.

11 Q Did you check to see if there were any other
12 persons or entities, other than Washington County and Gulf
13 Coast Electric, that were providing or funding assistance
14 to Washington County to help them locate this prison?

15 A Yes, I did.

16 Q You did?

17 A That's correct.

18 Q Who did you check with?

19 A Checked with our district manager,
20 Mr. Dougherty.

21 Q Do you know whether or not -- are you aware that
22 Mr. Dougherty did not do any checking to see if there were
23 other persons who were providing financial assistance, and
24 that he stated that in his deposition?

25 A Well, as I said, Mr. Dougherty was involved in

1 this prison siting from early on. He was, in fact,
2 helping with the site selection. Mr. Dougherty also at
3 that time was chairman of the Economic Development
4 Council. I would think if anybody else was making
5 contributions toward the prison, he would certainly know
6 it. In fact, I said we would be happy and have a track
7 record of participating in community-wide fundraising
8 efforts to -- for economic development. In fact, I
9 encouraged that for this particular case.

10 Q Mr. Hodges, I know you counted on Mr. Dougherty
11 to do this, but what I asked you was were you aware that I
12 didn't go out and check to see if anybody else was
13 providing any type of financial assistance?

14 MS. LILES: I'm going to object to that question
15 as assuming facts not in evidence. You may ask whether he
16 knows what Mr. Dougherty did or did not do.

17 Q (By Mr. Floyd) I think that's what I did, but
18 I'm asking him whether -- and I think -- you read
19 Mr. Dougherty's deposition, didn't you?

20 A Yes, I've read his deposition. Would you show
21 me in his deposition where it relates to your question?

22 Q Yes, sir. Yes, sir. Page 40, Lines 5 through
23 11.

24 I would like to have this marked as an exhibit
25 if you will, Mr. Chairman.

1 CHAIRMAN DEASON: You want the deposition marked
2 as an exhibit?

3 MR. FLOYD: Yes, sir, please.

4 CHAIRMAN DEASON: Be identified as Exhibit
5 No. 35.

6 (Exhibit No. 35 marked for identification.)

7 Q Mr. Hodges, let me read this to you, the
8 question and answer.

9 Question asked of Mr. Dougherty: "But what I
10 asked you was did you check to see if there were any other
11 persons or entities that were providing funding or
12 assistance to Washington County to help them locate the
13 prison here?"

14 ANSWER: "I personally did not."

15 QUESTION: "And do you know anybody from Gulf
16 Power who did?"

17 ANSWER: "I do not know of anyone who did."

18 Were you aware that he didn't take any effort to
19 go out and look for anybody else?

20 A Well, he -- in the paragraph before that, I
21 think he's relating to Mr. Ellis, the chamber executive.
22 Again, Mr. Dougherty is our district manager. At that
23 time he was chairman of the Economic Development Council.
24 Chipley has a population of around 2500 to 3000 people.
25 If anybody else were involved in the fundraising project,

1 I feel confident that Mr. Dougherty would know it and
2 wouldn't have to ask anybody.

3 Q Mr. Hodges, are you aware that the only person
4 that Mr. Dougherty says that he told that y'all might be
5 interested in some kind of, quote, "community-wide
6 project," such as this was one county Commissioner?

7 A Well, I think he told Mr. Ellis who is the
8 chamber executive, and he said that in his deposition.

9 Q I mean with respect to Washington County.

10 A I believe Chipley is the county seat of
11 Washington County.

12 Q All right, sir, and you did not provide any
13 grant money or financial assistance with respect to this
14 Washington County having the correctional facility located
15 there, did you?

16 A We did not provide any grant money, but we
17 offered to participate in a broad community project.

18 Q And that's what we were just talking about, what
19 Mr. Dougherty was checking with people about, right?

20 A If there had been one, we would have
21 participated.

22 Q All right, after this reply or response to
23 Mr. Dougherty to the effect that y'all weren't going to
24 provide any grant money, you gave an instruction to John
25 Dougherty and Vic Jones not to do anything such as

1 complaining to the County Commission, Department of
2 Corrections, the Florida Public Service Commission or
3 causing a conflict within the community itself because it
4 might hurt the county's chances of getting the prison; is
5 that correct?

6 A Is that in my deposition?

7 Q I'm just asking if that's correct, sir.

8 A I don't remember if that's in my deposition. I
9 know in the deposition Mr. Dougherty and Mr. Jones and I
10 discussed the situation, basically around the issue as to
11 whether we were going to get into a bidding contest or
12 whether we were going to actually try to match the Co-op's
13 bid. We decided not to do that. We decided that we could
14 earn the business. When the site was finally selected, we
15 would know at that time whether under the Public Service
16 Commission rules and regulations we would have a chance to
17 serve it. As a result, the site was selected, that we did
18 feel like we had a good chance to serve it and there was
19 no need to cause a community problem. We wouldn't have
20 anyway.

21 Q But Mr. Hodges, let me get back to the simple
22 question here. Did you tell Mr. Dougherty and Mr. Jones
23 after -- not to do anything that would cause a conflict in
24 the community, that might cause a problem with Washington
25 County actually having the prison to be located there; yes

1 or no? And if you -- do you recall one way or the other?

2 A I recall discussing it. Whether I gave them
3 direct instructions, we decided that would not be in the
4 best interests of Washington County at that time and that
5 the process would be through the Florida Public Service
6 Commission. They would decide who is going to serve the
7 prison.

8 Q All right, sir. Let me ask you to look at your
9 deposition testimony, Page 45, Lines 9 through 21, and ask
10 you if you gave this statement:

11 QUESTION: "Was Mr. Dougherty ever instructed to
12 just sit back and wait to see how this whole thing worked
13 out and wait and let Gulf Coast make its grant?"

14 ANSWER: "I think my instructions to John and
15 Vic both were, when they told me that Gulf Coast was
16 willing to put up this money, my position was that we're
17 not going to do anything that would, that would hurt
18 Washington County or cause a real conflict within
19 Washington County and the Department of Corrections to
20 hurt their ability to get the prison."

21 MS. LILES: Mr. Floyd, are you offering that as
22 impeachment? Because I think that's absolutely consistent
23 with what the witness just said.

24 Q (By Mr. Floyd) Not to my recollection. That
25 was the reason I was offering it for. But if it is

1 consistent, then I'll take your word for it.

2 You felt confident, Mr. Hodges, that when the
3 time came, that you could earn the business of the
4 correctional facility from the Department of Corrections,
5 correct?

6 A That's correct.

7 Q And when you said in your -- when you say when
8 the time came, did you mean by that after the financial
9 assistance had been secured to Washington County and
10 consequently no danger was being posed as to them losing
11 the prison?

12 A No. What I meant by that was when the final
13 site had been selected and we could evaluate our ability
14 to serve the prison versus the Co-op's ability to serve
15 the prison, and that we -- if we could serve the prison
16 under the Florida Public Service Commission rules and
17 regulations, then if we feel like we had a fair shot at
18 it, we would go after it and earn the business.

19 Q But Mr. Hodges, when you talk about when the
20 time came, was it your intention to lay back on this -- or
21 wasn't it your intention to kind of lay back and not cause
22 any problem until the Washington County actually had
23 obtained the financial monies they needed to purchase the
24 land?

25 A There wasn't a dispute until the duplication of

1 service actually occurred. It was at that time that we
2 started this process.

3 Q Exactly. What I'm asking is, that dispute, when
4 you filed this dispute was when? In the late summer of
5 1993?

6 A I don't have that date in front of me.

7 Q And that was -- and that was at the time -- at
8 that time you felt the time had come for y'all to take
9 action in terms of securing the prison for Gulf Power,
10 correct?

11 A That's correct, because I was advised by our
12 people that the duplication of service had begun, and we
13 felt like that was in violation of the public service
14 Commission rules, so we filed a dispute.

15 Q All right, in fact, what you had said was that
16 you were going to wait until that time came, and at that
17 time you were going to show the Department of Corrections
18 that you could earn that business. And you had said if
19 they didn't -- if you weren't able to convince the
20 Department of Corrections, that you would just appeal it
21 to the Public Service Commission; is that correct?

22 A Where did I say that, Mr. Floyd?

23 Q I'm just asking you right now, and I'll refer
24 you to it in just a second if you want to.

25 A I'd rather wait until you refer me to my

1 testimony.

2 Q Just a minute, I'll get that for you. Page 46,
3 Lines 23 through 25; Page 47, Lines 1 through 4.

4 Answer -- I'll just read the answer. You can
5 read the question through if you want to but: "We would
6 make an offer to the Department of Corrections and show
7 that our product was at a lower cost and had higher
8 reliability as far as service and for security of that
9 prison. And that if we were right, hopefully, the
10 Department of Corrections would award us that business.
11 If they didn't then we would appeal to the Public Service
12 Commission." Is that correct? That was the testimony you
13 gave there, right?

14 A That's correct.

15 Q And in fact, that's exactly what you did, wasn't
16 it? You went to see Mr. Kronenberger, about three or four
17 of you from Gulf Power, on July the 30th, 1993, to see if
18 you could have the Department of Corrections choose Gulf
19 Power as the supplier of this site, correct?

20 A I was not at that meeting, but Mr. Jones and
21 Mr. Weintritt went to see Mr. Kronenberger.

22 Q For that purpose, to see if he would designate
23 Gulf Power to serve the prison?

24 A I think the purpose of that meeting was to make
25 him aware that we were willing and able to serve the site

1 and would like the business.

2 Q And that you were going to earn the business,
3 correct?

4 A I don't know exactly what the discussions were
5 at that meeting, but --

6 Q And apparently this meeting of July the 30th,
7 they were not successful in convincing Mr. Kronenberger of
8 the Department of Corrections to change their approval
9 from Gulf Coast to Gulf Power, were they?

10 A I don't think any decision was made at that
11 meeting.

12 Q Mr. Hodges, aren't you aware that the Department
13 of Corrections and the Washington County had designated or
14 approved Gulf Coast in May, May 28th, 1993, and then June
15 7th, 1993, as the approved power supplier? That was
16 about -- over two months before you guys went up there;
17 wasn't it?

18 A Again, I didn't go.

19 Q I mean Gulf Power representatives?

20 A I'm not aware that the DOC actually made that
21 selection. I think the Washington County commissioners
22 made that selection.

23 Q Were you one of the people that were at
24 Mr. Kronenberger's deposition, Mr. Hodges?

25 A No.

1 Q Okay, well you are aware of his testimony that
2 the Department of Corrections approved Gulf Coast as a
3 power supplier for this facility; are you not?

4 MS. LILES: Mr. Floyd and Mr. Chairman, I
5 apologize. If I could just interject. We have had almost
6 all of Mr. Kronenberger's deposition literally read into
7 the record on this issue. Mr. Hodges was here when
8 Mr. Haswell read the part he wanted into the record. He
9 was here when our side read what we wanted into the
10 record. I don't know that there is a whole lot of need to
11 go back and forth on this. I certainly don't want to have
12 to go back and forth through the parts that we've already
13 had inserted into the record.

14 CHAIRMAN DEASON: The entire deposition is in
15 the record.

16 MS. LILES: I agree.

17 MR. FLOYD: If it's been gone over that many
18 times, then certainly Mr. Hodges should be aware of it.
19 And that's just what I'm asking.

20 Q (By Mr. Floyd) Are you aware that the
21 Department of Corrections approved Gulf Coast as the power
22 supplier, in addition to Washington County approving Gulf
23 Coast?

24 A I think I remember they accepted Washington
25 County's recommendation. There were some other things, if

1 I remember, in Mr. Kronenberger's deposition that he also
2 said that they always take the low-cost provider.

3 Q Mr. Hodges, he said if there are no other
4 factors to be considered, then they would always take the
5 lowest cost; didn't he?

6 MS. LILES: Again, the deposition is in the
7 record. It speaks for itself. You're characterizing one
8 portion of what he said. I don't see the point of this
9 line of questioning.

10 CHAIRMAN DEASON: Are you making an objection?

11 MS. LILES: Yes, in the interest of time, I am.
12 I think this has been thoroughly brought out. The record
13 speaks for itself.

14 MR. FLOYD: Mr. Chairman, I understand the
15 interest of time. But whenever the witness makes a
16 statement that's completely contrary to the testimony
17 that's already been entered, I feel compelled to be able
18 to bring it out. I'll move on, in the interest of time.

19 Q (By Mr. Floyd) Mr. Hodges, did Gulf Power ever
20 write a letter to Washington County requesting the
21 opportunity to serve the prison, to your knowledge?

22 A Mr. Bowden wrote a letter to the chairman of the
23 Washington County Commission in support of the prison.

24 Q That was after this suit was filed in response
25 to a question from the Washington County commissioner,

1 correct?

2 A I can get the exact timing and date on that
3 letter, but the -- we never felt like that Washington
4 County should be making that decision. We felt like the
5 customers should make that decision. That's the
6 Department of Corrections.

7 Q So you never -- other than this one that was
8 March 15th, 1994, or thereabouts after that -- before this
9 litigation started, y'all never wrote a letter to
10 Washington County saying, We want to serve it, we want to
11 provide the electric -- we want to provide the power to
12 it, anything like that, correct?

13 A Not to my knowledge. We wouldn't feel like it
14 was necessary to do that.

15 Q Okay, sir, and is it correct that as a result of
16 Gulf Power having -- serving other areas in which you have
17 correctional facilities located, that you're in contact
18 from time to time with the Department of Corrections?

19 A That's correct.

20 Q And as a result of having these and other areas
21 that you serve, you're familiar with the process of going
22 through and getting a prison located there and serving the
23 site and providing the temporary hookups; are you not?

24 A Yes, I am.

25 Q But you and Gulf Power didn't feel it necessary

1 or appropriate to go to see Mr. Kronenberger, Department
2 of Corrections, until July 30th, 1993; is that correct?

3 A I don't believe Mr. Kronenberger specifically.
4 I know there had been some talks with the project
5 manager. That's normally who we deal with in other prison
6 sitings.

7 Q That's not what Mr. Kronenberger said, was it?
8 He said in his deposition that he was the person that made
9 those decisions; didn't he?

10 COMMISSIONER CLARK: If I can interrupt a
11 minute. That again is in the deposition and I've read the
12 deposition and I think you can characterize it lots of
13 different ways.

14 MR. FLOYD: With that suggestion, I'll move on.

15 Q (By Mr. Floyd) Does Gulf Power have a
16 territorial agreement with anybody?

17 A No.

18 Q All right, sir, you mention that in response --
19 in your testimony, Page 9, Lines 3 through 5, you
20 mentioned that you, John Dougherty and Mr. Mallini went to
21 see the Chairman of the Washington County Commission
22 sometime in late March or early April 1994, in response to
23 a letter from the Washington County Board of County
24 Commissioners dated March 15th, 1994, correct?

25 A That's correct.

1 Q And that letter from the Board of County
2 Commissioners was to Mr. Travis Bowden of Gulf Power
3 Company, correct?

4 A Correct.

5 Q And that is the letter where -- well, let me ask
6 you this, would you read that letter for us, please?

7 MR. HASWELL: Mr. Chairman, that's part of
8 Exhibit No. 15, Bob Norris's exhibits. I think it's HN-5.

9 MS. LILES: I'm sorry, is that an exhibit that
10 has already been admitted that he's been asked to refer
11 to?

12 MR. HASWELL: Yes.

13 MS. LILES: What exhibit was that?

14 MR. HASWELL: Composite Exhibit 15. Those were
15 the exhibits attached to Mr. Norris's testimony, one of
16 them.

17 WITNESS HODGES: Regarding "Electrical service
18 to Washington Correctional Institute.

19 "Dear Mr. Bowden:

20 "The Washington County Board of County
21 Commissioners requests that Gulf Power withdraw its recent
22 complaint to the Public Service Commission concerning
23 Washington County's choice of Gulf Coast Electric
24 Cooperative, Incorporated to serve the new correctional
25 facility and adjacent site owned by Washington County.

1 "Washington County did not receive a proposal
2 from Gulf Power and has no record of any interest
3 expressed by you in assisting us with this rural
4 development project or to serve the property. Gulf Coast
5 Electric, as part of their rural development policy,
6 provided us with the opportunity to keep this project in
7 Washington County by making available the financial
8 assistance necessary to make purchase" -- I believe it
9 says, "of the property possible. Gulf Coast Electric
10 Cooperative, Incorporated already had lines over and
11 service to the property and is continuing to serve the
12 site.

13 "We simply wish to move forward with this
14 project without the uncertainty created by your
15 complaint."

16 Q All right, sir, Mr. Hodges, at that time, when
17 you went to visit with the chairman of the Board of County
18 Commissioners, you didn't know of anything that could
19 happen that would cause Washington County to lose the
20 prison site at that time, did you?

21 A No. I knew there were some nervous people in
22 Washington County, and I knew that someone had made them
23 nervous over the fact that Gulf Power may contest this
24 issue and for some reason made them believe that they were
25 going to lose those jobs.

1 Q But then again you had -- in fact isn't it
2 correct that you waited to challenge Gulf Coast until the
3 time that your competing with Gulf Coast for the service
4 would not create any danger to Washington County not being
5 able to purchase this property?

6 MR. STONE: Mr. Chairman, Mr. Floyd has asked
7 this question a number of times. I feel compelled to
8 object to it. The dispute was filed in September, 1993
9 after there was a duplication of facilities. With regard
10 to this perceived waiting, the waiting was until the
11 dispute was ripe; that is there was a duplication of
12 facilities. And we're now making reference to a letter
13 that was -- an exchange of letters and some meetings that
14 took place six months after we filed this complaint. It's
15 all in the record. I simply object to the repetitive
16 nature of this questioning and --

17 CHAIRMAN DEASON: Objection has been made.

18 MR. FLOYD: Mr. Chairman, one of the reasons I
19 interjected there was I didn't want Mr. Stone to be
20 testifying about it; and number two, I think that this
21 particular question has not been answered, and I wanted to
22 move through it because it's a reference to they not
23 having -- they did not want to create any danger to
24 Washington County by interrupting the financial assistance
25 until such time as that was secured and then they would go

1 in and start competing.

2 CHAIRMAN DEASON: Mr. Floyd, I sincerely believe
3 that you have covered that and this witness has addressed
4 it and I think the record is abundantly full.

5 MR. FLOYD: Thank you, sir.

6 Q (By Mr. Floyd) Mr. Hodges, did you ever contact
7 the Cooperative to advise that you were interested in
8 providing some type of financial assistance with them to
9 ensure the location of this prison?

10 A No.

11 Q I want to ask you to presume for this question,
12 as has been stated by Washington County in their letters,
13 that without the financial assistance provided by Gulf
14 Coast, Washington County would not be able to purchase the
15 property to locate the prison in Washington County. Now
16 the question: If Gulf Coast had not provided the grant of
17 \$45,000, and there was no contribution by anyone else,
18 would Gulf Power have stuck with this refusal to make such
19 a grant to Washington County to help them locate the
20 prison there?

21 A Presuming -- if I heard your question right,
22 presuming that Washington County could not raise the money
23 for the \$45,000 grant --

24 Q Yes, sir.

25 A -- would we have --

1 Q Made the grant of \$45,000?

2 A I think it would have to be on community-wide
3 basis. We would ask the entire community to support the
4 county in that effort.

5 Q So the answer is no, correct?

6 A The answer is no, not us giving a sole source
7 grant, no.

8 Q Mr. Hodges, you're going to be handed in a
9 second by Mr. Haswell, a document that is labeled "Company
10 Policy Statement, Gulf Power" with respect to economic
11 development and growth in the service area. I want to ask
12 you if that is your current policy as of this time?

13 A We don't have an economic development policy, so
14 to speak. We have a -- what we call a growth policy, sort
15 of -- it gets into community development.

16 Q Is this it?

17 A That is it.

18 MR. FLOYD: We would like to have that marked as
19 an exhibit for a late-filed exhibit.

20 CHAIRMAN DEASON: We'll identify it as Exhibit
21 No. 36.

22 (Exhibit No. 36 marked for identification.)

23 MR. FLOYD: We would like to have it moved into
24 the record.

25 CHAIRMAN DEASON: Have you finished your cross

1 examination?

2 MR. FLOYD: Yes, sir, I have.

3 CHAIRMAN DEASON: We'll move exhibits after all
4 cross examination has taken place. Ms. Brown?

5 MR. FLOYD: Thank you, Mr. Hodges.

6 CROSS EXAMINATION

7 BY MS. BROWN:

8 Q Mr. Hodges, I have one question, and
9 unfortunately it's a little bit on the chronology that
10 took place with Gulf Coast giving the grant to the prison
11 and when Gulf got involved in it. The only question that
12 I don't think has been answered yet is after you learned
13 that this project that Gulf Coast was pursuing, this
14 project with Washington County, did you ever inform Gulf
15 Coast that if the prison located in Washington County,
16 Gulf would seek to serve it?

17 A Let me first say that Gulf Power Company was
18 also pursuing this prison with John Dougherty's
19 involvement. I'm not sure -- I can't tell you if we ever
20 notified Gulf Coast Electric that we would also go after
21 the load. I think -- I can add more to that.

22 Q You had no -- you yourself had no -- or would
23 not have had any discussions or would not have been the
24 person know notify Gulf Coast that you intended to pursue
25 this if the prison located there?

1 A Not me personally, but I can tell you that being
2 a utility employee, I would presume that when Gulf Coast
3 was involved in selecting the site, that they could see
4 the fact that Gulf Power Company's three-phase lines were
5 already there, and I'm sure they knew we would pursue
6 serving the prison.

7 COMMISSIONER CLARK: Do you think Mr. Dougherty
8 told Gulf Coast that you were interested in it, too?

9 WITNESS HODGES: I feel sure he did.

10 COMMISSIONER CLARK: It seems to me you all
11 should talk to each other, and if there's a possibility of
12 a dispute try to avoid it.

13 WITNESS HODGES: Well, he -- as I said,
14 Mr. Dougherty was involved in helping the prison officials
15 find a site. Part of that selection process was finding
16 sites that had utility service already there, and this is
17 one of the sites that they selected, and then ultimately
18 finally selected. And there's no question in my mind that
19 John Dougherty made Gulf Coast aware that we certainly
20 were interested and were thrilled that that was the site
21 selected.

22 COMMISSIONER CLARK: While they're doing that,
23 Mr. Hodges, I would like you to look at an exhibit
24 attached to -- I think it's Mr. Norris's testimony. Look
25 at HN-4, if you would.

1 WITNESS HODGES: Okay, I have it.

2 COMMISSIONER CLARK: Suppose for me that there
3 was a development such as Leisure Lakes that went in
4 Section 16, and that would be four sections up from the
5 bottom. If you'll look four sections up from the bottom
6 and five from the right, Section 16.

7 WITNESS HODGES: I see it.

8 COMMISSIONER CLARK: Just suppose there was a
9 development like Leisure Lakes going in there. Would it
10 be Gulf Power's position that that would be load that they
11 were entitled to serve.

12 WITNESS HODGES: Only if we could serve it
13 cheaper than Gulf Coast could serve it.

14 COMMISSIONER CLARK: Okay.

15 Q (By Ms. Brown) Mr. Hodges, I just have one more
16 question --

17 COMMISSIONER CLARK: Let me just ask, when you
18 say cheaper, do you mean in terms of putting in the
19 facilities to build it, or do you mean in terms of putting
20 in the facilities and the rates to be charged thereafter?

21 WITNESS HODGES: Least incremental cost.

22 COMMISSIONER CLARK: Define that for me, please.

23 WITNESS HODGES: That is our facilities --
24 constructing our facilities off of our present
25 distribution or transmission lines.

1 COMMISSIONER CLARK: And you wouldn't look at
2 the ongoing rates that you would charge; you wouldn't
3 compare and say for a kilowatt hour from Gulf it's ten
4 cents and for a kilowatt hour from Gulf Coast it's 15
5 cents? You would not factor that into a decision?

6 WITNESS HODGES: We wouldn't, but I'm sure the
7 customer would.

8 COMMISSIONER CLARK: Well, who determines who
9 serves?

10 WITNESS HODGES: I'm sorry?

11 COMMISSIONER CLARK: Who determines who serves
12 that customer?

13 WITNESS HODGES: If it wasn't a dispute, the
14 customer would determine.

15 COMMISSIONER CLARK: Okay.

16 Q (By Ms. Brown) Mr. Hodges, you've been asked a
17 question about Page 14 of your deposition before, but I
18 just -- you weren't asked this and I need some
19 clarification on it. The statement you made was that, "We
20 are available to serve any customer that requests service
21 from us if it's a prudent decision, economic decision, and
22 it's not a complete duplication of service from an REA."
23 What do you mean by complete duplication of service?

24 A This prison dispute is a good example, I think.
25 The Co-op has a distribution line on the property, was

1 there currently, but they certainly didn't duplicate our
2 service. We had dual feed, three-phase line coming on
3 both sides of the prison property. That, I don't think,
4 was a duplication of service until the Co-op built their
5 4,000 feet of three-phase line; then, a duplication is
6 exactly that, in my mind.

7 Q So a complete duplication of service would be
8 establishing exactly the same lines to the same area that
9 the other utility already had lines to; is that what you
10 mean by complete duplication?

11 A Yes, and that would be uneconomical to do that.
12 If it was an uneconomical decision, then in my mind that's
13 complete duplication of services.

14 Q So taking Commissioner Clark's hypothetical of
15 the development that would go in at 16, block 16 on this
16 map, if that development started and one road was built
17 with four houses on it, and those customers came to you
18 and said, we want you to provide us service, would you --
19 do you think that if you built lines into that area, to
20 serve that area, that would be a complete duplication of
21 service?

22 A We would have to look at the total subdivision
23 and make that decision at that time.

24 Q Well, if you look at it in terms of this map and
25 you see that Gulf Coast has several distribution lines

1 around there, and you are not really in that area, but
2 they don't have specific distribution lines in this
3 potential new subdivision, if you crossed over that, would
4 you be completely duplicating that service or not, in your
5 mind?

6 A Well, again, I would have to know what the load
7 was --

8 Q I'm giving you the hypothetical that I would
9 like you to answer.

10 A You're saying there would be four -- only four
11 houses?

12 Q With the potential for buildout of the
13 development over time, like Leisure Lakes.

14 A Hypothetically, then, there could be quite a bit
15 of future load there that would require three-phase
16 service. The REA may not have three-phase service in that
17 area, and I wouldn't perceive it as complete duplication.
18 Again, if we -- we would not violate the rules and
19 regulations of the Public Service Commission and we
20 wouldn't want to go in there unless we feel like it was a
21 prudent decision for Gulf Power and the rest of our
22 customers.

23 Q Well, suppose --

24 COMMISSIONER CLARK: Mr. Chairman, may I
25 interrupt just a moment?

1 I am concerned about Mr. Hodges answering these
2 questions himself without assistance of counsel. I don't
3 think it's right for Mr. Dunn to get up, walk and talk to
4 you, and come back and whisper to the witness.

5 MS. LILES: Commissioner Clark, for the record,
6 I certainly did not tell Mr. Dunn anything to tell
7 Mr. Hodges, nor did he offer anything to me that was any
8 kind communication.

9 COMMISSIONER CLARK: I don't mind a witness
10 getting help, but I don't think it's appropriate for the
11 helper to get up, talk to you and sit back down and talk
12 to the witness.

13 MR. FLOYD: Mr. Chairman, in fact that is the
14 reason that I got up and moved down here because that's
15 been going on for some time, and I do want to object to
16 it.

17 CHAIRMAN DEASON: Objection is noted and I
18 believe that the counsel has been told of the Commission's
19 preference and it will not happen again.

20 Ms. Brown, you may continue.

21 Q (By Ms. Brown) I really hate to pursue it
22 because I know we're getting late, but just one more
23 question on this hypothetical. If the only service that
24 was needed to serve those four new customers in this new
25 development was single-phase service, if you built your

1 lines in there, would you consider that to be complete
2 duplication of service?

3 A No, I don't think so. And we wouldn't do it for
4 four customers.

5 Q You would?

6 A We wouldn't do it for four customers.

7 MS. BROWN: We have no further questions. Thank
8 you, Mr. Hodges.

9 COMMISSIONER CLARK: I would like to follow up.
10 If the prison were located in Section 16 and it requires
11 three phase, and the lines that the Co-op had down that
12 road were single phase, what would your position be?

13 WITNESS HODGES: If we could serve the prison at
14 less cost and we would -- and the prison wanted the lowest
15 cost service available, we would give it serious
16 consideration.

17 COMMISSIONER CLARK: Thank you.

18 CHAIRMAN DEASON: Ms. Liles, how extensive is
19 the redirect?

20 MS. LILES: I have two questions.

21 CHAIRMAN DEASON: Please proceed.

22 REDIRECT EXAMINATION

23 BY MS. LILES:

24 Q Mr. Hodges, did Gulf Coast Cooperative, to your
25 knowledge, contact Gulf Power Company before they built

1 their three-phase line up Highway 279 to serve the prison?

2 A No.

3 Q I would like to hand you a document that I would
4 like to ask the Commission to take official notice of. It
5 is a court case from the Supreme Court of Florida entitled
6 Escambia River Electric Cooperative, Inc. versus Florida
7 Public Service Commission it's reported at 421 Southern
8 Reporter, Second series, page 1384, decided on September
9 2, 1982.

10 Mr. Hodges if you will turn to the second page
11 of that document, Page 1385, and read the paragraph that
12 is approximately in the middle of the left column which is
13 indented, out loud, for the record.

14 MR. FLOYD: Mr. Chairman, in light of the
15 consistent objections on the length of time that I had
16 taken and the fact that this is a court case, like the
17 other statutes that have been mentioned, I think it would
18 be proper to just take judicial notice of it rather than
19 have the witness read through it.

20 MS. LILES: That's fine. I will withdraw that
21 request and I will follow up with a question. If the
22 witness will read that paragraph.

23 Q (By Ms. Liles) Have you read that paragraph,
24 Mr. Hodges?

25 A Yes.

1 Q Does that accurately state the position of Gulf
2 Power Company with respect to serving customers within its
3 territory?

4 A Yes, it does.

5 MS. LILES: Thank you. I have no further
6 questions.

7 CHAIRMAN DEASON: Commission will take
8 recognition of this citation. This is an order; is it?

9 MS. LILES: That was a final decision by the
10 Supreme Court of Florida that's reported in the Southern
11 Reporter system, sir.

12 CHAIRMAN DEASON: Very well. Exhibits?

13 MS. LILES: We would like to move Mr. Hodges'
14 exhibit attached to his prefiled testimony.

15 CHAIRMAN DEASON: That would be Exhibit 34
16 without objection. Exhibit 34 is admitted.

17 MR. FLOYD: We would like to -- are you
18 finished, Teresa? We would like to move in Exhibit
19 No. 35, the growth policy of Gulf Power that we had
20 identified, growth policy.

21 CHAIRMAN DEASON: The growth policy is Exhibit
22 36. Without objection Exhibit 36 is admitted.

23 MR. FLOYD: I think 35 is the deposition.

24 CHAIRMAN DEASON: Exhibit 35 is the deposition
25 of John Dougherty.

1 MR. FLOYD: We would like to move that one in
2 too.

3 MS. LILES: Mr. Chairman, I don't want to make a
4 big deal out of this. We referred to two pages out of
5 that entire deposition. I don't know that it's necessary
6 to clutter the record with it. Can we just agree to admit
7 those -- that excerpt?

8 CHAIRMAN DEASON: Mr. Floyd?

9 MR. FLOYD: Mr. Chairman, that's one of the ones
10 that was excluded before, and I was going to proffer it
11 anyway, like they had done --

12 MS. LILES: With withdraw the objection.

13 CHAIRMAN DEASON: You have no objection to the
14 entire deposition being entered into the record?

15 MS. LILES: No, I really don't want to take
16 anymore time arguing over this. We really don't have any
17 objection to it. We just thought it would be easier for
18 the purposes of the record.

19 CHAIRMAN DEASON: Staff have any objection?

20 MS. BROWN: We have no objection.

21 CHAIRMAN DEASON: Show Exhibit 35 as admitted in
22 its entirety. And we'll take a ten-minute recess at this
23 time.

24 (Exhibit Nos. 34, 35 and 36 received into
25 evidence.)

1 (Recess)

2 CHAIRMAN DEASON: Call the hearing back to
3 order. Mr. Stone, you may call your witness.

4 MR. STONE: Yes, sir, Mr. Chairman,
5 Mr. Weintritt has taken the stand. Of course he's
6 previously been sworn.

7 WILLIAM C. WEINTRITT
8 was called as a witness on behalf of Gulf Power Company,
9 and having been duly sworn, testified as follows:

10 DIRECT EXAMINATION

11 BY MR. STONE:

12 Q Mr. Weintritt, you prefiled some rebuttal
13 testimony in this case?

14 A Yes, I did.

15 Q Do you have any changes or corrections to your
16 prefiled rebuttal testimony?

17 A No, I don't.

18 Q If I were to ask you the questions contained in
19 your rebuttal testimony, would your responses be the same?

20 A They would.

21 MR. STONE: We would ask that Mr. Weintritt's
22 rebuttal testimony, consisting of eight numbered pages be
23 inserted into the record as though read.

24 CHAIRMAN DEASON: Without objection it will be
25 so inserted.

1 MR. STONE: Mr. Chairman, Mr. Weintritt had one
2 schedule attached to his rebuttal testimony. It was
3 Exhibit WCW-2. We would ask that it be assigned an
4 exhibit number.

5 CHAIRMAN DEASON: It will be identified as
6 Exhibit No. 37.

7 (Exhibit No. 37 marked for identification.)

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1 GULF POWER COMPANY
2 Before the Florida Public Service Commission
3 Rebuttal Testimony of
4 William C. Weintritt
5 Docket No. 930885-EU
6 Date of Filing June 3, 1994
7
8
9
10

11 Q. Please state your name and business address.

12 A. My name is William C. Weintritt, and my business
13 address is 1230 East 15th Street, Panama City, Florida
14 32405.

15

16 Q. Are you the same William C. Weintritt who prefiled
17 direct testimony in this docket on May 10, 1994?

18 A. Yes.

19

20 Q. Do you have an exhibit to which you will refer in your
21 testimony?

22 A. Yes.

23 Counsel: We ask that Mr. Weintritt's
24 exhibit, consisting of 1 schedule,
25 be marked for identification as
Exhibit 37 (WCW-2).

26

27 Q. What is the purpose of your rebuttal testimony?

28 A. My testimony will respond to the prefiled direct
29 testimony of Gulf Coast Electrical Cooperative, Inc.'s

1 ["the Coop"] witness William S. Dykes, specifically as
2 to Mr. Dykes' testimony concerns Gulf Power Company's
3 provision of electric service in the vicinity of the
4 disputed area, and the relative cost to Gulf Power of
5 providing service to the correctional facility at the
6 disputed area. I will also respond to the testimony of
7 Mr. Dykes and of Coop witness Jeff Parish, concerning
8 the relative reliability of Gulf Power's service. I
9 will also respond to the testimony of Archie Gordon
10 concerning the rate comparison between Gulf Power and
11 the Coop.

12
13 Q. Does Mr. Dykes disagree with your description of the
14 area in dispute as stated in your prefiled direct
15 testimony in this docket?

16 A. Apparently not. On page 2, lines 13-14, Mr. Dykes
17 describes the "disputed area" as being "the area lying
18 between County Road 279 and State Road 77 near their
19 intersection...". This corresponds with the site of
20 the correctional facility being built by the Department
21 of Corrections in south Washington County, which is the
22 description of the "disputed area" contained in my
23 prefiled direct testimony.

24
25 Q. How do you respond to Mr. Dykes' statement that the

1 Coop has maintained service at the site itself since
2 1950?

3 A. The statement is misleading and untrue. While the Coop
4 had a single phase line located on the disputed area,
5 prior to the Department of Corrections commencing
6 construction of the correctional facility there was no
7 customer at the site which the Coop could serve. The
8 State of Florida Department of Transportation traffic
9 signal located at the intersection of Highway 279 and
10 Highway 77 is, however, served by Gulf Power. Gulf
11 Power also serves residential and commercial customers
12 along these highways, both north and west of the
13 disputed area.

14

15 Q. On page 5, lines 11-12 and 13-14 of his direct
16 testimony, Mr. Dykes contends that, if Gulf Power were
17 awarded the right to serve the correctional facility,
18 then Gulf Power would have had to pay the Coop for
19 removal of the single phase line located on the
20 disputed area. Is this contention correct?

21 A. No. The location of the Red Sapp line to which Mr.
22 Dykes refers would not affect Gulf Power's ability to
23 provide service to the correctional facility. The only
24 impact of this existing line would be on the
25 construction plans of the Department of Corrections.

1 If the line had to be relocated in order to build the
2 correctional facility, the cost of relocation would be
3 a matter between the Coop and the Department, and would
4 not concern Gulf Power.

5

6 Q. What is the cost to the Coop of relocating the Red Sapp
7 Road line?

8 A. I don't know. On page 5, line 16 of his direct
9 testimony Mr. Dykes is asked the same question, but he
10 never provides the answer. Instead, he refers to the
11 cost differential of \$14,582.54 to "convert" a single
12 phase line to three phase. What he fails to provide is
13 the Coop's cost of removing the Red Sapp Road line and
14 the Coop's cost of constructing a new single phase line
15 at a different location to replace the Red Sapp Road
16 line. In a letter to the attorney for the Washington
17 County Commission, the Coop's General Manager,
18 H. W. Norris, stated that relocation costs would be
19 approximately \$42,000. A copy of that letter is
20 attached as Schedule 1 of my exhibit.

21

22 Q. On page 6, lines 15-17 Mr. Dykes also states that the
23 cost to Gulf of serving the correctional facility would
24 be the same as that to the Coop "except for the width
25 of CR 279". Do you agree?

1 A. Absolutely not. Unlike the Coop, Gulf Power has had an
2 existing three phase line along Highway 279 adjacent to
3 the correctional facility site since 1971. The cost of
4 the Coop's construction of approximately 4000 feet of
5 three phase line along the opposite side of Highway
6 279, parallel to Gulf Power's existing facilities, is
7 an additional cost Gulf Power would not have expended.
8 The Coop line is parallel to and uneconomically
9 duplicates our existing three phase facilities that
10 have been in place for 23 years. We are awaiting
11 responses to interrogatories addressing the cost of
12 this three phase extension to determine the Coop's
13 additional cost to provide service to the correctional
14 facility.

15

16 Q. Would Gulf Power have had to build totally new
17 temporary service as Mr. Dykes indicated on page 7 line
18 5?

19 A. No. Gulf Power has three phase primary distribution
20 lines on both Highway 77 and Highway 279 adjacent to
21 the correctional facility site. Temporary services
22 could have easily been made available from these
23 distribution lines at several locations.

24

25 Q. What response do you have to Mr. Dykes' and Mr.

1 Parish's testimony concerning the relative reliability
2 of Gulf Power and the Coop?

3 A. Both of the witnesses paint an untrue picture. For the
4 last several years, well before any plans for the
5 prison, Gulf Power has spent substantial dollars
6 upgrading the electrical reliability in the Vernon-
7 Sunny Hills area to improve customer service. Gulf
8 Power has three transmission lines which feed the area,
9 and the prison can be fed from two completely different
10 substations and two electrically separate distribution
11 lines.

12 While Mr. Parish propounds the advantages of being
13 able to switch the AEC substation source to either of
14 only two transmission sources, this is not the real
15 reliability issue. Lightning is the primary culprit
16 that will cause a transmission line to trip out, and
17 the line will almost always automatically come back
18 successfully. For example, over the last five years,
19 our main transmission line feeding the area has had 46
20 occasions where it tripped and immediately reclosed.
21 In only two instances did the outage last for 10
22 seconds or more. AEC's lines will be subject to the
23 same lightning in the area. Thus, transmission line
24 reliability is really not the issue.

25 The real issue is the distribution line

1 reliability. Gulf Power's system design at this
2 location is clearly superior to that of the Coop and
3 will provide significantly greater reliability.
4 If there is a problem with the Coop's lone distribution
5 line, the customer has no power until the line is
6 completely repaired. But Gulf Power can feed it from
7 two different substations powering two different
8 distribution feeders. Since most power outages are on
9 the distribution system rather than the transmission
10 system, Gulf Power has the decided advantage. Couple
11 this with our aggressive preventative maintenance
12 program and our commitment to our stated corporate goal
13 of customer satisfaction, and Gulf Power is the clear
14 choice on this issue. The high degree of integrity and
15 redundancy of our total transmission, substation, and
16 distribution systems will assure the customer the best
17 service. For Gulf Power, the Department of Corrections
18 back-up equipment constitutes a third, rather than a
19 second, level of reliable service.

20 Q. At page 12 of his testimony, Mr. Archie Gordon takes
21 issue with Gulf Power's rate comparison and indicates
22 that the differential is "only" \$10,097.76 per year.
23 Do you agree?

24 A. Gulf Power stands by its comparison, which utilized the
25 information contained in the Coop's tariff on file with

1 the Commission. Mr. Gordon does not take issue with
2 the methodology or the tariffs used by Gulf Power to
3 make its calculation, but includes an additional
4 component entitled "return of patronage capital", which
5 is not included in the Coop's tariff, to calculate the
6 Coop's rate. Gulf Power is attempting to obtain
7 through discovery the details necessary to make an
8 accurate comparison of the rates. Regardless of the
9 correct amount, be it \$10,000 or \$20,000, this is money
10 being spent needlessly by the taxpayers of the state.
11 It is also anticipated that as with similar
12 correctional facilities in the state, there will be
13 expansion of the facilities at this site. As the load
14 increases, so will the differential.

15

16 Q. Does this conclude your testimony?

17 A. Yes, with the proviso that we have not received the
18 Coop's responses to our discovery requests. Based on
19 those responses, I may need to supplement my testimony.

20

21

22

23

24

25

1 MR. STONE: Mr. Chairman, in the interest of
2 time, we would like to waive Mr. Weintritt's summary.
3 However, we have an exhibit that he has prepared that we
4 would like to distribute at this time that is directly
5 responsive to Exhibit 10.

6 MR. HASWELL: Is this the same exhibit that was
7 identified originally as 27?

8 MR. STONE: No.

9 CHAIRMAN DEASON: This will be identified as
10 Exhibit No. 38.

11 (Exhibit No. 38 marked for identification.)

12 MR. STONE: Mr. Chairman, in the interest of
13 time we have decided to waive a summary of Mr. Weintritt
14 unless the Commission would prefer that he make a
15 summary. However, we would like the opportunity to ask a
16 few questions with regard to this last exhibit we
17 distributed. It is responsive to an exhibit that was
18 handed out yesterday during the direct examination of
19 Mr. Gordon, and this is essentially our version of that
20 exhibit, and we would like to ask some questions of
21 Mr. Weintritt to get him to explain his exhibit and also
22 to explain the differences between it and Mr. Gordon's
23 exhibit.

24 MR. HASWELL: Mr. Chairman, I would object to
25 that. There is -- this is not responsive to any rebuttal

1 testimony addressed in Mr. Weintritt's testimony in which
2 he said that he will also respond to the testimony of
3 Archie Gordon concerning the rate comparison. They've had
4 the opportunity to do a distribution cost to serve an
5 exhibit just like we have. Asking him -- and then going
6 ahead and asking him questions is going beyond the scope
7 of what is rebuttal is already about. He wants to add
8 additional rebuttal testimony.

9 MR. STONE: Mr. Chairman, the testimony that we
10 are attempting to offer at this time is responsive to an
11 exhibit that had not been prefiled back in May when
12 Mr. Gordon submitted his testimony. Had it been prefiled
13 back in May when Mr. Gordon submitted his testimony,
14 Mr. Weintritt would have been able to respond to it in his
15 rebuttal testimony that was filed in June. Since we only
16 received that exhibit for the first time yesterday, it
17 seems to be a fundamental requirement of due process that
18 we be given an opportunity to respond to that exhibit in
19 our rebuttal testimony. That is the purpose of rebuttal
20 testimony. And to my knowledge this commission has never
21 denied a party the opportunity to submit rebuttal
22 testimony to matters that have come up for the first time
23 during the live presentation.

24 MR. HASWELL: Mr. Chairman, if that logic is
25 true, we could come up with rebuttal testimony on anything

1 of discovery that's occurred since then or anything
2 anybody has already prefiled. People are limited to what
3 is in their rebuttal testimony. Matter of fact, if nobody
4 asked Mr. Weintritt any questions, that's the end of the
5 case; he doesn't have the opportunity to add any
6 additional exhibits to his testimony that go beyond the
7 scope of what his testimony started with. None of this
8 was discussed in his rebuttal testimony.

9 CHAIRMAN DEASON: I am going to be quite frank
10 with the parties and explain the dilemma that I'm in, and
11 then I'm going to give you some opportunity to comment on
12 that and probably ask Mr. Pruitt for his advice.

13 When Exhibit 10 was first presented yesterday, I
14 know there was an objection raised, but the objection was
15 not that it was new. The objection was you disagreed with
16 it. And we made the determination that if you disagreed,
17 that's not the basis for an objection because you disagree
18 with what's in the exhibit, and we told you that you
19 could, in your brief describe whatever deficiencies you
20 found in that exhibit. That was the basis of your
21 objection. Had you objected that it was new, I would have
22 felt compelled, probably, to have sustained that
23 objection. That was not the basis of the objection.

24 Earlier by another witness you tried to get in
25 some information that you alleged would rebut Exhibit 10.

1 The objection was raised that it was new and that it was
2 not contemplated and was not part of that witness's
3 prefiled testimony, which we all know that is the custom
4 here at the Commission to prefile testimony. I had no
5 alternative, in my opinion, but to sustain that
6 objection. And that objection was sustained and that
7 exhibit was not admitted.

8 However, I do think that Exhibit 10 is new
9 information that was not part of a witness's prefiled
10 testimony. That objection on that grounds was not
11 raised. That -- the exhibit was admitted. I do think
12 that to some extent perhaps Gulf Power is at some
13 disadvantage, but the other way of looking at it is that
14 you allowed that exhibit to go in; you did not object to
15 it on the grounds that I would have sustained as being
16 appropriate grounds to prevent its admission. That is the
17 very unique circumstance I find myself in.

18 Now if you have any comments upon my
19 observation, I would welcome that and I'm then probably
20 going to seek some advice from Mr. Pruitt.

21 MS. LILES: Mr. Chairman, very respectfully, I
22 don't mean to go argumentative or to prolong this. I
23 believe I did object to Exhibit 10 on the grounds that it
24 was new, that it had not been listed in the prehearing
25 statement, that it had not been identified previously,

1 that we had not seen the information before, and had had
2 no opportunity to evaluate it. I think the response from
3 the Cooperative was, just because you don't agree with the
4 exhibit does not mean that you cannot get it in.

5 My objections were twofold: One, that it had
6 not been listed as a -- an exhibit to his prefiled direct
7 testimony; and two, that it was not what it purported to
8 be, and we had not had an opportunity through discovery to
9 point that out and were being taken by surprise. I
10 apologize if I didn't make that point as clearly as I
11 thought I had, but --

12 CHAIRMAN DEASON: I may be mistaken. Maybe you
13 did raise that objection.

14 MS. LILES: We did believe that the record would
15 refute what was in that exhibit, but we would obviously
16 also like the opportunity to reciprocate and address
17 issues that are in fact discussed in Mr. Weintritt's
18 testimony, his rebuttal testimony. On Page 2, beginning
19 on Line 4, he says he is going to address the relative
20 cost to Gulf Power of providing service to the
21 correctional facility, and we think this is just an
22 exhibit which expands on that point, similar to the
23 late-filed exhibit that Mr. Parish was allowed to
24 introduce today.

25 Again, I don't mean to prolong this already very

1 lengthy proceeding, but in all fairness, we feel incumbent
2 that we be allowed to introduce this exhibit for
3 discussion purposes.

4 CHAIRMAN DEASON: Mr. Haswell?

5 MR. HASWELL: The problem I see is that unless
6 there is some redirect testimony here, number one, there's
7 no opportunity for them to even discuss this as a vehicle
8 to get it in, even be identified as an exhibit by this
9 witness.

10 Another thing, I think Ms. Liles
11 mischaracterizes what we did. We've already had an
12 objection raised and an exhibit presented that the
13 objection was overruled. And it was our position and it
14 continues to be that none of the figures in that exhibit
15 were a surprise to Gulf Power. They had already been
16 disclosed through discovery. They just didn't like the
17 way we listed them on the exhibit and for that reason,
18 while the witness was there, we -- and had testified to
19 all the matters and facts on it, it got in.

20 CHAIRMAN DEASON: Let me ask this question of
21 counsel for Gulf Power, are the numbers that are contained
22 in what has been identified as Exhibit 38, numbers that
23 can be ascertained from matters that have already been
24 entered into the record and it's a matter of presentation
25 and calculation of those numbers?

1 MR. STONE: They are matters that have been
2 revealed to both sides through discovery, whether or not
3 the individual discovery items covering each of these
4 items have all been admitted into the record, I would have
5 to do an inspection to determine. We certainly would have
6 no objection to those items from which these numbers were
7 all derived to be inserted into the record.

8 MR. HASWELL: That kind of parallels my view
9 about why don't we just stipulate these interrogatory
10 questions and answers into the record.

11 Matter of fact, we're prepared to waive any
12 objection to this exhibit if Gulf Power will stipulate to
13 the interrogatories I previously asked to be introduced.
14 Then all of the information that was used --

15 MR. STONE: In the interest of time, we'll so
16 stipulate.

17 CHAIRMAN DEASON: Great.

18 Mr. Haswell, you need to once again identify for
19 the record all of the interrogatories and discovery items,
20 production of documents, et cetera, which you wish to have
21 admitted.

22 Also going to give Staff an opportunity to see
23 whether they object or not because they have standing as
24 well to make an objection. If there is no objection and
25 all of that matter is agreed to be entered into the

1 record, then I think that we have agreement that Exhibit
2 38 can also be admitted, but I also believe that Gulf
3 Power wants to ask some questions concerning Exhibit 38,
4 or do you wish to just have it admitted into the record?

5 MR. STONE: Mr. Chairman, my reason for raising
6 the question being able to ask the questions was this
7 would be supplemental rebuttal testimony. It was not
8 meant to be redirect rebuttal testimony. It was to be
9 able to allow other parties to cross examine him on the
10 same subject matter. On the other hand, if what
11 Mr. Haswell is trying to tell us is he has no cross
12 examination for Mr. Weintritt and that therefore that the
13 only way I would be able to ask these questions would be
14 as redirect, if he's willing to waive cross examination,
15 we'll waive further direct examination.

16 MR. HASWELL: We'll do that.

17 CHAIRMAN DEASON: Very well, please identify the
18 discovery matters which you wish to have inserted into the
19 record or admitted into the record as evidence.

20 MR. HASWELL: In fact, I eliminated one set of
21 them. Staff's second interrogatories to Gulf Power and
22 answers.

23 CHAIRMAN DEASON: Staff's Second Set to Gulf
24 Power in its entirety?

25 MR. HASWELL: Yes, sir.

1 CHAIRMAN DEASON: Let me identify that. That
2 will be identified as Exhibit No. 39.

3 MR. HASWELL: And next would be Staff's second
4 interrogatories to Gulf Coast and the answers.

5 CHAIRMAN DEASON: That will be Exhibit No. 40.

6 MR. HASWELL: And then Staff's first
7 interrogatories to Gulf Coast.

8 CHAIRMAN DEASON: Exhibit 41.

9 MR. HASWELL: And Gulf Coast's third
10 interrogatories to Gulf Power.

11 CHAIRMAN DEASON: Gulf Coast's Third Set to Gulf
12 Power will be identified as Exhibit 42.

13 MR. STONE: Is that the entire set of Gulf
14 Coast's Third Set of Interrogatories?

15 MR. HASWELL: I thought that's what we agreed
16 on.

17 MR. STONE: I wanted to make sure I understood.
18 If I may have a moment, I think there may be some others I
19 would like to have admitted if that concludes
20 Mr. Haswell's list.

21 MR. HASWELL: Yes, sir.

22 CHAIRMAN DEASON: You may have an opportunity to
23 review that. (Pause)

24 MR. STONE: At the same time that Gulf Coast
25 submitted their Third Set of Interrogatories to Gulf Power

1 Company, I believe it was at the same time, they also
2 submitted a request for production of documents. I may be
3 mistaken as to whether or not it's at the same time, but
4 in any event, we would like to supplement the list
5 Mr. Haswell provided and provide Gulf Power Company's
6 response to Gulf Coast's Electric Cooperative's request
7 for Production of Documents. The response is dated
8 October 10, 1994, and we would like to submit the entire
9 set. In lieu of that great volume, we would submit Item
10 No. 8 to that.

11 MR. HASWELL: I have no objection to No. 8.
12 However, I would object to anything else because we
13 haven't had a chance to review those documents.

14 MR. STONE: For the record, Item No. 8 is what
15 was previously identified at Exhibit 27, the one that
16 Mr. Haswell objected to.

17 CHAIRMAN DEASON: Okay, and that objection, I
18 take it, is now being withdrawn?

19 MR. HASWELL: Yes.

20 CHAIRMAN DEASON: Does Staff have objections to
21 any of these matters that have been identified?

22 MS. BROWN: We do not, but we have one request.
23 We are not certain that we have received everything that
24 Gulf Power provided to Gulf Coast in their Third Set of
25 Interrogatory Responses, and if we could have the parties'

1 assurance that when we go back and look to see what we
2 have, if we find that we're missing something in that set,
3 they would be willing to provide it to us at our request.
4 Never mind, we have no objection.

5 CHAIRMAN DEASON: Any objection to Staff's
6 request?

7 MR. HASWELL: Mr. Chairman, I would hope that,
8 and we will make the commitment that if anybody is missing
9 a document that's either been identified as an exhibit or
10 discovery item that needs to be reviewed, we'll make every
11 effort to share that with everybody and sufficient
12 copies. I'm sure Mr. Stone will do the same thing.

13 MR. STONE: May we also identify as an exhibit
14 Gulf Power's Company's Response to Gulf Coast Electric
15 Cooperative's First Request for Production of Documents,
16 Item No. 7, and Gulf Power's response was dated May 26th,
17 1994?

18 CHAIRMAN DEASON: Hold on just a second. Let's
19 identify it first. I didn't get it. Repeat what you
20 said, please.

21 MR. STONE: It is Gulf Power Company's Response
22 to Gulf Coast Electric Cooperative's First Request for
23 Production of Documents, Item No. 7. And the date of our
24 response is May 26th, 1994.

25 MR. HASWELL: I have a little bit of a problem

1 with getting into blanket production of documents. See,
2 the interrogatories, Mr. Chairman, are sworn to by a
3 representative of the Company. That gives us some
4 assurance that they -- some accuracy to them and they're
5 standing behind them. I have not had a chance to review
6 the stack of documents --

7 CHAIRMAN DEASON: I think he's indicated Item
8 No. 7 from that production of documents.

9 MR. HASWELL: Can I see it?

10 MR. STONE: We're going to have to make copies
11 of it. (Pause)

12 MR. HASWELL: I've got a problem with this,
13 Mr. Chairman, because although we have these documents, we
14 have not had a chance to review them, either by deposition
15 or witness certifying that what these documents
16 represent --

17 MR. STONE: Mr. Chairman, Mr. Haswell asked
18 Mr. Weintritt about some of those work orders that are
19 attached as a response to that item during the course of
20 his deposition. They've had those since May 26th.

21 MR. HASWELL: I understand that, but they're --
22 I do not understand these have been prepared by
23 Mr. Weintritt.

24 CHAIRMAN DEASON: Very well. There's an
25 objection made to that particular item which has not yet

1 been identified, and I am not prepared at this point to
2 have it admitted unless it is being specifically sponsored
3 by a witness and is being subject to cross examination and
4 that opportunity apparently does not present itself,
5 therefore that matter will not be admitted. But I do have
6 that Exhibit 27, 38 through 42 have been admitted.

7 Is Mr. Weintritt subject to cross examination at
8 this point?

9 (Exhibit Nos. 27, 38, 39, 40, 41 and 42 received
10 into evidence.)

11 MS. BROWN: Mr. Chairman, are you sure that Gulf
12 Power's Response to Gulf Coast Production of Documents
13 No. 8 is not No. 43 and has been identified?

14 CHAIRMAN DEASON: No, it was identified as 27.

15 MS. BROWN: Oh, it's 27, I'm sorry.

16 CHAIRMAN DEASON: Staff have questions for
17 Mr. Weintritt?

18 MS. BROWN: Yes, we have very short questions
19 for Mr. Weintritt.

20 CROSS EXAMINATION

21 BY MS. BROWN:

22 Q Mr. Weintritt, Staff's -- the exhibit that has
23 been identified as Exhibit No. 7 has come under some
24 scrutiny earlier. Do you have that?

25 A I do not. I need a copy. (Pause)

1 Q You see the title "Gulf Power Monthly Customer
2 Bill Estimate" there?

3 A Yes.

4 Q Those charges that are identified, the figures
5 that are identified underneath that title, are those the
6 same figures that are included in your direct testimony?

7 A I don't have a copy of my direct testimony up
8 here, but I don't think they are.

9 Q You don't think they are?

10 A Let me look at it.

11 Q What is the difference?

12 A The customer charge is the same. The demand
13 charge is the same. The energy charge is the same. Fuel
14 charge has changed. ECCR has changed. EPCC has changed.
15 ECRC has been added.

16 Q Can you explain the difference between these two
17 figures, the one that's in your testimony and the one
18 that's on Staff's Exhibit 7?

19 A Can I explain the difference?

20 Q I mean I can help you if you can't.

21 A I'm not a rate expert. As I said in my direct
22 testimony, this was prepared by a market -- I don't know
23 if I said a marketing rep, it was. And the difference I
24 see is roughly a year and a half in time.

25 Q Would you agree that these are Gulf Power's

1 current rates that are reflected on Staff's exhibit and
2 the charges that are in your testimony are for earlier
3 periods before certain of these clauses were changed in
4 recent proceedings in August?

5 A I would agree that the --

6 Q Effective October 1?

7 A I don't have a reason to disagree with you.

8 Q Okay, fine. Thank you. We have no further
9 questions.

10 CHAIRMAN DEASON: Commissioners? Redirect?

11 MR. HASWELL: I thought we just waived cross,
12 they waived redirect.

13 CHAIRMAN DEASON: They waived redirect because
14 you had no cross, but he has the right to conduct redirect
15 for the cross that Staff conducted.

16 MR. STONE: Briefly.

17 REDIRECT EXAMINATION

18 BY MR. STONE:

19 Q Mr. Weintritt, on Exhibit 7, there are current
20 charges with regard to Gulf Coast Electric Cooperative;
21 are there not?

22 A There are charges shown on here, yes, there are.

23 Q You've heard the earlier testimony of Mr. Gordon
24 with regard to his average -- his use of the average

25 C.O.P.S.A. --

1 MS. BROWN: Mr. Chairman, if I might interject,
2 I simply asked one question about the charges reflected in
3 this exhibit with respect to Gulf Power. I asked no
4 questions about Gulf Coast's numbers.

5 CHAIRMAN DEASON: Mr. Stone.

6 MR. HASWELL: She didn't mention anything either
7 about Mr. Gordon.

8 MR. STONE: She asked about the exhibit. I was
9 asking about the exhibit.

10 CHAIRMAN DEASON: I'm going to sustain the
11 objection. The question is outside the scope of cross
12 examination, not appropriate for redirect.

13 MR. STONE: No further questions.

14 CHAIRMAN DEASON: Exhibits? I think we've
15 addressed all the exhibits except perhaps --

16 MS. BROWN: Staff needs to move Exhibit 7.

17 CHAIRMAN DEASON: Without objection. Exhibit 7
18 is admitted.

19 (Exhibit No. 7 received into evidence.)

20 CHAIRMAN DEASON: Anything else to come before
21 the Commission?

22 MR. HASWELL: Could we have a review of the
23 CASR, when the transcript might be ready, and --

24 MS. BROWN: I was just getting it out and I have
25 to wear these glasses to read it. The transcripts are due

1 November 3rd. Briefs are due November 21st. Staff
2 recommendation December 8th for the December 20th agenda.
3 Standard order to be issued January 9th.

4 MR. STONE: I apologize, but I don't know when
5 Thanksgiving is this year.

6 COMMISSIONER CLARK: 24th of November.

7 MR. STONE: Thank you.

8 MR. HASWELL: That's an incentive, right?

9 CHAIRMAN DEASON: Anything else? Hearing
10 nothing, this hearing is adjourned. Thank you all.

11 MR. HASWELL: Thank you.

12 (Hearing concluded at 6:45 p.m.)

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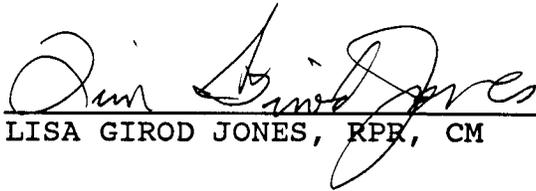
CERTIFICATE

STATE OF FLORIDA
COUNTY OF LEON

I, LISA GIROD JONES, Registered Professional Reporter, certify that I was authorized to and did stenographically report the foregoing proceedings; and that the transcript is a true record.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED THIS 31st DAY OF October, 1994.


LISA GIROD JONES, RPR, CM

STATE OF FLORIDA
COUNTY OF LEON

The foregoing certificate was acknowledged before me

this 31st day of October 1994, by Lisa Girod Jones, who is personally known to me.


NOTARY PUBLIC, State of Florida
at Large Notary Public, State of Florida
My Commission Expires April 20, 1995
Bonded Thru Troy Fain - Insurance Inc.

CC 90785

STATE OF FLORIDA
DEPARTMENT OF CORRECTIONS

INTEROFFICE MEMORANDUM

FILED

SID J. WHITE

OCT 24 1995

CLERK, SUPREME COURT

By _____
Chief Deputy Clerk

DATE: May 21, 1993

FROM: Alan Kellum

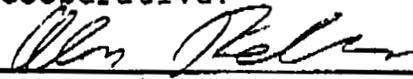
TO: David Scott, Professional Engineer Administrator

RE: Washington Correctional Institution - Permits
(Electrical Rate Comparison)

In trying to obtain their correct rate schedule for large power loads, I attempted to contact Stan Sexton of Gulf Power Company. Mr. Sexton has since called and asked for actual load data from a similar institution with a work camp. He has asked to prepare another estimated bill with this data. I have obtained this information from Madison C.I. for the past ten months. A load summary and the calculated bills for each month are attached. I have also attached a monthly bill estimate using a range of demands at the approximate load factor of Madison C.I.

Using data from Madison C.I., Gulf Power is from 7% to 13% lower than Gulf Coast Electric Cooperative when capital credits are not considered. The two companies are within 4% when capital credits are included. Gulf Coast is lower than Gulf Power during three of these months.

Should this load information be released to Gulf Power Company? If so, should we also send a copy to Gulf Coast Electric Cooperative?



OPS Engineer I

attachment

ARK:akk

REF: \kea\memos\washele2.ark

92,479

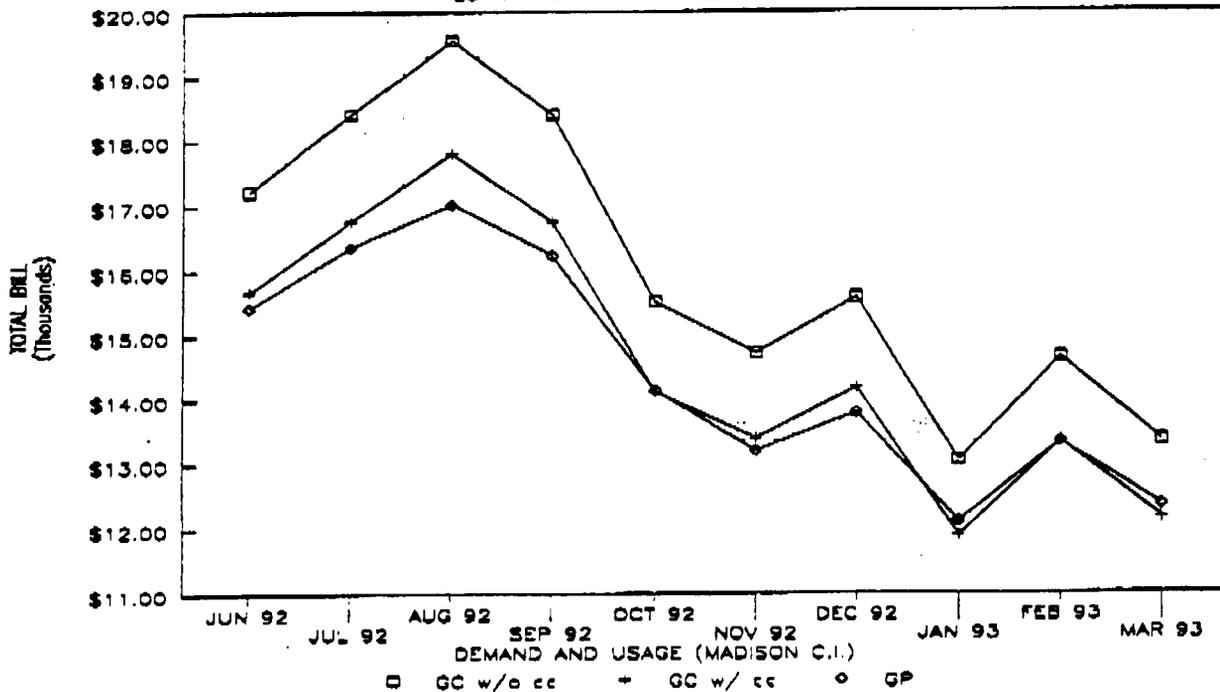
SEARCHED _____
SERIALIZED _____
INDEXED _____
FILED _____
OCT 24 1995
FBI - TAMPA
10-19-94

RECEIVED

ESTIMATED MONTHLY ELECTRIC BILL FOR WASHINGTON C.I.
 using metered loads from Madison C.I.

	<u>DEMAND</u> <u>KW</u>	<u>ENERGY</u> <u>KWH</u>	<u>GULF COAST E.C.</u> not including <u>capital credits</u>	<u>GULF COAST E.C.</u> including 9 % <u>capital credits</u>	<u>GULF POWER</u>
JUN 92	840	298800	\$17,219.90	\$15,670.11	\$15,432.14
JUL 92	876	321300	\$18,414.36	\$16,757.06	\$16,357.33
AUG 92	870	345900	\$19,551.58	\$17,791.92	\$17,003.08
SEP 92	855	322800	\$18,406.94	\$16,750.31	\$16,230.31
OCT 92	792	266400	\$15,514.16	\$14,117.89	\$14,130.83
NOV 92	714	255600	\$14,714.95	\$13,390.60	\$13,197.08
DEC 92	726	273000	\$15,579.74	\$14,177.56	\$13,784.82
JAN 93	696	221700	\$13,050.11	\$11,875.60	\$12,095.38
FEB 93	744	252000	\$14,656.86	\$13,337.74	\$13,337.43
MAR 93	708	227100	\$13,349.28	\$12,147.84	\$12,344.52
AVERAGE	782	278460	\$16,045.78	\$14,601.66	\$14,391.29

WASHINGTON CORRECTIONAL INSTITUTION
 ESTIMATED ELECTRIC SERVICE COSTS



ESTIMATED MONTHLY ELECTRIC BILL
assuming 50% load factor

<u>DEMAND</u> <u>KW</u>	<u>ENERGY</u> <u>KWH</u>	<u>GULF COAST E.C.</u> not including <u>capital credits</u>	<u>GULF COAST E.C.</u> Including 9 % <u>capital credits</u>	<u>GULF POWER</u>
400	144000	\$8,286.60	\$7,540.81	\$6,862.75
450	162000	\$9,321.03	\$8,482.14	\$7,715.55
500	180000	\$10,355.46	\$9,423.47	\$8,568.35
550	198000	\$11,389.89	\$10,364.80	\$10,249.25
600	216000	\$12,424.32	\$11,306.13	\$11,160.37
650	234000	\$13,458.75	\$12,247.46	\$12,071.48
700	252000	\$14,493.18	\$13,188.79	\$12,982.60
750	270000	\$15,527.61	\$14,130.13	\$13,893.71
800	288000	\$16,562.04	\$15,071.46	\$14,804.83
850	306000	\$17,596.47	\$16,012.79	\$15,715.95
900	324000	\$18,630.90	\$16,954.12	\$16,627.06

STATE OF FLORIDA
DEPARTMENT OF CORRECTIONS

INTEROFFICE MEMORANDUM

DATE: May 17, 1993

FROM: Alan R. Kellum

TO: David Scott, Professional Engineer Administrator

RE: Washington Correctional Institution - Permits
(Electrical Rate Comparison)

There are two possible power suppliers to the proposed site of the new Washington C.I., Gulf Power Company and Gulf Coast Electric Cooperative. Both utilities apparently have ample facilities to provide reliable power to the institution. Based on rate structures provided by the two companies, I have calculated estimated bills for a range of loads (see attachments). Gulf Power Company consistently has a lower bill. However, as a member of Gulf Coast Electric Cooperative, the Department will earn capital credits (Currently 9% of annual patronage paid on a fourteen year cycle). With the inclusion of these capital credits, Gulf Power is approximately 6% to 10% lower than Gulf Coast for the expected load (600 to 700KV). Without considering the capital credits, Gulf Power is approximately 14% to 18% lower than Gulf Coast for the same load.

Gulf Coast Electric Cooperative has been working with Washington County in an effort to procure the site. Gulf Coast has promised to donate from \$45,000 to \$75,000 to the county to aid in purchasing the land for the institution. They are also working, at their own expense, on behalf of the county to secure an interest free loan for \$308,000 from the Rural Electrification Administration. I am not aware of any efforts by Gulf Power to aid in the location of the institution. Additionally, Gulf Coast currently has power lines running across the site. If another company is chosen as supplier, the Department may be required to reimburse Gulf Coast for the cost of relocating the lines.


OPS Engineer I

attachment

ARK:akk

REF: \kea\memos\washelec.ark

ESTIMATED MONTHLY ELECTRIC BILL
assuming 60% load factor

DEMAND <u>KW</u>	ENERGY <u>KWH</u>	GULF COAST E.C. not including <u>capital credits</u>	GULF COAST E.C. including 9 % <u>capital credits</u>	<u>GULF POWER</u>
350	151200	\$8,439.97	\$7,680.37	\$6,913.59
400	172800	\$9,644.09	\$8,776.12	\$7,895.48
450	194400	\$10,848.20	\$9,871.87	\$8,877.37
500	216000	\$12,052.32	\$10,967.61	\$9,859.26
550	237600	\$13,256.44	\$12,063.36	\$11,368.94
600	259200	\$14,460.55	\$13,159.10	\$12,381.85
650	280800	\$15,664.67	\$14,254.85	\$13,394.75
700	302400	\$16,868.78	\$15,350.59	\$14,407.66
750	324000	\$18,072.90	\$16,446.34	\$15,420.57

\$ 8052

assuming 70% load factor

DEMAND <u>KW</u>	ENERGY <u>KWH</u>	GULF COAST E.C. not including <u>capital credits</u>	GULF COAST E.C. including 9 % <u>capital credits</u>	<u>GULF POWER</u>
350	176400	\$9,627.77	\$8,761.27	\$7,816.00
400	201600	\$11,001.58	\$10,011.43	\$8,926.81
450	226800	\$12,375.38	\$11,261.59	\$10,037.61
500	252000	\$13,749.18	\$12,511.75	\$11,148.42
550	277200	\$15,122.98	\$13,761.91	\$12,486.32
600	302400	\$16,496.78	\$15,012.07	\$13,600.81
650	327600	\$17,870.59	\$16,262.23	\$14,715.30
700	352800	\$19,244.39	\$17,512.39	\$15,829.78
750	378000	\$20,618.19	\$18,762.55	\$16,944.27

0 257

WASHINGTON C.I. ELECTRIC RATES

	GULF COAST LP <u>>50 KW</u>	GULF POWER GD <u>50 to 500 KW</u>	GULF POWER LP <u>>500 KW</u>
Customer Charge \$	12.00	40.35	226.98
Primary Discount - Cust.	7.00%	0.00%	0.00%
Demand Charge \$/KW	4.00	4.56	8.57
Primary Discount - Dem.	7.00%	1.00%	1.00%
Addl. Dem. Discount \$/KW	0	0.35	0.42
Energy Charge \$/KWH	0.0495	0.013	0.00533
Primary Discount - Energy	7.00%	1.00%	1.00%
Fuel charge \$/KWH	0.0011	0.02243	0.02243
ECCR Charge \$/KWH	0	0.00015	0.00015
PPCC Charge \$/KWH	0	0.00036	0.00036
TOTAL CHARGE - DEMAND \$/KW	3.72	4.1679	8.0685
TOTAL CHARGE - ENERGY \$/KWH	0.047135	0.035810	0.028217

200 East 10th Street
Post Office Box 2448
Panama City FL 32402
Telephone 904 785-4611

Florida Public Service Commission
Docket No. 930885-EU
GULF POWER COMPANY
Witness: W. C. Weinert
Exhibit No. _____ (WCW-1)
Schedule I
Page 1 of 5



the southern electric system

April 9, 1993

Mr. Marvin Moran
Florida Dept. of Corrections
2601 Blainstone Rd.
Tallahassee FL 32399-25500

Dear Mr. Moran:

After several telephone conversations between Brian Blair and my staff, Mr. Blair indicated future communications concerning the new Washington Co. correctional facility be addressed to you. According to Mr. Blair, the facility will be located at the northwest corner of Highway 77 and Highway 279 (Greenhead FL).

Gulf Power Company is pleased to submit the following proposal for electrical service for the new prison. It is Gulf's understanding this facility is similar to the Holmes correctional facility which is now being served by Gulf Power. In an effort to make realistic electrical recommendations for the Washington Co. prison, we have used actual metered data from the Holmes Co. facility. Since the two prisons are similar, our initial estimates (372 KW and 163,450 KWH/month) should be the most accurate information available.

The estimated monthly billing for electric service from Gulf Power is \$7,442.66; from Gulf Coast Electric it is estimated at \$9,361.58. The net result of receiving service from Gulf Power is our annual reduction of \$23,027.04 in the prison's electric bill (Attachment I).

The Washington Co. prison site is strategically located such that Gulf Power has facilities in place to provide independent alternate electrical service. Gulf's normal service will be from the Sunny Hills 115/25 KV substation. Backup power is available from Gulf's Vernon 115/25 KV substation. Since the prison site is between these substations, it is unlikely a single problem can render both inoperative. The substations are fed from multiple 115,000 volt transmission sources with the capability for switching operations, and these substations contain independent power transformers. The existing 25,000 volt distribution line between the two stations completes the system which can provide complete backup power to the prison. This electrical transmission and distribution system is similar to the one serving the Holmes correctional facility. I have enclosed an electrical single-line diagram for your review (Attachment II). Research through our computerized Distribution Trouble Reporting System shows that there have been only a few outages in the past two years (Attachment III).

"Our business is customer satisfaction"

DOCUMENT NUMBER-DATE

04497 MAY 10 85

FPSC-RECORDS/REPORTING

Mr. Marvin Moran
Florida Dept. of Corrections
Pg. 2 - April 9, 1993

I hope that I have provided the information you need concerning Gulf Power's ability to provide reliable, low-cost electric service to the Washington Co. correctional facility. If you have additional questions, please do not hesitate to call me at 904-872-3201 or Stan Sexton at 904-872-3276.

Sincerely,

Vic L. Jones
General Manager of Eastern Division

VLJ:sd

Attachments

ATTACHMENT I

**ESTIMATED ELECTRICAL LOAD
 FOR PROPOSED STATE PRISON
 IN WASHINGTON COUNTY**

Based on conversations with Department of Corrections officials, estimates indicate that the proposed Washington County facility would use 372 KW demand and 163,450 KWH/month. It is also our understanding that primary service (12 KV) will be requested.

ESTIMATED MONTHLY BILL

Gulf Coast Electric Co-op

\$12.00 customer charge
 \$4.00/KW demand charge
 \$0.04950/KWH energy charge
 \$0.00270/KWH fuel charge

Discount 7% of demand
 charge for primary voltage
 Discount 7% of energy charge
 for primary voltage

TOTAL ESTIMATED MONTHLY BILL:

\$9,361.58

Gulf Power Company

\$40.35 customer charge
 \$4.56/KW demand charge
 \$0.01300/KWH energy charge
 \$0.02243/KWH fuel charge
 \$0.00015/KWH ECCR charge
 \$0.00036/KWH FPCC charge

Discount 35¢/KW for primary
 voltage
 Discount 1% of demand charge
 for primary voltage
 Discount 1% of energy charge
 for primary voltage

TOTAL ESTIMATED MONTHLY BILL:

\$7,442.66

\$9,361.58

-7,442.66

\$1,918.92 monthly difference
 x 12 months

\$23,027.04 = yearly savings

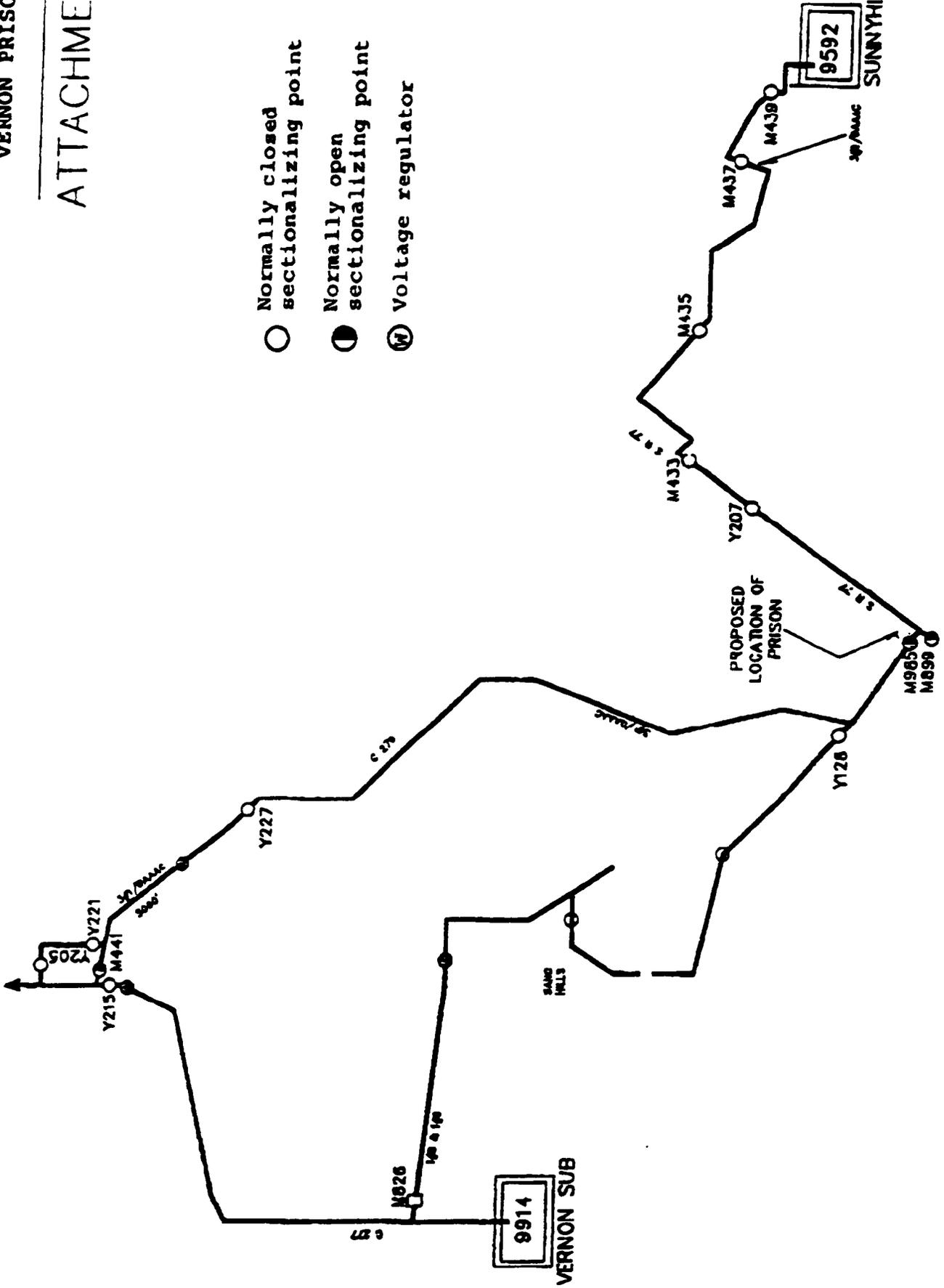
Gulf Coast Electric Co-op's bill is 21% higher than Gulf Power Company's bill.

SINGLE-LINE DIAGRAM
OF PROPOSED
VERNON PRISON

ATTACHMENT

- Normally closed sectionalizing point
- Normally open sectionalizing point
- Ⓜ Voltage regulator

TO BONIFAY SUB



ATTACHMENT III

DISTRIBUTION TROUBLE REPORTING SYSTEM

<u>Device</u>	<u>Date</u>	<u>Duration of Outage (Minutes)</u>	<u>Cause</u>
Vernon	None since 1990	N/A	N/A
Sunny Hills	06/28/90	70	Tree on line in wind storm
Sunny Hills	08/06/91	45	Lightning
Sunny Hills	08/27/92	58	Rain bands on edge of Hurricane Andrew
Sunny Hills	02/22/93	79	Lightning, reclosing device failed
Sunny Hills	03/14/93	132	The "Blizzard of 1993"

Note that at no time were both Vernon and Sunny Hills out. The load between the stations can be transferred which limits the duration of any outage.

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF BAY)

Docket No. 930885-EU

Before me the undersigned authority, personally appeared William C. Weintritt, who being first duly sworn, deposes, and says that he is the Power Delivery Manager of the Panama City District 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.

William C. Weintritt

William C. Weintritt
Power Delivery Manager

Sworn to and subscribed before me this 28th day of April, 1994.

Karon Henson

Notary Public, State of Florida at Large



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve)
territorial dispute with Gulf) Docket No.: 930885-EU
Coast Electrical Cooperative, Inc.) Served: March 10, 1994
by Gulf Power Company)
_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following by hand delivery or U.S. Mail this 10th day of March, 1994:

John H. Haswell, Esquire
Chandler, Lang & Haswell, P.A.
211 N.E. 1st Street
P.O. Box 23879
Gainesville, FL 32602

Martha Carter Brown, Esquire
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32301

J. Patrick Floyd, Esquire
408 Long Avenue
Port St. Joe, FL 32456



G. EDISON HOLLAND, JR.
Florida Bar No. 261599
JEFFREY A. STONE
Florida Bar No. 325956
TERESA E. LILES
Florida Bar No. 510998
Beggs & Lane
P.O. Box 12950
Pensacola, Florida 32576-2950
(904) 432-2451
Attorneys for Gulf Power Company

EXHIBIT NO. 3

DOCKET NO.: 930885-EU

WITNESS: WEINTRITT

DESCRIPTION: STAFF'S SECOND SET OF OF INTERROGATORIES TO
GULF POWER, ITEM NUMBER 11

92,479

EXHIBIT NO. 3
DOCKET NO. 930885-EU
DATE 10-19-99

11. What is the average number of outage hours per customer per year over the past 12 months for customers receiving service within five miles of the intersection of Highway 270 and Highway 77? Provide calculation and documentation with response.

RESPONSE:

The average number of outage hours per customer served within the five mile radius for the period 6/1/93 through 5/31/94 is 2.52 hours. The calculation is as follows:

Cumulative minutes of interruption = 80,538
(6/1/93 - 5/31/94)

Number of customers served = 532

Average outage time per customer =

$$\frac{80,538}{532} = 151.39 \text{ minutes or } 2.52 \text{ hours/customer}$$

It should be noted that one single Sunny Hills substation breaker outage on July 10, 1993 contributed 57,840 minutes to the total of 80,538 minutes. This outage would not have affected the correctional facility if it was being served from the Vernon substation.

$$\frac{(80,538 - 57,840)}{532} = 42.67 \text{ minutes or } 0.71 \text{ hours/customer}$$

Gulf Power Company records outages that are greater than one (1) minute on its Distribution Trouble Reporting System and reports outages based on grid coordinates utilizing the Transformer Load Management System. Gulf Power Company's recording system includes outages down to the individual customer service.

EXHIBIT NO. 4

DOCKET NO.: 930885-EU

WITNESS: WEINTRITT

DESCRIPTION: STAFF'S SECOND SET OF OF INTERROGATORIES TO
GULF POWER, ITEM NUMBER 6 AND 8

92,479

EXHIBIT NO. 4
FPC DOCKET NO. 930885-EU
DATE 10-19-94

6. Provide the following information regarding current electric service within 5 miles of the intersection of Highway 279 and Highway 77:
- a. Number of customers presently receiving service. (Classify and separate by residential, commercial or industrial)
 - b. Average annual revenues. (Classify and separate by residential, commercial or industrial)
 - c. Current depreciated value of facilities.
 - d. Salvage value of facilities.

RESPONSE:

- a. The number of metered services presently receiving service is as follows:
- | | | |
|-------------|---|------|
| Residential | - | 494 |
| Commercial | - | 38 |
| Industrial | - | None |
- b. Residential Annual Revenue = \$445,568
Commercial Annual Revenue = 75,883

6. c. & d.

Listed below is an approximate description of Gulf Power Company's facilities within the 5 mile radius of the correctional facility and the estimated present cost to construct these facilities.

Since Gulf Power Company utilizes mass property accounting, arriving at an accurate depreciated value would be virtually impossible. We would first have to know the actual dates of installation and the installed costs of all the facilities in the area, and any replacements or improvements since installation, an onerous task since some of these facilities have been in place since the 1940's.

<u>DESCRIPTION</u>	<u>QUANTITY</u>
Primary conductor, overhead	75,082 lb.
Primary conductor, underground	72,844 ft.
Transformers	391
Poles, wood	1,005
Poles, concrete	69
Arresters	707
Cutouts	275
Gang operated switches	3
Oil circuit reclosers	11
Secondary & Service conductor	90,230 ft.
Meters	532
Conduit	7,000 ft.
Streetlights & outdoor lights	153
Sunny Hills Substation	1

The total estimated present cost to install these facilities is \$3,314,000.

8. Provide the following information as it relates to the Sunny Hills subdivision.
- a. Number of lots currently receiving service from Gulf Power Company.
 - b. Average annual revenues.
 - c. Description and depreciated value of facilities used to currently serve customers.
 - d. Description and depreciated value of all facilities in the Sunny Hills subdivision.

RESPONSE:

a.	Residential	-	299
	Commercial	-	31
	Total	-	330
b.	Residential	-	\$269,686
	Commercial	-	60,450
	Total	-	330,136

8. c. & d.

Listed below is an approximate description of Gulf Power Company's facilities in the Sunny Hills subdivision area and the estimated present cost to construct these facilities.

Since Gulf Power Company utilizes mass property accounting, arriving at an accurate depreciated value would be virtually impossible. We would first have to know the actual dates of installation and the installed costs of all the facilities in the area, and any replacements or improvements since installation, an onerous task since some of these facilities have been in place since 1971.

<u>DESCRIPTION</u>	<u>QUANTITY</u>
Primary conductor, overhead	84,469 lb.
Primary conductor, underground	47,298 ft.
Transformers	310
Poles, wood	1,405
Poles, concrete	69
Arresters	754
Cutouts	301
Gang operated switches	5
Oil circuit reclosers	13
Secondary & Service conductor	100,070 ft.
Meters	330
Conduit	8,200 ft.
Streetlights & outdoor lights	153
Sunny Hills Substation	1

The total estimated present cost to install these facilities is \$3,146,000.

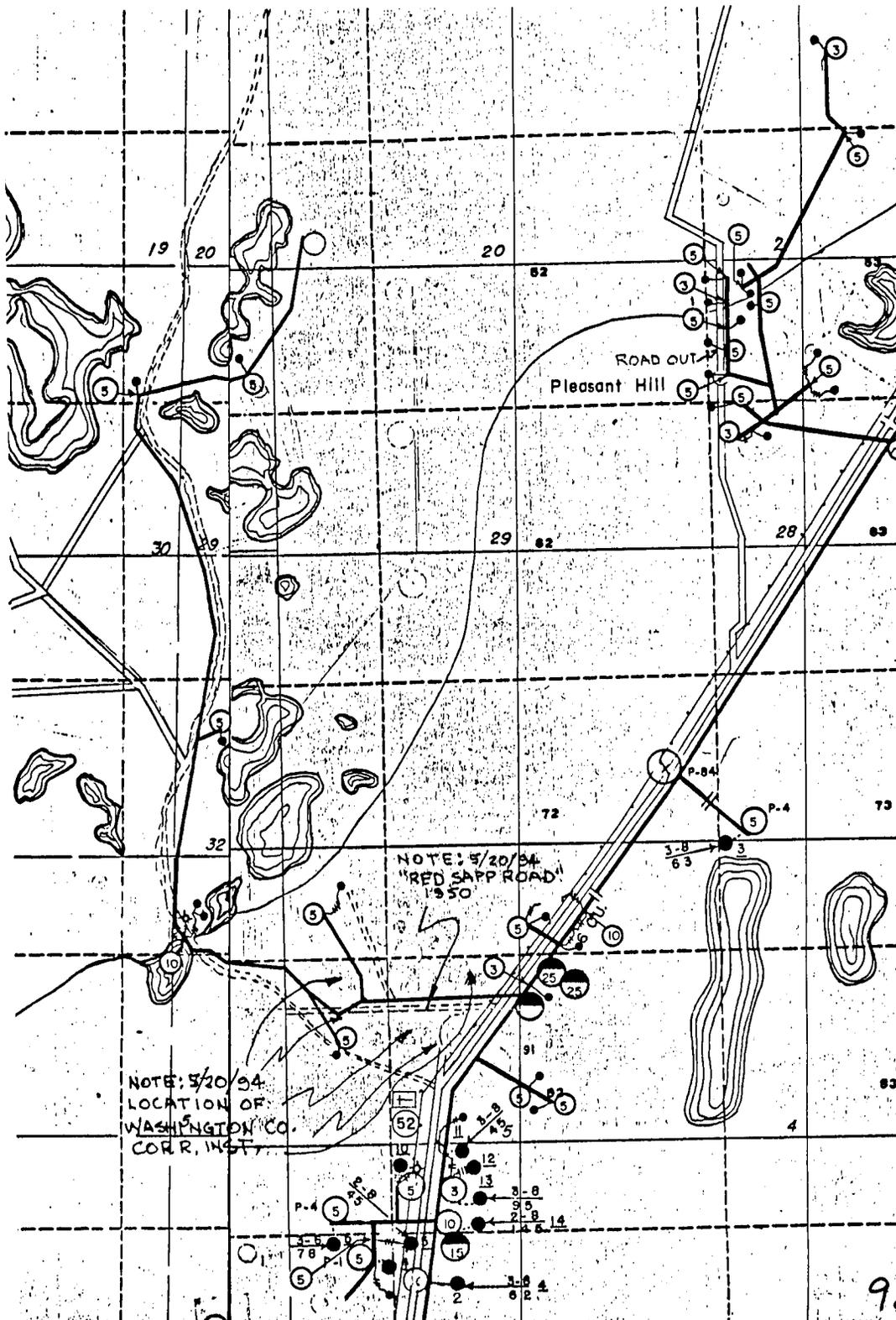
Response to FPSC Staff's Second
Set of Interrogatories
Docket No. 930885 - EU
GULF POWER COMPANY
July 22, 1994
Item 15
Page 1 of 1

15. Did Gulf Power construct the Green Head Substation in anticipation of serving the Leisure Lakes area?

RESPONSE:

Yes, Greenhead Substation was constructed in anticipation of serving the Leisure Lakes area and for the additional purpose of providing the backup to Sunny Hills in the event of a Sunny Hills Substation transformer failure.

92,479
5
EXHIBIT NO. _____
FPSC DOCKET NO. 930885-EU
DATE 10-19-94



92,479

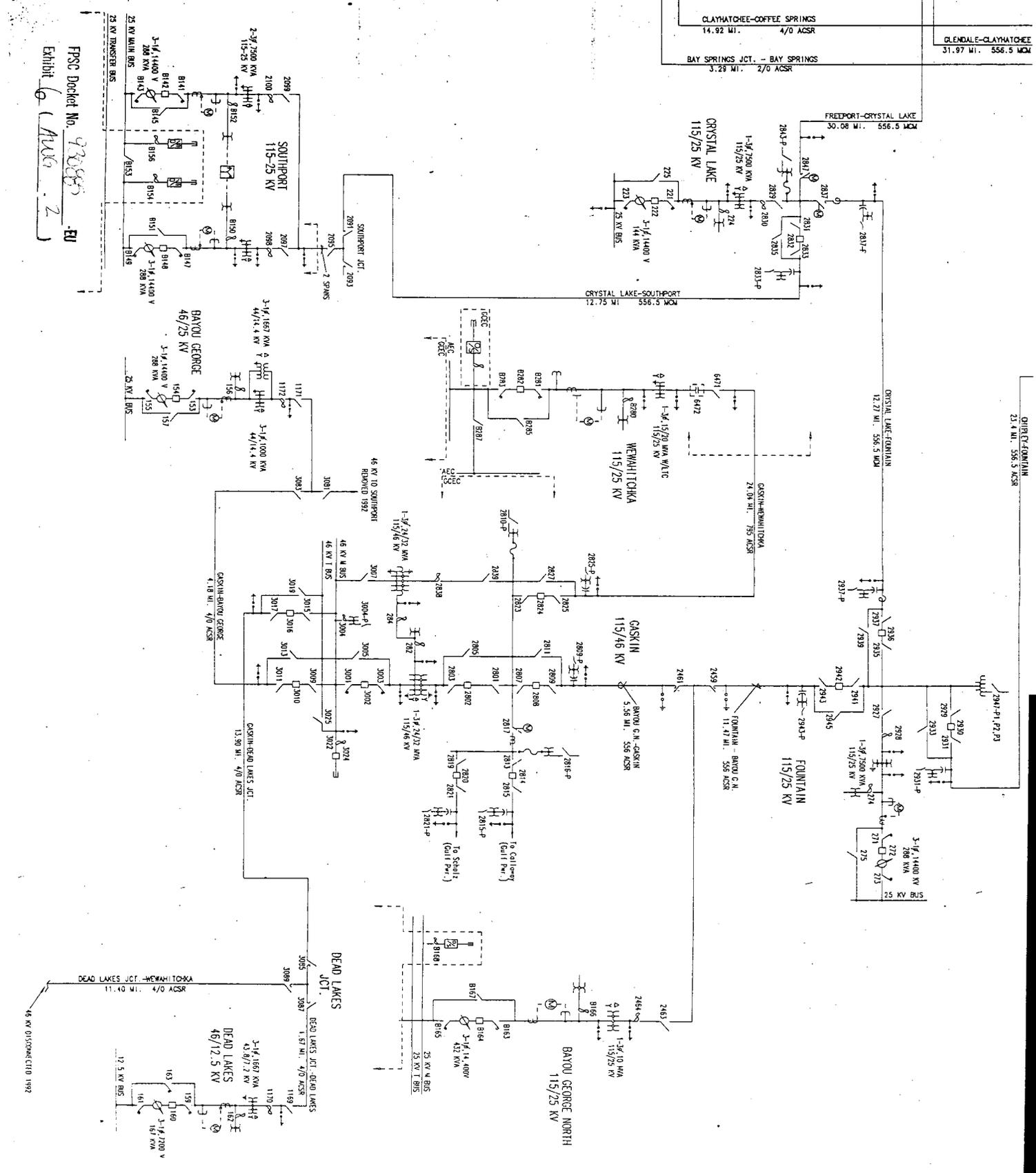
EXHIBIT "1"
(Testimony, Archie W. Gordon)

COMPOSITE COPY OF ORIGINAL
DISTRIBUTION MAPS

GULF COAST ELECTRIC COOPERATIVE

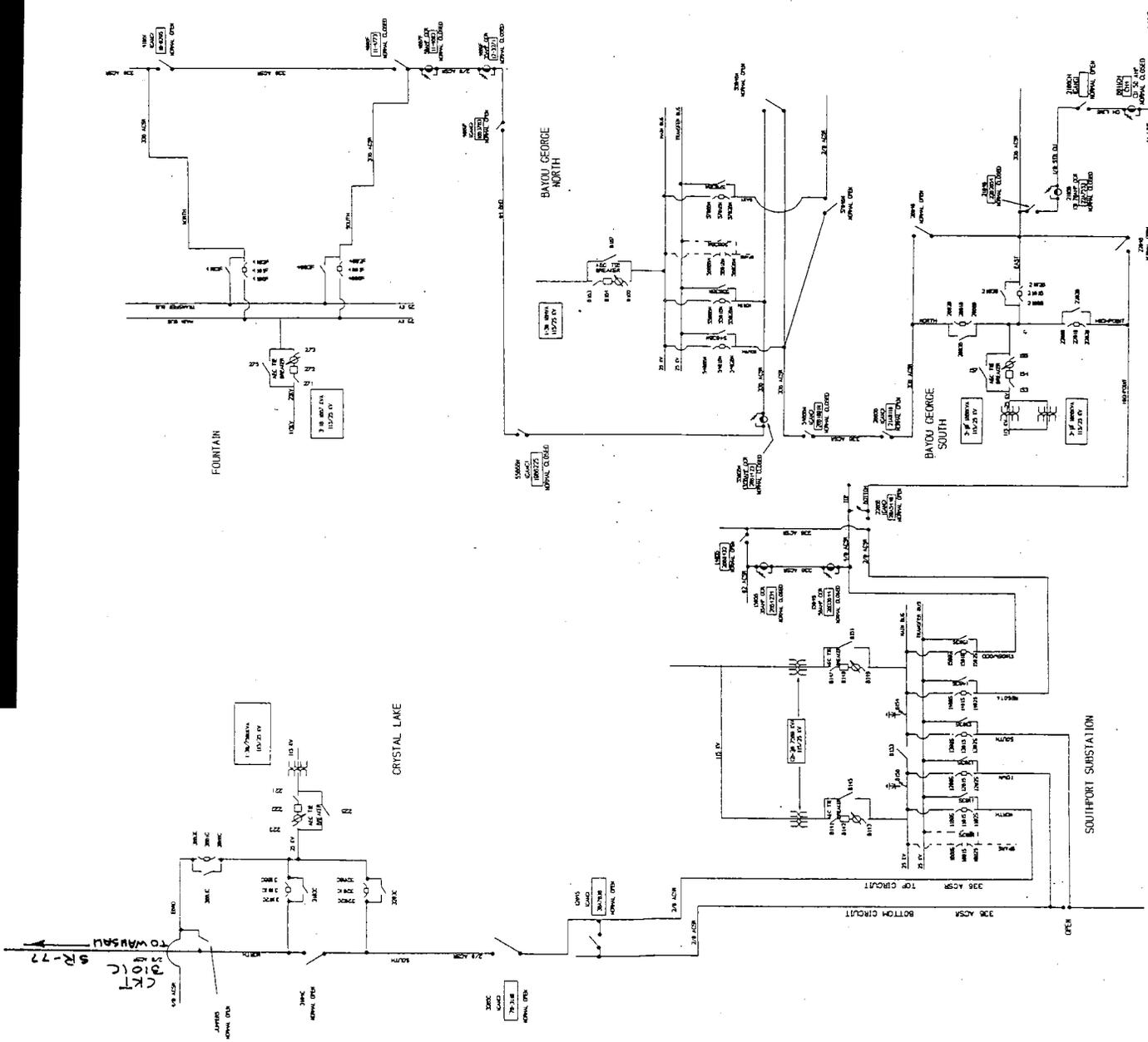
FPSC Docket No. 930885 -EU

Exhibit 6 (AWG-1)



ALABAMA ELECTRIC COOPERATIVE		DRAWN: M. EDDY	
P.O. Box 550 Andalusia, Alabama 36420		DATE: 1/23	
FL 34		CHECKED: J. S. K.	
		DATE: 2-2-93	
		APPROVED: [Signature]	
		REFERENCES: 158-014	
		158-FL3-90	
		158-FL3-91	

EXHIBIT "3"
 (Testimony, Archie W. Gordon)
 ONE LINE SUBSTATION AND
 MAIN FEEDER SWITCHING DIAGRAM
 GULF COAST ELECTRIC FACILITIES
 SOUTHPORT DISTRICT



GULF COAST ELECTRIC COOP
 SOUTHPORT DISTRICT
 SWITCHING DIAGRAM

FOSC Decket No. 93-0885 -EU
 Exhibit 6 (Aug. 3)

GULF COAST ELECTRIC COOPERATIVE, INC.
May 14, 1993

ESTIMATED ELECTRICAL LOAD
FOR PROPOSED STATE PRISON
IN WASHINGTON COUNTY

Based on conversations with Department of Corrections officials, estimates indicate that the proposed Washington County facility would use 372 KW demand and 163,450 KWH/month. It is also our understanding that primary service (12 KV) will be requested.

ESTIMATED MONTHLY BILL

Gulf Coast Electric Co-op

\$12.00 customer charge
\$4.00/KW demand charge
\$.04950/KWH energy charge
**\$.00110/KWH C.O.P.S.A. charge

Discount 7% of customer charge
for primary voltage
Discount 7% of demand charge
for primary voltage
Discount 7% of energy charge
for primary voltage

TOTAL ESTIMATED MONTHLY BILL:

\$9,103.45
** -819.31

\$8,284.14

Gulf Power Company

\$40.35 customer charge
\$4.56/KW demand charge
\$.01300/KWH energy charge
\$.02243/KWH fuel charge
\$.00015/KWH ECCR charge
\$.00036/KWH PCC charge

Discount \$.35/KW for primary
voltage
Discount 1% of demand charge
for primary voltage
Discount 1% of energy charge
for primary voltage

TOTAL ESTIMATED MONTHLY BILL:

\$7,442.66

\$8,284.14
-7,442.66

\$ 841.48 monthly difference
X 12 months

\$10,097.76 yearly difference

* The Cost of Power Sold Adjustment (C.O.P.S.A.) is calculated monthly and includes such factors as load factor, meter reading dates, line loss, etc. and is carried as a rolling average and is therefore seasonally variable. Our best estimate for an annual average charge is 1.1 mils/KWH.

** Gulf Coast Electric Cooperative's return of patronage capital to its members is an important part of the Cooperative's corporate structure. With patronage capital credited back to the State of Florida account directly related to the Washington County Correctional Institute patronage, we anticipate a return of approximately 9%.

Gulf Coast Electric Cooperative's bill is then 11% higher than Gulf Power Company's bill.

Prefiled testimony, Archie W. Gordon

EXHIBIT "5"

COMPARATIVE ESTIMATED BILLING

FPSC Docket No. 930885 -EU
 Exhibit 6 (AWG - 5)

RECORDER ID: 44031102000

GROUP: 41403G START TIME: 07/25/94 00:01

LOCATION:

CLOCK: 15 MINS STOP TIME: 07/25/94 24:00

ST NAME: HOLMES CORR INSTITUT

UOM: KW CHAN: 1 PULSE MULT: .045

TIME	Sunday	Monday 07/25	Tuesday	Wednesday	Thursday	Friday	Saturday
12:15		437.40					
12:30		433.26					
12:45		414.36					
13:00		436.32					
13:15		467.64					
13:30		466.38					
13:45		489.06					
14:00		414.54					
14:15		422.82					
14:30		410.40					
14:45		413.10					
15:00		381.78					
15:15		394.02					
15:30		376.20					
15:45		375.48					
16:00		389.52					
16:15		382.14					
16:30		397.08					
16:45		399.60					
17:00		399.42					
17:15		393.12					
17:30		392.22					
17:45		368.46					
18:00		339.66					
18:15		324.18					
18:30		323.10					
18:45		310.68					
19:00		316.62					
19:15		310.50					
19:30		311.58					
19:45		307.08					
20:00		304.38					
20:15		304.92					
20:30		305.64					
20:45		298.26					
21:00		295.38					
21:15		268.38					
21:30		270.54					
21:45		278.82					
22:00		277.56					
22:15		253.08					
22:30		235.08					
22:45		240.30					
23:00		229.86					
23:15		247.14					
23:30		234.36					
23:45		245.34					
00:00		227.88					
High		489.06					
Low		222.12					

459.40

394.56

(86%)

373.37

(81%)

EXHIBIT NO. 1

DOCKET NO.: 930885-EI

DESCRIPTION: MONTHLY BILL COMPARISION USING CURRENT RATES

92,479

EXHIBIT NO. 1
FPSC DOCKET NO. 930885-EI
DATE 10-19-94

Monthly Bill Comparison Using Current Rates

Gulf Coast Monthly Bill	\$7,640.71
Gulf Power Monthly Bill -	<u>\$7,846.37</u>
Net Difference	(\$205.67)

Gulf Coast Monthly Customer Bill Estimate

Rate Schedule LP
Rates in Effect in October 1994

Demand (KW)	372
Energy (KWH)	163,450

	\$12.00	Customer Charge	
	\$4.00	Demand Charge (\$/KW)	
	\$0.0495	Energy Charge (\$/KWH)	
	(\$0.0032)	C.O.P.S.A. (\$/KWH)	
	60.19%	Load Factor	
	\$9,067.74	Total Bill	
-	<u>\$671.35</u>	Discounts	
	\$8,396.38		
-	<u>\$755.67</u>	Capital Credit	
	\$7,640.71		

Calculation	
\$12.00	\$11.16
\$1,488.00	\$1,383.84
\$8,090.78	\$7,524.42
(\$523.04)	(\$523.04)
<u>\$9,067.74</u>	<u>\$8,396.38</u>

Gulf Power Monthly Customer Bill Estimate

GSD Rate Schedule
Rates in Effect in October 1994

Demand (KW)	372
Energy (KWH)	163,450

	\$40.35	Customer Charge	
	\$4.56	Demand Charge (\$/KW)	
	\$0.0130	Energy Charge (\$/KWH)	
	0.02206	Fuel Charge (\$/KWH)	
	0.00026	ECCR (\$/KWH)	
	\$0.0017	PPCC (\$/KWH)	
	0.00139	ECRC (\$/KWH)	
	60.19%	Load Factor	
	\$8,014.78	Total Bill	
-	<u>\$168.41</u>	Discounts	
	\$7,846.37		

Calculation	
\$40.35	\$40.35
\$1,696.32	\$1,696.32
\$2,124.85	\$2,124.85
\$3,605.71	\$3,605.71
\$42.50	\$42.50
\$277.87	\$277.87
\$227.20	\$227.20
<u>\$8,014.78</u>	<u>\$8,014.78</u>

COST TO SERVE WASHINGTON CORRECTIONAL, INST.

	GULF POWER COMPANY COST TO SERVE	GULF COAST COST TO SERVE
3Ø TO PRIMARY MP	7,436.00	18,540.92
TEMPORARY SERVICES PT OF SERVICE NO. 20 (INCLUDES INSTALL & REMOVE)	21,369.00 -0-	14,852.94 1,533.28
STAFF HOUSING	45,169.00	14,128.60
MAIN ENT. RD TO STAFF HOUSING ROAD	-0-	9,155.86
	-----	-----
SUB TOTALS	\$73,974.00	\$58,211.60
COST OF RELOCATION ALONG CR 279, 1Ø EQUIVALENT LAKE MCDANIAL LINE LOCATIONS # 11 & 13	-0-	RELOCATION 36,996.74 7,058.29 3,826.48
	DOUBLE TIE LINE	
VOLTAGE REGULATORS	45,909.00	
VERNON CONVERSION	9,594.00	
GRAND TOTALS	\$129,477.00	\$106,093.11

92,479

EPSC EXP. NO. 10
DOCKET NO. 930885-E4
DATE 10-19-94

GULF COAST ELECTRIC COOPERATIVE, INC.
ESTIMATED ELECTRICAL BILL
FOR PROPOSED STATE PRISON
IN WASHINGTON COUNTY

Based on estimates provided that the proposed Washington County facility would use 372 KW demand and 163,450 KWH/month and also our understanding that primary service (12 KV) will be requested, the following estimated monthly bill for rates effective as of October 11, 1994 is provided:

\$12.00 customer charge
\$4.00/KW demand charge
\$.04950/KWH energy charge
*\$.00060/KWH C.O.P.S.A. charge

Discount 7% of customer charge
for primary voltage
Discount 7% of demand charge
for primary voltage
Discount 7% of energy charge
for primary voltage

TOTAL ESTIMATED MONTHLY BILL:

\$9,017.50
**-811.58
\$8,205.92

*The Cost of Power Sold Adjustment (C.O.P.S.A.) is calculated monthly and includes such factors as load factor, meter reading dates, line loss, etc. and is carried as a rolling average and is therefore seasonally variable. Our average for the previous twelve months was 0.6 mils/KWH.

** Gulf Coast Electric Cooperative's return of patronage capital to its members is an important part of the Cooperative's corporate structure. With patronage capital credited back to the State of Florida account directly related to the Washington County Correctional Institute patronage, we anticipate a return of approximately 9% annually.

92,479
EXHIBIT NO. 7 11
FPSC DOCKET NO. 930885-EU
DATE 10-19-94

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve territorial dispute with Gulf Coast Electrical Cooperative, Inc. by Gulf Power Company)

) Docket No.: 930885-EU)
) Served: Aug. 24, 1994)

Gulf Coast Electric Cooperative's answers to GULF POWER COMPANY'S THIRD SET OF INTERROGATORIES TO GULF COAST ELECTRICAL COOPERATIVE, INC.

Gulf Power Company ["Gulf Power" or "Gulf"], by and through its undersigned attorneys, propounds the following interrogatories pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Gulf Coast Electrical Cooperative, Inc. ["the Coop"]. These interrogatories shall be answered under oath by you or your agent, who is qualified and who shall be identified, with the answers being served as provided by the Florida Rules of Civil Procedure. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Please give the name, address and business relationship to the Coop of those persons providing answers to each of the following interrogatories.

92,479

EXHIBIT NO. 12
FPSC DOCKET NO. 930885-EU
DATE 10-19-94

DEFINITIONS AND INSTRUCTIONS

1. As used herein, "the Coop" shall mean Respondent Gulf Coast Electric Cooperative, Inc., its agents, officers, directors, attorneys, representatives and employees.
2. As used herein, "the correctional facility" shall mean the correctional facility which is located, or to be located, at the northwest corner of Highway 77 and Highway 279 in the Greenhead area of Washington County, Florida.
3. As used herein, "identify" shall mean, with respect to a person, to provide the name, last known address, and last known telephone number.
4. As used herein, "identify" shall mean, with respect to documents, the description of the document, its whereabouts, and the identity of the individual responsible for custody of the document.
5. As used herein, "relating to" shall mean without limitation with respect to, referring to, concerning, embodying, establishing, evidencing, proposing, compromising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting or constituting.
6. As used herein, "any" and "all" shall have the same meaning as needed to bring within the scope of these interrogatories any answer that might otherwise be construed to be outside the scope hereof.
7. As used herein the singular shall mean the plural and the plural shall mean the singular if such construction brings

within the scope of these interrogatories any answer that might otherwise be construed to be outside the scope hereof.

8. If the Coop withholds any information in response to an interrogatory on the grounds of an asserted privileged or work product exemption, identify the privilege or exemption forming the basis for the withholding of information and describe the basis for the asserted privilege or exemption.

INTERROGATORIES

27. Please state the total cost, as originally estimated and actual costs incurred to date, to the Coop to extend three-phase service from its facilities as they existed on January 1, 1993, to the Department of Corrections primary metering point as shown as POS number 1 on the map which was attached as Exhibit 1 to the Coop's Second Set of Interrogatories to Gulf Power Company in this docket. In addition, please separately identify any anticipated future costs due to expansion and/or other growth in this area. For purposes of this interrogatory, please assume that the Department of Corrections required the Coop to construct the facilities necessary to provide the services shown on said map to the correctional facility, following the general coordination requirements and all other notations as shown on said map.

Answer: \$18,540.92 (Archie W. Gordon)
"of this amount, \$479.14 is for street lights".

28.

Please state the total cost, as originally estimated and actual costs incurred to date, to the Coop to construct and ultimately remove the temporary single phase service to the points of service shown on said map as:

- a. POS number 2;
- b. POS number 3;
- c. POS number 4;
- d. POS number 5;
- e. POS number 6;
- f. POS number 7;
- g. POS number 8;
- h. POS number 9;
- i. POS number 10;
- j. POS number 11;
- k. POS number 12;
- l. POS number 13;
- m. POS number 20.

For purposes of this interrogatory, please assume that the Department of Corrections required the Coop to construct the facilities necessary to provide the services shown on said map to the correctional facility, following the general coordination requirements and all other notations as shown on said map.

Answer: \$14,852.94 (Archie W. Gordon)
The DOC dropped out POS 20 which is estimated to have cost \$1,533.28.

29. Please provide the total cost, as originally estimated and actual costs incurred to date, to the Coop to construct the electrical services shown on said map as:
- a. POS number 14 - permanent service;
 - b. POS number 15 - permanent service;
 - c. POS number 16 - permanent service;
 - d. POS number 17 - permanent service;
 - e. POS number 18 - permanent service;
 - f. POS number 19 - permanent service;
 - g. Single phase distribution and street lighting for the staff housing shown for the ~~17~~²⁷ lots. (Correct # is 27 lots)
- For purposes of this interrogatory, please assume that the Department of Corrections required the Coop to construct the facilities necessary to provide the services shown on said map to the correctional facility, following the general coordination requirements and all other notations as shown on said map.

Answer: \$14,128.60 (Archie W. Gordon)

30. Please state whether the Department of Corrections did in fact require, or did state its intentions to require, the Coop to construct the facilities necessary to provide the services shown on said map to the correctional facility, following the general coordination requirements and all other notations as shown on said map.

Answer: Yes. (Archie W. Gordon)

31. For the prison in Alabama mentioned on page 3 of the prefiled direct testimony of Coop witness Jeff Parish, please provide the following for the period January 1, 1990 to the present:

- a. the monthly peak demand
- b. the hour in which each monthly peak occurred
- c. the day of the month for the monthly peak
- d. the monthly energy usage
- e. the monthly average cost in cents per kilowatt-hour
- f. the name of the facility
- g. the location of the facility

Answer: See attached Exhibit A

32. For the period January 1, 1990 to the present, please provide the following information for the cooperative that provides service to the Alabama prison mentioned on page 3 of the prefiled direct testimony of Coop witness Jeff Parish:

- a. the day of each monthly peak
- b. the hour of each monthly peak
- c. the total monthly peak demand in megawatts
- d. the day for which the substation serving the prison reached its peak
- e. the hour on which the substation serving the prison reached its peak

Answer: See attached Exhibit A

- f. the monthly peak demand for the substation serving the prison
- g. the name of the cooperative providing service to the prison

33. For the period January 1, 1990 to the present, please provide the following for Alabama Electric Cooperative:
- a. the day of each monthly peak
 - b. the hour of each monthly peak
 - c. the monthly peak demand in megawatts
 - d. the monthly energy supplied to its members

Answer: See attached Exhibit A

34. As to the "return of patronage capital" mentioned on Exhibit 5 of the prefiled direct testimony of Coop witness Archie W. Gordon, please identify the Coop tariff on file with the Florida Public Service Commission which allows the Coop to include a return of patronage capital as part of its rate structure.

Answer: None of the Coop's tariff filings include a return of patronage capital. (Archie W. Gordon)

35. If there is no Coop tariff as described in interrogatory no. 34. above, please identify any other FPSC order, or any other local, state, or federal authority for the inclusion of return of patronage capital in the Coop's rate structure. If none, please explain the Coop's rationale for including a return of patronage capital in its rate calculation on Exhibit 5 of the prefiled direct testimony of Coop witness Archie W. Gordon.

Answer: None as to the FPSC. The Coop allocates capital credits to its members as a Rural Electric Cooperative under Chapter 425 and is subject to REA financial requirements regarding any refunds. See also answer to #36. (Archie W. Gordon)

36. Please describe with specificity the tracking of and accounting for the segregation of patronage capital which is (a) the Coop's distributive portion of the patronage capital earned by AEC, and (b) the patronage capital which is realized through the operation of the Coop. Please further indicate whether each cooperative member's portion of each component of such patronage capital is determined by both AEC and the Coop by the billing to each member during each vintage year.

Answer: Members and non-members alike have received refund of capital credits and current recycling is on a fourteen (14) year period. Payment is made by check on an annual basis. Payments to estates of deceased patrons is made upon application. The distribution cooperative's portion of AEC's patronage capital plus all other margins are assigned to each member and are accrued on an annual basis upon the completion of a business year.
(Answer by Archie W. Gordon)

37. Please describe with specificity each requirement which a customer must meet in order to receive the "return on patronage capital" identified as a credit on Exhibit 5 of the prefiled direct testimony of Archie W. Gordon, including, without limitation, the length of time a customer must have been a Coop customer in order to receive the credit; the manner in which the credit is applied to the customer; the time (i.e., monthly, annually, etc.) on which such a credit is made; and any other applicable requirements.

Answer: Capital credits are accrued beginning with the first month or billing period during which the consumer patronizes the Cooperative. Assignment of margins as capital credits are based upon an annual accrual at the end of each business year. (See Bylaws & deposition testimony of Archie W. Gordon).
(Answer by Archie W. Gordon)

38. Please describe with specificity the legal relationship between the Coop and AEC other than in the parties' capacities as power provider and power purchaser. Such description should include, but not be limited to: (a) a description of the Coop's rights and obligations as a member of AEC; (b) whether such membership is evidenced by the Coop's ownership of AEC common stock, and if so, what percentage of the AEC common stock is owned by the Coop and a description of the voting rights, including any abridgement of such rights, in respect of such common stock, (c) the Coop's rights to elect members of AEC's Board of Directors, the number of Directors elected by the Coop and the number of total Directors that serve on

AEC's Board, and the number of AEC Directors that also serve on the Coop's Board of Directors, and (d) whether the Coop exercises "control" of AEC as that term is defined in applicable law. Answer: See AEC's By-laws. Gulf Coast is entitled to 2 directors on AEC's board, out of approximately 42 directors. One of the Coop's Trustees is also a director of AEC. We have no common stock in AEC.

39. To the extent not included in your response to interrogatories 34 and 35 above, please identify any other documents relating to your responses to these interrogatories.

Answer: Gulf Coast's By-laws & policies.



Alabama Electric Cooperative
P.O. Box 550
Andalusia, Alabama 36420
Telecopier Number: (205) 282-3776

To: John Harwell / Hub-Norris
Date: October 10, 1994
Re: EPSC Information

Sent From:
Nanna Morgan

Comments:

Total pages 6 (including cover sheet)
If you do not receive all pages, please call
back as soon as possible.
Reply To: Bum Wright

EXHIBIT A

**INFORMATION REQUESTED BY THE FPSC
FOR THE ALABAMA PRISON LOAD**

Question # 31

A. Attached

B & C. Not available. The prison does not have continuous metering data. The hourly load shape of residential and small commercial customers, derived from a nearby substation, was subtracted from the total Clayton substation load shape to develop an approximate prison load shape.

D. Attached

E. Attached

F. Bentress Correctional Facility.

G. The prison is located in Barbour County on Highway 239 approximately 2 miles north of Clayton, Alabama.

Question # 32

A through C. Attached

D. August 4, 1984

E. 2:00 p.m.

F. Attached

G. Pea River Electric Cooperative

Question # 33

A through D. Attached

Question # 40

Not available. See answer to question # 31, B and C.

BENTRESS CORRECTIONAL FACILITY

MONTH	YEAR	PEAK IN KW	MONTHLY ENERGY KWH	MONTHLY AVERAGE COST CENTS/KWH
JANUARY	1990	0.00	0	8.282
FEBRUARY	1990	0.00	0	7.728
MARCH	1990	0.00	0	7.221
APRIL	1990	281.30	34,735	8.744
MAY	1990	193.22	19,770	7.221
JUNE	1990	219.71	31,950	8.516
JULY	1990	378.23	78,630	4.231
AUGUST	1990	354.54	147,170	4.281
SEPTEMBER	1990	478.54	178,570	4.289
OCTOBER	1990	474.48	178,350	4.271
NOVEMBER	1990	484.82	148,270	4.241
DECEMBER	1990	408.70	148,030	4.107
JANUARY	1991	419.48	178,773	3.888
FEBRUARY	1991	431.88	174,771	4.107
MARCH	1991	458.34	182,144	3.988
APRIL	1991	488.04	182,488	4.390
MAY	1991	613.48	178,594	4.136
JUNE	1991	578.54	204,394	4.027
JULY	1991	683.80	248,898	3.798
AUGUST	1991	688.28	235,823	3.864
SEPTEMBER	1991	603.78	251,545	4.018
OCTOBER	1991	578.40	233,772	3.897
NOVEMBER	1991	488.84	170,888	4.182
DECEMBER	1991	488.24	180,488	3.897
JANUARY	1992	454.01	177,787	4.080
FEBRUARY	1992	402.02	118,222	5.082
MARCH	1992	338.80	91,802	4.859
APRIL	1992	338.64	102,218	4.809
MAY	1992	413.32	113,302	4.381
JUNE	1992	473.04	159,231	4.303
JULY	1992	670.88	188,081	4.071
AUGUST	1992	648.88	188,231	4.184
SEPTEMBER	1992	619.58	170,009	4.231
OCTOBER	1992	501.14	138,509	4.379
NOVEMBER	1992	383.48	131,305	4.421
DECEMBER	1992	377.88	131,101	4.183
JANUARY	1993	385.88	131,171	4.308
FEBRUARY	1993	378.08	114,848	4.484
MARCH	1993	378.84	137,408	4.258
APRIL	1993	381.48	132,408	4.509
MAY	1993	412.82	99,003	4.104
JUNE	1993	654.70	182,778	4.070
JULY	1993	673.88	211,418	3.848
AUGUST	1993	688.80	219,124	4.028
SEPTEMBER	1993	680.22	218,821	4.241
OCTOBER	1993	588.50	188,228	4.314
NOVEMBER	1993	483.82	188,413	4.389
DECEMBER	1993	458.88	151,848	4.041
JANUARY	1994	417.28	173,888	3.982
FEBRUARY	1994	428.40	155,312	4.388
MARCH	1994	433.74	148,877	4.187
APRIL	1994	473.48	188,728	4.283
MAY	1994	658.70	188,777	4.201
JUNE	1994	885.84	210,774	4.078
JULY	1994	830.04	282,708	4.273
AUGUST	1994	818.10	220,484	3.889
SEPTEMBER	1994	688.78	247,881	3.818

* Monthly Energy Cost shown is for the Clayton Substation.

Refs for Question #91 A, B, and E

PEA RIVER ELECTRIC COOPERATIVE

MONTH	YEAR	PEAK IN MW	DAY OF MONTH	HOUR
JANUARY	1990	31.367	26	07:00 AM
FEBRUARY	1990	30.943	26	07:00 AM
MARCH	1990	27.494	21	07:00 AM
APRIL	1990	27.465	30	09:00 PM
MAY	1990	30.107	27	06:00 PM
JUNE	1990	40.312	20	06:00 PM
JULY	1990	38.620	20	06:00 PM
AUGUST	1990	41.715	29	06:00 PM
SEPTEMBER	1990	38.990	8	06:00 PM
OCTOBER	1990	31.310	8	06:00 PM
NOVEMBER	1990	31.088	30	07:00 AM
DECEMBER	1990	35.101	8	07:00 AM
JANUARY	1991	36.002	22	07:00 AM
FEBRUARY	1991	35.892	16	06:00 AM
MARCH	1991	32.807	11	07:00 AM
APRIL	1991	26.284	1	07:00 AM
MAY	1991	32.766	29	07:00 PM
JUNE	1991	36.557	23	06:00 PM
JULY	1991	38.755	14	02:00 PM
AUGUST	1991	40.118	6	06:00 PM
SEPTEMBER	1991	39.483	16	06:00 PM
OCTOBER	1991	27.512	8	07:00 AM
NOVEMBER	1991	38.452	5	07:00 AM
DECEMBER	1991	37.328	20	07:00 AM
JANUARY	1992	40.181	16	07:00 AM
FEBRUARY	1992	34.609	10	07:00 AM
MARCH	1992	35.015	11	07:00 AM
APRIL	1992	27.846	29	07:00 AM
MAY	1992	29.973	25	08:00 PM
JUNE	1992	37.034	25	08:00 PM
JULY	1992	41.798	12	03:00 PM
AUGUST	1992	41.287	10	06:00 PM
SEPTEMBER	1992	35.760	20	04:00 PM
OCTOBER	1992	26.313	20	07:00 AM
NOVEMBER	1992	36.340	30	07:00 AM
DECEMBER	1992	35.010	3	07:00 AM
JANUARY	1993	38.342	28	07:00 AM
FEBRUARY	1993	41.433	18	07:00 AM
MARCH	1993	42.641	15	07:00 AM
APRIL	1993	28.483	23	07:00 AM
MAY	1993	32.708	31	06:00 PM
JUNE	1993	40.353	8	06:00 PM
JULY	1993	45.938	21	06:00 PM
AUGUST	1993	43.495	18	06:00 PM
SEPTEMBER	1993	40.876	20	06:00 PM
OCTOBER	1993	34.724	31	06:00 AM
NOVEMBER	1993	39.912	1	07:00 AM
DECEMBER	1993	41.666	22	06:00 PM
JANUARY	1994	53.540	19	07:00 AM
FEBRUARY	1994	45.230	3	07:00 AM
MARCH	1994	36.669	11	07:00 AM
APRIL	1994	31.109	27	06:00 PM
MAY	1994	33.236	16	06:00 PM
JUNE	1994	38.079	28	06:00 PM
JULY	1994	39.709	24	06:00 PM
AUGUST	1994	41.982	30	06:00 PM

Data for Question #32 A, B, and C

CLAYTON SUBSTATION

MONTH	YEAR	PEAK IN MW
JANUARY	1990	0.128
FEBRUARY	1990	0.106
MARCH	1990	0.112
APRIL	1990	0.110
MAY	1990	0.105
JUNE	1990	0.428
JULY	1990	0.572
AUGUST	1990	0.690
SEPTEMBER	1990	0.694
OCTOBER	1990	0.616
NOVEMBER	1990	0.489
DECEMBER	1990	0.532
JANUARY	1991	0.659
FEBRUARY	1991	0.613
MARCH	1991	0.576
APRIL	1991	0.696
MAY	1991	0.755
JUNE	1991	0.768
JULY	1991	0.894
AUGUST	1991	0.840
SEPTEMBER	1991	0.832
OCTOBER	1991	0.604
NOVEMBER	1991	0.569
DECEMBER	1991	0.576
JANUARY	1992	0.659
FEBRUARY	1992	0.409
MARCH	1992	0.433
APRIL	1992	0.625
MAY	1992	0.640
JUNE	1992	0.774
JULY	1992	0.876
AUGUST	1992	0.869
SEPTEMBER	1992	0.776
OCTOBER	1992	0.568
NOVEMBER	1992	0.657
DECEMBER	1992	0.549
JANUARY	1993	0.565
FEBRUARY	1993	0.603
MARCH	1993	0.671
APRIL	1993	0.484
MAY	1993	0.654
JUNE	1993	0.904
JULY	1993	0.962
AUGUST	1993	0.991
SEPTEMBER	1993	0.901
OCTOBER	1993	0.873
NOVEMBER	1993	0.597
DECEMBER	1993	0.693
JANUARY	1994	0.755
FEBRUARY	1994	0.899
MARCH	1994	0.625
APRIL	1994	0.779
MAY	1994	0.839
JUNE	1994	0.935
JULY	1994	0.948
AUGUST	1994	0.978

Data for Question 282 - F

ALABAMA ELECTRIC COOPERATIVE, INC.

MONTH	YEAR	PEAK IN MVA	DAY OF MONTH	HOUR	TOTAL ENERGY MWH
JANUARY	1990	840	26	07:00 AM	298,450
FEBRUARY	1990	831	26	07:00 AM	247,274
MARCH	1990	813	21	07:00 AM	260,938
APRIL	1990	877	30	08:00 PM	255,518
MAY	1990	870	26	08:00 PM	311,140
JUNE	1990	871	19	08:00 PM	368,754
JULY	1990	854	30	07:00 PM	468,386
AUGUST	1990	864	19	03:00 PM	602,391
SEPTEMBER	1990	828	8	08:00 PM	431,638
OCTOBER	1990	749	1	08:00 PM	353,268
NOVEMBER	1990	711	30	07:00 AM	315,125
DECEMBER	1990	752	25	08:00 AM	363,890
JANUARY	1991	844	22	07:00 AM	388,017
FEBRUARY	1991	871	18	08:00 AM	323,449
MARCH	1991	733	11	07:00 AM	348,674
APRIL	1991	837	1	07:00 AM	331,411
MAY	1991	843	30	08:00 PM	367,766
JUNE	1991	804	4	08:00 PM	434,837
JULY	1991	864	13	06:00 PM	506,814
AUGUST	1991	873	6	08:00 PM	492,535
SEPTEMBER	1991	858	14	04:00 PM	436,265
OCTOBER	1991	888	2	08:00 PM	381,288
NOVEMBER	1991	847	28	07:00 AM	380,578
DECEMBER	1991	885	6	07:00 AM	368,770
JANUARY	1992	844	17	07:00 AM	433,488
FEBRUARY	1992	851	10	07:00 AM	381,882
MARCH	1992	820	11	07:00 AM	368,404
APRIL	1992	871	24	08:00 PM	348,603
MAY	1992	789	20	08:00 PM	383,577
JUNE	1992	888	26	08:00 PM	469,726
JULY	1992	1061	11	05:00 PM	538,189
AUGUST	1992	978	6	06:00 PM	488,593
SEPTEMBER	1992	913	8	08:00 PM	436,118
OCTOBER	1992	870	20	07:00 AM	363,744
NOVEMBER	1992	857	30	07:00 AM	389,582
DECEMBER	1992	878	3	07:00 AM	418,980
JANUARY	1993	868	28	07:00 AM	414,183
FEBRUARY	1993	890	18	07:00 AM	390,082
MARCH	1993	850	16	07:00 AM	402,888
APRIL	1993	722	23	07:00 AM	350,044
MAY	1993	835	31	04:00 PM	403,518
JUNE	1993	1033	8	08:00 PM	510,524
JULY	1993	1093	21	05:00 PM	678,528
AUGUST	1993	1098	17	08:00 PM	673,608
SEPTEMBER	1993	989	18	08:00 PM	478,801
OCTOBER	1993	870	20	07:00 AM	401,837
NOVEMBER	1993	831	1	07:00 AM	404,148
DECEMBER	1993	931	31	08:00 AM	497,298
JANUARY	1994	1087	10	07:00 AM	608,664
FEBRUARY	1994	958	23	07:00 AM	393,890
MARCH	1994	787	11	07:00 AM	391,718
APRIL	1994	725	27	08:00 PM	383,828
MAY	1994	790	18	08:00 PM	438,370
JUNE	1994	842	28	08:00 PM	510,433
JULY	1994	862	18	08:00 PM	632,841
AUGUST	1994	863	30	08:00 PM	547,187

Date for Question #33 A through D

STATE OF FLORIDA

COUNTY OF Bay

Before me, the undersigned authority, personally appeared Hubbard Norris who being by me first duly sworn and who is personally known to me/who has produced the following as identification: _____, states on oath that the foregoing answers to interrogatories are true and correct.

Hubbard Norris
Name: Hubbard Norris
Title: General Manager
For Gulf Coast Electrical
Cooperative, Inc.

Sworn to and subscribed before me this 10th day of October, 1994.

Shirley A. Barnes
Notary Public, State of Florida
at Large
Name: Shirley A. Barnes
Commission No: _____
My Commission Exp. _____

Notary Public, State of Florida
My Commission Expires May 8, 1995
Bonded Thru Troy Fain - Insurance, Inc.



GULF COAST ELECTRIC COOPERATIVE, INC.

R. O. BOX 229 • WYWAHATCHKA, FLORIDA 32466 • PHONE (904) 639-2276

DISTRICT OFFICE

R. O. BOX 2379 • SOUTHPORT, FLORIDA 32469 • PHONE (904) 265-2631

COVER SHEET

TO Jeff STONE, Esquire
Begg + LANE
FAX 904-469-3330

FROM John H. Haswell
904 265-3631

DATE Oct. 10, 1994
TIME _____

GULE_COASI_ELECTRIC_COOPERATIVE
 COSI_OE_POWER_SOLD_ADJUSTMENT

<u>MONTH</u>	<u>C.O.P.S.A.</u>
NOVEMBER, 1993	-0.0027
DECEMBER	0.0000
JANUARY, 1994	0.0001
FEBRUARY	-0.0016
MARCH	0.0000
APRIL	0.0021
MAY	0.0064
JUNE	0.0050
JULY	0.0020
AUGUST	0.0002
SEPTEMBER	-0.0011
OCTOBER	-0.0032
TOTAL	0.0072
AVERAGE	0.0006

92,479
 13
 FPSC DOCKET NO. 930885-ET
 DATE 10-19-94



FLORIDA
DEPARTMENT of
CORRECTIONS

Governor
LAWTON CHILES

Secretary
HARRY K. SINGLETARY, JR.

2601 Blainstone Road • Tallahassee, Florida 32399-2500 • (904) 488-5021

May 26, 1993

Mr. Roger Hagan
County Administrator
Washington County
Post Office Box 647
Chipley, FL 32428

Dear Mr. Hagan:

Re: Electric Utilities

It is our understanding that there are two utility companies that can provide electric power to the proposed prison site. The site engineer has been hired to adapt our prototype plans to this site. Part of the design phase is to work with the utility company regarding the supply of electrical power to operate this facility.

Please advise which utility company will be providing electrical power for the Institution. Actual construction of this prison is contingent upon legislative appropriation.

Your attention to this matter is appreciated.

Sincerely,

Ron Kronenberger
Assistant Secretary
Office of Management and Budget

RK/lb

92,479

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 930885-EU EXHIBIT NO. 15

COMPANY/ COFC/Veris

WITNESS: 10-19-99

DATE: 10-19-99

FPSC Docket No. 930885EU
Exhibit (A/N-1)



EARNESTINE MILLER
Clerk and Accountant
(904) 638-4233

WASHINGTON COUNTY
BOARD OF COUNTY COMMISSIONERS

POST OFFICE BOX 847 • CHIPLEY, FLORIDA 32423-0847

TELEPHONE: (904) 633-3200

EDM MORGAN
District One

BOYLE TAYLOR
District Two

CHARLES BROCK
District Three

LENZY CORBIN
District Four

HULAN CARTER
District Five

WILLIAM S. HOWELL, JR.
Attorney

ROGER D. HAGAN
Administrator

June 7, 1993

M. W. Norris
BOX 220
WEWAHITCHKA, FL 32465

Dear Mr. Norris:

In regards to your letter referencing electrical service at the site of the proposed prison in Washington County, it is the understanding of the Board of County Commissioners that Gulf Coast Electric will provide the service.

I trust this will allow your site engineer to begin his work.

If I can be of further service please contact me or Roger Hagan, County Administrator at (904) 638-6200 or SunCom 769-6200.

Sincerely,


Lenzy Corbin
Chairman



EARNESTINE MILLER
Clerk and Accountant
(904) 638-6233

WASHINGTON COUNTY
BOARD OF COUNTY COMMISSIONERS

POST OFFICE BOX 647 • CHIPLEY, FLORIDA 32428-0647

TELEPHONE: (904) 638-6200

JIM MORRIS
District One

DOYLE TAYLOR
District Two

CHARLES BROCK
District Three

LENZY CORBIN
District Four

HULAN CARTER
District Five

WILLIAM S. HOWELL, JR.
Attorney

ROGER D. HAGAN
Administrator

September 28, 1993

H.W. Norris, General Manager
Gulf Coast Electric Cooperative, Inc.
Post Office Box 220
Wewahitchka, Florida 32465

Re: Washington County Prison Facility

Dear Mr. Norris:

This letter is to advise that the Board of County Commissioners of Washington County appreciate your cooperative's grant in the amount of \$45,000.00 to Washington County to make possible our purchase of the future site of Washington Correctional Institute. Your generous contribution to our County has allowed us to qualify for placement of a prison facility in Washington County. The Board of County Commissioners and citizens of our County appreciate your interest in our growth and development and assisting us in providing additional employment opportunities for our citizens.

As you know we have chosen Gulf Coast Electric Cooperative to provide electrical service to the facility because of your interest in our County's future growth and prosperity. On behalf of the Board of County Commissioners and the citizens of Washington County we wish to extend our heart felt thanks and appreciation.

Very truly yours,

Lenzy Corbin, Chairman
Board of County Commissioners

LC/nwh

FPSC Docket No. 93C 885 -EU
Exhibit (HN-3)

**GULF COAST ELECTRIC COOPERATIVE, INC.
EXHIBIT HN-4**

**IS A MAP TO BE
SUPPLIED AND FILED
UNDER SEPARATE COVER
FROM JOHN HASWELL,
ESQUIRE**

Gulf Coast Elec

HN-4

WASHINGTON COUNTY
BOARD OF COUNTY COMMISSIONERS

POST OFFICE BOX 647 • CHIPLEY, FLORIDA 32428-0647

TELEPHONE: (904) 638-6200



ARNESTINE MILLER
Clerk and Accountant
(904) 638-6211

JIM MORRIS
District One

DOYLE TAYLOR
District Two

CHARLES BROCK
District Three

LENZY CORBIN
District Four

HULAN CARTER
District Five

WILLIAM S. HOWELL, JR.
Attorney

ROGER D. HAGAN
Administrator

March 15, 1994

Mr. Travis Bowden
Gulf Power Company
Post Office Box 1511
Pensacola, Florida 32520

Re: Electrical Service to Washington Correctional Institute

Dear Mr. Bowden:

The Washington County Board of County Commissioners requests that Gulf Power withdraw its recent complaint to the Public Service Commission concerning Washington County's choice of Gulf Coast Electric Cooperative, Inc. to serve the new correctional facility and adjacent site owned by Washington County.

Washington County did not receive a proposal from Gulf Power and has no record of any interest expressed by you in assisting us with this rural development project or to serve the property. Gulf Coast Electric, as a part of their rural development policy, provided us with the opportunity to keep this project in Washington County by making available the financial assistance necessary to make purchase of the property possible. Gulf Coast Electric Cooperative, Inc. already had lines over and service to the property and is continuing to serve the site.

We simply wish to move forward with this project without the uncertainty created by your complaint.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Morris".

Jim Morris, Chairman
Washington County Board
of County Commissioners

FPSC Docket No. 930885-EU
Exhibit _____ (HN-5)

RED - GULF COAST ELECTRIC
GREEN - GULF POWER CORP

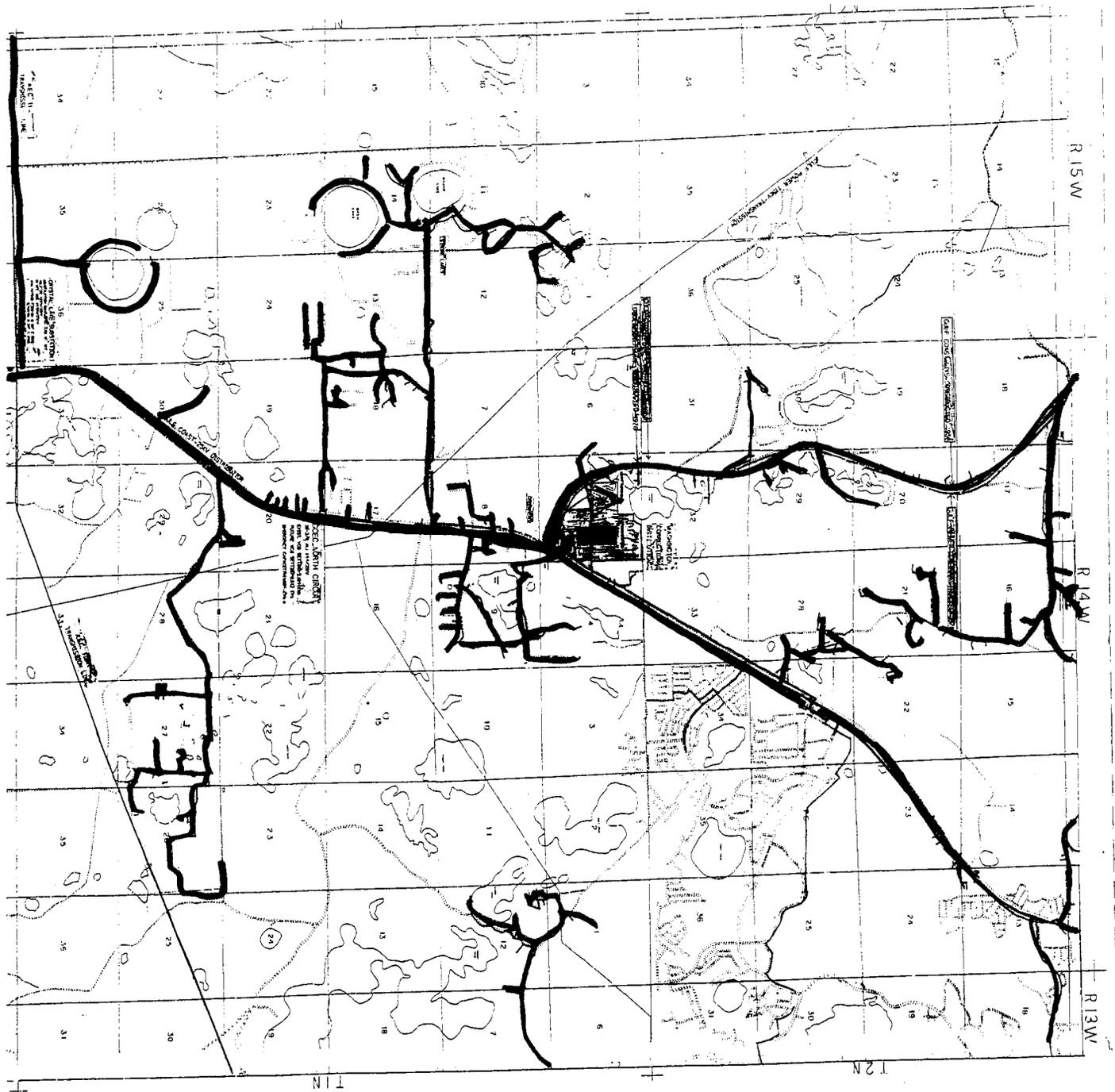
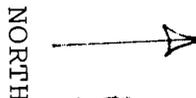


EXHIBIT _____ (HN - _____)

FPSC DOCKET # 930885-EU



DOCUMENT NO.
05094-94
5-24-94

FPSC Docket No. 930885 .EU
Exhibit (HN - 4)

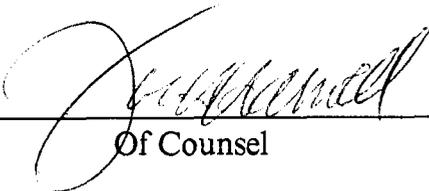
CERTIFICATE OF SERVICE

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

EXHIBIT NO. 16

DOCKET NO.: 930885-EU

WITNESS: NORRIS

DESCRIPTION: GULF POWER'S FIRST SET OF OF INTERROGATORIES
TO GULF COAST, ITEM NUMBER 13

92,479
16
FPSC 930885-EU
DATE 10-19-94



GULF COAST ELECTRIC COOPERATIVE, INC.

P. O. BOX 220 • WEWAHITCHKA, FLORIDA 32465 • PHONE (904) 639-2216

DISTRICT OFFICE

P. O. BOX 8368 • SOUTHPORT, FLORIDA 32409 • PHONE (904) 265-3631

April 13, 1993

Mr. Lindsey Corbin, Chairman
Washington County Board of Commissioners
P. O. Box 647
Chipley, FL 32428

Lindsey Corbin
Nelson Carter
Charles Brock
Jim Menis
Worfe Taylor

Dear Mr. Corbin and Commissioners:

Historically, in the past, Electric Cooperatives all over our great country have encouraged, promoted and contributed to efforts to develop rural America, provide more jobs and overall, have sought to improve economic conditions and better the quality of life for our memberships and others found to be living, generally in unincorporated areas.

Back in 1990 Gulf Coast Electric Cooperative found itself in a position to assist Gulf County, Florida, financially in the purchase of 230 acres of land to, in turn, deed over to the Department of Corrections for the construction of a 900 bed prison in this county. Our contribution of \$45,000, along with what the county contributed, enabled them to buy this land, give it to the state and today the facility stands on this purchased acreage. It infact provides some 300 jobs, putting money into the local economy through purchases and most of all, a large payroll every two weeks. A great number of Gulf County folks now have been put to work and the community of Wewahitchka is proud to have such a fine institution and work place available.

Due to the fact that Washington County, Florida, is in our service area, along with Gulf, Bay and Calhoun Counties, we are able to offer the following assistance to your county in its' rural area development program. as you plan for the Department of Corrections along with Washington Counties joint venture prison location and construction over the next few months.

Gulf Coast Electric Cooperative will:

- A. Contribute a like amount of \$45,000.00 as was done for Gulf County, Florida, for Washington County to help with the necessary purchase of the required acreage. (See Exhibit A. Call Billy Traylor, phone 639-2764 if you need Gulf County information on this).

- B. Assist, retain consultants, develop and submit to the Rural Electrification Administration an application for interest free loan in the amount of \$300,000 for a period of ten (10) years. (See Exhibit B on savings on interest projected at 6% if the county would have to pay such interest. Savings to the county would be \$133,112.39.) This application would come at a cost to the Cooperative and its' power supplier, Alabama Electric Cooperative of approximately \$11,500.00. The county must understand that this loan program presently has money to loan and this project meets all the criteria, however, Gulf Coast Electric cannot assure this loan but is willing to spend up to \$11,500.00 in a diligent effort to acquire it for the county.
- C. Relocate from the property to be purchased, power lines that presently run through the middle of said tract, Red Sapp Road line and additional lines running north, to re-route existing line that continues up the Vernon Highway for some six (6) to eight (8) miles serving numbers of Coop members in this area. This relocation represents a sizeable expenditure to retire and relocate this line to free up acreage that the Department of Corrections will require for construction purposes. If the county wants a dollar figure on this work, it will be available later, however, this work will not be at Department of Correction's or the county's expense. (47,000)
- D. The electrical reliability in this area is without question, as good or better than any area of the country, and presently we have a large sub-station on Highway 77 on the Washington County-Bay County line. This substation also feeds from two different directions which assures excellent quality in electric service.
- E. The' above assistance will be provided including Section A, part of Section B relating to the cost of loan application and Section C having to do with retirement of existing lines and reconstruction and relocation, based on the agreement with the county that the Cooperative will be allowed to serve this facility with all of its electrical needs.

Having considered these various assistance packages, we hope the Board of County Commissioners will allow Gulf Coast Electric Cooperative to proceed in assisting the Department of Corrections and Washington County in making these much needed jobs and this great economic boost become a reality for the betterment of all.

We sincerely appreciate your consideration of the Cooperative in working with you fine Washington County folks. With a letter from the County, we will proceed at your pleasure.

Washington County Commissioners
April 13, 1993
Page 3

If you need any additional information please call me at 904-639-2215 and I will be glad to provide any other needed information.

Sincerely,



H. W. Norris
General Manager

HWN/ps

66 100

JIMMY O. GORTMAN
District 1

Willy E. Traylor
District 2



JAMES E. CREAMER
District 3

NATHAN PETERS, JR.
District 4

DONALD B. PARKER
District 5

BOARD OF COUNTY COMMISSIONERS GULF COUNTY, FLORIDA

1000 FIFTH STREET, PORT ST. JOE, FLORIDA 32456 • PHONE 904/229-6113 • BENNY C. LISTER, CLERK

June 20, 1990

Mr. H. W. Norris
Post Office Box 762
Wewahitchka, FL 32465

Dear Mr. Norris:

I would like to take this opportunity, on behalf of the Gulf County Board of County Commissioners, to let you know how much we appreciate your effort in acquiring a prison facility for Gulf County. Your untiring and dedicated work has proven fruitful, and the people of Gulf County, as well as this Board, will be forever indebted.

Once again, from the bottom of our hearts, we are thankful to you and will always remember your great service. Please accept this letter as our show of appreciation.

Sincerely,

Nathan Peters, Jr., Chairman
Gulf County Board of County Commissioners

NPJ:DCB:tpc

NAME: WASHINGTON COUNTY PRISON

ADDRESS:

DATE FINANCED: May 1, 1993
 FIRST PAYMENT DUE: June 1, 1993
 PRINCIPAL: 400,000
 INTEREST RATE (A.P.R.): 6%
 DAILY RATE: 0.000164384
 TERM (MONTHS): 120
 PAYMENTS: 119 MONTHS @ 4440.82
 1 MONTH @ 4654.81

PAYMENT NO.	MONTH	NO. OF DAYS INTEREST	INTEREST FOR PERIOD	PRINCIPAL FOR PERIOD	BALANCE
					400000.00
1		31	2038.36	2402.46	397597.54
2		30	1960.75	2480.07	395117.47
3		31	2013.48	2427.34	392690.13
4		31	2001.11	2439.71	390250.42
5		30	1924.52	2516.30	387734.12
6		31	1975.85	2464.97	385269.15
7		30	1899.96	2540.86	382728.29
8		31	1950.34	2490.48	380237.81
9		31	1937.65	2503.17	377734.64
10		28	1738.61	2702.21	375032.43
11		31	1911.12	2529.70	372502.73
12		30	1837.00	2603.82	369898.91
13		31	1884.96	2555.86	367343.05
14		30	1811.55	2629.27	364713.78
15		31	1858.54	2582.28	362131.50
16		31	1845.38	2595.44	359536.06
17		30	1773.05	2667.77	356868.29
18		31	1818.56	2622.26	354246.03
19		30	1746.97	2693.85	351552.18
20		31	1791.47	2649.35	348902.83
21		31	1777.97	2662.85	346239.98
22		28	1593.65	2847.17	343392.81
23		31	1749.89	2690.93	340701.88
24		30	1680.17	2760.65	337941.23

25	31	1722.11	2718.71	335222.52
26	30	1653.15	2787.67	332434.85
27	31	1694.05	2746.77	329688.08
28	31	1630.05	2760.77	326927.31
29	30	1612.24	2828.58	324098.73
30	31	1651.57	2789.25	321309.48
31	30	1584.54	2856.28	318453.20
32	31	1622.80	2818.02	315635.18
33	31	1608.44	2832.38	312802.80
34	29	1491.17	2949.65	309853.15
35	31	1578.98	2861.84	306991.31
36	30	1513.93	2926.89	304064.42
37	31	1549.48	2891.34	301173.08
38	30	1485.24	2955.58	298217.50
39	31	1519.68	2921.14	295296.36
40	31	1504.80	2936.02	292360.34
41	30	1441.78	2999.04	289361.30
42	31	1474.55	2966.27	286395.03
43	30	1412.36	3028.46	283366.57
44	31	1444.00	2996.82	280369.75
45	31	1428.73	3012.09	277357.66
46	28	1276.61	3164.21	274193.45
47	31	1397.26	3043.56	271149.89
48	30	1337.18	3103.64	268046.25
49	31	1365.93	3074.89	264971.36
50	30	1306.71	3134.11	261837.25
51	31	1334.29	3106.53	258730.72
52	31	1318.46	3122.36	255608.36
53	30	1260.53	3180.29	252428.07
54	31	1286.35	3154.47	249273.60
55	30	1229.29	3211.53	246062.07
56	31	1253.91	3186.91	242875.16
57	31	1237.67	3203.15	239672.01
58	28	1103.15	3337.67	236334.34
59	31	1204.33	3236.49	233097.85
60	30	1149.52	3291.30	229806.55
61	31	1171.07	3269.75	226536.80
62	30	1117.17	3323.65	223213.15
63	31	1137.47	3303.35	219909.80
64	31	1120.64	3320.18	216589.62
65	30	1068.11	3372.71	213216.91
66	31	1086.53	3354.29	209862.62
67	30	1034.94	3405.86	206456.74
68	31	1052.08	3388.74	203068.00
69	31	1034.81	3406.01	199661.99
70	28	918.99	3521.83	196140.16
71	31	999.51	3441.31	192698.85
72	30	950.30	3490.52	189208.33
73	31	964.18	3476.64	185731.69
74	30	915.94	3524.88	182206.81
75	31	928.51	3512.31	178694.50
76	31	910.61	3530.21	175164.29
77	30	863.82	3577.00	171587.29
78	31	874.39	3566.43	168020.86
79	30	828.60	3612.22	164408.64

80	31	837.81	3603.01	160805.63
81	31	819.45	3621.37	157184.26
82	29	749.32	3691.50	153492.76
83	31	782.18	3658.64	149834.12
84	30	738.91	3701.91	146132.21
85	31	744.67	3696.15	142436.06
86	30	702.42	3738.40	138697.66
87	31	706.79	3734.03	134963.63
88	31	687.76	3753.06	131210.57
89	30	647.07	3793.75	127416.82
90	31	649.30	3791.52	123625.30
91	30	609.66	3831.16	119794.14
92	31	610.46	3830.36	115963.78
93	31	590.94	3849.88	112113.90
94	28	516.03	3924.79	108189.11
95	31	551.32	3889.50	104299.61
96	30	514.35	3926.47	100373.14
97	31	511.49	3929.33	96443.81
98	30	475.61	3965.21	92478.60
99	31	471.26	3969.56	88509.04
100	31	451.03	3989.79	84519.25
101	30	416.81	4024.01	80495.24
102	31	410.19	4030.63	76464.61
103	30	377.09	4063.73	72400.88
104	31	368.95	4071.87	68329.01
105	31	348.20	4092.62	64236.39
106	28	295.66	4145.16	60091.23
107	31	306.22	4134.60	55956.63
108	30	275.95	4164.87	51791.76
109	31	263.93	4176.89	47614.87
110	30	234.81	4206.01	43408.86
111	31	221.21	4219.61	39189.25
112	31	199.70	4241.12	34948.13
113	30	172.35	4268.47	30679.66
114	31	156.34	4284.48	26395.18
115	30	130.17	4310.65	22084.53
116	31	112.54	4328.28	17756.25
117	31	90.48	4350.34	13405.91
118	28	61.70	4379.12	9026.79
119	31	46.00	4394.82	4631.97
120	30	22.84	4631.97	0.00

133,112.39

400,000.00

STATE OF FLORIDA



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK

Public Service Commission

Docket No. : 930885-EU

Docket Title: Petition to resolve territorial dispute with Gulf Coast Electric Cooperative, Inc. by Gulf Power Company

DN 11088-94: EXHIBIT 17- CONTAINS (WSD-1) AND (WSD-2); MAPS OF WASHINGTON COUNTY FLORIDA FOR GULF COAST ELECTRIC COOP INC.

[CLK NOTE: MAP PORTION OF TESTIMONY EXHIBIT CAN BE FOUND IN MAPS MICROFILM.]

William M. Bishop

Consulting Engineers, Inc.

COPY

Telephone (904) 222-0334
Fax No. (904) 561 0205
P. O. Box 3407
715 North Calhoun Street
Tallahassee, Florida 32315-3407

July 20, 1993

Mr. Marvin Moran
Florida Department of Corrections
2601 Blair Stone Road
Tallahassee, Florida 32399-2500

92,479
SERIAL NO. 18
FSC DOCKET NO. 930885-EL
DATE 10-19-94

Re: Washington Correctional Institution
Electrical Predesign Meeting
WMBCE Project No. 1857

Dear Mr. Moran:

The following individuals were in attendance for the above referenced meeting held at William M. Bishop Consulting Engineers, Inc., in Panama City, Florida at 11:15 a.m. on Wednesday June 23rd, 1993.

Jim Long - Gulf Coast Electric Co-Op
Sid Dykes - Gulf Coast Electric Co-Op
Phil Humber, P.E. - Humber Consulting Engineers
Marvin Moran - Department of Corrections
Johnny Williams - Department of Corrections
Jimmy Southall, P.E. - William Bishop Consulting Engineers
Mike Murphy, P.E. - William Bishop Consulting Engineers
J. Keith Dantin, P.E. - William Bishop Consulting Engineers

The following items were discussed:

A) Construction Power Service

- 1) Temporary power will be brought from C.R. 279 along proposed entrance roadway and through main institution. It will be located and placed in areas for permanent power service, to eliminate the need for relocation once permanent power is installed.
- 2) Exact locations of the Institution and staff housing entrance roads need to be identified and flagged by surveyor, once determined by engineer and accepted by the Florida Department of Corrections so that Gulf Coast Electric Co-Op can install the necessary power service poles at these specified entrance locations. This will also allow the Co-Op to proceed with electric service installation along C.R. 279 and the necessary spacing between power poles. We will contact Mr. Sid Dykes once these entrance locations are identified and flagged.

18

- 3) William M. Bishop Consulting Engineers, Inc. will supply Phil Humber a Department of Corrections approved site plan as soon as possible so that he can layout the design of the temporary power service. Once completed and reviewed by the Department of Corrections this temporary power design will be forwarded to Gulf Coast Electric Co-Op for implementation.
- 4) Temporary service/meter poles will be spotted by electrical engineer on civil site layout plans with identification of each pole for Gulf Coast Electric Co-Op reference.
- 5) Overhead primary line to service above meter poles and will be installed by electric co-op and removed after construction at no charge.
- 6) Johnny Williams, DOC will coordinate all contact with Gulf Coast Electric Co-Op regarding applications for service, inspections and energizing for specific meter poles.

B) Permanent Power Service

- 1) Gulf Coast Electric Co-Op will disconnect the existing electric service and remove the power poles along Redd Sapp Road from its intersection with the dirt road to the north (that services the out parcels) until S.R. 77. This will leave the existing power supply to the out parcels from CR 279 without interruption and allow the construction of the institution to begin. It is proposed to service the out parcels through the staff housing electric lines once completed. Once the staff housing electrical service is completed, energized and tied into the existing out parcel services, then the existing overhead electric service along Redd Sapp and Dirt Road will be disconnected and removed.
- 2) Service will be delivered from C.R. 279 along main institution entry road by overhead line and primary meter at 24/13.8 K.V. Street lights will be provided on primary poles by Gulf Coast Electric Co-Op on a rental basis.
- 3) Service to Staff Housing will be overhead primary (along entrance roadway) with underground service to a metering pedestal at the back of each lot. Notes will be placed on the construction plans to the contractor which will advise him to coordinate with the electric Co-Op so that these underground electric services will be installed after the sewer collection line is installed but prior to water line and roadway base construction in the staff housing area. All facilities including underground conduits and service conductor to pedestals will be

William M. Bishop

installed by Gulf Coast Electric Co-Op. Contractor will furnish/install pedestals. Street lights will be provided by Gulf Coast Electric Co-Op on a rental basis. The electric Co-Op also requested that each staff housing lot be numbered for referenced purposes.

- 4) Should 3-phase service be needed for the sewer lift station at staff housing, the electric Co-Op requested it be constructed as close to CR-279 as possible.
- 5) Electric power poles will be constructed approximately 10 feet from the edge of the pavement along both the institution and staff housing entrance roads. A 20 foot utility easement needs to be dedicated by the Department of Corrections to the Electric Co-Op for the overhead electric service. We propose that 10 feet each side of the proposed overhead lines serve as the easement. We recommend that the overhead lines/power poles be installed first, then the Surveyor, Robert Nations can survey the exact locations and provide the Department of Corrections the necessary legal descriptions for the easements dedication to Gulf Coast Electric Co-Op.
- 6) Electric Co-Op representatives stated that there would be "no" impact fee or charge for re-routing the electric service on CR 279. They also stated that a 7% discount would be given to the Department of Corrections for the institutions's electric rate.

After reviewing the minutes of this meeting should anyone in attendance disagree with anything stated within this document, or need to add any comments not previously stated please respond to us as soon as possible.

Sincerely,

WILLIAM M. BISHOP CONSULTING ENGINEERS, INC.


J. Keith Dantin, P.E.
Vice President

JKD/ajg

cc: Mr. Jim Long
Mr. Sid Dykes
Mr. Phil Humber, P.E.
Mr. Johnny Williams
Mr. Jimmy Southall, P.E.

William M. Bishop

Gulf Coast Answers to
Second Set of Interrogatories

A. No. [Answer provided by Hub Norris.]

11Q. What is Gulf Coast's estimate of the cost to remove the Red Sapp Road single phase distribution line? Provide calculation and documentation with response and exclude any cost for relocation or upgrading.

Aa. \$2,622.72

Ab. 16 hours labor at \$54.64 per hour equals \$874.24.

Overhead - Two times \$ 874.24 equals \$1,748.48, total: \$874.24 plus \$1,748.48 equals \$2,622.72. [Answer provided by Sid Dykes and Archie Gordon.]

12Q. What is Gulf Coast's estimate of the cost to relocate and upgrade the Red Sapp Road single phase distribution line? Provide calculation and documentation with response and exclude any cost for removal.

Aa. Single phase relocation totals \$36,996.7A

Ab. Upgrading single phase to three phase adds \$14,582.54.

Ac. Total of single phase relocation and three phase upgrade equals \$51,579.28.

Consequently the incremental cost to the cooperative for providing three phase service to the Department of Corrections is \$14,582.54. [Answer provided by Sid Dykes and Archie

92,479

4
EXHIBIT NO. 19

FMSL DOCKET NO. 930885-EU

DATE 10-19-94

Gordon.]

13Q. Under what circumstances would Gulf Coast be compensated for removal of the Red Sapp Road single phase distribution line?

A. If Gulf Coast did not serve the load, then a condemnation award or an agreement by the parties would compensate Gulf Coast for the removal and relocation costs. In short, if any other power supplier were selected by the Department of Corrections to provide service, some one, whether it be the power supplier, or the customer, would be responsible for the cost of removal of the Red Sapp Road single phase distribution line and its necessary relocation either on Department of Transportation right-of-way or on additional private utility easements. Since Gulf Power has indicated it would not have agreed to compensate Gulf Coast for the removal of the Red Sapp Road single phase distribution line or provide for the relocation costs of that line, the Department of Corrections would not have constructed its facility in South Washington County. [Answer provided by Sid Dykes and Archie Gordon.]

14Q. Will any service to existing customers be affected by the removal of the Red Sapp Road single phase distribution line? If yes, indicate the number of customers, average annual revenues, cost for relocation of electric service and location

Gulf Coast Answers to
Second Set of Interrogatories

of the customers.

- 14a. Number of customers: 41
- 14b. Average annual revenues: \$67.60 per customer
- 14c. Cost of relocation: \$36,996.74
- 14d. Location of customers: Highway 279 area from Red Sapp Road North to Roche Road.

The cooperative could not simply remove the Red Sapp Road single phase distribution line and still provide the quality of service to its customers on the Western end of the Red Sapp distribution line. Although they could be served from the other side of the looped service, the cooperative would not rely on that service to its consumers and would rebuild and relocate its distribution tie. [Answer provided by Sid Dykes and Archie Gordon.]

15Q. How will Gulf Coast provide electric service to the customers presently being served by the Red Sapp Road single phase distribution line in the event they are not chosen as the provider of electric service to the Washington Correctional facility?

15A. In a same manner such customers are being served at the present time, by the relocated Red Sapp line. [Answer

#17
#18

PERMANENT METERED SERVICE 1 PHASE 200 AMP
PERMANENT METERED SERVICE 1 PHASE 200 AMP

EXIST. ACCESS RDWY.

X=10,027.69
Y=6310.58

POS #19
PERMANENT METERED SERV
1 PHASE 200 AMP.

STAFF HOUSING 27 LOTS
1 PHASE DISTRIBUTION AND
STREET LIGHTING

POS #12
TEMPORARY SERVICE 1 PHASE 200 AMP

POS #16
PERMANENT METERED
SERVICE 3 PHASE 200 AMP

POS #13
TEMPORARY WATER WELL
SERVICE 1 PHASE 200 AMP

STAFF HOUSING

FIRING RANGE

LAYOUT AREA FOR
GROUND STORAGE
TANK
ELEVATED
LAYOUT AREA FOR
ELEVATED TANK

POS #11
TEMPORARY SERVICE 1 PHASE 200 AMP

POS #14
PERMANENT METERED
SERVICE 1 PHASE 200 AMP

POS #15
PERMANENT METERED
SERVICE 1 PHASE 200 AMP

TRAINING FACILITY

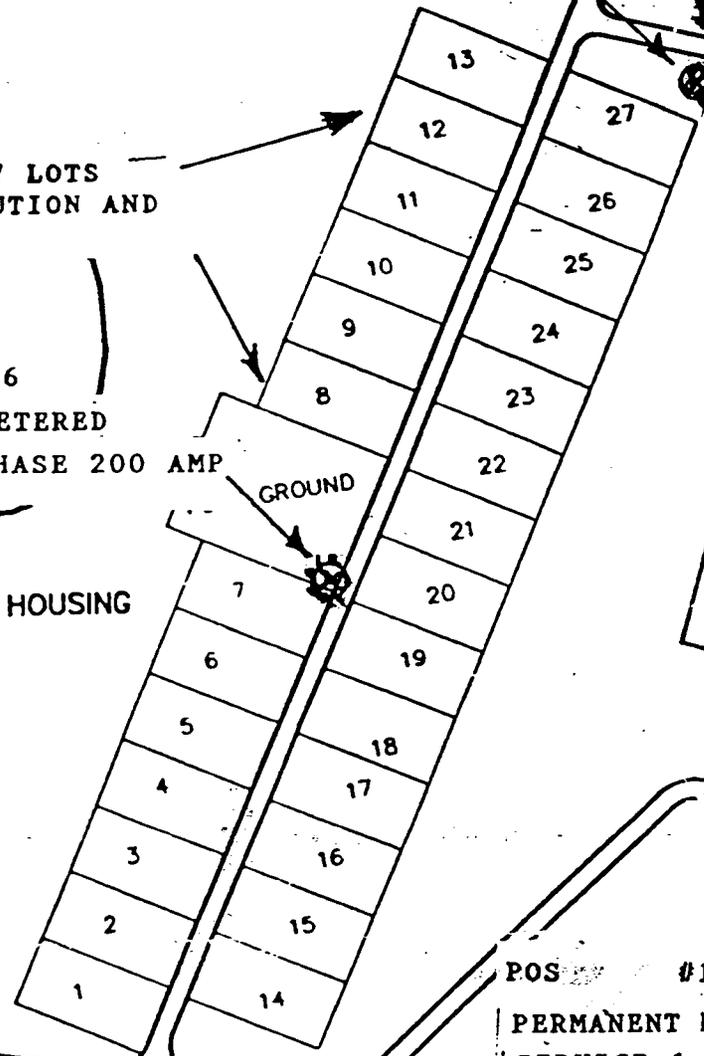
LAYOUT AREA FOR
WIND-CLUT

X=10,000.00
Y=5000.00

POS #10

FPSC DOCKET NO. 930885-E1
EXHIBIT NO. 20
DATE 10-19-54

92,479



RUN DATE 10/21/93
 RUN TIME 10:57:37

THE SOUTHERN SYSTEM
 MONTHLY ESTIMATED LOAD-CAPACITY COMPARISON
 AUGUST , 1994

ALL FIGURES IN MW

	ALABAMA	GEORGIA	GULF	MISSISSIPPI	SAVANNAH	SYSTEM
1. LOADS						
(A) NON-COINCIDENT HOUR DEMANDS	9,343.0	13,978.0	1,889.0	1,779.0	663.0	27,436.0
(B) HISTORICAL LOAD RATIO	34.5100%	49.6262%	6.8950%	6.5552%	2.4136%	100.0000
(C) CO. LOAD RESPONSIBILITY	9,468.2	13,615.4	1,891.7	1,798.5	662.2	27,436.0
2. OWNED CAPACITY						
(A) CONTRACT PURCHASES/(SALES)	256.0	(647.5)	8.0	62.0	0.0	(321.5)
(B) DSO CAPACITY EQUIVALENTS	527.2	367.9	0.0	2.5	16.9	914.5
(C) CONVENTIONAL HYDRO CAPACITY	1,584.5	662.1	0.0	0.0	0.0	2,246.6
(D) PUMPED STORAGE HYDRO	0.0	210.4	0.0	0.0	0.0	210.4
(E) NUCLEAR CAPACITY	1,639.8	2,736.0	0.0	0.0	0.0	4,375.8
(F) COAL FIRED STEAM CAPACITY	6,505.6	10,700.0	2,013.2	1,530.7	391.9	21,141.4
(G) OIL AND GAS FIRED STEAM CAPACITY	49.0	294.8	86.1	450.5	224.7	1,105.1
(H) COMBUSTION TURBINE CAPACITY	8.8	1,419.6	35.2	70.2	223.8	1,757.6
(I) TOTAL GENERATING CAPACITY	10,570.9	15,743.3	2,142.5	2,115.9	857.3	31,429.9
3. EQUIVALENT UNAVAILABILITY FACTORS						
(A) CONVENTIONAL HYDRO	1.31%	1.31%	1.31%	1.31%	1.31%	0.00
(B) PUMPED STORAGE HYDRO	0.02%	0.02%	0.02%	0.02%	0.02%	0.00
(C) FOSSIL	3.10%	3.10%	3.10%	3.10%	3.10%	0.00
4. EQUIVALENT UNAVAILABILITY						
(A) CONVENTIONAL HYDRO	20.8	8.7	0.0	0.0	0.0	29.5
(B) PUMPED STORAGE HYDRO	0.0	0.0	0.0	0.0	0.0	0.0
(C) NUCLEAR	50.8	84.8	0.0	0.0	0.0	135.6
(D) COAL FIRED STEAM	201.7	331.7	62.4	47.5	12.1	655.4
(E) OIL AND GAS FIRED STEAM	1.5	9.1	2.7	14.0	7.0	34.3
(F) COMBUSTION TURBINE	0.3	44.0	1.1	2.2	6.9	54.5
(G) TOTAL UNAVAILABLE CAPACITY	275.1	478.3	66.2	63.7	26.0	909.3
5. EFFECTIVE LOAD SERVED BY CAPACITY						
(A) CONTRACT PURCHASES/(SALES)	256.0	(647.5)	8.0	62.0	0.0	(321.5)
(B) DSO CAPACITY EQUIVALENTS	527.2	367.9	0.0	2.5	16.9	914.5
(C) CONVENTIONAL HYDRO	1,563.7	653.4	0.0	0.0	0.0	2,217.1
(D) NUCLEAR	1,589.0	2,651.2	0.0	0.0	0.0	4,240.2
(E) COAL, OIL, GAS, PSH, CT	5,532.3	10,590.4	1,883.7	1,734.0	645.3	20,385.7
(F) TOTAL	9,468.2	13,615.4	1,891.7	1,798.5	662.2	27,436.0

92,479

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 930885-5A EXHIBIT NO. 21
 COMPANY: BCEC / Pash
 WITNESS: _____
 DATE: _____

DOCUMENT NUMBER-DATE

05098 MAY 24 93

FPSC-RECORDS/REPORTING

FPSC Docket No. 930885 -EU

Exhibit 21 (JP - 1)

page 1

RUN DATE 10/21/93
 RUN TIME 10:57:37

THE SOUTHERN SYSTEM
 MONTHLY ESTIMATED LOAD-CAPACITY COMPARISON
 AUGUST , 1994

ALL FIGURES IN MW	ALABAMA	GEORGIA	GULF	MISSISSIPPI	SAVANNAH	SYSTEM
6. LOAD OUTAGES BY TYPE						
(A) CONVENTIONAL HYDRO	20.8	8.7	0.0	0.0	0.0	29.5
(B) NUCLEAR	50.8	84.8	0.0	0.0	0.0	135.6
(C) COAL, OIL, GAS, PSH, CT	177.0	332.9	60.3	55.6	20.6	646.4
(D) AVG COAL, OIL GAS, PSH, CT UNAVAILABILITY RATES	3.10%	3.05%	3.10%	3.11%	3.09%	3.07
(E) TOTAL	248.6	426.4	60.3	55.6	20.6	811.5
7. CALCULATION OF RESERVES						
(A) TOTAL OWNED CAPACITY	10,570.9	15,743.3	2,142.5	2,115.9	857.3	31,429.9
(B) LESS LOAD SERVED BY CAPACITY	9,468.2	13,615.4	1,891.7	1,798.5	662.2	27,436.0
(C) LESS LOAD OUTAGES BY TYPE	248.6	426.4	60.3	55.6	20.6	811.5
(D) TOTAL RESERVES	854.1	1,701.5	190.5	261.8	174.5	3,182.4
(E) RESERVE PERCENT (%)	9.02%	12.50%	10.07%	14.56%	26.35%	11.60
8. RESERVE PURCHASES/(SALES)						
(A) RESERVE RESPONSIBILITY	1,098.3	1,579.3	219.4	208.6	76.8	3,182.4
(B) TOTAL AVAILABLE RESERVES	854.1	1,701.5	190.5	261.8	174.5	3,182.4
(C) RESERVE PURCHASE/(SALES) MW-MONTHS	244.2	(122.2)	28.9	(53.2)	(97.7)	0.0
(D) CO. MONTHLY CAPACITY RATES (\$/KW)	7.175667	5.041750	6.233250	6.262249	5.894500	
(E) CO. SELLING CAPACITY RATE (\$/KW)	0.000000	5.041750	0.000000	6.262249	5.894500	
(F) CO. COMPOSITE PURCHASE RATE (\$/KW)	5.584570	0.000000	5.584570	0.000000	0.000000	
(G) DOLLARS	1,363,752	(616,102)	161,394	(333,151)	(575,893)	0

() INDICATES SALES TO POOL

1994 INTERCOMPANY INTERCHANGE CONTRACT

RUN DATE 10/21/93
 RUN TIME 10:57:37

THE SOUTHERN SYSTEM
 MONTHLY ESTIMATED LOAD-CAPACITY COMPARISON
 APRIL , 1994

ALL FIGURES IN MW	ALABAMA	GEORGIA	GULF	MISSISSIPPI	SAVANNAH	SYSTEM
6. LOAD OUTAGES BY TYPE						
(A) CONVENTIONAL HYDRO	3.3	1.4	0.0	0.0	0.0	4.7
(B) NUCLEAR	372.2	642.2	0.0	0.0	0.0	1,014.4
(C) COAL, OIL, GAS, PSH, CT	880.2	2,212.4	382.4	336.4	139.5	3,950.9
(D) AVG COAL, OIL GAS, PSH, CT UNAVAILABILITY RATES	22.70%	22.37%	22.69%	22.70%	22.70%	22.51
(E) TOTAL	1,255.7	2,856.0	382.4	336.4	139.5	4,970.0
7. CALCULATION OF RESERVES						
(A) TOTAL OWNED CAPACITY	10,207.7	15,598.7	2,129.2	2,109.0	824.1	30,868.7
(B) LESS LOAD SERVED BY CAPACITY	6,616.2	10,209.2	1,310.7	1,207.8	475.1	19,819.0
(C) LESS LOAD OUTAGES BY TYPE	1,255.7	2,856.0	382.4	336.4	139.5	4,970.0
(D) TOTAL RESERVES	2,335.8	2,533.5	436.1	564.8	209.5	6,079.7
(E) RESERVE PERCENT (%)	35.30%	24.82%	33.27%	46.76%	44.10%	30.68
8. RESERVE PURCHASES/(SALES)						
(A) RESERVE RESPONSIBILITY	2,029.6	3,131.8	402.1	370.5	145.7	6,079.7
(B) TOTAL AVAILABLE RESERVES	2,335.8	2,533.5	436.1	564.8	209.5	6,079.7
(C) RESERVE PURCHASE/(SALES) MW-MONTHS	(306.2)	598.3	(34.0)	(194.3)	(63.8)	0.0
(D) CO. MONTHLY CAPACITY RATES (\$/KW)	6.990083	5.049167	6.195583	6.218166	5.853750	
(E) CO. SELLING CAPACITY RATE (\$/KW)	6.990083	0.000000	6.195583	6.218166	5.853750	
(F) CO. COMPOSITE PURCHASE RATE (\$/KW)	0.000000	6.573077	0.000000	0.000000	0.000000	
(G) DOLLARS	(2,140,363)	3,932,672	(210,650)	(1,208,190)	(373,469)	0

() INDICATES SALES TO POOL

1994 INTERCOMPANY INTERCHANGE CONTRACT

FPSC Docket No. 930885 -EU
 Exhibit (JP - 1)
 PAGE 3

RUN DATE 10/21/93
 RUN TIME 10:57:37

THE SOUTHERN SYSTEM
 MONTHLY ESTIMATED LOAD-CAPACITY COMPARISON
 APRIL ,1994

ALL FIGURES IN MW	ALABAMA	GEORGIA	GULF	MISSISSIPPI	SAVANNAH	SYSTEM
1. LOADS						
(A) NON-COINCIDENT HOUR DEMANDS	6,639.0	10,545.0	1,206.0	1,167.0	415.0	19,819.0
(B) HISTORICAL LOAD RATIO	33.3832%	51.5121%	6.6132%	6.0942%	2.3973%	100.0000
(C) CO. LOAD RESPONSIBILITY	6,616.2	10,209.2	1,310.7	1,207.8	475.1	19,819.0
2. OWNED CAPACITY						
(A) CONTRACT PURCHASES/(SALES)	256.0	(647.5)	8.0	62.0	0.0	(321.5)
(B) DSO CAPACITY EQUIVALENTS	465.8	299.2	0.0	0.6	0.0	765.6
(C) CONVENTIONAL HYDRO CAPACITY	1,632.5	692.3	0.0	0.0	0.0	2,324.8
(D) PUMPED STORAGE HYDRO	0.0	214.6	0.0	0.0	0.0	214.6
(E) NUCLEAR CAPACITY	1,639.8	2,829.2	0.0	0.0	0.0	4,469.0
(F) COAL FIRED STEAM CAPACITY	6,154.8	10,493.0	1,995.7	1,517.2	351.5	20,512.2
(G) OIL AND GAS FIRED STEAM CAPACITY	49.0	294.8	86.1	450.5	224.7	1,105.1
(H) COMBUSTION TURBINE CAPACITY	9.8	1,423.1	39.4	78.7	247.9	1,798.9
(I) TOTAL GENERATING CAPACITY	10,207.7	15,598.7	2,129.2	2,109.0	824.1	30,868.7
3. EQUIVALENT UNAVAILABILITY FACTORS						
(A) CONVENTIONAL HYDRO	0.20%	0.20%	0.20%	0.20%	0.20%	0.00
(B) PUMPED STORAGE HYDRO	3.37%	3.37%	3.37%	3.37%	3.37%	0.00
(C) FOSSIL	22.70%	22.70%	22.70%	22.70%	22.70%	0.00
4. EQUIVALENT UNAVAILABILITY						
(A) CONVENTIONAL HYDRO	3.3	1.4	0.0	0.0	0.0	4.7
(B) PUMPED STORAGE HYDRO	0.0	7.2	0.0	0.0	0.0	7.2
(C) NUCLEAR	372.2	642.2	0.0	0.0	0.0	1,014.4
(D) COAL FIRED STEAM	1,397.1	2,381.9	453.0	344.4	79.8	4,656.2
(E) OIL AND GAS FIRED STEAM	11.1	66.9	19.5	102.3	51.0	250.8
(F) COMBUSTION TURBINE	2.2	323.0	8.9	17.9	56.3	408.3
(G) TOTAL UNAVAILABLE CAPACITY	1,785.9	3,422.6	481.4	464.6	187.1	6,341.6
5. EFFECTIVE LOAD SERVED BY CAPACITY						
(A) CONTRACT PURCHASES/(SALES)	256.0	(647.5)	8.0	62.0	0.0	(321.5)
(B) DSO CAPACITY EQUIVALENTS	465.8	299.2	0.0	0.6	0.0	765.6
(C) CONVENTIONAL HYDRO	1,629.2	690.9	0.0	0.0	0.0	2,320.1
(D) NUCLEAR	1,267.6	2,187.0	0.0	0.0	0.0	3,454.6
(E) COAL, OIL, GAS, PSH, CT	2,997.6	7,679.6	1,302.7	1,145.2	475.1	13,600.2
(F) TOTAL	6,616.2	10,209.2	1,310.7	1,207.8	475.1	19,819.0

FPSC Docket No. 930885 -EU

Exhibit (JP - 1)

page 4

PRISON ENERGY SOURCES

1. **Ventress Correctional Facility at Clayton, Alabama (by Pea River Coop)**
Holmes County Correctional Institute (by Gulf Power)
Century Correctional Institute (by Gulf Power)
Gulf Correctional Institute (by Gulf Coast Coop)
Walton Correctional Institute (by Choctawhatchee Coop)
Washington County Correctional (this case)

Electricity:

Air conditioning (in some cases heat pumps) of administrative and staff areas, fans in prisoner dorms, lighting, small amount of water heating, miscellaneous

Gas:

Cooking, space heating in prison dorms, almost all water heating

2. **Escambia County Jail in Pensacola (by Gulf Power)**

Electricity:

Air conditioning for all jail including inmate areas, some cooking, lighting, miscellaneous

Gas:

Space heating, water heating, some cooking

92,479

22

FPSC

DATE

930885-EJ

DATE

10-19-94

PARISH EXHIBIT TO DEPOSITION

Month	A Estimated Demand of Prison (kw)	B Estimated Coincidence with Crystal Lake	C Estimated Load on Crystal Lake (kw)
1	323	.70	241
2	294	.70	220
3	298	.70	222
4	325	.70	242
5	339	.65	235
6	363	.65	251
7	358	.65	248
8	372	.65	258
9	362	.65	251
10	325	.65	225
11	313	.70	234
12	290	.70	216
Total	3962		2844

Column A x Column B x 1.0661 loss factor = Column C

3962 x 1.07 x 1.2 x \$5.75 = \$29,251
 • ** ***

2844 x \$9.58 = \$27,246

2844 x \$10.00 = \$28,440

- * Capacity Loss Factor
- ** Reserve Factor
- *** Pool Purchase/Sale Rate for 1994 (see p. 2)

92,479

FPSC EXHIBIT NO. 23
 DOCKET NO. 930885-01
 DATE 10-19-94

PARISH EXHIBIT TO DEPOSITION

<u>Month</u>	<u>Purchase</u>	<u>Sell</u>	<u>Rate (\$/kw-Mo.)</u>
1	x		5.23
2	x		5.31
3	x		5.69
4		x	6.20
5		x	6.21
6	x		5.54
7	x		6.12
8	x		5.58
9	x		5.42
10	x		5.48
11	x		5.90
12	x		6.28
Average			5.75

31. For the prison in Alabama mentioned on page 3 of the prefiled direct testimony of Coop witness Jeff Parish, pleas provide the following for the period January 1, 1990 to the present:
- a. the monthly peak demand
 - b. the hour in which each monthly peak occurred
 - c. the day of the month for the monthly peak
 - d. the monthly energy usage
 - e. the monthly average cost in cents per kilowatt-hour
 - f. the name of the facility
 - g. the location of the facility
- Answer: See attached Exhibit A

32. For the period January 1, 1990 to the present, please provide the following information for the cooperative that provides service to the Alabama prison mentioned on page 3 of the prefiled direct testimony of Coop witness Jeff Parish:
- a. the day of each monthly peak
 - b. the hour of each montly peak
 - c. the total monthly peak demand in megawatts
 - d. the day for which the substation serving the prison reached its peak
 - e. the hour on which the substation serving the prison reached its peak

Answer: See attached Exhibit A

92,479
EXHIBIT NO. 24
FPC DOCKET NO. 930885-64
DATE 10-19-94

**INFORMATION REQUESTED BY THE FPSC
FOR THE ALABAMA PRISON LOAD**

Question # 31

A. Attached

B & C. Not available. The prison does not have continuous metering data. The hourly load shape of residential and small commercial customers, derived from a nearby substation, was subtracted from the total Clayton substation load shape to develop an approximate prison load shape.

D. Attached

E. Attached

F. Bentress Correctional Facility.

G. The prison is located in Barbour County on Highway 239 approximately 2 miles north of Clayton, Alabama.

Question # 32

. through C. Attached

D. August 4, 1994

E. 2:00 p.m.

F. Attached

G. Pea River Electric Cooperative

Question # 33

A through D. Attached

Question # 40

Not available. See answer to question # 31, B and C.

[Answer provided by Sid Dykes and Archie Gordon.]

18Q. Provide monthly integrated peaks for the years 1990 - 1993 using the following format.

Month Year Peak in MW Day of Week Day of Month Hour

18A. See attached exhibit.

19Q. What is the average number of outage hours per customer per year over the past 12 months for customers receiving service within five miles of the intersection of Highway 279 and Highway 77? Provide calculation and documentation with response.

19A. Number of hours out: 3,157

19B. Number of customers out: 1,899

19C. Average hours per customer: 1.66 (See also attached exhibit for documentation. [Answer provided by Sid Dykes and Archie Gordon.]

20Q. What is the current capacity and normal rating of the Crystal Lake and Southport substations?

20A. See attached exhibit answered by Jeff Parish.

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CRYSTAL LAKE SUBSTATION
 HOURLY MONTHLY PEAKS (MW)
 SOURCE: KVA ANALYSIS FROM METERING

Staff 2nd Interrogs to GCEC
 930885-EU

MONTH	YEAR	PEAK IN MW	DAY OF WEEK	DAY OF MONTH	HOUR
JANUARY	1990	2.902	SUN	14	08:00 AM
FEBRUARY	1990	2.685	SUN	26	07:00 AM
MARCH	1990	2.890	WED	21	07:00 AM
APRIL	1990	3.068	SUN	30	09:00 PM
MAY	1990	3.805	SAT	26	09:00 PM
JUNE	1990	4.357	TUE	19	09:00 PM
JULY	1990	4.533	SAT	7	05:00 PM
AUGUST	1990	4.430	SAT	18	04:00 PM
SEPTEMBER	1990	4.417	MON	3	08:00 PM
OCTOBER	1990	3.397	SUN	7	04:00 PM
NOVEMBER	1990	2.978	FRI	30	07:00 AM
DECEMBER	1990	3.392	WED	5	07:00 AM
JANUARY	1991	3.529	MON	14	07:00 AM
FEBRUARY	1991	3.776	SAT	16	08:00 AM
MARCH	1991	3.038	WED	27	08:00 PM
APRIL	1991	3.252	SAT	27	09:00 PM
MAY	1991	3.781	THU	30	09:00 PM
JUNE	1991	4.555	SAT	29	05:00 PM
JULY	1991	4.632	SAT	13	04:00 PM
AUGUST	1991	4.395	WED	7	09:00 PM
SEPTEMBER	1991	4.447	MON	2	08:00 PM
OCTOBER	1991	2.945	SAT	26	07:00 PM
NOVEMBER	1991	3.726	TUE	26	07:00 AM
DECEMBER	1991	3.818	THU	5	07:00 AM
JANUARY	1992	4.187	FRI	17	07:00 AM
FEBRUARY	1992	3.701	MON	10	07:00 AM
MARCH	1992	3.713	WED	11	07:00 PM
APRIL	1992	3.378	FRI	24	09:00 PM
MAY	1992	3.830	MON	25	09:00 PM
JUNE	1992	4.592	SAT	20	05:00 PM
JULY	1992	6.114	MON	20	08:00 PM
AUGUST	1992	4.627	SAT	8	02:00 PM
SEPTEMBER	1992	4.298	SAT	12	02:00 PM
OCTOBER	1992	2.791	THU	8	08:00 PM
NOVEMBER	1992	3.957	MON	30	07:00 AM
DECEMBER	1992	3.808	THU	3	07:00 AM
JANUARY	1993	3.819	THU	28	07:00 AM
FEBRUARY	1993	4.424	FRI	19	07:00 AM
MARCH	1993	4.687	SAT	13	07:00 PM
APRIL	1993	3.259	FRI	23	07:00 AM
MAY	1993	4.383	MON	31	05:00 PM
JUNE	1993	5.044	SUN	13	05:00 PM
JULY	1993	5.223	THU	29	06:00 PM
AUGUST	1993	5.181	WED	18	06:00 PM
SEPTEMBER	1993	4.595	MON	20	08:00 PM
OCTOBER	1993	3.663	SUN	31	08:00 PM
NOVEMBER	1993	4.171	MON	1	07:00 AM
DECEMBER	1993	4.653	FRI	31	08:00 AM

GULF COAST ELECTRIC COOPERATIVE, INC.
 HOURLY MONTHLY PEAKS (MW)
 SOURCE: KVA ANALYSIS FROM METERING

INTEROGATORY ANSWER # 18

Staff 2nd Interrogs to GCEC
 930885-EU

MONTH	YEAR	PEAK IN MW	DAY OF WEEK	DAY OF MONTH	HOUR
JANUARY	1990	23.473	TUE	2	07:00 AM
FEBRUARY	1990	22.755	MON	26	07:00 AM
MARCH	1990	23.563	WED	21	07:00 AM
APRIL	1990	21.741	MON	30	09:00 PM
MAY	1990	26.970	SAT	26	05:00 PM
JUNE	1990	31.595	WED	20	06:00 PM
JULY	1990	32.422	SAT	7	04:00 PM
AUGUST	1990	32.639	SAT	18	04:00 PM
SEPTEMBER	1990	32.046	MON	3	05:00 PM
OCTOBER	1990	26.638	SUN	7	04:00 PM
NOVEMBER	1990	23.986	FRI	30	07:00 AM
DECEMBER	1990	26.562	WED	5	07:00 AM
JANUARY	1991	30.072	MON	14	07:00 AM
FEBRUARY	1991	30.563	SAT	16	08:00 AM
MARCH	1991	27.842	MON	11	07:00 AM
APRIL	1991	26.525	MON	29	06:00 PM
MAY	1991	30.133	WED	29	06:00 PM
JUNE	1991	35.050	SUN	30	05:00 PM
JULY	1991	35.318	TUE	23	06:00 PM
AUGUST	1991	34.453	THU	8	05:00 PM
SEPTEMBER	1991	35.083	SUN	15	05:00 PM
OCTOBER	1991	24.601	MON	28	07:00 PM
NOVEMBER	1991	27.840	TUE	26	07:00 AM
DECEMBER	1991	31.464	TUE	17	07:00 AM
JANUARY	1992	34.473	TUE	21	07:00 AM
FEBRUARY	1992	30.269	MON	10	07:00 AM
MARCH	1992	27.798	WED	11	07:00 AM
APRIL	1992	23.108	FRI	24	06:00 PM
MAY	1992	28.901	MON	25	06:00 PM
JUNE	1992	35.252	SAT	20	06:00 PM
JULY	1992	38.476	TUE	7	06:00 PM
AUGUST	1992	35.759	THU	6	06:00 PM
SEPTEMBER	1992	33.846	SAT	12	03:00 PM
OCTOBER	1992	21.970	THU	15	08:00 PM
NOVEMBER	1992	32.551	MON	30	07:00 AM
DECEMBER	1992	31.704	THU	3	07:00 AM
JANUARY	1993	31.845	THU	28	07:00 AM
FEBRUARY	1993	35.904	FRI	19	07:00 AM
MARCH	1993	36.752	MON	15	07:00 AM
APRIL	1993	26.240	FRI	23	07:00 AM
MAY	1993	33.169	MON	31	05:00 PM
JUNE	1993	37.806	SUN	13	05:00 PM
JULY	1993	40.823	THU	29	06:00 PM
AUGUST	1993	39.753	WED	18	04:00 PM
SEPTEMBER	1993	37.543	SUN	19	03:00 PM
OCTOBER	1993	29.899	SUN	31	07:00 PM
NOVEMBER	1993	35.173	TUE	2	07:00 AM
DECEMBER	1993	36.829	FRI	31	08:00 AM

Responses to FPSC Staff's
2nd Set of Interrogatories
Docket No. 930885 - EU
GULF POWER COMPANY
July 22, 1994
Item 10
Page 1 of 3

10. Provide monthly integrated peaks for the years 1990 - 1993 using the following format.

Month Year Peak in MW Day of Week Day of Month Hour

RESPONSE:

See attached pages 2 of 3 and 3 of 3.

92,479
EXHIBIT NO. 26
FPSC DOCKET NO. 930885-E4
DATE 10-19-94

MONTHLY PEAK INFORMATION FROM 1990 - 1993

<u>MONTH</u>	<u>YEAR</u>	<u>PEAK IN MW</u>	<u>DAY OF WEEK</u>	<u>DAY OF MONTH</u>	<u>HOUR</u>
JANUARY	1990	1,250	FRIDAY	26	8A
FEBRUARY	1990	1,152	MONDAY	26	8A
MARCH	1990	1,177	WEDNESDAY	21	7A
APRIL	1990	1,509	MONDAY	30	5P
MAY	1990	1,202	THURSDAY	21	5P
JUNE	1990	1,770	SATURDAY	20	5P
JULY	1990	1,753	THURSDAY	26	4P
AUGUST	1990	1,785	WEDNESDAY	29	4P
SEPTEMBER	1990	1,696	TUESDAY	4	2P
OCTOBER	1990	1,446	THURSDAY	8	4P
NOVEMBER	1990	1,170	MONDAY	30	7A
DECEMBER	1990	1,317	SUNDAY	6	7A
JANUARY	1991	1,397	TUESDAY	22	8A
FEBRUARY	1991	1,425	SATURDAY	16	9A
MARCH	1991	1,181	MONDAY	11	7A
APRIL	1991	1,284	MONDAY	29	3P
MAY	1991	1,540	THURSDAY	30	5P
JUNE	1991	1,663	MONDAY	24	5P
JULY	1991	1,748	FRIDAY	12	5P
AUGUST	1991	1,743	WEDNESDAY	7	5P
SEPTEMBER	1991	1,712	MONDAY	16	4P
OCTOBER	1991	1,295	FRIDAY	4	3P
NOVEMBER	1991	1,360	TUESDAY	5	7A
DECEMBER	1991	1,371	THURSDAY	5	7A

MONTHLY PEAK INFORMATION FROM 1990 - 1993

<u>MONTH</u>	<u>YEAR</u>	<u>PEAK IN MW</u>	<u>DAY OF WEEK</u>	<u>DAY OF MONTH</u>	<u>HOUR</u>
JANUARY	1992	1,541	FRIDAY	17	8A
FEBRUARY	1992	1,390	MONDAY	10	8A
MARCH	1992	1,293	WEDNESDAY	11	8A
APRIL	1992	1,235	FRIDAY	24	5P
MAY	1992	1,389	THURSDAY	21	5P
JUNE	1992	1,743	THURSDAY	25	5P
JULY	1992	1,836	THURSDAY	9	3P
AUGUST	1992	1,698	MONDAY	10	2P
SEPTEMBER	1992	1,643	FRIDAY	11	3P
OCTOBER	1992	1,151	THURSDAY	29	7P
NOVEMBER	1992	1,362	MONDAY	30	8A
DECEMBER	1992	1,331	THURSDAY	3	7A
JANUARY	1993	1,383	WEDNESDAY	27	8A
FEBRUARY	1993	1,579	FRIDAY	19	8A
MARCH	1993	1,568	MONDAY	15	7A
APRIL	1993	1,049	MONDAY	26	5P
MAY	1993	1,458	MONDAY	31	5P
JUNE	1993	1,770	FRIDAY	11	3P
JULY	1993	1,906	TUESDAY	27	4P
AUGUST	1993	1,866	WEDNESDAY	18	4P
SEPTEMBER	1993	1,741	MONDAY	20	4P
OCTOBER	1993	1,391	WEDNESDAY	20	5P
NOVEMBER	1993	1,343	MONDAY	1	7A
DECEMBER	1993	1,479	FRIDAY	31	9A

Response to GCEC's Request for
Production of Documents
Docket No. 930885 - EU
GULF POWER COMPANY
October 10, 1994
Item 8
Page 1 of 15

8. All documentation of the 5 year plans of Gulf Power or any other Gulf Power plans which include any work on or replacement of lines from Vernon Substation to Sunny Hills Substation for each year from 1987 to present.

RESPONSE:

See attached pages 2 of 15 through 15 of 15.

92,479
EXHIBIT NO. 27
FPSC DOCKET NO. 930885-EU
DATE 10-19-94

BUDGET ESTIMATE OF PLANT EXPENDITURES AND RETIREMENTS

Authorized Date February 1, 1990 Estimated Starting Date July 1, 1990
 Revision No. Date Estimated Completion Date July 1, 1993

Response to GCEC's Third
Request For Documents
Docket No. 930885 - EU
GULF POWER COMPANY
October 10, 1994
Item No. 8
Page 2 of 15

Title Vernon Substation - 12 KV to 25 KV Conversion

Details By Jobs And Supporting Data:

Item 1. West Area Conversion

Convert 4,175 nameplate KVA from 12 KV to 25 KV on the Hwy 79 tap west of Hwy 277, using dual-voltage transformers. Install step-up transformers to convert the 12 KV substation voltage to the desired 25 KV line voltage. Retire existing 12 KV line regulators without replacement.

1990

Distribution Facilities	125,000
Gulf Eng. & Supervision	<u>37,000</u>
TOTAL	<u>162,000</u>

Item 2. West Area Recloser Conversion

Replace eight existing 12 KV reclosers with 24.9KV Type "E" reclosers: one 25A, four 50A, and three 100A, Type "E".

1990

Distribution Facilities	15,000
Gulf Eng. & Supervision(30%)	<u>5,000</u>
TOTAL	<u>20,000</u>

Distribution Substation - \$751,000 / Distribution Line - \$783,000

Item No.	MEMO		ESTIMATED PLANT EXPENDITURES					MEMO	Original Cost Of Plant Retired
	Previous Authorized Amount	Expended To Date	Plant Additions	Plant Transfers (Credits)	Plant Removal Cost	Plant Salvage (Credits)	Total Cash Required	Maintenance Charges	
1			162,000		9,000	(16,000)	155,000	60,000	20,000
2			20,000		1,000	(10,000)	11,000	1,000	10,000
3			175,000		5,000	(10,000)	170,000	70,000	13,000
4			71,000				71,000	2,000	
5			308,000		12,000	(8,000)	312,000	125,000	26,000
6			47,000				47,000		
7			751,000	(25,000)	30,000		756,000	30,000	40,000
Total	\$9,000		1,534,000	(25,000)	57,000	(44,000)	1,522,000	288,000	109,000

Original Estimated Cost	ESTIMATED EXPENDITURES BY YEARS								
	\$	Prior Years	1990	1991	1992	1993	Future Years		
APPROVALS	19 90		182,000		10,000	(26,000)	166,000	61,000	30,000
	19 91		246,000		5,000	(10,000)	241,000	72,000	13,000
	19 92		355,000		12,000	(8,000)	359,000	125,000	26,000
	19 93		751,000	(25,000)	30,000		756,000	30,000	40,000
	19								
	Future Years								

J.C. Engel Jr.

**BUDGET ESTIMATE OF PLANT EXPENDITURES AND RETIREMENTS
SUPPORTING DATA**

Response to GCEC's Third
Request For Documents
Docket No. 930885 - EU
GULF POWER COMPANY
October 10, 1994
Item No. 8
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Title Vernon Substation - 12 KV to 25 KV Conversion

Item 3. 12 KV to 25 KV Conversion

Convert 4,333 nameplate KVA from 12 KV to 25 KV along Ebenezer Church Road west of Hwy 279 and along Hwy 278 and Hwy 278A beyond switch number M-830, using dual-voltage transformers and step-up transformers.

1991

Distribution Facilities	135,000
Gulf Eng. & Supervision(30%)	<u>40,000</u>
TOTAL	<u>175,000</u>

Item 4. Thurmen Estates Tap Relocation

Construct three (3) miles of one #1/0 AL primary and #2 neutral along the entrance road to Thurmen Estates Subdivision replacing an existing one (1) mile underground tap through a swamp to enable the conversion of the underground 7.2 KV system.

1991

Distribution Facilities	55,000
Gulf Eng. & Supervision(30%)	<u>16,000</u>
TOTAL	<u>71,000</u>

Item 5. Vernon Area Conversion

Reconductor 1,400 feet of one #6 CU 7.2 KV primary to three #1/0 AL 25 KV primary on Church Street in Vernon. Convert 9,479 KVA from 12 KV to 25 KV along Hwy 79 from C277 to Vernon, up Hwy 79 to just south of I-10, and along Hwy 277 northeast from Vernon to the end of the line, using dual-voltage transformers and step-up transformers.

1992

Distribution Facilities	237,000
Gulf Eng. & Supervision(30%)	<u>71,000</u>
TOTAL	<u>308,000</u>

Item 6. Highway 77 Regulators

Install three (3) 218 A 25 KV regulators on Hwy 77 two miles north of Hwy 279.

1992

Distribution Facilities	45,000
Gulf Eng. & Supervision(30%)	<u>2,000</u>
TOTAL	<u>47,000</u>

Item 7. Vernon 115/25 KV Substation - E

Construct a new 115/25 KV substation adjacent to the existing Vernon 115/12 KV substation. The substation will be used to convert the existing 12 KV distribution feeder to 25 KV. The existing 115KV structure will be utilized and all other equipment including the highside fuses, 10 MVA transformer, lowside bus switches, and regulators will be transferred from Greenhead substation to the new Vernon substation. Purchase a new 115/25KV 10 MVA transformer as an idle spare in the substation.

1993

Station equipment	585,000
Gulf E & S	146,000
SCS Design	<u>20,000</u>
TOTAL	<u>751,000</u>

BUDGET ESTIMATE OF PLANT EXPENDITURES AND RETIREMENTS

Authorized Date February 1, 1990 Estimated Starting Date July 1, 1990
 Revision No. 1 Date February 1, 1992 Estimated Completion Date July 1, 1993

Response to GCEC's Third Request For Documents
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 GULF POWER COMPANY
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Title Vernon Substation - 12 KV to 25 KV Conversion
 Details By Jobs And Supporting Data:

This revision is to cancel plans to purchase a spare 115/25 KV, 10 MVA power transformer (Item 7) and to reflect actuals for Items 1 through 4. The total project decreased by \$138,000 due to these changes.

Year	Previous Estimate	Present Estimate	Increase/Decrease
Prior Yr	428,000	339,000	(89,000)
1992	355,000	365,000	10,000
1993	751,000	692,000	(59,000)
	<u>1,534,000</u>	<u>1,396,000</u>	<u>(138,000)</u>

Item 1. West Area Conversion - COMPLETED

Convert 4,175 nameplate KVA from 12 KV to 25 KV on the Hwy 79 tap west of Hwy 277, using dual-voltage transformers. Install step-up transformers to convert the 12 KV substation voltage to the desired 25 KV line voltage. Retire existing 12 KV line regulators without replacement.

	Actual
Distribution Facilities	106,000
Gulf Eng. & Supervision	32,000
TOTAL	138,000

Item 2. West Area Recloser Conversion - COMPLETED

Replace eight existing 12 KV reclosers with 24.9KV Type "E" reclosers: one 25A, four 50A, and three 100A, Type "E".

	Actual
Distribution Facilities	5,000
Gulf Eng. & Supervision(30%)	1,000
TOTAL	6,000

Distribution Substation - \$702,000 / Distribution Line - \$694,000

Item No.	MEMO		ESTIMATED PLANT EXPENDITURES					MEMO		Original Cost Of Plant Retired
	Previous Authorized Amount	Expended To Date	Plant Additions	Plant Transfers (Credits)	Plant Removal Cost	Plant Salvage (Credits)	Total Cash Required	Maintenance Charges		
1	162,000	138,000	138,000		7,000		145,000	60,000	27,000	
2	20,000	6,000	6,000		1,000		7,000	1,000	10,000	
3	175,000	148,000	148,000		7,000	(3,000)	152,000	70,000	12,000	
4	71,000	47,000	47,000				47,000	2,000		
5	308,000		308,000		12,000	(8,000)	312,000	125,000	26,000	
6	47,000		47,000				47,000			
7	751,000		702,000	(25,000)	30,000		707,000	30,000	40,000	
Total P.E.	1,534,000	339,000	1,396,000	(25,000)	57,000	(11,000)	1,417,000	288,000	115,000	
Original Estimated Cost		ESTIMATED EXPENDITURES BY YEARS								
\$	89,000	Prior Years	339,000		15,000	(3,000)	351,000	133,000	49,000	
APPROVALS	18	92	365,000		12,000	(8,000)	369,000	125,000	26,000	
<i>M. Maxwell</i>	18	93	692,000	(25,000)	30,000		697,000	30,000	40,000	
	19									
	19									
	19									
		(Future Years)								

Gulf Power Company Budget Committee By: *[Signature]* Secretary

BUDGET ESTIMATE OF PLANT EXPENDITURES AND RETIREMENTS
SUPPORTING DATA

Response to GCEC's Third
Request For Documents
Docket No. 930885 - EU
GULF POWER COMPANY
October 10, 1994
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Title Vernon Substation - 12 KV to 25 KV Conversion

Item 3. 12 KV to 25 KV Conversion - COMPLETED

Convert 4,333 nameplate KVA from 12 KV to 25 KV along Ebenezer Church Road west of Hwy 279 and along Hwy 278 and Hwy 278A beyond switch number M-830, using dual-voltage transformers and step-up transformers.

	<u>Actual</u>
Distribution Facilities	114,000
Gulf Eng. & Supervision(30%)	<u>34,000</u>
TOTAL	<u>148,000</u>

Item 4. Thurman Estates Tap Relocation - COMPLETED

Construct three (3) miles of one #1/0 AL primary and #2 neutral along the entrance road to Thurman Estates Subdivision replacing an existing one (1) mile underground tap through a swamp to enable the conversion of the underground 7.2 KV system.

	<u>Actual</u>
Distribution Facilities	36,000
Gulf Eng. & Supervision(30%)	<u>11,000</u>
TOTAL	<u>47,000</u>

Item 5. Vernon Area Conversion

Reconductor 1,400 feet of one #6 CU 7.2 KV primary to three #1/0 AL 25 KV primary on Church Street in Vernon. Convert 9,479 KVA from 12 KV to 25 KV along Hwy 79 from C277 to Vernon, up Hwy 79 to just south of I-10, and along Hwy 277 northeast from Vernon to the end of the line, using dual-voltage transformers and step-up transformers.

	<u>1992</u>
Distribution Facilities	237,000
Gulf Eng. & Supervision(30%)	<u>71,000</u>
TOTAL	<u>308,000</u>

Item 6. Highway 77 Regulators

Install three (3) 218 A 25 KV regulators on Hwy 77 two miles north of Hwy 279.

	<u>1992</u>
Distribution Facilities	45,000
Gulf Eng. & Supervision(30%)	<u>2,000</u>
TOTAL	<u>47,000</u>

Item 7. Vernon 115/25 KV Substation - 4024 - E

Construct a new 115/25 KV substation adjacent to the existing Vernon 115/12 KV substation. The substation will be used to convert the existing 12 KV distribution feeder to 25 KV. The existing 115KV structure will be utilized and all other equipment including the highside fuses, 10 MVA transformer, lowside bus switches, and regulators will be transferred from Greenhead substation to the new Vernon substation.

	<u>TOTAL</u>	<u>1992</u>	<u>1993</u>
Station equipment	597,000	-0-	597,000
Gulf E & S	50,000	4,000	46,000
SCS Design	<u>55,000</u>	<u>6,000</u>	<u>49,000</u>
TOTAL	<u>702,000</u>	<u>10,000</u>	<u>692,000</u>

GULF POWER COMPANY CAPITAL ADDITIONS BUDGET AND FORECAST
SUMMARY OF ESTIMATES OF PLANT ADDITIONS AND RETIREMENTS

DATE OCTOBER 1, 1990

10-04-90

AMOUNTS SHOWN IN THOUSANDS OF DOLLARS

PE NO	TOTAL ESTIMATED COST	EXPENDED PREVIOUS YEARS	PLANT ADDITIONS BY YEARS						SUSSEQ YEAR	
			1990	1991	1992	1993	1994	1995		
3703	171	20	151	0	0	0	0	0	0	0
3718	3,932	1,388	1,627	87	830	0	0	0	0	0
3731	1,380	40	1,340	0	0	0	0	0	0	0
3733	662	0	662	0	0	0	0	0	0	0
3734	262	0	262	0	0	0	0	0	0	0
3735	1,534	0	182	246	355	751	0	0	0	0
3736	1,167	0	50	1,117	0	0	0	0	0	0
3738	117	0	0	6	111	0	0	0	0	0
8706	305	0	0	0	29	276	0	0	0	0
8708	225	0	0	0	0	225	0	0	0	0
8709	0	0	0	0	0	0	0	0	0	0
8711	2,401	0	0	0	7	372	384	396	1	1
	12,787	1,448	4,450	1,541	1,417	1,714	479	496	1	1
	221	0	196	0	0	25	0	0	0	0
	802	0	367	435	0	0	0	0	0	0
4300	1,816	0	0	0	422	442	465	487	0	0
9300	955	0	410	545	0	0	0	0	0	0
4301	1,943	0	0	0	455	474	495	519	0	0
4302	484	0	250	234	0	0	0	0	0	0

GULF POWER COMPANY CAPITAL ADDITIONS BUDGET

SUMMARY OF ESTIMATES OF PLANT ADDITIONS AND RETIREMENTS

Date : February 1, 1992

PLANT ADDITIONS BY YEARS \$000'S

PE No.	Description	Total Estimated Cost	Expended Previous Years	1992-1997						Subsequent Years
				1992	1993	1994	1995	1996	1997	
3570	BALDWIN RD FEEDER IMP	113	0	0	0	0	0	0	0	0
3571	MILITARY POINT 46/12KV SUB	29	0	0	0	0	0	0	0	0
3572	DISTRIBUTION SUB REGULATOR-1992	561	0	0	0	0	0	0	0	0
3573	FORT WALTON SUB UCB REPLACEMENT	96	0	0	32	0	0	32	0	0
3574	MUNSAUTO 115KV SUB BREAKER REPLACEMENT	77	0	0	0	0	0	0	0	0
3575	MILIGAN SUB FEEDER BAY	164	0	0	0	0	0	0	0	0
3576	VARIOUS SUB UNDERFR RELAY INSTAL-CANCEL	0	0	0	0	0	0	0	0	0
3577	DISTRIBUTION SUB CIR SWITCH 93-CANCEL	0	0	0	0	0	0	0	0	0
3578	MISC DISTRIBUTION SUB DRIVENWAYS-CANCEL	0	0	0	0	0	0	0	0	0
3581	OCEAN CTY SUB BUS-TIE BREAKER-CANCEL	0	0	0	0	0	0	0	0	0
3582	SPARE 115/12KV DISTRI SUB TRANS-CANCEL	0	0	0	0	0	0	0	0	0
TOTAL DISTRIBUTION PLANT		12,205	193	625	56	0	0	122	0	0
PLANT TRANSFERS		67-	0	0	0	0	0	0	0	0
JOINT SUB & DIST LINE PLANT		88	0	0	0	0	0	0	0	0
3700	SYSTEM POWER FACTOR CORRECTION	3,751	2,934	0	0	0	0	0	0	0
3718	HULLY-NAV-LIVE OAK-GULF BR 2-115KV LINE	1,396	339	692	0	0	0	0	0	0
3735	VERNOH SUB-12 KV TO 25 KV CONVERSION	153	0	0	0	0	0	0	0	0
3738	SUBSTATION FAULT RECORDERS	1,836	166	0	0	0	0	0	0	0
3739	SHIPYARD 115/12KV SUB AND AREA DISTRIB	0	0	0	0	0	0	0	0	0
3740	SUBSTATION SLAG UPGRADING-CANCEL	0	0	0	0	0	0	0	0	0
3741	MISC SUBSTATION FENCE REPL-CANCEL	581	0	248	155	0	0	0	0	0



3621	Phillips Inlet Sub-OCB 8972 Feeder Imp	68	68	0	68	68	0	0	0	0	0	0	0	0	0	0	0
3622	Morسانto Substation Circuit Switcher	203	208	2	201	206	0	0	0	0	0	0	0	0	0	0	0
3623	Hurlburt Sub-OCB 5892 Feeder Imp	173	85	0	173	85	0	0	0	0	0	0	0	0	0	0	0
3624	Niceville Sub-OCB 9462 Feeder Impr	101	101	0	0	0	101	0	0	0	0	0	0	0	0	0	0
3625	Destin Sub-OCB 9562 Feeder Impr	74	74	0	0	0	74	0	0	0	0	0	0	0	0	0	0
3626	Fort Walton Sub-OCB 9492 Feeder Impr	643	643	0	0	0	643	0	0	0	0	0	0	0	0	0	0
3627	East Bay Sub-OCB 5812 Feeder Imp	74	74	0	0	0	74	0	0	0	0	0	0	0	0	0	0
3630	East Bay Sub-OCB 5832 Feeder Imp	108	108	0	0	0	108	0	0	0	0	0	0	0	0	0	0
3631	Gulf Breeze Sub-OCB 7532 Feeder Imp	100	100	0	0	0	100	0	0	0	0	0	0	0	0	0	0
3643	Distribution Substation Reg Repl	469	469	0	0	0	469	0	0	0	0	0	0	0	0	0	0
3644	Distribution Sub Lightning Arrester	199	199	0	0	0	133	66	0	0	0	0	0	0	0	0	0
3645	Distribution Sub Potential Trans Repl	125	125	0	0	0	125	0	0	0	0	0	0	0	0	0	0
3646	Goulding 115/12kv Substation Switcher Repl	200	200	0	0	0	3	197	0	0	0	0	0	0	0	0	0
3647	Unlocated 115/12kv Sub Transformer Add	1,400	1,400	0	0	0	1	1,399	0	0	0	0	0	0	0	0	0
3648	Merrianna Alpha Transformer Transfer	100	107	0	100	107	0	0	0	0	0	0	0	0	0	0	0
3649	Storm Support for Other UMWlee	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8406	Misc Distribution Line Specific Feeder Improve	7,700	7,700	0	0	0	0	1,700	2,000	2,100	1,900	0	0	0	0	0	0
8411	Greenwood Sub-Area Feeder Reconnector	73	73	0	0	0	0	0	0	73	0	0	0	0	0	0	0
8438	Substation Regulator Repl	1,430	1,430	0	0	0	0	405	415	305	305	0	0	0	0	0	0
8439	Molino 115/12 KV Sub Capacity Increase	1,087	1,087	0	0	0	0	0	0	50	1,037	0	0	0	0	0	0
8440	Cordova 115/12 KV Sub Bank #2 Addition	1,180	1,180	0	0	0	0	0	0	100	1,080	0	0	0	0	0	0
8441	Highland City 115/12KV Sub Bank #2-CANCEL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8447	Jay Road 115 KV Capacitor Bank	529	529	0	0	0	0	77	452	0	0	0	0	0	0	0	0
8453	Innerarity Sub Bank #2	1,180	1,180	0	0	0	0	0	233	927	0	0	0	0	0	0	0
8455	Pensacola City Sub OCB Replacements	157	157	0	0	0	0	0	0	157	0	0	0	0	0	0	0
8456	Scenic Hills Sub-OCB 7802-Woodrun Subdiv Cable Repl	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8460	Hurlburt Sub-OCB 5892 Feeder Imp	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8461	Fort Walton Sub-OCB 9492 Feeder Impr	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8462	Niceville Sub-OCB 9462 Feeder Imp	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8463	Destin Sub-OCB 9562 Feeder Impr	51	51	0	0	0	0	0	51	0	0	0	0	0	0	0	0
8464	Substation Lightning Arrester Repl	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8468	Distribution Sub. Bus-Tie Breaker Repl.	1,108	1,108	0	0	0	0	0	28	638	542	0	0	0	0	0	0
8476	Destin 115/12.47kv Sub Bank Add-CANCEL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8477	Live Oak 115/12.47kv Sub Bank Add	1,610	1,610	0	0	0	0	10	1,600	0	0	0	0	0	0	0	0
8478	Miramar 115kv Sub 30 MVAR Capacitor	675	675	0	0	0	0	0	44	631	0	0	0	0	0	0	0
8479	S. Crestview 115/12.47kv Sub Bank Add	1,625	1,625	0	0	0	0	0	0	60	1,565	0	0	0	0	0	0
8480	Milton 115/12kv Sub Bank Add	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8481	Merrianna 115kv Sub Bank Add	550	550	0	0	0	0	0	44	506	0	0	0	0	0	0	0
8482	Sullivan Sub-OCB 9612 Feeder Impr	99	99	0	0	0	0	99	0	0	0	0	0	0	0	0	0
8483	Parker Sub-OCB 8332 Feeder Impr	91	91	0	0	0	0	91	0	0	0	0	0	0	0	0	0
	Total Distribution Plant	84,591	86,053	781	13,833	15,295	10,756	10,699	13,565	13,622	14,412	14,412	14,998	14,998	16,246	16,246	0

JOINT SUB & DIST LINE PLANT																	
3700/8700	System Reactive Corrective Capacity	1,854	1,639	0	292	277	262	267	272	278	283	0	0	0	0	0	0
3735	Vernon Sub-12 KV to 25 KV Conversion	1,161	809	469	692	340	0	0	0	0	0	0	0	0	0	0	0
3743	Sub. PCB Capacitor Repl	532	543	129	248	259	155	0	0	0	0	0	0	0	0	0	0
3744	Misc. Sub. Fence Repl.	90	54	0	90	54	0	0	0	0	0	0	0	0	0	0	0

OCT 1, 1993 REVISION

2/1/84 Revision
GULF POWER COMPANY
CAPITAL ADDITIONS BUDGET & FORECAST
(THOUSANDS OF DOLLARS)

PE NO.	DESCRIPTION	Total Estimated Cost	Expended Previous Years	PLANT ADDITIONS BY YEARS						2/1/84 Subsequent Years
				1993	1994	1995	1996	1997	1998	
3700	System Reactive Corrective Capacity	539	0	277	262	0	0	0	0	0
8700	System Reactive Corrective Capacity	1,100	0	0	0	267	272	278	283	0
3735	Vernon Sub-12 KV to 25 KV Conversion	809	469	340	0	0	0	0	0	0
3743	Sub. PCB Capacitor Repl	543	129	259	155	0	0	0	0	0
3744	Misc. Sub. Fence Repl.	54	0	54	0	0	0	0	0	0
3745	B Marcus Sub New Feeder #8	357	0	357	0	0	0	0	0	0
3746	East Bay-Hurhart 115kv Line	2,641	0	0	8	404	2,229	0	0	0
3747	Crystal Beach 115/12kv Sub and Feeder	1,658	0	217	1,441	0	0	0	0	0
8706	Northside Substation Feeder No. 4	212	0	0	0	0	0	7	205	0
8711	Circuit Switcher Improvements	1,881	0	0	0	27	638	663	555	0
8713	Misc. Sub. Fence Repl	96	0	0	0	0	96	0	0	0
8714	115KV Sub Capacitor Breaker Repl	528	0	0	0	0	16	512	0	0
8715	Cristl 115kv Circuit Breaker Repl	2,238	0	0	0	0	61	2,177	0	0
8716	Pine Forest Sub Feeder Bay	211	0	0	0	0	0	211	0	0
8717	Chipley Sub Third Feeder	309	0	0	0	309	0	0	0	0
8718	Honeysuckle Sub Fourth Feeder	186	0	0	0	186	0	0	0	0
8719	Gulf Breeze Sub Feeder #5 & Sub Cable	2,071	0	0	0	0	0	5	2,066	0
8720	Milton 115/12Kv New Sub	1,935	0	0	0	0	0	55	1,880	0
TOTAL JOINT SUB & DIST LINE PLANT		17,368	598	1,504	1,866	1,193	3,310	3,908	4,989	0
PLANT TRANSFERS		170	0	0	70	0	0	100	0	0

RECORDER ID: 44031102000 GROUP: 41403G START TIME: 07/25/94 00:01
LOCATION: CLOCK: 15 MINS STOP TIME: 07/25/94 24:00
TEST NAME: HOLMES CORR INSTITUT UOM: KW CHAN: 1 PULSE MULT: .045

TIME	Sunday	Monday 07/25	Tuesday	Wednesday	Thursday	Friday	Saturday
00:15		238.32					
00:30		223.56					
00:45		238.68					
01:00		224.64					
01:15		236.70					
01:30		222.12	-				
01:45		243.18					
02:00		225.72					
02:15		231.66					
02:30		230.76					
02:45		233.64					
03:00		232.92					
03:15		227.52					
03:30		243.54					
03:45		259.02					
04:00		258.84					
04:15		262.80					
04:30		253.62					
04:45		262.98					
05:00		293.58					
05:15		324.72					
05:30		311.40					
05:45		357.12					
06:00		356.94					
06:15		287.28					
06:30		300.24					
06:45		340.02					
07:00		329.22					
07:15		322.92					
07:30		330.12					
07:45		376.92					
08:00		372.96					
08:15		379.80					
08:30		391.86					
08:45		387.36					
09:00		395.10					
09:15		387.90					
09:30		407.16					
09:45		397.44					
10:00		410.04					
10:15		389.88					
10:30		381.42					
10:45		381.78					
11:00		380.88					
11:15		376.02					
11:30		391.86					
11:45		417.06					
12:00		417.24					

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EXHIBIT NO. 28
FISC DOCKET NO. 930885-ED
DATE 10-19-94

4. Please provide an analysis of the rate impacts which includes:
- a. the total annual KWH sales for the electric utility for the preceding 5 years and the projected total annual KWH sales for the succeeding 5 years; and,
 - b. an estimate of the total annual kilowatt demand and the kilowatt hour load to be served in the disputed area for each of the next 5 years.

Response:

a. **Total Retail Billed KWH**

<u>Preceding 5 Years</u>		
	1988	7,198,014,105
	1989	7,510,576,031
	1990	7,879,764,731
	1991	7,886,360,089
	1992	8,022,807,586
(6 Months Actual)	1993	8,030,558,482
<u>Succeeding 5 Years</u>		
	1994	8,213,452,917
	1995	8,360,385,720
	1996	8,494,943,809
	1997	8,618,596,344

b. **Annual Kilowatt Demand * Annual KWH Load**

1994	372 KW	1,961,400
1995	372 KW	1,961,400
1996	372 KW	1,961,400
1997	372 KW	1,961,400
1998	372 KW	1,961,400

* Based on existing similar correctional facilities now served by Gulf Power Company. These facilities are Holmes Correctional and Century Correctional. The possible expansion of this facility has not been shown.

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EXHIBIT NO. 29
 FPSC DOCKET NO. 930885-EU
 DATE 10-19-94

3. Please provide an economic analysis of the utility's current costs and costs for each of the next five years for the following:
- a. the annual and cumulative present value revenue requirements for generating facilities or purchased power, and fixed operating and maintenance expenses necessary to serve the disputed area;
 - b. the annual and cumulative present value revenue requirements for additional fuel necessary to serve the disputed area;
 - c. the total system embedded cost for generating plant and fixed operating and maintenance expenses (or purchased power) expressed in dollars per kilowatt;
 - d. an estimate of the total system incremental cost for generating plant and fixed operation and maintenance expenses (or purchased power) expressed in dollars per kilowatt;
 - e. the project description and the total project cost to construct and maintain the following facilities to serve the disputed area:
 - i. transmission facilities and any associated operating and maintenance costs;
 - ii. distribution facilities and any associated operating and maintenance costs; and,
 - iii. customer service facilities and any associated operating and maintenance costs including such costs as salaries, administrative overhead and other identifiable expenses.

Response:

a. & d.

There are currently no existing documents, studies, reports, etc., that would qualify to satisfy this Request for Production of Documents. The reason for not needing to study or analyze the impacts on the Company from the estimated correctional facility load of 372 kilowatts, is that this load increase falls well within the Company's 224,000 kilowatts reserve margin and has no impact on Gulf's planned resource or purchased power needs.

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EXHIBIT NO. 30
FPSC DOCKET NO. 930885-EU
DATE 10-19-94

COMPARISON OF WHEN COMPANIES PEAK

<u>MONTH</u>	<u>YEAR</u>	<u>GULF's PEAK HOUR</u>	<u>CRYSTAL LAKE SUB. PEAK HOUR</u>
JANUARY	1990	8A	8A
FEBRUARY	1990	8A	7A
JUNE	1990	5P	9P
JULY	1990	4P	5P
AUGUST	1990	4P	4P
DECEMBER	1990	7A	7A
JANUARY	1991	8A	7A
FEBRUARY	1991	9A	8A
JUNE	1991	5P	5P
JULY	1991	5P	4P
AUGUST	1991	5P	9P
DECEMBER	1991	7A	7A
JANUARY	1992	8A	7A
FEBRUARY	1992	8A	7A
JUNE	1992	5P	5P
JULY	1992	3P	8P
AUGUST	1992	2P	2P
DECEMBER	1992	7A	7A
JANUARY	1993	8A	7A
FEBRUARY	1993	8A	7A
JUNE	1993	3P	5P
JULY	1993	4P	6P
AUGUST	1993	4P	6P
DECEMBER	1993	9A	8A

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EXHIBIT NO. 31

FPSC DOCKET NO. 930885-EN

DATE 10-19-94

MONTHLY PEAK INFORMATION FROM 1990 - 1993

<u>MONTH</u>	<u>YEAR</u>	<u>PEAK IN MW</u>	<u>DAY OF WEEK</u>	<u>DAY OF MONTH</u>	<u>HOUR</u>
JANUARY	1990	1,250	FRIDAY	26	8A
FEBRUARY	1990	1,152	MONDAY	26	8A
MARCH	1990	1,177	WEDNESDAY	21	7A
APRIL	1990	1,509	MONDAY	30	5P
MAY	1990	1,202	THURSDAY	21	5P
JUNE	1990	1,770	SATURDAY	20	5P
JULY	1990	1,753	THURSDAY	26	4P
AUGUST	1990	1,785	WEDNESDAY	29	4P
SEPTEMBER	1990	1,696	TUESDAY	4	2P
OCTOBER	1990	1,446	THURSDAY	8	4P
NOVEMBER	1990	1,170	MONDAY	30	7A
DECEMBER	1990	1,317	SUNDAY	6	7A
JANUARY	1991	1,397	TUESDAY	22	8A
FEBRUARY	1991	1,425	SATURDAY	16	9A
MARCH	1991	1,181	MONDAY	11	7A
APRIL	1991	1,284	MONDAY	29	3P
MAY	1991	1,540	THURSDAY	30	5P
JUNE	1991	1,663	MONDAY	24	5P
JULY	1991	1,748	FRIDAY	12	5P
AUGUST	1991	1,743	WEDNESDAY	7	5P
SEPTEMBER	1991	1,712	MONDAY	16	4P
OCTOBER	1991	1,295	FRIDAY	4	3P
NOVEMBER	1991	1,360	TUESDAY	5	7A
DECEMBER	1991	1,371	THURSDAY	5	7A

MONTHLY PEAK INFORMATION FROM 1990 - 1993

<u>MONTH</u>	<u>YEAR</u>	<u>PEAK IN MW</u>	<u>DAY OF WEEK</u>	<u>DAY OF MONTH</u>	<u>HOUR</u>
JANUARY	1992	1,541	FRIDAY	17	8A
FEBRUARY	1992	1,390	MONDAY	10	8A
MARCH	1992	1,293	WEDNESDAY	11	8A
APRIL	1992	1,235	FRIDAY	24	5P
MAY	1992	1,389	THURSDAY	21	5P
JUNE	1992	1,743	THURSDAY	25	5P
JULY	1992	1,836	THURSDAY	9	3P
AUGUST	1992	1,698	MONDAY	10	2P
SEPTEMBER	1992	1,643	FRIDAY	11	3P
OCTOBER	1992	1,151	THURSDAY	29	7P
NOVEMBER	1992	1,362	MONDAY	30	8A
DECEMBER	1992	1,331	THURSDAY	3	7A
JANUARY	1993	1,383	WEDNESDAY	27	8A
FEBRUARY	1993	1,579	FRIDAY	19	8A
MARCH	1993	1,568	MONDAY	15	7A
APRIL	1993	1,049	MONDAY	26	5P
MAY	1993	1,458	MONDAY	31	5P
JUNE	1993	1,770	FRIDAY	11	3P
JULY	1993	1,906	TUESDAY	27	4P
AUGUST	1993	1,866	WEDNESDAY	18	4P
SEPTEMBER	1993	1,741	MONDAY	20	4P
OCTOBER	1993	1,391	WEDNESDAY	20	5P
NOVEMBER	1993	1,343	MONDAY	1	7A
DECEMBER	1993	1,479	FRIDAY	31	9A

CRYSTAL LAKE SUBSTATION
 HOURLY MONTHLY PEAKS (MW)
 SOURCE: KVA ANALYSIS FROM METERING

Staff 2nd Interrogs to GCEC
 930885-EU

MONTH	YEAR	PEAK IN MW	DAY OF WEEK	DAY OF MONTH	HOUR
JANUARY	1990	2.902	SUN	14	08:00 AM
FEBRUARY	1990	2.685	SUN	26	07:00 AM
MARCH	1990	2.890	WED	21	07:00 AM
APRIL	1990	3.068	SUN	30	09:00 PM
MAY	1990	3.805	SAT	26	09:00 PM
JUNE	1990	4.357	TUE	19	09:00 PM
JULY	1990	4.533	SAT	7	05:00 PM
AUGUST	1990	4.430	SAT	18	04:00 PM
SEPTEMBER	1990	4.417	MON	3	08:00 PM
OCTOBER	1990	3.397	SUN	7	04:00 PM
NOVEMBER	1990	2.978	FRI	30	07:00 AM
DECEMBER	1990	3.392	WED	5	07:00 AM
JANUARY	1991	3.529	MON	14	07:00 AM
FEBRUARY	1991	3.776	SAT	16	08:00 AM
MARCH	1991	3.038	WED	27	08:00 PM
APRIL	1991	3.252	SAT	27	09:00 PM
MAY	1991	3.781	THU	30	09:00 PM
JUNE	1991	4.555	SAT	29	05:00 PM
JULY	1991	4.632	SAT	13	04:00 PM
AUGUST	1991	4.395	WED	7	09:00 PM
SEPTEMBER	1991	4.447	MON	2	08:00 PM
OCTOBER	1991	2.945	SAT	26	07:00 PM
NOVEMBER	1991	3.726	TUE	26	07:00 AM
DECEMBER	1991	3.818	THU	5	07:00 AM
JANUARY	1992	4.187	FRI	17	07:00 AM
FEBRUARY	1992	3.701	MON	10	07:00 AM
MARCH	1992	3.713	WED	11	07:00 PM
APRIL	1992	3.378	FRI	24	09:00 PM
MAY	1992	3.830	MON	25	09:00 PM
JUNE	1992	4.592	SAT	20	05:00 PM
JULY	1992	6.114	MON	20	08:00 PM
AUGUST	1992	4.627	SAT	8	02:00 PM
SEPTEMBER	1992	4.298	SAT	12	02:00 PM
OCTOBER	1992	2.791	THU	8	08:00 PM
NOVEMBER	1992	3.957	MON	30	07:00 AM
DECEMBER	1992	3.808	THU	3	07:00 AM
JANUARY	1993	3.819	THU	28	07:00 AM
FEBRUARY	1993	4.424	FRI	19	07:00 AM
MARCH	1993	4.687	SAT	13	07:00 PM
APRIL	1993	3.259	FRI	23	07:00 AM
MAY	1993	4.383	MON	31	05:00 PM
JUNE	1993	5.044	SUN	13	05:00 PM
JULY	1993	5.223	THU	29	06:00 PM
AUGUST	1993	5.181	WED	18	06:00 PM
SEPTEMBER	1993	4.595	MON	20	08:00 PM
OCTOBER	1993	3.663	SUN	31	08:00 PM
NOVEMBER	1993	4.171	MON	1	07:00 AM
DECEMBER	1993	4.653	FRI	31	08:00 AM

GULF COAST ELECTRIC COOPERATIVE, INC.
 HOURLY MONTHLY PEAKS (MW)
 SOURCE: KVA ANALYSIS FROM METERING

INTEROGATORY ANSWER # 18

Staff 2nd Interrogs to GCEC
 930885-EU

MONTH	YEAR	PEAK IN MW	DAY OF WEEK	DAY OF MONTH	HOUR
JANUARY	1990	23.473	TUE	2	07:00 AM
FEBRUARY	1990	22.755	MON	26	07:00 AM
MARCH	1990	23.563	WED	21	07:00 AM
APRIL	1990	21.741	MON	30	09:00 PM
MAY	1990	26.970	SAT	26	05:00 PM
JUNE	1990	31.595	WED	20	06:00 PM
JULY	1990	32.422	SAT	7	04:00 PM
AUGUST	1990	32.639	SAT	18	04:00 PM
SEPTEMBER	1990	32.046	MON	3	05:00 PM
OCTOBER	1990	26.638	SUN	7	04:00 PM
NOVEMBER	1990	23.986	FRI	30	07:00 AM
DECEMBER	1990	26.562	WED	5	07:00 AM
JANUARY	1991	30.072	MON	14	07:00 AM
FEBRUARY	1991	30.563	SAT	16	08:00 AM
MARCH	1991	27.842	MON	11	07:00 AM
APRIL	1991	26.525	MON	29	06:00 PM
MAY	1991	30.133	WED	29	06:00 PM
JUNE	1991	35.050	SUN	30	05:00 PM
JULY	1991	35.318	TUE	23	06:00 PM
AUGUST	1991	34.453	THU	8	05:00 PM
SEPTEMBER	1991	35.083	SUN	15	05:00 PM
OCTOBER	1991	24.601	MON	28	07:00 PM
NOVEMBER	1991	27.840	TUE	26	07:00 AM
DECEMBER	1991	31.464	TUE	17	07:00 AM
JANUARY	1992	34.473	TUE	21	07:00 AM
FEBRUARY	1992	30.269	MON	10	07:00 AM
MARCH	1992	27.798	WED	11	07:00 AM
APRIL	1992	23.108	FRI	24	06:00 PM
MAY	1992	28.901	MON	25	06:00 PM
JUNE	1992	35.252	SAT	20	06:00 PM
JULY	1992	38.476	TUE	7	06:00 PM
AUGUST	1992	35.759	THU	6	06:00 PM
SEPTEMBER	1992	33.846	SAT	12	03:00 PM
OCTOBER	1992	21.970	THU	15	08:00 PM
NOVEMBER	1992	32.551	MON	30	07:00 AM
DECEMBER	1992	31.704	THU	3	07:00 AM
JANUARY	1993	31.845	THU	28	07:00 AM
FEBRUARY	1993	35.904	FRI	19	07:00 AM
MARCH	1993	36.752	MON	15	07:00 AM
APRIL	1993	26.240	FRI	23	07:00 AM
MAY	1993	33.169	MON	31	05:00 PM
JUNE	1993	37.806	SUN	13	05:00 PM
JULY	1993	40.823	THU	29	06:00 PM
AUGUST	1993	39.753	WED	18	04:00 PM
SEPTEMBER	1993	37.543	SUN	19	03:00 PM
OCTOBER	1993	29.899	SUN	31	07:00 PM
NOVEMBER	1993	35.173	TUE	2	07:00 AM
DECEMBER	1993	36.829	FRI	31	08:00 AM

**INCREMENTAL PURCHASED CAPACITY COST
TO SERVE WASHINGTON COUNTY CORRECTIONAL FACILITY
1995 through 1998**

It should be noted that this exhibit has been prepared in response to a request made by the FPSC Staff during the hearing in this case. As stated at the hearing, Gulf Power believes that it is inappropriate to consider in isolation capacity transactions made between Gulf Power Company and other members of the Southern electric system through their collective participation in the Intercompany Interchange Contract (IIC). A proper review of the IIC impacts resulting from Gulf's service of the prison load should include all of the benefits flowing to Gulf as a result of its participation in the IIC, including (without limitation) the production cost savings that flow from economic dispatch of the system as a whole and benefits of economy energy transactions. The submission of this exhibit should not be interpreted as a change in Gulf Power's position on this issue.

It should also be noted that the size of the prison load in question is too small to be captured in the computer models used by the Southern electric system to forecast the capacity equalization payments that flow between member companies under the IIC. The results for such a small incremental load are unduly impacted by rounding that occurs within the model. The following information, which has been calculated without use of the system models, should be construed as only an approximation of the capacity equalization costs associated with the loads presented in the following tables.

Summary of Results					
	1995	1996	1997	1998	Total
Gulf	\$0	\$9,214	\$18,426	\$27,641	\$55,281
GCEC	\$39,488	\$39,488	\$39,488	\$39,488	\$157,952
Difference	(\$39,488)	(\$30,274)	(\$21,062)	(\$11,847)	(\$102,671)
Gulf (NPV)	\$0	\$8,483	\$15,617	\$21,569	\$45,669
GCEC (NPV)	\$39,488	\$36,905	\$34,490	\$32,234	\$143,117
Difference	(\$39,488)	(\$28,422)	(\$18,873)	(\$10,665)	(\$97,448)

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 930885-EU EXHIBIT NO. 32
COMPANY/ GPC/Howell
WITNESS: _____

DOCUMENT NUMBER-DATE
11558 NOV 16 1994

Gulf Power Company (Gulf)

Month	A Prison Peak Demand	B Gulf's Reserve Requirement	C Gulf's System Losses	D [A*B*C=D] Gulf's Demand Contribution	E IIC Capacity Charge	F [(D*E)*0/3=F] Gulf's Capacity Cost 1995	G [(D*E)*1/3=G] Gulf's Capacity Cost 1996	H [(D*E)*2/3=H] Gulf's Capacity Cost 1997	I [(D*E)*3/3=I] Gulf's Capacity Cost 1998	Gulf's Cumulative Capacity Cost 1995-1998
1 January	323	1.2058	1.07	417	\$5.35	\$0	\$744	\$1,487	\$2,231	
2 February	294	1.1677	1.07	367	\$5.43	\$0	\$664	\$1,329	\$1,993	
3 March	298	1.2158	1.07	388	\$6.12	\$0	\$792	\$1,583	\$2,375	
4 April	325	1.3327	1.07	463	\$5.86	\$0	\$904	\$1,809	\$2,713	
5 May	339	1.1011	1.07	399	\$5.40	\$0	\$718	\$1,436	\$2,155	
6 June	363	1.0664	1.07	414	\$5.45	\$0	\$752	\$1,504	\$2,256	
7 July	358	1.0553	1.07	404	\$5.45	\$0	\$734	\$1,468	\$2,202	
8 August	372	1.1007	1.07	438	\$5.37	\$0	\$784	\$1,568	\$2,352	
9 September	362	1.1090	1.07	430	\$5.35	\$0	\$767	\$1,534	\$2,301	
10 October	325	1.3553	1.07	471	\$5.35	\$0	\$840	\$1,680	\$2,520	
11 November	313	1.2895	1.07	432	\$5.49	\$0	\$791	\$1,581	\$2,372	
12 December	290	1.2709	1.07	394	\$5.51	\$0	\$724	\$1,447	\$2,171	
TOTAL						\$0	\$9,214	\$18,426	\$27,641	\$55,281
Net Present Value 1995						\$0	\$8,483	\$15,617	\$21,569	\$45,669
8.62% discount rate (Gulf's after tax cost of capital)										

Gulf Coast Electric Cooperative (GCEC)

Month	A Prison Peak Demand	B GCEC's Reserve Requirement	C GCEC's System Losses	D [A*B*C=D] GCEC's Demand Contribution	E AEC Capacity Charge	F [D*E=F] GCEC's Capacity Cost 1995	G [D*E=G] GCEC's Capacity Cost 1996	H [D*E=H] GCEC's Capacity Cost 1997	I [D*E=I] GCEC's Capacity Cost 1998	GCEC's Cumulative Capacity Cost 1995-1998
1 January	323	n.a.	1.04	336	\$9.58	\$3,219	\$3,219	\$3,219	\$3,219	
2 February	294	n.a.	1.04	306	\$9.58	\$2,931	\$2,931	\$2,931	\$2,931	
3 March	298	n.a.	1.04	310	\$9.58	\$2,970	\$2,970	\$2,970	\$2,970	
4 April	325	n.a.	1.04	338	\$9.58	\$3,238	\$3,238	\$3,238	\$3,238	
5 May	339	n.a.	1.04	353	\$9.58	\$3,382	\$3,382	\$3,382	\$3,382	
6 June	363	n.a.	1.04	378	\$9.58	\$3,621	\$3,621	\$3,621	\$3,621	
7 July	358	n.a.	1.04	372	\$9.58	\$3,564	\$3,564	\$3,564	\$3,564	
8 August	372	n.a.	1.04	387	\$9.58	\$3,707	\$3,707	\$3,707	\$3,707	
9 September	362	n.a.	1.04	376	\$9.58	\$3,602	\$3,602	\$3,602	\$3,602	
10 October	325	n.a.	1.04	338	\$9.58	\$3,238	\$3,238	\$3,238	\$3,238	
11 November	313	n.a.	1.04	326	\$9.58	\$3,123	\$3,123	\$3,123	\$3,123	
12 December	290	n.a.	1.04	302	\$9.58	\$2,893	\$2,893	\$2,893	\$2,893	
TOTAL						\$39,488	\$39,488	\$39,488	\$39,488	\$157,952
Net Present Value 1995						\$39,488	\$36,905	\$34,490	\$32,234	\$143,117
7.00% discount rate (rate assumed by AEC for discovery purposes)										

Notes:

- Column A: prison peak demands assumed by AEC for discovery purposes.
- Column B: figures for Gulf Power reflect monthly reserve obligation under IIC for 1994; no similar requirement is assumed for GCEC.
- Column C: figures for Gulf reflect combination of assumed losses for both transmission and distribution; figures for GCEC reflect only distribution losses. Difference in treatment results from different measurement point for billing purposes. Assumed transmission losses are 3%. Assumed distribution losses are 4%.
- Column D: calculated as shown.
- Column E: figures reflect 1995 capacity charge rates which for simplicity have been held constant over the four years.
- Column F: calculated as shown. Formula for Gulf reflects the first year impact of three year load averaging for calculation of IIC costs.
- Column G: calculated as shown. Formula for Gulf reflects the second year impact of three year load averaging for calculation of IIC costs.
- Column H: calculated as shown. Formula for Gulf reflects the third year impact of three year load averaging for calculation of IIC costs.
- Column I: calculated as shown. Formula for Gulf in the fourth year and thereafter reflects 100% impact of prison load for IIC calculation.

Florida Public Service Commission
 Docket No. 930885-EU
 GULF POWER COMPANY
 Hearing Exhibit No. 32 (late filed)
 Witness: M. W. Howell
 November 15, 1994
 Page 2 of 2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to resolve)
territorial dispute with Gulf)
Coast Electric Cooperative, Inc.) Docket No. 930885-EU
by Gulf Power Company)
_____)

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 15th day of November 1994 by U.S. Mail or hand delivery to the following:

Martha Carter Brown, Esquire
Staff Counsel
FL Public Service Commission
101 East Gaines Street
Tallahassee FL 32399-0863

Patrick Floyd, Esquire
Gulf Coast Electric Coop.
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G. EDISON HOLLAND, JR.
Florida Bar No. 261599
JEFFREY A. STONE
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Beggs & Lane
P. O. Box 12950
Pensacola FL 32576
904 432-2451
Attorneys for Gulf Power Company

<u>PRESENT VALUE OF CURRENT PERIOD ASSIGNMENT OF PATRONAGE CAPITAL</u>				
	14 YEARS Avg. Monthly Bill \$811.58¹	14 YEARS October Bill \$755.67²	20 YEARS Avg. Monthly Bill \$811.58¹	20 YEARS October Bill \$755.67²
5%	409.93	381.69	305.88	284.81
7%	314.73	293.05	209.71	195.27
10%	213.69	198.98	120.60	112.29
15%	114.68	106.78	49.59	46.17

The appropriate discount rate used to determine the present value of the current period assignment of patronage capital must be discretely established for each customer/member based on that member's opportunity cost for reinvesting the same funds which have been retained by the cooperative. This basic discount rate should be adjusted upward to reflect the additional risk that the refund of the assigned patronage capital credit may be deferred, temporarily or indefinitely, as a result of the cooperative's need to fulfill current capital requirements or the necessity to comply with the cooperative's mortgage loan covenants.

¹Amount of Patronage Capital Credit taken from Hearing Exhibit No. 11 introduced into the record during the testimony of Archie Gordon.

²Amount of Patronage Capital Credit taken from Hearing Exhibit No. 7 introduced into the record during the testimony of Archie Gordon.

92,479
 EXHIBIT NO. 33
 FPSC DOCKET NO. 930885-EU
 DATE 10-19-94

Florida Public Service Commission

Docket No. 930885-EU

Witness: John E. Hodges, Jr.

Exhibit No. 34 (JEH-1)

Schedule 1

Page 1 of 2

UTILITY DEPARTMENT
1230 East 15th Street
Post Office Box 2448
Panama City FL 32402
Telephone 904 785-4611



Gulf Power

The Gulf Power Company

April 9, 1993

Mr. Marvin Moran
Florida Dept. of Corrections
2601 Blainstone Rd.
Tallahassee FL 32399-25500

Dear Mr. Moran:

After several telephone conversations between Brian Blair and my staff, Mr. Blair indicated future communications concerning the new Washington Co. correctional facility be addressed to you. According to Mr. Blair, the facility will be located at the northwest corner of Highway 77 and Highway 279 (Greenhead FL).

Gulf Power Company is pleased to submit the following proposal for electrical service for the new prison. It is Gulf's understanding this facility is similar to the Holmes correctional facility which is now being served by Gulf Power. In an effort to make realistic electrical recommendations for the Washington Co. prison, we have used actual metered data from the Holmes Co. facility. Since the two prisons are similar, our initial estimates (372 KW and 163,450 KWH/month) should be the most accurate information available.

The estimated monthly billing for electric service from Gulf Power is \$7,442.66; from Gulf Coast Electric it is estimated at \$9,361.58. The net result of receiving service from Gulf Power is our annual reduction of \$23,027.04 in the prison's electric bill (Attachment I).

The Washington Co. prison site is strategically located such that Gulf Power has facilities in place to provide independent alternate electrical service. Gulf's normal service will be from the Sunny Hills 115/25 KV substation. Backup power is available from Gulf's Vernon 115/25 KV substation. Since the prison site is between these substations, it is unlikely a single problem can render both inoperative. The substations are fed from multiple 115,000 volt transmission sources with the capability for switching operations, and these substations contain independent power transformers. The existing 25,000 volt distribution line between the two stations completes the system which can provide complete backup power to the prison. This electrical transmission and distribution system is similar to the one serving the Holmes correctional facility. I have enclosed an electrical single-line diagram for your review (Attachment II). Research through our computerized Distribution Trouble Reporting System shows that there have been only a few outages in the past two years (Attachment III).

RECEIVED DATE

05444 JUN-3 1993

RECORDS MANAGEMENT

Florida Public Service Commission

Docket No. 930885-EU

Witness: John E. Hodges, Jr.

Exhibit No. 34 (JEH-1)

Schedule 1

Page 2 of 2

Mr. Marvin Moran
Florida Dept. of Corrections
Pg. 2 - April 9, 1993

I hope that I have provided the information you need concerning Gulf Power's ability to provide reliable, low-cost electric service to the Washington Co. correctional facility. If you have additional questions, please do not hesitate to call me at 904-872-3201 or Stan Sexton at 904-872-3276.

Sincerely,

Vic L. Jones
General Manager of Eastern Division

VLJ:sd

Attachments

Florida Public Service Commission
Docket No. 930885-EU
Witness: John E. Hodges, Jr.
Exhibit No. 34 (JEH-1)
Schedule 2

Gulf Power Company
620 Baymont Parkway
Post Office Box 1181
Pensacola, FL 32502-0181
Telephone 904 444-6381

Travis J. Bowden
President

the southern electric system

March 23, 1994

Mr. Jim Morris, Chairman
Washington County Board
of County Commissioners
Post Office Box 647
Chipley, FL 32428-6647

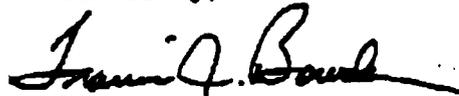
Dear Mr. Morris:

Please be assured that Gulf Power Company supports Washington County in their efforts with the new correctional facility.

I have asked John E. Hodges, Jr., our Vice President, Customer Operations, to contact you regarding our interest in this customer.

I look forward to meeting you in a future visit to Chipley.

Sincerely,



ccy

cc: Mr. John E. Hodges, Jr.

cc: John F. Dougherty, III ←

1 TRANSCRIPT IS HEREBY AMENDED TO DELETE DISCUSSION OF
2 ATTORNEYS PRECEDING DEPOSITION CONCERNING DISCOVERY, WHICH
3 DISCUSSION COMMENCED ON PAGE TWO OF TRANSCRIPT AND
4 CONCLUDED ON PAGE SIX.

5 (discussion of attorneys)
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(continuation of discussion of attorneys)

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(continuation of discussion of attorneys)

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(end of discussion of attorneys)

October 11, 1994

THEREUPON,

JOHN DOUGHERTY

called as a witness, having been duly sworn, was examined
and testified as follows:

PURM 2004 PENGADINDY 1-800-631-6889

1 MR. FLOYD: Mr. Dougherty, my name is Patrick
2 Floyd. I'm one of the attorneys here for Gulf Coast
3 Electric Cooperative in a petition filed by Gulf Power, a
4 territorial dispute regarding the Washington County
5 Correctional facility.

6 I would like to ask you some questions concerning that
7 and you're involvement in it. As a process of doing that,
8 I will be asking you some questions. If you do not
9 understand the question, I would like to have you tell me
10 and ask me to rephrase it or repeat it, because once you
11 answer the question it will be presumed that you understood
12 it. Do you understand that?

13 THE WITNESS: I think so.

14 EXAMINATION

15 BY MR. FLOYD:

16 Q. Would you give us your full name, please, sir?

17 A. John Frank Dougherty, III.

18 Q. All right, sir. Mr. Dougherty, have you had your
19 deposition taken before?

20 A. Yeah, I think so; about 15 years ago in a civil
21 case, I guess.

22 Q. All right, sir. Before the taking of this
23 deposition, prior to it, you've not discussed your
24 testimony that you're going to make with anyone, have you?

25 A. No.

1 Q. Okay. And you've been employed by Gulf Power for
2 how many years?

3 A. Thirty-seven.

4 Q. What is your position with Gulf Power at this
5 time?

6 A. I'm Chipley District Manager.

7 Q. How long have you served Gulf Power in that
8 position?

9 A. Since 1978.

10 Q. And that was the position that you were in when
11 this... during 1992, 1993, when the prison, correctional
12 facility initiative started?

13 A. Yes.

14 Q. Could you give us a general description of the
15 authorities and duties that you have as district manager in
16 the Chipley area?

17 A. Well, I guess I have overall responsibility for
18 all of the Gulf Power Company activities in the area.

19 Q. All right. Does that area include all of
20 Washington County?

21 A. Yes.

22 Q. All right. What other areas does it include?

23 A. Holmes County, Jackson County.

24 Q. What is the level of your formal education?

25 A. I'm a college graduate.

1 Q. What college?

2 A. Auburn University.

3 Q. All right, sir. Mr. Dougherty, have you read..
4 you're aware that Mr. John Hodges gave a deposition in this
5 case regarding his involvement, aren't you?

6 A. Yes.

7 Q. Okay. And you've gone over his deposition to see
8 what he said regarding his testimony, right?

9 A. Yes, I've looked at it.

10 Q. And are you in agreement with his statement that
11 you, John Dougherty, are involved in the day to day
12 economic development aspects for Gulf Power in the
13 Washington County area?

14 MR. STONE: Mr. Floyd, could you tell me where in
15 the deposition you're referring to, please?

16 MR. FLOYD: Page 37, lines 20 through 23. Excuse
17 me, 20 through 23.

18 A. (No response).

19 Q. (Mr. Floyd continuing) Is that correct?

20 A. Well, I don't know how you describe day to day
21 activity. I participate in Chamber of Commerce activities
22 on a somewhat regular basis.

23 Q. Well, you see that that's what he said (reading)
24 John's involved on a day to day basis with economic
25 activity going on in that area; correct?

1 A. (Looking) I guess you could interpret it as
2 that.

3 Q. Well, do you agree with that or not?

4 A. I don't know if that's exactly how I would
5 describe it.

6 Q. Well, how would you describe your involvement in
7 economic activities?

8 A. Well, he says day to day here. Some days I work
9 with the Chamber of Commerce and there are days that I
10 don't participate any in activities. But I am active in
11 the Chamber of Commerce in the economic activities of the
12 Chamber of Commerce on a somewhat regular basis. I guess
13 you could call it day to day.

14 Q. With respect to economic development, you report
15 directly to Mr. Hodges; correct?

16 A. No. I report to Mr. Tony Milleni at this time.

17 Q. I mean, back in say 1992, 1993.

18 A. I reported to Mr. Vic Jones in Panama City.

19 Q. Okay. You agree that Mr. John Hodges is the...
20 at this time in 1992, 1993 was the senior officer of Gulf
21 Power, responsible for economic development, to the best of
22 your knowledge?

23 A. To the best of my knowledge, yes.

24 Q. Now, Mr. Dougherty, you had been made aware in
25 early 1993 that Washington County wanted a prison located

1 in Washington County; correct?

2 A. (No response).

3 Q. You were aware of it before that time?

4 A. Yes.

5 Q. Okay. But in early 1993 you were made aware
6 through one source or another that they would have trouble
7 purchasing the property that would be required to give to
8 the State in order to locate the prison in Washington
9 County, correct?

10 A. I don't believe I was made aware that the county
11 would have a problem purchasing the property.

12 Q. All right. Were you ever made aware from anybody
13 that Washington needed financial assistance to be able to
14 obtain this property to transfer it to the State?

15 A. No. I don't think anyone told me they needed the
16 money. I guess I was aware they would be glad to accept
17 any help.

18 Q. Did you ever see any letters from the Washington
19 County Commission to the effect that financial assistance
20 that had been provided by Gulf Coast Electric Cooperative
21 made it possible for them to purchase the property to
22 obtain the location of the prison?

23 A. I obtained some correspondence from the county
24 office between the county and Gulf Coast Electric Coop, but
25 to the fact that it said they needed the money I'm not sure

1 that I remember that being part of any of that
2 correspondence.

3 Q. Okay. How about this letter dated March 15, 1994
4 from the chairman of the Washington County Commission to
5 Mr. Bowdin; did you ever see that letter before?

6 (document handed to witness)

7 (witness reviewing)

8 A. Yes.

9 Q. Okay. And doesn't that letter have in there that
10 it was the Gulf Coast financial assistance that made the
11 purchase of the property possible?

12 A. (Looking) Well, it seems to indicate that.

13 Q. You read that letter at the time...

14 A. Yes, sir.

15 Q. ...before today anyway; right?

16 A. Yes.

17 Q. In fact, one of your duties is as a part of being
18 in charge of this area, is to try to keep track of the new
19 industry, new projects that may be coming to the area to
20 see if Gulf Power can get those, to be the power supplier
21 to them; correct?

22 A. I suppose that would be correct.

23 Q. That's part of good management; right... I mean
24 marketing?

25 A. I would think so.

1 Q. And as a part of that, you try to keep track of
2 what the Washington County Commission is doing?

3 A. Well, I don't go to their meetings on a regular
4 basis.

5 Q. But you try to keep track of what they're doing
6 as far as any type of economic development or project
7 that's coming in that you might be able to service as
8 customers; correct?

9 A. Well, through the Chamber of Commerce I do that
10 because the Chamber of Commerce, I guess, basically does
11 the economic development work for the county commission.

12 Q. All right. And you're in pretty close touch with
13 Oley Ellis over there; correct?

14 A. That's right.

15 Q. And that's... some of the activities of the
16 Chamber of Commerce are reported to you from that source;
17 right?

18 A. Right.

19 Q. Now, in early 1993 isn't it correct that you told
20 Mr. Hodges that the Cooperative, Gulf Coast Electric
21 Cooperative was willing to give \$45,000 and secure an
22 interest free loan for Washington County and you asked him
23 if Gulf Power could also do that, meaning the grant of
24 \$45,000 to assist Washington County?

25 MR. STONE: Are you referring to a particular

1 page in the deposition of Mr. Hodges?

2 MR. FLOYD: No. I mean I have pages of different
3 ones; but I'm just asking him in general if he went and
4 asked him that.

5 A. Well, my inquiries went through my immediate
6 supervisor, who was Vic Jones. And he reported directly to
7 John Hodges. So, I assume in a round about way that I
8 asked John Hodges. But my discussion was with Vic Jones,
9 my immediate supervisor.

10 Mr. Oley Ellis had on numerous occasions over the past
11 year, not just in this particular case, pointed out that
12 West Florida Electric Cooperative participated with Jackson
13 County on one and then inquired would Gulf Power Company do
14 a similar thing. And I had requested through Mr. Vic Jones
15 if Gulf Power Company would do that.

16 Q. (Mr. Floyd continuing) All right. You had seen
17 that Gulf Coast or been made aware that Gulf Coast Electric
18 Cooperative was going to provide financial assistance in
19 the way of this grant and this interest free loan; you were
20 made aware of that?

21 A. Yes, sir.

22 Q. And you wanted to assist Washington County, also,
23 as a good marketing practice, to provide financial
24 assistance to them in connection with getting this prison;
25 correct?

1 A. I did not ask...

2 Q. I'm just asking what your intention was. Was
3 that what your feeling was?

4 A. My intention was to ask if the company would.

5 Q. Right. But the reason that you wanted to, was to
6 provide financial assistance like Gulf Coast was doing to
7 Washington County to help get the prison; right?

8 A. I'm not sure that I wanted to. I merely passed
9 the inquiry on. As far as my personal wanting to, I'm not
10 sure that I wanted to. And that's honest.

11 Q. You never spoke with John Hodges asking him on
12 the phone or otherwise to give a grant of \$45,000 like Gulf
13 Coast was doing to Washington County?

14 A. To the best of my knowledge, I never asked Gulf
15 Power Company or anybody to give it. My inquiry was, was
16 Gulf Power Company willing to do that.

17 Q. Let me ask you, then, I'm going to refer you to
18 page 42, lines eight through seventeen, and ask you if what
19 you're saying here, if this is incorrect testimony by Mr.
20 Hodges.

21 (Reading) "Question: How much money did Mr.
22 Dougherty ask you for? Answer: He asked me for the same
23 amount the Coop was willing to give, I think around
24 \$45,000."

25 A. I never, in my opinion, insinuated that Gulf

1 Power Company should do that.

2 Q. Well, I'm not saying that. What I'm asking you
3 now, is this correct? As he says, (reading) "He asked me
4 for the same amount Gulf Coast was willing to give, I think
5 around \$45,000." Is that correct?

6 A. If I were going to word that, I would say I asked
7 would Gulf Power Company be willing to do that.

8 Q. To give the \$45,000, which was the same amount
9 that Gulf Coast is giving?

10 A. Yes, sir.

11 Q. All right. And that was the statement that you
12 made to the best of your recollection to Mr. Hodges?

13 A. In some discussions with him, I probably did.

14 Q. And did you advise him that this money, the
15 \$45,000, would be used towards purchase of the property
16 that would be contributed to the State; in more words or
17 less?

18 A. I probably did.

19 Q. All right, sir. And you know from your
20 experience here that this piece of property that was
21 actually purchased by... eventually was purchased by
22 Washington County, part of which was contributed to the
23 State, cost much more than \$45,000; right?

24 A. Yes.

25 Q. It cost much more than \$90,000?

1 A. I think so; yes.

2 Q. And the response by Mr. Hodges to your inquiry
3 was, and I ask you, to the effect that the public service
4 commission would not allow you to make such a grant of the
5 \$45,000?

6 MR. STONE: Are you referring to a particular
7 passage of Mr. Hodges' deposition?

8 MR. FLOYD: I have particular passages, but I'm
9 just asking him now, generally, if that's what he said.

10 A. I don't know that he ever said that the public
11 service commission would not allow us to do it. I'm not
12 sure that I remember that wording.

13 Q. (Mr. Floyd continuing) All right. Well, what is
14 your understanding as to why Gulf Power had not provided
15 these grants before?

16 A. It was my understanding it was to be our policy
17 that we would not be the sole contributor; that we would
18 work with other organizations within the communities to try
19 to come up with funds for projects.

20 Q. Okay. Like Gulf Coast Electric Cooperative;
21 correct?

22 A. What do you mean?

23 Q. I mean that would be another person in the
24 community?

25 A. I suppose so.

1 Q. But what Mr. Hodges did tell you that you agreed
2 with is that no financial assistance would be provided;
3 correct?

4 MR. STONE: Are you referring to a passage in Mr.
5 Hodges' deposition?

6 MR. FLOYD: I'm just asking him.

7 MR. STONE: Well, my concern is the way you're
8 phrasing the questions it implies that you were listening
9 to a conversation. If you want to ask him what Mr. Hodges
10 told him, then just ask him what he told him.

11 MR. FLOYD: Well, I'm trying to limit down the
12 deposition here so we can get on and do the other things
13 with this document request that I've been burdened with
14 here today. So, I just want to pinpoint the questions and
15 if you have some kind of explanation or something, you can
16 certainly give it, Mr. Dougherty.

17 A. (No response).

18 Q. (Mr. Floyd continuing) But what I'm asking you,
19 again, is in response to your questions to him regarding
20 the grant of the \$45,000 like Gulf Coast had been willing
21 to do, Mr. Hodges told you no; is that correct?

22 A. As a sole contributor, we would not do it.

23 Q. Okay. All right. Now, as a part of these
24 conversations with Mr. Hodges and Mr. Jones, you were made
25 aware, were you not, of the decision at that time by Gulf

1 Power to refrain from any type of challenge, dispute, or
2 other conflict of any type to Gulf Coast providing of
3 service to the prison until after financial assistance that
4 had been promised by Gulf Coast had been secured by
5 Washington County; is that correct?

6 MR. STONE: Mr. Floyd, are you referring to a
7 particular passage in Mr. Hodges' deposition?

8 MR. FLOYD: Well, I have passages, but I'm not
9 referring to them at this time. I'm just asking him a
10 question.

11 MR. STONE: Again, the way you're reading the
12 question implies that Mr. Hodges made such a statement.
13 Did he make such a statement in his deposition?

14 MR. FLOYD: I'm asking the question, if that's
15 what Mr. Hodges said. I'll go back and show him that if he
16 varies from wherever the testimony is of Mr. Hodges, I'll
17 go back and show him where it is. And that's my privilege
18 on cross... I mean on taking the deposition of a Gulf Power
19 employee.

20 A. (No response).

21 MR. FLOYD: Do you want me to repeat the
22 question?

23 THE WITNESS: If you don't mind.

24 Q. (Mr. Floyd continuing) Okay. What I was asking
25 is were you aware... you were made aware, weren't you, of

1 the decision by Gulf Power at that time to refrain from any
2 type of challenge or dispute or conflict with Gulf Coast
3 providing of service to the prison until after the
4 financial assistance that had been promised by Gulf Coast
5 had been secured by Washington County?

6 A. No.

7 Q. You never were provided anything to that effect?

8 A. Not that we were waiting for Gulf Coast to make
9 a commitment; no, sir.

10 Q. All right. And isn't it correct that you... no,
11 let me ask you this: You were never told that ya'll
12 weren't going to do anything to cause a problem for
13 Washington County until after the grant had been made?

14 A. No, sir.

15 Q. You had never been told anything like that?

16 A. No, sir.

17 Q. Had you ever been told by Mr. Hodges, Vic Jones,
18 or anyone else that you were... that it was the position of
19 the company or that you yourself were to conduct yourself
20 in this manner as to, not to do anything that would hurt
21 Washington County or cause a conflict with Washington
22 County with respect to the location of the prison?

23 A. I was told that Gulf Power Company would not do
24 anything to jeopardize the decision by the Department of
25 Corrections to locate a prison in Washington County.

1 Q. Okay. And when was it that you were told this?

2 A. I don't know.

3 Q. Wasn't that in your conversations... or after the
4 conversations that you had with Mr. Hodges about the
5 \$45,000?

6 A. I'm sure it would have been, because there was no
7 reason to have the conversation before that.

8 Q. Okay. And are you telling me that your
9 conversation about not doing anything that would hurt
10 Washington County came at a time before the decision had
11 been made that the prison was going to be located there?

12 A. I don't understand that.

13 Q. What I'm saying is: Are you telling me that you
14 conversation about not doing anything that would harm
15 Washington County with respect to the prison came at a time
16 when the... before the time that the prison had already
17 been decided would be located in Washington County?

18 A. I think from my understanding from what I was
19 told, I got the feeling that Gulf Power Company, regardless
20 of when, if there was any indication that the Department of
21 Corrections might back out, I don't believe... I'm not
22 sure... but I don't believe that the property was purchased
23 before we had this discussion.

24 Q. But there had already been a decision to locate
25 the... you do remember that there already had been the

1 decision of the Department of Corrections to say okay,
2 you're going to have a prison, it's going to be at this
3 site; and then Washington County started the process of
4 saying okay, now we have to go through the process of
5 buying it; correct?

6 MR. STONE: I object to the question. The
7 questions assumes facts not in evidence.

8 MR. FLOYD: Go ahead, you can answer it.

9 A. Ask me the question again.

10 MR. FLOYD: Go ahead, Peggy, read it back to him.

11 (last question read back by reporter)

12 MR. STONE: I believe Mr. Dougherty has already
13 answered the question when he stated earlier that it was
14 his understanding that the Department of Corrections could
15 back out of the decision and that there had been no such
16 decision to locate it at that particular site.

17 MR. FLOYD: Well, I don't recall that being his
18 testimony. Let me ask you.

19 Q. (Mr. Floyd continuing) The information you had
20 at that time was that Washington County and this site where
21 it is located at this time had been selected; correct?

22 MR. STONE: At which time are you referring to?

23 MR. FLOYD: I'm talking about at the time of this
24 conversation about not causing any trouble?

25 A. I don't really know. I can't tell you for sure.

1 Q. (Mr. Floyd continuing) Your statement before was
2 that at any time that there would cause... that actions
3 would cause Washington County to have difficulty in
4 continuing to have the right to have the prison there...

5 MR. STONE: I believe that's a
6 mischaracterization of Mr. Dougherty's earlier testimony.
7 His statement was the Department of Corrections could back
8 out of the decision.

9 MR. FLOYD: Well, I know what his testimony was.

10 A. (No response).

11 Q. (Mr. Floyd continuing) You knew, Mr. Dougherty,
12 that if the funding that was being provided by Gulf Coast
13 Electric was not provided that that may cause a problem
14 with Washington County getting the prison?

15 A. No, I did not know that.

16 Q. You didn't know that?

17 A. (Witness shakes head).

18 Q. And the type of actions that it had been
19 discussed that were not to be taken that would endanger
20 Washington County's location of the prison, were they not
21 complaining to the Department of Corrections or complaining
22 to the Florida Public Service Commission?

23 A. I don't recollect anyone telling me what... the
24 reasons specifically.

25 Q. Let me show you page 45, lines 22 through 25;

1 page 46, lines 1 through 8 and ask you if you agree with
2 Mr. Hodges' testimony there.

3 (Reading) Question: "When you said you didn't want
4 to do anything to hurt the County's effort to get this
5 prison, what exactly would Gulf Power have done to hurt the
6 county's chances of getting the prison? Answer: Well, I
7 guess we could have complained to the county commission, we
8 could have complained to the county commission, we could
9 have formally complained to the Public Service Commission,
10 we could have complained to the Department of Corrections.
11 We could have caused a conflict within the community
12 itself, and I just didn't feel like it was in the best
13 interest of the citizens of Washington County."

14 Do you agree with that?

15 A. (Looking) I never had any conversation with
16 anyone concerning any of that naming specific people.

17 Q. I understand that, but I'm saying do you agree
18 with that statement of Mr. Hodges?

19 MR. STONE: I'm sorry, Mr. Floyd, perhaps I
20 misunderstood your question. I thought you were asking
21 whether or not he had such a conversation and he's answered
22 that question.

23 MR. FLOYD: Well, I've asked him this question
24 now. I asked him whether or not he agrees with that
25 response by Mr. Hodges?

1 A. (Looking) I suppose I could agree with that.

2 Q. Okay. Do you agree with it?

3 A. (Looking) Yeah, I guess so.

4 Q. All right. As far as you were concerned, this
5 policy of not causing a conflict with Washington County as
6 put it by Mr. Hodges, would be putting Washington County's
7 interest above yours for the time being until they secured
8 the financial assistance; do you agree with that?

9 MR. STONE: Are you referring to a particular
10 passage in Mr. Hodges' testimony?

11 MR. FLOYD: I'm referring to the quote of Mr.
12 Hodges at page 68, lines 19 through 20 of putting
13 Washington County's interest above yours.

14 MR. STONE: All right. Page 68.

15 MR. FLOYD: Lines 19 and 20.

16 MR. STONE: My copy of the transcript is missing
17 that page.

18 MR. FLOYD: Here is the deposition.

19 (Mr. Floyd hands document to Mr. Stone)

20 (Mr. Stone reviewing)

21 A. (No response).

22 Q. (Mr. Floyd continuing) Look at 68, line 17.
23 (Reading). You earlier also said, as you explained to Mr.
24 Morris, or Commissioner Morris, if it came down to the
25 bottom line you'd place the interest of Washington County

1 ahead of Gulf Power. Answer: Yes, I would.

2 MR. STONE: That statement is referring to a
3 conversation Mr. Hodges had with Commissioner Morris, I
4 believe in 1994; is that correct, in the context of this
5 deposition?

6 MR. FLOYD: Well, it's referring back to, as he
7 had explained to Commissioner Morris, but it's just dealing
8 with the principle of and policy of Gulf Power in terms of
9 not doing anything that would endanger Gulf Power with
10 respect to this prison.

11 A. (No response).

12 Q. (Mr. Floyd continuing) My question back to you
13 was I just referred to that part... as far as you were
14 concerned, this instruction of not doing anything to cause
15 a problem, complain to the Department of Corrections,
16 whatever; that policy, as Mr. Hodges put it, was putting
17 Washington County's interest above yours until such time as
18 they were out of any danger with respect to the loss of the
19 prison; correct?

20 MR. STONE: I object to the form of the question.

21 MR. FLOYD: Go ahead. You can answer.

22 MR. STONE: No. I've objected to the form of the
23 question on the basis that you have taken statements that
24 you have made and you've implied that Mr. Dougherty has
25 said those statements when he specifically denied to you

1 that he received any instructions about complaining to the
2 Department of Corrections, complaining to the... you've
3 asked him whether he agreed with Mr. Hodges' statement and
4 he told you that he did not receive any instructions along
5 those lines from any one. You then insisted and asked
6 whether he agreed with the statement of Mr. Hodges in his
7 deposition. And he reviewed it and said "I guess I could
8 agree with that."

9 You've now gone and said that he received such
10 instructions, and he has already denied that he received
11 such instructions. On that basis he can now answer the
12 question.

13 A. (No response).

14 MR. FLOYD: Mr. Dougherty, will you read with me
15 on lines 18 and 20 of Mr. Hodges' deposition? It says
16 (reading) "If it came down to the bottom line, you would
17 place the interest of Washington County ahead of Gulf
18 Power's? Answer: Yes, I would." That's what it says
19 there, right?

20 MR. STONE: That's what Mr. Hodges said.

21 MR. FLOYD: Okay. That's what Mr. Hodges said.

22 Q. (Mr. Floyd continuing) Now, what I'm asking you
23 is as far as you were concerned, this not causing any
24 trouble for Washington County with respect to the prison
25 was consistent with that policy of putting Washington

1 County's interest above yours for that time, until they
2 were clear of any danger or problem; is that correct?

3 MR. STONE: When you put the qualifier on it,
4 that's different than what Mr. Hodges said.

5 A. (No response).

6 Q. (Mr. Floyd continuing) Is that correct?

7 A. Can I ask you a question?

8 Q. Sure; go ahead.

9 A. If I understood you correctly the first time you
10 asked me that question, you referred to whether or not the
11 monies from Gulf Coast was in jeopardy. And if that is
12 your question, no one has ever indicated to me that that
13 would... the \$45,000 from Gulf Coast would be the
14 determining factor of whether or not we would...

15 Q. Start taking any action?

16 A. Action.

17 Q. Correct?

18 A. Correct.

19 Q. Now, let me ask you this. What I'm saying is,
20 I'm saying... what you're saying is that the determining
21 factor of ya'll taking any action that may cause a conflict
22 was whether Washington County was out of danger of losing
23 the prison; correct? Based on what your understanding was.

24 A. Yes.

25 Q. Okay. And you would agree with me that if

1 Washington County did not have the financial ability to
2 purchase the property to transfer to the Department of
3 Corrections, then that would be a major factor... that
4 could cause them to "lose the prison"; do you agree with
5 that?

6 A. I'm not sure I quite understand what you're
7 saying.

8 Q. All right. Let me repeat it. You do understand,
9 don't you, that if Washington County did not have enough
10 money to purchase the property to transfer to the
11 Department of Corrections for the facility site, that that
12 may cause Washington County to lose the prison facility?

13 A. If the county could not buy the property, the
14 facility would not be located in Washington County.

15 Q. Okay. Good. You were aware, weren't you, Mr.
16 Dougherty, that Gulf Coast Electric had by April provided
17 the \$45,000 to Washington County?

18 MR. STONE: Are you saying they paid money by
19 April?

20 MR. FLOYD: Yes, that's what I'm saying.

21 A. No. I'm not aware of what date they paid the
22 money, no.

23 Q. (Mr. Floyd continuing) Well, when were you aware
24 that monies had been paid?

25 A. I don't know that I was ever really made aware

1 that a check had been submitted.

2 Q. Well, when was it that you started to do any
3 activity to try to secure for Gulf Power the service to the
4 prison?

5 A. When did I try to secure?

6 Q. Yes, sir. When did you start your activities...
7 we've talked about not causing any conflict or problem that
8 would endanger Washington County. What I'm asking you is
9 when did you actually start... well, let me go back for a
10 second.

11 As an employee of Gulf Power, you follow the
12 directives of your employers; correct?

13 A. Try to.

14 Q. And you complied with this position of not
15 causing any trouble with Washington County, as far as them
16 having the prison located there; not causing any conflict
17 with Gulf Coast that would result in any type of
18 endangerment of them losing the prison or Washington County
19 losing the prison?

20 MR. STONE: I don't believe there's been any
21 indication that the policy to which you have referred,
22 talked about not having any conflict with Gulf Coast. I
23 object to the form of the question.

24 MR. FLOYD: Go ahead and answer, if you can, Mr.
25 Dougherty.

1 THE WITNESS: Well, I guess I'm confused on the
2 question.

3 MR. FLOYD: Okay. Would you read it back for me,
4 Peggy?

5 (reporter read last question)

6 A. Are you asking me was I instructed not to... I
7 don't know how to answer that.

8 Q. (Mr. Floyd continuing) Well, let me ask you
9 this: Mr. Hodges stated that... we're not going to do
10 anything that would hurt Washington County or cause a real
11 conflict within Washington County and the Department of
12 Corrections to hurt their ability to get the prison. What
13 I'm asking you is did you comply with that position of Gulf
14 Power, to the best of your knowledge?

15 A. I would say to the best of my knowledge I did.

16 Q. All right, sir. And the first time that... you
17 know Mr. Kronenberger? Do you know of Mr. Kronenberger of
18 the Department of Corrections?

19 A. No, sir.

20 Q. Have you talked with him?

21 A. Not to my knowledge.

22 Q. You're aware that Vic Jones went to talk with him
23 concerning this prison; right?

24 A. Yes, sir.

25 Q. Okay. Are you aware that the first time that Mr.

1 Jones went to see Mr. Kronenberger or contacted him to tell
2 him that Gulf Power was interested in serving the prison
3 was when they went to visit him on July 30, 1993?

4 A. I'm not sure what the date was.

5 Q. Okay. But whatever that visit was, that that's
6 what your understanding of what happened; whatever the date
7 of the visit was?

8 A. That we went to talk about the possibility of
9 serving the prison?

10 Q. Right.

11 A. Yes.

12 Q. You went with him?

13 A. No, I did not.

14 Q. You don't have any reason to believe that it's
15 other than July 30, 1993 was that first visit, do you?

16 A. I have no reason to believe otherwise.

17 Q. To your knowledge did Gulf Power ever provide any
18 financial assistance to Washington County to help them make
19 the purchase of the property to locate the prison in
20 Washington County?

21 A. Gulf Power?

22 Q. Yes, sir.

23 A. Not that I know of.

24 Q. Presuming, as has been stated in letters by the
25 Gulf County Commission that they would not be able to

1 purchase the property without the financial assistance that
2 was provided by Gulf Coast in order to obtain the property
3 and provide it to the Department of Corrections...

4 MR. STONE: Mr. Floyd, do you have such letters
5 that you can show us.

6 MR. FLOYD: Peggy, could you read that back that
7 I have right there before I was interrupted.

8 (reporter read last question)

9 A. (No response).

10 Q. (Mr. Floyd continuing) Presuming, as has been
11 stated by Washington County in letters that they would not
12 have been able to purchase the property without the
13 financial assistance provided by Gulf Coast, which property
14 was to be transferred to the Department of Corrections, if
15 Gulf Coast had not provided this financial assistance, was
16 it your directive to the company to continue not to provide
17 any financial assistance?

18 A. To start with, I have never understood that
19 Washington County could not buy that property without the
20 assistance of the \$45,000 or any other funds.

21 Q. Did you read this letter? Remember this letter
22 we just referred to a while ago?

23 A. I'm not sure that it said that exactly.

24 Q. It says (reading) "Gulf Coast as a part of their
25 rural development policy provided us with the opportunity

1 to keep this project in Washington County by making
2 available the financial assistance necessary to make the
3 purchase of the property possible."

4 MR. STONE: And the date of that letter, Mr.
5 Floyd?

6 MR. FLOYD: That letter is dated March 15 and it
7 is directed to...

8 MR. STONE: March 15 of what year, Mr. Floyd?

9 MR. FLOYD: Of 19... I'm asking the questions
10 here; but for courtesy to such a rude interruption I'll
11 mention it's dated March 15, 1994 to Travis Bowdin of Gulf
12 Power Company.

13 A. (No response).

14 Q. (Mr. Floyd continuing) Isn't that a statement to
15 that effect, that this financial assistance made it
16 possible, Mr. Dougherty?

17 MR. STONE: That wasn't your earlier question,
18 Mr. Floyd.

19 MR. FLOYD: Go ahead.

20 A. It indicates the possibility.

21 Q. (Mr. Floyd continuing) All right, sir. Now,
22 presuming that to be the situation as stated in this
23 letter, it was the position of Gulf Power not to provide
24 any financial assistance, correct?

25 A. Based on that letter?

1 Q. Yes.

2 A. Not to my knowledge.

3 Q. Based on your information, Gulf Power was
4 prepared to just sit there and not provide any financial
5 assistance even if Gulf Coast didn't provide any, correct?

6 A. I don't know that.

7 Q. Well, the only information you got was that ya'll
8 weren't going to provide it?

9 MR. STONE: Except as part of a community wide
10 assistance, Mr. Floyd.

11 MR. FLOYD: Thank you for your testimony, Mr.
12 Stone. We'd be willing to swear you under oath; we'll do
13 that. Go ahead.

14 MR. STONE: I need to take a break.

15 MR. FLOYD: You can answer the question.

16 MR. STONE: We're going to take a break.

17 A. (No response).

18 (off the record)

19 (record resumed)

20 Q. (Mr. Floyd continuing) Mr. Dougherty, we've gone
21 over that part about your asking Mr. Hodges about Gulf
22 Power would grant \$45,000 like Gulf Coast had been willing
23 to do and his response to that. What I'm asking you is:
24 In your opinion, from your standpoint, is that what should
25 have been done as far as Gulf Power not granting the

1 \$45,000 or financial assistance to this project?

2 MR. STONE: You can break that down to the number
3 of questions he asked you.

4 A. Okay. You're asking for my opinion?

5 Q. (Mr. Floyd continuing) Yes, sir.

6 A. Of what, now?

7 Q. I'm asking for your opinion if Mr. Hodges'
8 statement of not providing the financial assistance that
9 you had requested, the \$45,000 grant, was... do you feel
10 like that was the right decision; do you feel like that's
11 a decision that should have been made?

12 A. Well, I don't know. I think it was probably the
13 right decision that we not be a lone sponsor, I guess you'd
14 call it, of a project.

15 Q. Mr. Hodges, when we talked with... excuse me...
16 Mr. Dougherty, when we talked with Mr. Hodges about this,
17 he, on page 67, lines four through five, advised us that
18 you had told him (reading) "We need to do this in
19 Washington County." Is that correct?

20 (Mr. Stone showing witness document)

21 (witness reviewing)

22 MR. STONE: What line?

23 MR. FLOYD: Lines one through five.

24 MR. STONE: Is he agreeing to the statement of
25 Mr. Hodges at lines four through eleven on page 67?

1 MR. FLOYD: No. I'm asking him does he agree
2 with Mr. Hodges' characterization of what Mr. Dougherty had
3 told him, we need to do this in Washington County.

4 A. I don't remember ever making a comment that we
5 needed to do that.

6 Q. (Mr. Floyd continuing) But you do remember
7 asking him to provide the \$45,000; correct?

8 A. Did I specifically ask Mr. Hodges for a \$45,000
9 grant?

10 Q. Yes, sir.

11 A. No, sir; I did not specifically ask for a \$45,000
12 grant. I asked if we would participate to some extent.

13 Q. Okay. Then you disagree with his testimony at
14 page 42, lines eight through ten, in which the question was
15 (reading) "How much money did Mr. Dougherty ask you for?"
16 Answer: "He asked me for the same amount the Coop was
17 willing to give, I think around \$45,000." So, now you
18 disagree with that?

19 A. I did not ask that we specifically give a certain
20 amount of money, to my knowledge.

21 Q. Did you just tell him that you wanted to provide
22 the same amount that Gulf Coast was providing?

23 A. I don't think so.

24 Q. Did you ask him to consider providing the same
25 amount that Gulf Coast was providing?

1 A. I asked my superiors, now whether it was Mr.
2 Hodges or Mr. Jones or whoever it was, that the Coop had
3 offered \$45,000 and I was asked to see if Gulf Power
4 Company would make the same offer. And that's what I asked
5 the people.

6 Q. What, if anything, did you convey to the
7 Washington County Commission regarding the response of Gulf
8 Power to providing some funds for their assistance?

9 A. To Washington County?

10 Q. Yes.

11 A. I think I explained to them that we would be
12 willing to work with the group, but that we could not
13 solely be a sponsor of a project.

14 Q. Who did you explain that to?

15 A. Mr. Hulan Carter.

16 Q. Who else was present when you had that
17 conversation with him?

18 A. No one; just he and I.

19 Q. Did you have any other meetings with Hulan Carter
20 concerning this?

21 A. Yes. Several days or so later Mr. Jones and Mr.
22 Winetrip and I met again with Mr. Carter.

23 Q. That's at the time where it was expressed that
24 Gulf Power would not do anything to endanger Washington
25 County's receipt of the prison?

1 A. I don't think... that conversation did not
2 transpire at those meetings.

3 Q. Okay. Well, what other commissioners... did you
4 ever have a meeting with... present anything to the
5 Washington County Commission at a commission meeting?

6 A. No. I met with the county administrator, Mr.
7 Roger Dale Hagan, and explained to him that we did not feel
8 like we could participate as a sole sponsor in the project.

9 Q. But you knew at that time that Gulf Coast was
10 providing monies; didn't you?

11 A. Yes.

12 Q. Well, what made you think that you would be the
13 sole sponsor?

14 A. We had been asked would we be.

15 Q. You had been asked if you would contribute
16 \$45,000; right?

17 A. Or any amount.

18 Q. And you presumed that if you gave any money at
19 all you'd be the sole sponsor?

20 A. I guess I assumed that.

21 Q. Did you check to see if there were any other
22 entities providing funds for assistance to Washington
23 County to help them locate the prison?

24 A. As I told you earlier, Mr. Oley Ellis was the
25 first person who contacted me about the possibility. Mr.

1 Ellis is the chamber executive and he is the person who I
2 felt would need to take the lead in such a project. And
3 the feeling I got was that Mr. Ellis did not feel that it
4 was a viable alternative.

5 Q. But what I asked you was did you check to see if
6 there were any other persons or entities that were
7 providing funding or assistance to Washington County to
8 help them locate the prison here?

9 A. I personally did not.

10 Q. And do you know anybody from Gulf Power who did?

11 A. I do not know of anyone who did.

12 Q. Mr. Dougherty, did you make any... were you
13 involved in any construction matters during the... in the
14 Washington County area, say during the period of time from
15 1984 through the present?

16 A. I'm sorry. I don't understand what you're
17 asking.

18 Q. Were you involved in any construction on behalf
19 of Gulf Power in the Washington County area during the
20 period of time from say 1984 to the present?

21 A. If you mean do I have knowledge of any
22 construction, line construction?

23 Q. Yes, sir.

24 A. Yes. We did work since I've been here.

25 Q. During that period of time have you made any

1 decisions regarding line construction of lines that were
2 built by Gulf Power in south Washington County that
3 actually crossed over or under existing facilities of Gulf
4 Coast in that area?

5 THE WITNESS: Ask me that question again.

6 MR. FLOYD: Read it back to him, Peggy.

7 (reporter read last question)

8 A. I think I'm aware of one where we did, but I'm
9 not sure that I made the final decision. Mr. Winetrip is
10 the... has been the manager of operations and would make,
11 usually, the final decision on lines being built.

12 Q. Okay. That one that you're talking about is
13 where?

14 A. There's a... On 77 there at Sunny Hills, there's
15 a double wide trailer that's Alliance Realty, I believe,
16 that we ran a service to.

17 Q. All right, sir. And this was... that was this
18 year, wasn't it?

19 A. I think so.

20 Q. After the time this territorial dispute was
21 filed?

22 A. I'm not sure of that.

23 Q. And that was based on... I mean, why did you
24 cross the lines, existing lines of Gulf Coast at that time?

25 A. Because that customer came in and asked for

1 service.

2 Q. Based on the customer preference of the customer;
3 correct?

4 A. In that particular case, yes.

5 Q. During your 34 years with Gulf Power and serving
6 them in the south Washington County area, you are aware of
7 a number of other times where construction of Gulf Power
8 crossed over or under the existing lines of Gulf Coast
9 Electric Cooperative; are you not?

10 A. I'm not specifically aware of any.

11 Q. You're not aware of any?

12 A. That I knew of that were being constructed?

13 Q. That were constructed.

14 A. Oh, there are lines that... they cross us and we
15 cross them; yes, I know that.

16 Q. Have you ever been to the offices of Mr. Norris
17 or that of West Florida to discuss with them any type of
18 territorial agreement?

19 A. No.

20 MR. FLOYD: Thank you, Mr. Dougherty. I don't
21 have any further questions.

22 THE WITNESS: Okay.

23 MR. STONE: No questions.

24 (deposition concluded at 10:30 a.m., CST)

25

AMENDED CERTIFICATE

STATE OF FLORIDA
COUNTY OF GULF

I, PEGGY W. RAFFIELD, Stenograph Reporter and
Notary Public at Port St. Joe, Florida, do hereby certify
as follows:

THAT I correctly reported in stenograph the foregoing
proceedings at the time and place stated in the caption
hereof;

THAT I later reduced my stenograph notes to
typewriting, or under my supervision, and that the
foregoing pages six through forty-two, both inclusive,
contain a full, true, and correct transcript of the

THAT this transcript is amended to delete discussion
of attorneys preceding deposition concerning discovery,
which discussion commenced on page two of transcript and
ended on page six.

THAT I am neither of kin nor of counsel to any parties
involved in this matter nor in any manner interested in the
result hereof.

THIS 18th day of October, 1994.

Peggy W. Raffield

PEGGY W. RAFFIELD
COURT REPORTER AND NOTARY
PUBLIC, STATE OF FLORIDA
AT LARGE



PEGGY W. RAFFIELD
MY COMMISSION # CC384807 EXPIRES
February 12, 1995
BONDED THRU TROY FAIR INSURANCE, INC

FORM 2074 PENGADIRINDY 1-800-631-6998

Company Policy Statement



SUBJECT GROWTH POLICY	Number 110	
	Original Issue Date 10-04-79	Revision Date 04-30-91
	Page 1 of 1	

POLICY:

It is the policy of Gulf Power Company to encourage growth within its service area by providing for the planned and orderly growth of Northwest Florida and supporting individual communities in fostering economic diversity.

IMPLEMENTATION:

The Company's involvement in supporting economic growth will be within the boundaries dictated by our mortgage obligations, available funds for construction, limitations of the financial community, the Florida Public Service Commission, and our success in maintaining as near a constant load factor as practical.

This posture will allow us to continue providing quality service to all of our customers at a price that affords a fair rate of return to Gulf while minimizing energy and financial waste.

In support of this policy, while continuing to satisfy our customers electrical needs based on demand, we will consider it our duty to encourage energy conservation by all of our customers -- both those in the residential sector and those in the commercial/industrial sector. The education of our customers as to how they can manage their electric requirements will produce a more constant load factor, allowing for economic growth while minimizing waste of electricity and reducing expenditures for new power producing facilities.



President

EXHIBIT # 36

LATE FILED EXHIBIT

92,479
EXHIBIT NO. 36
FPC DOCKET NO. 930885-EJ
DATE 10-13-94

FILED
SIX MONTHS
OCT 24 1995
CLERK, SUPREME COURT
By _____

Florida Public Service Commission
Docket No. 930885-EU
Witness: William C. Weintritt
Exhibit No. 37 (WCW-2)
Schedule 1
Page 1 of 2



GULF COAST ELECTRIC COOPERATIVE, INC.

P. O. BOX 828 • WASHINGTON, FLORIDA 32804 • PHONE (904) 882-0278

DISTRICT OFFICE

P. O. BOX 828 • SOUTHPORT, FLORIDA 32409 • PHONE (904) 266-8228

May 19, 1993

MAY 20 1993

Mr. William S. Howell, Jr.
Attorney at Law
P. O. Box 98
Chipley, FL 32428

Dear Mr. Howell:

This is in response to your letter of April 27th accepting Gulf Coast's proposal to assist Washington County in securing a Department of Corrections prison for South Washington County.

Gulf Coast Electric pledged \$45,000 toward the purchase of the land. Mr. Howell's letter ask the Board's consideration in additional funds in the amount of \$30,000. This matter as requested was taken up with Gulf Coast's Board of Directors at their regular meeting on May 18, 1993.

In our initial proposal we had also pledged to remove and relocate lines that are presently on the property and reconstruct additional lines going up the Vernon Highway. It was stated that this work would be done at no charge if Gulf Coast was allowed to serve the prison complex with electricity. At that time we had not arrived at any figures as to what this would cost, however, upon running tabulations it was determined that this removal and relocation would cost the Coop approximately \$42,000. For that reason the Board respectfully declines any additional funds based on the fact that this removal and relocation would require a significant amount of money to complete.

On Friday of last week we reviewed the rough draft of the application for the interest free loan that was offered in the initial proposal and it is nearing completion at this time. We will be getting with your folks shortly to let you review the finished product before carrying it to Washington.

We look forward to working with you all in the future and appreciate the inquiry that you made regarding these additional funds. We do hope that you as county officials will understand we are limited with regard to expenditures of this nature and having done this amount for Gulf County and the expense of line retirement and relocation, we find ourselves only able to provide what was promised in the very beginning.

FLORIDA PUBLIC SERVICE COMMISSION

SECRET
Docket No. 930885-EU EXHIBIT NO. 37

COMPANY/ WITNESS: GEC/Weintritt

DATE: _____

92,479

DOCUMENT NUMBER-DATE

05441 JUN-3 93

FPSC-RECORDS/REPORTING

Florida Public Service Commission
Docket No. 930885-EU
Witness: William C. Weintritt
Exhibit No. _____ (WCW-2)
Schedule 1
Page 2 of 2

Mr. William S. Howell
May 19, 1993
Page 2

We will keep you all informed as to our progress on the loan,
on the retiring and relocation, and other matters concerning this
project.

Sincerely,



H. W. Morris
General Manager

HWM/ps

CC: Lindsey Corbin, Chairman
Hulon Carter
Roger Esbin, County Administrator

DISTRIBUTION COST TO SERVE WASHINGTON CORRECTIONAL FACILITY

	GULF POWER COST TO SERVE	GULF COAST COST TO SERVE
3Ø TO PRIMARY MP	7,436.00	18,540.92
TEMPORARY SERVICES PT OF SERVICE NO. 20 (INCLUDES INSTALL & REMOVE)	14,308.00	14,852.94 1,533.28
STAFF HOUSING LESS: URD COST DIFFERENTIAL	45,169.00 (13,862.00)	14,128.60
MAIN ENT. RD TO STAFF HOUSING ROAD	-0-	9,155.86
COST OF RELOCATION ALONG SR 279, 1Ø EQUIVALENT LAKE McDANIAL LINE LOCATIONS # 11 & 13	-0-	36,996.74 7,058.29 3,826.48
COOPERATIVE GRANT TO COUNTY EXPENSES TO PROCESS REA LOAN		45,000.00 11,500.00
GRAND TOTALS	<u>\$53,051.00</u>	<u>\$162,593.11</u>

92,479

EXHIBIT NO. 38

FPSC DOCKET NO. 930885-EU

DATE 10-19-94

#39

FILED

SID J. WHITE

OCT 24 1994

CLERK, SUPREME COURT

By _____
Chief Deputy Clerk

**RESPONSE TO FPSC STAFF'S
SECOND SET OF INTERROGATORIES**

DOCKET NO. 930885-EU

GULF POWER COMPANY

JULY 22, 1994

92,479
EXHIBIT NO. 39
FPSC DOCKET NO. 930885-EU
DATE 10-19-94

6. Provide the following information regarding current electric service within 5 miles of the intersection of Highway 279 and Highway 77:
- a. Number of customers presently receiving service. (Classify and separate by residential, commercial or industrial)
 - b. Average annual revenues. (Classify and separate by residential, commercial or industrial)
 - c. Current depreciated value of facilities.
 - d. Salvage value of facilities.

RESPONSE:

- a. The number of metered services presently receiving service is as follows:

Residential	-	494
Commercial	-	38
Industrial	-	None

- b. Residential Annual Revenue = \$445,568
Commercial Annual Revenue = 75,883

6. c. & d.

Listed below is an approximate description of Gulf Power Company's facilities within the 5 mile radius of the correctional facility and the estimated present cost to construct these facilities.

Since Gulf Power Company utilizes mass property accounting, arriving at an accurate depreciated value would be virtually impossible. We would first have to know the actual dates of installation and the installed costs of all the facilities in the area, and any replacements or improvements since installation, an onerous task since some of these facilities have been in place since the 1940's.

<u>DESCRIPTION</u>	<u>QUANTITY</u>
Primary conductor, overhead	75,082 lb.
Primary conductor, underground	72,844 ft.
Transformers	391
Poles, wood	1,005
Poles, concrete	69
Arresters	707
Cutouts	275
Gang operated switches	3
Oil circuit reclosers	11
Secondary & Service conductor	90,230 ft.
Meters	532
Conduit	7,000 ft.
Streetlights & outdoor lights	153
Sunny Hills Substation	1

The total estimated present cost to install these facilities is \$3,314,000.

7. Provide the following information regarding future electric service within 5 miles of the intersection of Highway 279 and Highway 77.
- a. Number of additional customers projected to be served. Classify and separate by residential, commercial or industrial)
 - b. Projected average annual revenues. (Classify and separate by residential, commercial or industrial)
 - c. Projected average annual load. (Classify and separate by residential, commercial or industrial)
 - d. Projected value of associated facilities to serve additional customers.

RESPONSE:

In addition to the Washington Correctional Facility the following additions are estimated:

	<u>1995</u>	<u>1996</u>	<u>1997</u>
a. <u>Customer Additions</u>			
Residential	19	10	10
Commercial	2	1	1
b. <u>Annual Revenue (\$)</u>			
Residential *	17,137	9,020	9,020
Commercial *	3,994	1,997	1,997
c. <u>Annual Load (KWH)</u>			
Residential *	259,749	136,710	136,710
Commercial *	45,470	22,735	22,735
d. <u>Additional Facilities (\$)</u>	27,909	15,136	15,653

* Totals given are annual values for the total number of customers added in each respective year.

8. Provide the following information as it relates to the Sunny Hills subdivision.
- a. Number of lots currently receiving service from Gulf Power Company.
 - b. Average annual revenues.
 - c. Description and depreciated value of facilities used to currently serve customers.
 - d. Description and depreciated value of all facilities in the Sunny Hills subdivision.

RESPONSE:

a.	Residential	-	299
	Commercial	-	31
	Total	-	330
b.	Residential	-	\$269,686
	Commercial	-	60,450
	Total	-	330,136

8. c. & d.

Listed below is an approximate description of Gulf Power Company's facilities in the Sunny Hills subdivision area and the estimated present cost to construct these facilities.

Since Gulf Power Company utilizes mass property accounting, arriving at an accurate depreciated value would be virtually impossible. We would first have to know the actual dates of installation and the installed costs of all the facilities in the area, and any replacements or improvements since installation, an onerous task since some of these facilities have been in place since 1971.

<u>DESCRIPTION</u>	<u>QUANTITY</u>
Primary conductor, overhead	84,469 lb.
Primary conductor, underground	47,298 ft.
Transformers	310
Poles, wood	1,405
Poles, concrete	69
Arresters	754
Cutouts	301
Gang operated switches	5
Oil circuit reclosers	13
Secondary & Service conductor	100,070 ft.
Meters	330
Conduit	8,200 ft.
Streetlights & outdoor lights	153
Sunny Hills Substation	1

The total estimated present cost to install these facilities is \$3,146,000.

9. Provide the following information as it relates to the distribution lines along Highway 279 and Highway 77 coming from the Vernon substation and going to the Sunny Hills subdivision.
- a. Date of initial construction.
 - b. Reason for installation.
 - c. Associated cost.
 - d. Date of all upgrades or modifications.
 - e. Reason for each modification.
 - f. Associated cost of each modification including materials and labor (a copy of the work order will suffice).

RESPONSE:

- a. 1971.
- b. This line was constructed to serve Sunny Hills and other future load additions in south Washington County.
- c. The estimated cost for construction of these facilities in 1971 was approximately \$175,000.
- d. During the second half of 1993, the lines from SR 79 to the Moss Hill auto-transformer were converted from 12KV to 25KV.
- e. The modifications were necessary in order to provide improved service and increased capacity.
- f. The cost associated with the installation of the regulator was \$45,909. The cost associated with the conversion was \$9,594.

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10. Provide monthly integrated peaks for the years 1990 -
1993 using the following format.

<u>Month</u>	<u>Year</u>	<u>Peak in MW</u>	<u>Day of Week</u>	<u>Day of Month</u>	<u>Hour</u>
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RESPONSE:

See attached pages 2 of 3 and 3 of 3.

MONTHLY PEAK INFORMATION FROM 1990 - 1993

<u>MONTH</u>	<u>YEAR</u>	<u>PEAK IN MW</u>	<u>DAY OF WEEK</u>	<u>DAY OF MONTH</u>	<u>HOUR</u>
JANUARY	1990	1,250	FRIDAY	26	8A
FEBRUARY	1990	1,152	MONDAY	26	8A
MARCH	1990	1,177	WEDNESDAY	21	7A
APRIL	1990	1,509	MONDAY	30	5P
MAY	1990	1,202	THURSDAY	21	5P
JUNE	1990	1,770	SATURDAY	20	5P
JULY	1990	1,753	THURSDAY	26	4P
AUGUST	1990	1,785	WEDNESDAY	29	4P
SEPTEMBER	1990	1,696	TUESDAY	4	2P
OCTOBER	1990	1,446	THURSDAY	8	4P
NOVEMBER	1990	1,170	MONDAY	30	7A
DECEMBER	1990	1,317	SUNDAY	6	7A
JANUARY	1991	1,397	TUESDAY	22	8A
FEBRUARY	1991	1,425	SATURDAY	16	9A
MARCH	1991	1,181	MONDAY	11	7A
APRIL	1991	1,284	MONDAY	29	3P
MAY	1991	1,540	THURSDAY	30	5P
JUNE	1991	1,663	MONDAY	24	5P
JULY	1991	1,748	FRIDAY	12	5P
AUGUST	1991	1,743	WEDNESDAY	7	5P
SEPTEMBER	1991	1,712	MONDAY	16	4P
OCTOBER	1991	1,295	FRIDAY	4	3P
NOVEMBER	1991	1,360	TUESDAY	5	7A
DECEMBER	1991	1,371	THURSDAY	5	7A

MONTHLY PEAK INFORMATION FROM 1990 - 1993

<u>MONTH</u>	<u>YEAR</u>	<u>PEAK IN MW</u>	<u>DAY OF WEEK</u>	<u>DAY OF MONTH</u>	<u>HOUR</u>
JANUARY	1992	1,541	FRIDAY	17	8A
FEBRUARY	1992	1,390	MONDAY	10	8A
MARCH	1992	1,293	WEDNESDAY	11	8A
APRIL	1992	1,235	FRIDAY	24	5P
MAY	1992	1,389	THURSDAY	21	5P
JUNE	1992	1,743	THURSDAY	25	5P
JULY	1992	1,836	THURSDAY	9	3P
AUGUST	1992	1,698	MONDAY	10	2P
SEPTEMBER	1992	1,643	FRIDAY	11	3P
OCTOBER	1992	1,151	THURSDAY	29	7P
NOVEMBER	1992	1,362	MONDAY	30	8A
DECEMBER	1992	1,331	THURSDAY	3	7A
JANUARY	1993	1,383	WEDNESDAY	27	8A
FEBRUARY	1993	1,579	FRIDAY	19	8A
MARCH	1993	1,568	MONDAY	15	7A
APRIL	1993	1,049	MONDAY	26	5P
MAY	1993	1,458	MONDAY	31	5P
JUNE	1993	1,770	FRIDAY	11	3P
JULY	1993	1,906	TUESDAY	27	4P
AUGUST	1993	1,866	WEDNESDAY	18	4P
SEPTEMBER	1993	1,741	MONDAY	20	4P
OCTOBER	1993	1,391	WEDNESDAY	20	5P
NOVEMBER	1993	1,343	MONDAY	1	7A
DECEMBER	1993	1,479	FRIDAY	31	9A

11. What is the average number of outage hours per customer per year over the past 12 months for customers receiving service within five miles of the intersection of Highway 270 and Highway 77? Provide calculation and documentation with response.

RESPONSE:

The average number of outage hours per customer served within the five mile radius for the period 6/1/93 through 5/31/94 is 2.52 hours. The calculation is as follows:

Cumulative minutes of interruption = 80,538
(6/1/93 - 5/31/94)

Number of customers served = 532

Average outage time per customer =

$$\frac{80,538}{532} = 151.39 \text{ minutes or } 2.52 \text{ hours/customer}$$

It should be noted that one single Sunny Hills substation breaker outage on July 10, 1993 contributed 57,840 minutes to the total of 80,538 minutes. This outage would not have affected the correctional facility if it was being served from the Vernon substation.

$$\frac{(80,538 - 57,840)}{532} = 42.67 \text{ minutes or } 0.71 \text{ hours/customer}$$

Gulf Power Company records outages that are greater than one (1) minute on its Distribution Trouble Reporting System and reports outages based on grid coordinates utilizing the Transformer Load Management System. Gulf Power Company's recording system includes outages down to the individual customer service.

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12. Describe the two instances referred to on page 6 line 21 of Weintritt's rebuttal testimony when an outage of Gulf Power's transmission line lasted more than 10 seconds. Your response should include the reason for the outage, duration, any associated problems and the number of affected customers.

RESPONSE:

On May 14, 1991 at 3:33pm, lightning in the area caused an instantaneous fault that was remedied manually by supervisory control closing the breaker 43 seconds after it opened. 1599 customers affected.

On May 19, 1991 at 2:42pm, a broken insulator caused a phase to fall resulting in a lock-out of the breaker. The line was sectionalized allowing the Sunny Hills customers(323) to have service restored at 3:53pm, the Vernon customers(1203) to have service restored at 3:57pm, and the Greenhead customers(73) to have service restored at 4:36pm. The transmission line was returned to normal operation at 7:03pm.

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13. Did Gulf Power Company consider offering rural development funds to the Washington County Commission in support of locating the correctional facility in Washington County? If not, explain why?

RESPONSE:

Yes. Gulf Power Company supports economic development in both rural and urban areas of Northwest Florida. When Gulf Power received an inquiry concerning the provision of financial assistance for the correctional facility, the Company offered its assistance in a community-wide fundraising activity but declined to enter into a one-on-one bidding contest with the Coop.

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14. What percentage of Gulf Power's customer base is Residential, Commercial or Industrial?

RESPONSE:

For 1993, Gulf Power's average number of jurisdictional customers was 87.5 % Residential, 12.4% Commercial and .1% Industrial.

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15. Did Gulf Power construct the Green Head Substation in anticipation of serving the Leisure Lakes area?

RESPONSE:

Yes, Greenhead Substation was constructed in anticipation of serving the Leisure Lakes area and for the additional purpose of providing the backup to Sunny Hills in the event of a Sunny Hills Substation transformer failure.

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16. Did Gulf Power construct distribution lines extending southerly from the intersection of Highway 279 and Highway 77 in anticipation of serving the Leisure Lakes area?

RESPONSE:

No.



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17. Why did Gulf Power remove the Green Head substation?

RESPONSE:

In 1988, the Company determined as a result of load growth in the Vernon area that it was necessary to replace the existing Vernon transformer with a transformer of greater capacity. The Company decided that it would be a good economic choice to use the existing Greenhead transformer as the replacement of the Vernon bank. The use of the Greenhead bank at the Vernon substation was in lieu of buying a new transformer at a significantly higher cost. The Company considers this to have been a prudent, cost-effective decision.

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18. Why has Gulf Power left the 2.2 miles of distribution line extending southerly from the intersection of Highway 279 and Highway 77 in place?

RESPONSE:

Until mid 1993, the line was used to connect the Greenhead capacity to the Sunny Hills distribution system to provide backup in the event of a transformer failure. Since that time, other higher priority work has occupied Gulf Power's work force.

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19. What was the basis for the Deltona Corporation's initial selection of Gulf Power as the preferred provider of electric service for the Sunny Hills subdivision?

RESPONSE:

The Deltona Corporation's selection of Gulf Power as the preferred service provider in Sunny Hills was made more than twenty years ago. The hearing transcript of the Circuit Court dispute between Gulf Power and the Coop over the Sunny Hills subdivision does not specifically disclose the reasons Deltona chose Gulf Power, however, that record is replete with references to Gulf Power's low rates, reliable service, and history of providing electricity in Washington County, and it is reasonable to assume that these factors played no small part in Deltona's decision.

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20. Can the Vernon or Sunny Hills substation be remotely operated by motor operated switches in the case of an outage? If yes, include the date of installation of the motor operated switches in your response.

RESPONSE:

No.

21. Will Gulf Power receive any benefit from the location of a correctional facility in Washington County in the event they are not the provider of electric service to the correctional facility?

RESPONSE:

Gulf Power Company rate payers will receive only minimal benefit from serving a portion of the new customers which will eventually materialize from the economic impacts of the facility. The real benefits only materialize from serving the correctional facility itself due to its load factor being greater than Gulf Power's system load factor which would bestow economic benefits to all Gulf Power's customers through more efficient utilization of existing resources. Neither Gulf Power's rate payers acting as tax payers nor any state of Florida tax payers should be forced to pay higher taxes due to any governmental agency buying more expensive electricity. Common sense says that all governmental agencies should purchase products and services at the least cost to society.

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF BAY)

Docket No. 930885-EU

Before me the undersigned authority, personally appeared William C. Weintritt, who being first duly sworn, deposes, and says that he is the Power Delivery Manager of the Panama City District 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.

William C. Weintritt

William C. Weintritt
Power Delivery Manager

Sworn to and subscribed before me this 20th day of July, 1994.

Linda C. Webb

Notary Public, State of Florida at Large



LINDA C. WEBB
Notary Public-State of FL
Comm. Exp: May 31, 1998
Comm. No: CC 362783

#40

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve)
territorial dispute with Gulf)
Coast Electric Cooperative, Inc.)
by Gulf Power Company.)

Docket No.: 930885-EU
Filed: June 23, 1994

FILED

SIG J. WHITE

OCT 24 1995

CLERK, SUPREME COURT

By: _____
Clerk Deputy Clerk

GULF COAST ELECTRIC COOPERATIVE, INC.'S
ANSWERS TO INTERROGATORIES TO THE STAFF'S SECOND
SET OF INTERROGATORIES

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to GULF COAST ELECTRIC COOPERATIVE, INC.(GCEC). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address and relationship to GCEC of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to

92,479

EXHIBIT NO. 40

FPSC DOCKET NO. 930885-EU

DATE 10-19-94

the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

Q6. Why did Gulf Coast change its wholesale electric supplier from Gulf Power to Alabama Electric Cooperative?

A. Gulf Coast experienced unacceptable outages by Gulf Power, totalling 11.15 hours in 1974. Gulf Coast was concerned by reliability and maintenance problems, unilateral tariff changes by Gulf Power and threats by Gulf Power to terminate electric service to the entire cooperative system when Gulf Power deemed it appropriate to serve its own customers first. In addition the cooperative found low voltage situations unacceptable. [Answer provided by Hub Norris.]

Q7. What was the basis for the Deltona Corporation's selection of Gulf Power as the preferred provider of electric service for the Sunny Hills Subdivision?

A. Although we could speculate, we do not know why since Deltona Corporation did not communicate its reasoning to Gulf Coast. Gulf Power should know the answer to this question. [Answer provided by Hub Norris.]

Q8. When did Gulf Coast become aware that the Department of Corrections, or Washington County, had chosen Gulf Coast as the provider of electric service?

A. On receipt of the letter of June 7, 1993 from the Washington County Commission, attached as Exhibit HN-2 to the direct testimony of H. W. Norris.

Q9. Will Gulf Coast receive any benefit from the location of a correctional facility in Washington County in the event they are not the provider of electric service to the correctional facility?

A. There will be incidental benefit to Gulf Coast in addition to a direct and substantial benefit to the citizens of Washington County. We could only speculate on the incidental benefit to the cooperative in terms of potential new employees who may locate in Washington County who would receive service from Gulf Coast. [Answer provided by Hub Norris.]

10Q. Are there any terms or conditions under which the \$308,000 loan was granted to Washington County that require Gulf Coast to be the provider of electric service to the correctional facility?

A. No. [Answer provided by Hub Norris.]

11Q. What is Gulf Coast's estimate of the cost to remove the Red Sapp Road single phase distribution line? Provide calculation and documentation with response and exclude any cost for relocation or upgrading.

Aa. \$2,622.72

Ab. 16 hours labor at \$54.64 per hour equals \$874.24.

Overhead - Two times \$ 874.24 equals \$1,748.48, total: \$874.24 plus \$1,748.48 equals \$2,622.72. [Answer provided by Sid Dykes and Archie Gordon.]

12Q. What is Gulf Coast's estimate of the cost to relocate and upgrade the Red Sapp Road single phase distribution line? Provide calculation and documentation with response and exclude any cost for removal.

Aa. Single phase relocation totals \$36,996.24

Ab. Upgrading single phase to three phase adds \$14,582.54.

Ac. Total of single phase relocation and three phase upgrade equals \$51,579.28.

Consequently the incremental cost to the cooperative for providing three phase service to the Department of Corrections is \$14,582.54. [Answer provided by Sid Dykes and Archie

Gordon.]

13Q. Under what circumstances would Gulf Coast be compensated for removal of the Red Sapp Road single phase distribution line?

A. If Gulf Coast did not serve the load, then a condemnation award or an agreement by the parties would compensate Gulf Coast for the removal and relocation costs. In short, if any other power supplier were selected by the Department of Corrections to provide service, some one, whether it be the power supplier, or the customer, would be responsible for the cost of removal of the Red Sapp Road single phase distribution line and its necessary relocation either on Department of Transportation right-of-way or on additional private utility easements. Since Gulf Power has indicated it would not have agreed to compensate Gulf Coast for the removal of the Red Sapp Road single phase distribution line or provide for the relocation costs of that line, the Department of Corrections would not have constructed its facility in South Washington County. [Answer provided by Sid Dykes and Archie Gordon.]

14Q. Will any service to existing customers be affected by the removal of the Red Sapp Road single phase distribution line? If yes, indicate the number of customers, average annual revenues, cost for relocation of electric service and location.

of the customers.

- 14a. Number of customers: 41
- 14b. Average annual revenues: \$67.60 per customer
- 14c. Cost of relocation: \$36,996.74
- 14d. Location of customers: Highway 279 area from Red Sapp Road North to Roche Road.

The cooperative could not simply remove the Red Sapp Road single phase distribution line and still provide the quality of service to its customers on the Western end of the Red Sapp distribution line. Although they could be served from the other side of the looped service, the cooperative would not rely on that service to its consumers and would rebuild and relocate its distribution tie. [Answer provided by Sid Dykes and Archie Gordon.]

- 15Q. How will Gulf Coast provide electric service to the customers presently being served by the Red Sapp Road single phase distribution line in the event they are not chosen as the provider of electric service to the Washington Correctional facility?

- 15A. In a same manner such customers are being served at the present time, by the relocated Red Sapp line. [Answer

provided by Sid Dykes and Archie Gordon.]

16Q. Provide the following information regarding current electric service within 5 miles of the intersection of Highway 279 and Highway 77:

- a. Number of customers presently receiving service. (Classify and separate by residential, commercial or industrial)
- b. Average annual revenues. (Classify and separate by residential, commercial or industrial)
- c. Current depreciated value of facilities
- d. Salvage value of facilities

16Aa.	No cons. presently rec. service	residential	small comm.	total
		662	3	665
16Ab.	Avg. Ann. Rev.	@\$930.69	@\$2,471.04	@\$937.64
		\$616.117.	\$7,413.00	\$623.53
16Ac.	Current dep. value of facilities	\$1,227.910.	\$5,565.	\$1,233.475
16Ad.	*Salvage value	-0-	-0-	-0-

Gulf Coast Answers to
Second Set of Interrogatories

*It is estimated that removal labor would be equal to or greater than the junk value of the retired utility materials. [Answer provided by Sid Dykes and Archie Gordon.]

17Q. Provide the following information regarding future electric service within 5 miles of the intersection of Highway 279 and Highway 77:

- a. Number of additional customer projected to be served. (Classify and separate by residential, commercial or industrial).
- b. Projected average annual revenues. (Classify and separate by residential, commercial or industrial)
- c. Projected average annual load. (Classify and separate by residential, commercial or industrial).
- d. Projected value of associated facilities to serve additional) customers.

17Aa.	a.	Projected add'l cons. (10 yrs.)	RES.	SM. com.	LG. com.	Total
			116	1	1	118

Gulf Coast Answers to
Second Set of Interrogatories

b. Projected average

annual revenue:	Res.116 con. x 1127 KWH/mo.x	
\$.082559/KWHx12 =		\$129.517
Sm.Com. 1 x 280 KWH/mo. x \$.0734/KWH x 12		
Lg. com. 1 x 163.450KWH/mo x		
S.050683/KWH x 12 =		\$ 99.409
Total	116 con. 3,561.960 KWH	
	@S.064971257	\$231.425

c. Projected average annual load, additional consumers

Res.	116 con. @ 1.127 KWH/mo =	1,568,784 KWH/yr
Sm Com.	1 con. @ 2,806 KWH/mo =	33,672 KWH/yr
Lg Com.	1 con. @163,450KWH/mo =	1,961,400 KWH/yr
Total		3,563,856 KWH/yr

d. Projected value of assoc. facilities to serve additional customers.

Res.	116@	1,902.56 =	\$220,697.00
Sm. Com.	1@	1,902.56 =	1,903.00
Sub-total	117@	1,902.56 =	\$222,600.00
Lg. Com.	1@	97,133.00 =	97,133.00
Total	118	=	\$ 319,733.00

[Answer provided by Sid Dykes and Archie Gordon.]

18Q. Provide monthly integrated peaks for the years 1990 - 1993 using the following format.

Month Year Peak in MW Day of Week Day of Month Hour

18A. See attached exhibit.

19Q. What is the average number of outage hours per customer per year over the past 12 months for customers receiving service within five miles of the intersection of Highway 279 and Highway 77? Provide calculation and documentation with response.

19A. Number of hours out: 3,157

19B. Number of customers out: 1,899

19C. Average hours per customer: 1.66 (See also attached exhibit for documentation. [Answer provided by Sid Dykes and Archie Gordon.]

20Q. What is the current capacity and normal rating of the Crystal Lake and Southport substations?

20A. See attached exhibit answered by Jeff Parish.

Gulf Coast Answers to
Second Set of Interrogatories

21.Q Will the addition of the correctional facility to the Gulf Coast system impact Gulf Coast's or Alabama Electric Cooperative's date of requiring additional substation capacity?

21A. No.

GULF COAST ELECTRIC COOPERATIVE, INC.'S
ANSWERS TO INTERROGATORIES TO THE STAFF'S SECOND
SET OF INTERROGATORIES

STATE OF FLORIDA
COUNTY OF

BEFORE ME, the undersigned authority personally appeared _____, who being by me first duly sworn proposes and says that the foregoing answers to Staff's Second Set of Interrogatories are true and correct to the best of his information, knowledge and belief.

On Behalf of Gulf Coast Electric
Cooperative, Inc.

Notary Public, State of Florida
My Commission expires:
My Commission number is:

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

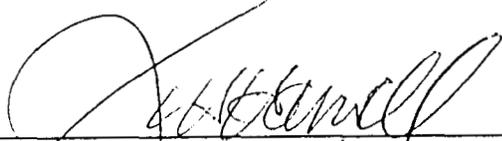
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Gulf Coast Answers to
Second Set of Interrogatories

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GULF COAST ELECTRIC COOPERATIVE, INC.
 HOURLY MONTHLY PEAKS (MW)
 SOURCE: KVA ANALYSIS FROM METERING

INTEROGATORY ANSWER # 18
 Staff 2nd Interrogs to GCEC
 930885-EU

MONTH	YEAR	PEAK IN MW	DAY OF WEEK	DAY OF MONTH	HOUR
JANUARY	1990	23.473	TUE	2	07:00 AM
FEBRUARY	1990	22.755	MON	26	07:00 AM
MARCH	1990	23.563	WED	21	07:00 AM
APRIL	1990	21.741	MON	30	09:00 PM
MAY	1990	26.970	SAT	26	05:00 PM
JUNE	1990	31.595	WED	20	06:00 PM
JULY	1990	32.422	SAT	7	04:00 PM
AUGUST	1990	32.639	SAT	18	04:00 PM
SEPTEMBER	1990	32.046	MON	3	05:00 PM
OCTOBER	1990	26.638	SUN	7	04:00 PM
NOVEMBER	1990	23.986	FRI	30	07:00 AM
DECEMBER	1990	26.562	WED	5	07:00 AM
JANUARY	1991	30.072	MON	14	07:00 AM
FEBRUARY	1991	30.563	SAT	16	08:00 AM
MARCH	1991	27.842	MON	11	07:00 AM
APRIL	1991	26.525	MON	29	06:00 PM
MAY	1991	30.133	WED	29	06:00 PM
JUNE	1991	35.050	SUN	30	05:00 PM
JULY	1991	35.318	TUE	23	06:00 PM
AUGUST	1991	34.453	THU	8	05:00 PM
SEPTEMBER	1991	35.083	SUN	15	05:00 PM
OCTOBER	1991	24.601	MON	28	07:00 PM
NOVEMBER	1991	27.840	TUE	26	07:00 AM
DECEMBER	1991	31.464	TUE	17	07:00 AM
JANUARY	1992	34.473	TUE	21	07:00 AM
FEBRUARY	1992	30.269	MON	10	07:00 AM
MARCH	1992	27.798	WED	11	07:00 AM
APRIL	1992	23.108	FRI	24	06:00 PM
MAY	1992	28.901	MON	25	06:00 PM
JUNE	1992	35.252	SAT	20	06:00 PM
JULY	1992	38.476	TUE	7	06:00 PM
AUGUST	1992	35.759	THU	6	06:00 PM
SEPTEMBER	1992	33.846	SAT	12	03:00 PM
OCTOBER	1992	21.970	THU	15	08:00 PM
NOVEMBER	1992	32.551	MON	30	07:00 AM
DECEMBER	1992	31.704	THU	3	07:00 AM
JANUARY	1993	31.845	THU	28	07:00 AM
FEBRUARY	1993	35.904	FRI	19	07:00 AM
MARCH	1993	36.752	MON	15	07:00 AM
APRIL	1993	26.240	FRI	23	07:00 AM
MAY	1993	33.169	MON	31	05:00 PM
JUNE	1993	37.806	SUN	13	05:00 PM
JULY	1993	40.823	THU	29	06:00 PM
AUGUST	1993	39.753	WED	18	04:00 PM
SEPTEMBER	1993	37.543	SUN	19	03:00 PM
OCTOBER	1993	29.899	SUN	31	07:00 PM
NOVEMBER	1993	35.173	TUE	2	07:00 AM
DECEMBER	1993	36.829	FRI	31	08:00 AM

CRYSTAL LAKE SUBSTATION
 HOURLY MONTHLY PEAKS (MW)
 SOURCE: KVA ANALYSIS FROM METERING

Staff 2nd Interrogs to GCEC
 930885-EU

MONTH	YEAR	PEAK IN MW	DAY OF WEEK	DAY OF MONTH	HOUR
JANUARY	1990	2.902	SUN	14	08:00 AM
FEBRUARY	1990	2.685	SUN	26	07:00 AM
MARCH	1990	2.890	WED	21	07:00 AM
APRIL	1990	3.068	SUN	30	09:00 PM
MAY	1990	3.805	SAT	26	09:00 PM
JUNE	1990	4.357	TUE	19	09:00 PM
JULY	1990	4.533	SAT	7	05:00 PM
AUGUST	1990	4.430	SAT	18	04:00 PM
SEPTEMBER	1990	4.417	MON	3	08:00 PM
OCTOBER	1990	3.397	SUN	7	04:00 PM
NOVEMBER	1990	2.978	FRI	30	07:00 AM
DECEMBER	1990	3.392	WED	5	07:00 AM
JANUARY	1991	3.529	MON	14	07:00 AM
FEBRUARY	1991	3.776	SAT	16	08:00 AM
MARCH	1991	3.038	WED	27	08:00 PM
APRIL	1991	3.252	SAT	27	09:00 PM
MAY	1991	3.781	THU	30	09:00 PM
JUNE	1991	4.555	SAT	29	05:00 PM
JULY	1991	4.632	SAT	13	04:00 PM
AUGUST	1991	4.395	WED	7	09:00 PM
SEPTEMBER	1991	4.447	MON	2	08:00 PM
OCTOBER	1991	2.945	SAT	26	07:00 PM
NOVEMBER	1991	3.726	TUE	26	07:00 AM
DECEMBER	1991	3.818	THU	5	07:00 AM
JANUARY	1992	4.187	FRI	17	07:00 AM
FEBRUARY	1992	3.701	MON	10	07:00 AM
MARCH	1992	3.713	WED	11	07:00 PM
APRIL	1992	3.378	FRI	24	09:00 PM
MAY	1992	3.830	MON	25	09:00 PM
JUNE	1992	4.592	SAT	20	05:00 PM
JULY	1992	6.114	MON	20	08:00 PM
AUGUST	1992	4.627	SAT	8	02:00 PM
SEPTEMBER	1992	4.298	SAT	12	02:00 PM
OCTOBER	1992	2.791	THU	8	08:00 PM
NOVEMBER	1992	3.957	MON	30	07:00 AM
DECEMBER	1992	3.808	THU	3	07:00 AM
JANUARY	1993	3.819	THU	28	07:00 AM
FEBRUARY	1993	4.424	FRI	19	07:00 AM
MARCH	1993	4.687	SAT	13	07:00 PM
APRIL	1993	3.259	FRI	23	07:00 AM
MAY	1993	4.383	MON	31	05:00 PM
JUNE	1993	5.044	SUN	13	05:00 PM
JULY	1993	5.223	THU	29	06:00 PM
AUGUST	1993	5.181	WED	18	06:00 PM
SEPTEMBER	1993	4.595	MON	20	08:00 PM
OCTOBER	1993	3.663	SUN	31	08:00 PM
NOVEMBER	1993	4.171	MON	1	07:00 AM
DECEMBER	1993	4.653	FRI	31	08:00 AM

~~CONFIDENTIAL~~ **COOP & INTERROG # 17**

19A

DATE	YEAR	OUTAGE	SUB	FEEDER	TLN	LOCATION	LAST NAME	NUM_OUT	HRS_OFF	HRS_TOT
01/03	94	Y	C	NORTH	55-7605	WAGES ROND	MCNEIL	2	2.00	4.00
01/07	94	Y	C	NORTH	53-8365	OFF CARTER CIRCLE	WEBB	1	4.50	4.50
02/22	94	Y	C	NORTH	58-6095	WAGES POND	STRICKLAND	15	1.00	15.00
02/24	94	Y	C	NORTH	58-6095	DUMAJACK RD., WAGES P	WEBB	2	1.00	2.00
02/27	94	Y	C	NORTH	53-8037-1	LEISURE LAKES RD.	BEST	2	1.75	3.50
03/02	94	Y	C	NORTH	54-2814	GREENHEAD	MILLER	2	4.00	8.00
03/05	94	Y	C	NORTH	53-8037-1	BELL-AIR ESTATES	BEST	8	3.00	24.00
03/09	94	Y	C	NORTH	57-6638-1	NORTH FEEDER, CRYSTAL	SCHERZER	500	1.00	500.00
03/12	94	Y	C	NORTH	59-8064	BUMA JACK RD.	PITMAN	1	1.50	1.50
03/24	94	Y	C	NORTH	60-5302	ROCHE RD. OFF HWY. 279	FOLMAR	1	0.75	0.75
03/24	94	Y	C	NORTH	60-5806	SPRING LAKES ESTATES	SUGGS	6	1.00	6.00
04/13	94	Y	C	NORTH	59-6008	DUMA JACK RD. & GAP P	HESS	50	2.50	125.00
04/16	94	Y	C	NORTH	55-6619	WAGES POND	CORBIN	20	2.25	45.00
04/17	94	Y	C	NORTH	60-6691	PINE LOG RD., WAUSAU	SHEFFIELD	1	1.00	1.00
05/04	94	Y	C	NORTH	57-0171	HWY 279	GAINER	1	0.50	0.50
05/14	94	Y	C	NORTH	60-7523	WOOD RD.	WOOD	2	1.00	2.00
05/29	94	Y	C	NORTH	56-2490	CHAIN LAKES TAP	BURDETTE	25	1.00	25.00
06/07	94	Y	C	NORTH	58-6595	DEADING AT WAGES PON	WALTERS	1	1.00	1.00
06/06	94	Y	C	NORTH	54-2092	GREEN HEAD 54-5092	HIGHWAY	727	2.00	1454.00
06/15	94	Y	C	NORTH	56-8112-1	56-8112-1	MAVEDEN,	1	1.00	1.00
06/15	94	Y	C	NORTH	59-6611	GAP POND	MADDEN	1	1.00	1.00
06/13	94	Y	C	NORTH	56-3186	CHAIN LAKE TAP	MERMAN	20	1.50	30.00

SUB TOTAL 1389 2254.75

Average outage hours per consumer

1.66 hrs

DOCUMENTATION FOR
 INTERROGATORY ANSWER
 # 19 A & B
 Staff 2nd Interrogos to
 GCEC 930885-EU

19B

DATE	YEAR	OUTAGE	SUB	FEEDER	TLN	LOCATION	LAST NAME	NUM_OUT	HRS_OFF	HRS_TOT
07/18	93	Y	C	NORTH	54-6920	PINEWOOD RD., GRASSY	McCLAIN	4	5.50	22.00
07/18	93	Y	C	NORTH	54-0967	CARTER CR.	BLEVINS	4	1.50	6.00
07/18	93	Y	C	NORTH	59-8165	DUMAJACK RD.	POWELL	1	1.00	1.00
07/19	93	Y	C	NORTH	54-2693	NORTH HWY 77, GREENHE	HERNANDEZ	2	0.50	1.00
07/20	93	Y	C	NORTH	57-7677	GRASSYPOND	DANIELS	1	2.00	2.00
07/21	93	Y	C	NORTH	54-6227-1	PINEWOOD ST., GRASSYP	WATSON	1	1.00	1.00
07/13	93	Y	C	NORTH	60-3822	WARD TAP, DOUBLE BRAN	WARD	1	4.00	4.00
07/10	93	Y	C	NORTH	57-2060	RED SAPP TAP	SMITH	1	1.00	1.00
07/11	93	Y	C	NORTH	56-2490	CHAIN LAKES	CURRIE	30	3.00	90.00
07/12	93	Y	C	NORTH	60-2569	PAYNE LAKE	BROWN	1	1.00	1.00
07/03	93	N	C	NORTH	58-7085	PORTER POND RD.	BULLOCK	0	0.00	0.00
07/21	93	Y	C	NORTH	60-3105	HWY 279, NEAR CAMPGRO	GALBREATH	1	1.00	1.00
07/21	93	N	C	NORTH	60-3923	HWY 279, NEAR ROCHE S	WARD	0	0.00	0.00
07/25	93	Y	C	NORTH	60-0291	HWY 279	BROWN	20	2.00	40.00
07/25	93	N	C	NORTH	58-7086	DUMA JACK RD.	BROCK	0	0.00	0.00
07/27	93	Y	C	NORTH		DUMA JACK RD.	WASH. CO. RD. DEPT	35	3.00	105.00
07/28	93	Y	C	NORTH	57-1202-1	DOUBLE BRANCH TAP &	ARNONE	75	2.00	150.00
08/02	93	Y	C	NORTH	61-5149	HWY 77 NORTH, WAUSAU	NESMITH	1	0.50	0.50
08/02	93	Y	C	NORTH	61-5103	FERGUSON CEMETARY RD	HOOD	1	1.50	1.50
08/04	93	Y	C	NORTH	57-2029-1	OFF HWY 279	ARNONE	1	2.50	2.50
08/10	93	Y	C	NORTH	59-8165	WHITE OAK & WAGES PO	POWELL	75	1.00	75.00
08/14	93	Y	C	NORTH	60-6855	WAUSAU	GENTRY	1	1.50	1.50
08/14	93	Y	C	NORTH	54-3713	GREENHEAD	HERNANDEZ	2	2.00	4.00
08/17	93	Y	C	NORTH	53-9835	LEISURE LAKE RD.	CARTER	1	0.75	0.75
08/19	93	Y	C	NORTH	61-5149	HWY 77 NORTH OF SUNN	NESMITH	1	0.50	0.50
08/19	93	N	C	NORTH	62-8285	GAP POND	WASH. COUNTY	0	0.00	0.00
09/07	93	N	C	NORTH	60-7927-1	PINE LOG RD.	WHITE	0	0.00	0.00
09/09	93	Y	C	NORTH	59-6008-3	GAP POND	REDFERN	15	2.00	30.00
09/09	93	Y	C	NORTH	59-6905	GAP POND	BUSH	1	3.00	3.00
09/18	93	Y	C	NORTH	54-2814-1	GREENHEAD	MILLER	2	2.00	4.00
10/30	93	Y	C	NORTH	60-1296	HWY 279	ARNONE	20	2.00	40.00
05/22	93	Y	C	NORTH	54-3123	GREENHEAD	BUCKBEE	1	1.00	1.00
05/16	93	Y	C	NORTH	61-4150-1	HWY 77 NORTH OF RED	HEART	200	1.50	300.00
05/10	93	N	C	NORTH	56-2390	CHAIN LAKES	PALMER	0	0.00	0.00
05/08	93	Y	C	NORTH	53-7440-1	CARTER CR.	CLECKLEY	5	1.00	5.00
06/30	93	Y	C	NORTH	61-5103	FERGUSON CEMETARY RD	HOOD	1	0.75	0.75
06/30	93	Y	C	NORTH	54-3219	GREENHEAD	HURD	1	0.75	0.75
06/30	93	Y	C	NORTH	56-8409	HWY 279 BACK OF OLD	WALLER	2	1.00	2.00
06/28	93	Y	C	NORTH	54-4008	HONDURAS LN.	CARTER	1	3.00	3.00
06/15	93	Y	C	NORTH	58-7085-1	WAGES POND	BULLOCK	1	2.00	2.00
11/27	93	Y	C	NORTH	60-6071-1	PINE LOG RD, WAUSAU	SMITH	1	1.00	1.00

SUB TOTAL 310

902.25

20A.

	<u>Transformer Capacity</u>		<u>Max. Demand</u>	<u>Prison</u>	<u>Total</u>
	<u>OA</u>	<u>FFA</u>	<u>To-date (year)</u>	<u>Load</u>	
Crystal Lake 115-25 KV	7500 KVA (55°c) 8400 KVA (65°c)	9375 KVA (55°) 10500 KVA (65°c)	5810 KW (1994)	258 KW	6068KW
Southport 115-25 KV "A"	<u>OA</u> 7500 KVA (55°c) 8400 KVA (65°c)		5495 KW (1990)		
Southport 115-25 KV "B"	7500 KVA (55°c) 8400 KVA (65°c)		5569 KW (1989)		

The Crystal Lakes substation has a present transformer capacity of 7500 KVA at (55°c), while the Southport substation has two (2) transformer banks with a present capacity of 7500 KVA each at (55°c). The Crystal Lakes transformer's capacity can be increased to 9575 KVA, at (55°c), with the installation of fans. Crystal Lakes' maximum demand to-date was 5810 KW. Southport's maximum demand to-date was 5495 KW for Bank "A" and 5569 KW for Bank "B".

Answer provided by Jeff Parish.

20.A.

INTERROGATORY ANSWER #20 A

STAFF 2nd Interrogs to GCEC
930885-EU

#41

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve)
territorial dispute with Gulf)
Coast Electric Cooperative,)
Inc. by Gulf Power Company.)

DOCKET NO. 930885-ET
FILED: 10-26-94

FILED

SID J. WHITE
OCT 24 1995

ANSWERS TO
STAFF'S FIRST SET OF INTERROGATORIES TO
GULF COAST ELECTRIC COOPERATIVE, INC. (NO. 1 - 5)
CLERK, SUPREME COURT
By _____
Chief Deputy Clerk

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Gulf Coast Electric Cooperative, Inc. (GULF COAST). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address and relationship to GULF COAST of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

92,479
41

CARD NO. _____
FPSC DOCKET NO. 930885-ET
DATE 10-19-94

1. Please describe the existing and new facilities that are to be added within the next 5 years in the county or counties where the disputed area is located. Include a description of the following:
 - a. transmission facilities;
 - b. distribution facilities;
 - c. distribution service facilities;
 - d. customer service facilities; and
 - e. generation or purchased power needed to serve the disputed area for the next ten (10) years.

a. Transmission facilities in Washington and Bay counties which supply electricity to GCEC are owned and operated by Alabama Electric Cooperative. The line(s) are 115 Kv and provides a reliable loop feed. Substation facilities supplying the disputed area consist of the Crystal Lake substation located 5.4 miles south of the Crystal Lake substation is 115KV/25KV with a 3 circuit secondary distribution bay. KVA capacity is 7,500 - O A @ 55 C riser; 8,400 - O A @ 65 C Rise; 10,500 F FA @ 65 C Rise. Capacity is adequate for the foreseeable future. See additional information on Exhibit 1(a).

b. Gulf Coast Electric Cooperative owns and operates an electrical distribution system in South Washington County, including the disputed area. The facilities are generally described as (1) Circuit #3001C/Ebro/Red Head 25/14.4 KV; SR 20, SR 79, all county roads in area with population. (2) Circuit #3101C North/Greenhead/CR279/Wausau 25/14.4 KV; SR 77, and all county roads in area with population. (3) Circuit #3201C 25/14.4 KV south SR 77 to Southport and all county roads populated in that area. See Staff POD's 1(a) and 1(b). The prison is being served from circuit #3101C, which includes 5.4 miles of three phase 25 KV line of 2/0 ACSR conductor. The continuous current rating of 270 amperes per conductor provides an emergency capacity of 11,664 KVA while the vacuum circuit breaker setting currently provides an existing capacity of 5184 KV and a simple resetting of the trip rating will provide a future capacity of 6,912 KVA.

c. Distribution service facilities are located at the GCEC district office in Southport, FL 7.5 miles south of the Crystal Lake substation. Total distance to the disputed area is 12.9 miles. The district facility includes thirteen (13) personnel in its field services and construction force along with 4 service and trouble trucks, 3 insulated bucket trucks and 2 digger pole trucks along with full communication facilities and supporting engineering staff.

d. Consumer service facilities are located at the GCEC District Office in Southport, FL which is 7.5 miles south of the Crystal Lake Substation. The total distance to the disputed area is 13.6 miles. The district facilities includes fourteen (14) personnel in its customer service staff. A community meeting facility is provided for the use of local members and organizations.

e. See attached Exhibit 1(e).

1 a, b, c, d - William S. Dykes, Manager of Engineering
Gulf Coast Electric Cooperative, Inc.

1 e M. Jeff Parish, Vice President, Bulk Power & Delivery
Alabama Electric Cooperative, Inc.

STAFF'S 1ST SET INTERR. TO GULF COAST (NOS. 1-5)
DOCKET NO. 930885-EU
PAGE 3

2. Please describe the utility's contribution in aid of construction (CIAC) policies governing the extension of facilities to new customers, and estimate the amount of CIAC that will be required from the correctional facility.

See attached board policy number 301 (area coverage).

3. Please describe the utility's policies governing the construction of underground facilities and the collection of an underground/overhead cost differential, and estimate the amount of differential costs that will be required from the correctional facility.

Gulf Coast Electric Cooperative, Inc. has always served rural areas where customer density is low and individual service cost is high. Experience has shown that residential developments require underground distribution facilities that are generally more compact than ordinary rural development. The comparative cost of underground/overhead construction has favored the underground facility. No differential cost will be required by the correction facility.

H. W. Norris, General Manager
Gulf Coast Electric Cooperative, Inc.

STAFF'S 1ST SET INTERR. TO GULF COAST (NOS. 1-5)
DOCKET NO. 930885-EU
PAGE 4

4. Please summarize customer complaints in the county, counties, or utility division in which the disputed area is located for the previous 5 years. The summary should include the date of the complaint and any recurring complaints of a similar nature by the same complainant; the location of the complaint; the nature of the complaint; and the corrective action taken by the company. The name of the complainant need not be specified.

No complaints.

William S. Dykes, Manager of Engineering
Gulf Coast Electric Cooperative, Inc.

5. Provide a Distribution Service Reliability Report for Gulf Coast's facilities located within 5 miles of the disputed area for the 12 month period from October 1, 1992 through September 30, 1993. (Refer to Rules 25-6.044 and 25-6.0455, Florida Administrative Code.) Please use the following format in the response:

SERVICE RELIABILITY DATA
Total Customers Served = XXX

Feeder Number	Incidents Per Feeder	Customers Affected	L	N	L-Bar (L/N)
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
Company					
Total					

Legend: L = Customer Interruption Duration (minutes).
N = Number of Service Interruptions (system)
L-Bar = Average Length of a Service Interruption (minutes)

The 12 month period from October 30, 1993 did not produce a single outage which would have affected the disputed area, or the proposed correction facility. Vacuum circuit breaker 3101C did not lock out and all operations are accounted for.

William S. Dykes, Manager of Engineering
Gulf Coast Electric Cooperative, Inc.

**GULF COAST ELECTRIC COOPERATIVE, INC.
RESPONSE TO
STAFF'S FIRST SET OF INTERROGATORIES
FPSC DOCKET NO. 930885-EU**

Interrogatory 1(a)

Wholesale power is delivered to Gulf Coast Electric Cooperative, Inc., through Alabama Electric Cooperative, Inc. (AEC). AEC owns and operates all transmission facilities which serve Gulf Coast, including distribution substations.

The AEC substations located in Washington County are Chipley and Fountain. Chipley is a 115-25 kV substation which serves West Florida Electric Cooperative Association in northern Washington County. The station is composed of three single-phase, 115-25 kV, 3333 kVA transformers. The Fountain Switch substation is composed of a three-phase, 115-25 kV, 7500 kVA transformer. The Fountain Switch substation ties to the Chipley substation to the north through a 24.14 mile 115 kV line (137 MVA rating).

Crystal Lake is on the northern border of Bay County and will serve the disputed Washington County prison facility. The Crystal Lake substation has a three-phase, 115-25 kV, 7500 kVA transformer in place. Crystal Lake is connected to the east at Fountain Switch and the west at Freeport Switch with 115 kV ties. The 115 kV line to Fountain was energized in 1978, and the Freeport line was energized two years later in 1980. Each has a thermal rating of 137 MVA.

No additions or improvements to the existing facilities mentioned above are planned within the next five years.

M. Jeff Parish, Vice President, Bulk Power &
Delivery
Alabama Electric Cooperative, Inc.

GULF COAST ELECTRIC COOPERATIVE, INC.

RESPONSE TO
STAFF'S FIRST SET OF INTERROGATORIES
FPSC DOCKET NO. 930885 – EU

INTERROGATORY 1(e):

<u>YEAR</u>	<u>CAPACITY (KVA)</u>
1994	22
1995	258
1996	258
1997	258
1998	258
1999	258
2000	258
2001	258
2002	258
2003	258

Note: Capacity requirement reflects diversity of prison load with existing Gulf Coast EC load.

GULF COAST ELECTRIC COOPERATIVE INCORPORATED

WEWAHITCHKA, FLORIDA

BOARD POLICY NO. 301

AREA COVERAGE

I. OBJECTIVE:

To fulfill the Cooperative's area coverage responsibility to the unserved persons within its service area, and to make available high quality, low cost, electric service to all those eligible to become members of, and to receive service from the Cooperative; and to provide this service as efficiently as possible with the least amount of inconvenience to the members and the public.

II. SCOPE:

Any person, firm or organization desiring electric service from the Cooperative shall sign an application for service and membership in the Cooperative. Upon receipt of such application for service, the Cooperative shall act in accordance with the following criterion:

If the applicant requests electric service at a location not previously served with electricity and the location is within the areas wherein the Cooperative has the legal right to serve, and the service is of a permanent nature, the Cooperative will proceed with the construction of the necessary facilities as soon as practicable, and service will be rendered after the consumer has met all city and county inspection requirements. Service to permanent residences

will be rendered at regularly established rates and minimum charges without any required contribution in aid of construction. The Cooperative shall provide service to permanent, fulltime residence without any cost in aid of construction.

Temporary services, cottages, camps, pumps, or other non-permanent, non-fulltime residences shall be required to pay cost in aid of construction in excess of one span of primary and one span of secondary required to furnish the service.

Commercial and industrial services shall be provided at no cost in aid of construction provided, in the opinion of the Cooperative, the service usage will permit recovery of cost within a reasonable period. Otherwise, all cost in excess of one span of primary and one span of secondary shall be paid in cost in aid of construction.

The Cooperative may waive all cost in aid of construction charges when, in the Cooperative's opinion, future growth will generate sufficient revenue to recover the cost of construction within a reasonable period.

III. RESPONSIBILITY:

The Manager is responsible for seeing that the provisions of this policy are carried out.

EFFECTIVE DATE: October 20, 1970

REVISED DATE: May 19, 1987

REVISED DATE: March 17, 1992

Response to GCEC's Third
Set of Interrogatories
Docket No. 930885 - EU
GULF POWER COMPANY
October 10, 1994
Item 1
Page 1 of 1

1. For each interrogatory previously submitted by Staff or by Gulf Coast to Gulf Power as to which there is additional information or information which alters or modifies a previous submitted response provide the updated answer on a page or pages to be attached.

RESPONSE:

None.

Response to GCEC's Third
Set of Interrogatories
Docket No. 930885 - EU
GULF POWER COMPANY
October 10, 1994
Item 2
Page 1 of 1

2. Regarding the prison facility referred to by William Pope in his prefiled rebuttal testimony, page 4 lines 15-17, please state:
- (a) The energy source that is used for air conditioning the facility and the amount of KW of load and/or amount of energy requirements associated with the air conditioning system.
 - (b) The energy source that is used for cooking at the facility and the amount of KW of load and/or energy requirements associated with the cooking at the facility.
 - (c) The energy source that is used for heating the facility and the amount of KW of load and/or amount of energy requirements associated with the heating of the facility.

RESPONSE:

- (a) Gulf Power does not have any information about the individual load components within the prison referenced above.
- (b) See response to 2(a) above.
- (c) See response to 2(a) above.

Response to GCEC's Third
Set of Interrogatories
GULF POWER COMPANY
Docket No. 930885-EU
October 10, 1994
Item 3
Page 1 of 10

3. What is the hourly load data of the prison facility referenced in the proceeding interrogatory for each of the last five years.

RESPONSE:

Gulf Power Company did not have the type of metering equipment that would provide hourly data installed at this facility until May 28, 1993. Therefore, the attached pages 2 of 10 through 10 of 10 are the only figures that can be provided to respond to this interrogatory.

HOURLY LOAD DATA FOR THE ESCAMBA COUNTY JAIL

DATE (MM/YY)	1AM	2AM	3AM	4AM	5AM	6AM	7AM	8AM	9AM	10AM	11AM	NOON	1PM	2PM	3PM	4PM	5PM	6PM	7PM	8PM	9PM	10PM	11PM	MN
052893	0	0	0	0	0	0	0	0	0	0	0	249	412	419	411	474	461	457	451	463	500	501	491	446
052993	397	398	392	418	490	458	420	428	431	447	442	451	459	459	467	466	468	477	472	484	519	526	523	466
053093	425	411	405	422	493	470	425	429	437	446	450	461	471	469	468	454	461	467	474	484	519	519	516	460
053193	407	405	401	421	488	468	430	428	434	455	464	458	463	479	460	460	472	478	486	495	521	514	499	450
060193	405	404	402	420	481	462	428	442	453	461	456	455	456	465	472	464	467	471	463	473	492	492	483	431
060293	387	386	385	408	467	448	411	426	439	455	465	461	468	464	481	468	466	471	467	476	502	504	497	449
060393	409	410	408	425	481	481	449	450	471	491	509	498	500	507	525	506	504	503	499	504	537	540	536	487
060493	443	442	443	455	518	516	489	505	502	512	510	498	515	523	516	498	500	497	498	511	539	543	540	482
060593	444	442	443	460	537	504	450	463	469	482	483	481	493	495	504	501	503	512	507	513	547	545	546	489
060693	448	448	450	462	522	512	459	458	467	485	488	496	507	508	500	507	499	504	487	507	536	538	535	480
060793	446	445	444	455	522	518	483	499	508	512	521	526	530	537	532	527	522	518	510	521	554	550	541	491
060893	452	451	449	457	528	504	484	494	498	519	530	529	524	534	537	522	508	508	508	516	539	542	537	483
060993	444	443	441	465	524	504	473	491	505	517	515	512	531	509	530	525	521	517	507	523	552	553	548	487
061093	453	447	448	458	527	500	478	503	509	516	521	530	535	531	527	526	522	504	500	516	548	549	546	493
061193	450	450	449	457	532	504	487	504	511	527	528	531	512	514	518	523	516	519	527	528	554	551	545	501
061293	454	449	450	467	527	503	488	471	478	485	495	502	499	508	511	513	514	509	512	514	544	546	544	490
061393	451	446	446	462	531	508	468	474	475	485	482	491	490	493	491	492	491	494	510	516	539	540	526	484
061493	447	441	440	476	535	516	491	494	498	510	519	515	526	541	534	541	534	520	517	503	527	533	523	471
061593	434	427	425	435	513	505	453	460	481	504	512	505	504	500	507	497	496	497	486	508	534	532	529	480
061693	437	438	435	450	522	507	471	510	500	495	509	497	509	495	505	493	487	483	490	504	535	531	530	481
061793	441	441	445	468	548	527	485	484	490	504	513	506	514	522	505	494	498	498	487	489	530	535	539	482
061893	444	440	439	456	532	518	490	502	501	531	518	506	493	501	508	494	501	494	488	496	529	528	527	482
061993	436	433	438	456	526	495	455	458	463	485	488	488	488	487	474	475	483	485	489	501	527	530	524	468
062093	439	429	435	454	521	486	442	447	452	476	477	483	484	482	496	487	499	505	501	517	545	553	546	494
062193	454	449	446	467	533	528	485	492	516	521	516	501	503	501	505	490	491	489	489	500	530	522	521	474
062293	428	427	427	446	517	503	479	488	493	511	517	504	507	463	500	489	486	481	477	486	516	517	512	462
062393	423	414	414	423	494	483	453	427	481	498	486	495	522	515	499	493	505	495	488	501	529	531	523	467
062493	430	425	428	436	517	505	473	482	494	507	487	490	485	484	483	489	489	493	487	492	514	525	522	461
062593	426	421	418	432	499	481	464	468	476	509	498	490	493	496	497	472	469	485	490	505	536	532	527	473
062693	441	432	430	453	508	501	441	431	443	462	469	468	469	485	484	480	488	498	496	494	525	532	531	481
062793	444	437	440	450	515	485	452	465	463	469	485	498	515	495	477	484	482	489	489	502	532	531	530	473
062893	441	431	434	447	517	504	478	488	473	433	528	520	529	508	513	505	504	503	503	515	545	548	541	488
062993	453	448	450	465	535	509	500	518	525	519	527	509	530	530	513	512	508	512	516	527	557	564	555	504
063093	470	464	461	487	550	528	507	527	523	530	528	512	527	533	517	517	529	530	532	525	548	550	548	498
070193	463	460	453	482	547	534	503	473	501	512	523	514	524	528	509	503	507	501	506	545	553	537	477	
070293	446	441	449	462	525	514	495	507	510	534	536	531	529	521	497	504	515	512	517	527	555	566	556	505
070393	473	468	467	491	552	532	485	512	500	500	511	520	510	514	512	504	512	516	304	349	388	575	485	330
070493	478	455	449	470	544	525	486	480	491	483	497	498	491	490	496	494	500	497	512	525	555	554	553	491
070593	460	452	453	474	546	518	474	480	482	502	514	505	531	528	504	498	500	494	503	512	545	546	542	492
070693	453	453	450	467	536	513	481	484	496	514	523	516	530	545	528	518	514	510	513	521	557	560	558	500
070793	464	460	462	476	546	528	501	506	517	537	531	519	530	539	523	522	528	527	528	527	551	546	539	486
070893	449	449	450	458	522	516	498	494	498	525	529	528	522	531	523	528	526	520	513	518	523	557	558	498
070993	449	450	452	464	528	518	474	488	503	509	522	506	497	510	508	508	512	513	518	523	557	558	553	498
071093	458	451	453	469	533	521	484	499	503	491	495	502	501	509	499	498	509	503	509	520	547	550	539	481
071193	445	443	445	462	522	512	469	467	462	480	481	475	474	468	477	476	485	487	491	493	527	526	526	473
071293	430	428	428	444	502	500	482	484	499	507	514	508	504	504	495	491	486	475	489	494	521	527	525	464
071393	427	426	427	434	512	501	462	459	469	490	492	498	509	494	500	499	493	494	485	496	527	532	526	477

Response to GCEC's Third
Set of Interrogatories
Docket No. 930885 - EU
GULF POWER COMPANY
October 10, 1994
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DATE (MM/YY)	1AM	2AM	3AM	4AM	5AM	6AM	7AM	8AM	9AM	10AM	11AM	NOON	1PM	2PM	3PM	4PM	5PM	6PM	7PM	8PM	9PM	10PM	11PM	MN
071493	438	437	434	447	521	529	503	507	491	502	495	487	509	497	500	504	499	491	496	512	538	541	526	476
071593	432	430	434	459	527	521	487	498	503	515	509	504	517	516	509	508	505	499	496	505	539	538	531	483
071693	441	437	441	464	528	506	483	500	494	509	499	495	503	507	520	511	508	510	518	522	552	549	540	489
071793	450	449	447	470	529	503	463	458	476	486	488	489	499	517	505	497	498	504	501	514	552	556	546	490
071893	454	450	452	471	537	513	477	461	472	494	495	505	521	486	489	491	501	508	509	523	554	557	550	500
071993	459	457	458	486	549	525	499	499	512	521	536	530	528	527	525	515	514	519	524	522	534	546	553	489
072093	454	450	448	480	548	523	496	494	504	522	521	518	534	523	535	525	527	523	514	540	548	545	536	484
072193	441	441	442	457	525	509	485	476	503	523	512	514	532	517	532	525	516	510	514	527	543	545	535	486
072293	449	445	446	465	527	519	486	451	504	519	517	515	524	517	516	521	520	521	507	518	555	548	535	477
072393	438	437	436	460	527	517	473	484	507	522	510	510	409	530	517	504	513	510	491	501	531	534	526	477
072493	436	428	436	457	523	499	459	455	464	472	474	471	481	485	497	483	501	504	501	512	545	550	539	496
072593	454	452	454	476	538	510	464	475	486	485	482	490	496	492	496	501	507	511	508	503	545	544	543	491
072693	455	454	451	480	537	525	497	501	512	528	527	522	530	551	527	512	515	510	510	521	557	561	552	503
072793	463	458	459	486	546	525	530	534	544	537	521	526	521	534	532	529	529	532	528	535	550	554	546	498
072893	459	458	455	469	525	510	490	494	520	538	534	527	536	545	537	526	525	521	512	521	550	551	540	482
072993	444	439	444	464	525	506	478	447	509	509	520	523	543	519	519	529	524	514	528	535	564	560	543	487
073093	451	449	447	462	529	521	504	490	504	517	506	503	513	528	517	521	514	508	506	516	544	548	543	498
073193	463	453	449	470	531	516	450	453	450	461	465	470	494	461	481	485	485	482	490	501	532	539	524	468
080193	432	434	426	449	521	517	454	440	457	469	477	483	474	487	486	491	496	514	518	522	554	548	546	485
080293	450	450	448	476	534	524	496	496	504	523	525	523	520	533	528	529	397	423	546	529	541	544	540	491
080393	450	446	449	471	541	535	510	493	493	521	538	529	511	515	522	515	517	507	503	503	521	533	531	476
080493	435	434	448	460	526	514	487	486	505	532	518	517	519	520	529	514	507	506	501	524	555	552	543	491
080593	450	445	447	464	530	530	518	507	506	524	514	499	509	509	520	514	509	501	509	527	550	549	548	498
080693	453	453	453	471	535	535	509	482	518	531	518	512	460	505	499	504	504	513	509	506	531	540	532	487
080793	450	449	450	474	536	508	484	469	478	476	476	479	501	492	479	483	482	491	505	518	554	544	534	486
080893	446	445	447	470	538	506	465	460	463	477	478	472	476	466	474	478	487	497	499	515	533	536	530	485
080993	442	441	442	466	531	512	496	488	504	518	513	501	510	510	509	510	507	495	499	513	541	541	531	480
081093	440	439	444	457	520	516	478	481	494	520	518	523	530	518	516	520	513	503	498	508	539	536	534	480
081193	446	435	437	460	525	515	482	478	496	507	509	510	505	505	513	515	508	496	498	522	551	552	546	501
081293	461	456	452	473	530	522	498	458	500	515	507	501	504	515	501	507	501	501	507	520	545	545	542	491
081393	450	445	447	472	535	519	505	498	506	508	504	503	504	516	509	520	499	492	502	524	549	550	540	490
081493	449	448	450	473	537	525	511	463	468	491	495	493	497	511	501	505	510	512	512	518	548	540	533	480
081593	445	444	445	464	531	512	483	469	473	488	487	487	495	497	492	510	522	528	522	532	554	555	548	494
081693	458	457	456	479	532	527	509	490	500	528	526	514	511	521	511	514	520	519	527	543	565	559	556	508
081793	463	464	463	473	543	530	520	515	518	525	530	531	535	544	544	532	527	531	534	542	566	570	559	505
081893	465	463	464	483	551	534	528	521	531	544	544	538	536	548	544	545	553	544	542	556	578	579	571	516
081993	474	471	468	485	564	543	514	474	522	542	542	542	532	534	534	483	531	525	520	520	518	542	550	486
082093	446	449	447	468	532	526	495	485	515	531	517	512	507	535	521	526	513	513	523	538	553	553	545	490
082193	452	447	444	476	531	510	485	466	473	489	479	485	489	498	501	498	498	496	509	537	555	556	553	493
082293	456	453	453	473	536	521	477	470	487	487	480	485	489	499	491	494	514	522	514	541	563	565	552	501
082393	459	454	455	481	533	518	497	492	501	525	526	520	536	549	523	516	524	529	536	562	579	578	562	509
082493	467	462	458	481	546	527	531	530	537	520	534	523	540	533	538	526	529	526	526	545	565	558	545	492
082593	455	451	450	473	541	523	498	508	501	519	523	514	505	489	519	521	519	513	518	553	572	576	570	517
082693	471	469	462	480	540	536	516	509	516	527	526	515	531	544	534	526	530	523	510	540	551	556	549	498
082793	458	459	461	476	534	517	506	492	521	534	527	518	513	538	520	510	509	518	522	545	559	560	549	496
082893	449	445	448	466	539	534	483	470	478	489	482	491	493	501	491	504	515	515	523	541	566	569	554	502
082993	463	457	457	470	540	536	505	489	476	486	490	498	505	505	504	505	506	517	521	539	550	552	547	501
083093	456	455	457	475	532	531	519	498	518	523	506	504	518	517	511	506	499	500	606	540	549	558	549	491
083193	450	441	438	459	528	516	501	490	500	510	515	509	525	530	511	509	505	505	507	539	552	553	542	494
090193	449	446	441	472	532	524	518	461	499	521	516	510	517	525	522	516	521	511	524	537	539	551	545	494
090293	460	454	454	467	530	524	523	450	507	522	518	523	517	529	532	535	511	517	521	541	552	555	549	502
090393	459	456	454	476	534	530	512	488	496	510	509	508	509	504	510	499	503	500	506	531	540	546	538	485
090493	451	442	444	463	530	536	522	488	483	464	463	475	476	468	492	478	509	500	501	529	535	537	526	476
090593	435	428	431	455	521	507	492	458	451	455	458	463	459	459	461	467	470	489	489	519	536	533	531	472
090693	436	423	422	458	511	501	478	444	449	473	479	469	470	485	480	480	485	496	506	530	543	541	532	477
090793	436	436	434	449	517	509	515	477	486	500	503	503	493	494	485	477	478	480	490	511	526	530	517	463
090893	419	411	409	427	505	494	490	464	460	469	475	473	484	487	483	490	485	485	495	513	532	531	519	470
090993	427	422	420	446	511	509	489	477	498	509	506	495	511	513	523	501	502	508	504	541	551	552	540	489

HOURLY LOAD DATA FOR THE ESCAMBIA COUNTY JAIL

DATE (MM/YY)	1 AM	2 AM	3 AM	4 AM	5 AM	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	NOON	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	MN
091093	449	441	441	466	527	523	512	501	503	534	525	516	499	500	491	499	494	508	519	517	514	516	505	458
091183	415	411	407	431	495	474	384	414	432	445	444	446	456	468	463	455	468	483	490	514	520	522	511	458
091293	423	413	417	435	507	492	468	440	447	479	471	471	482	486	496	485	480	500	508	533	539	534	528	480
091393	448	442	449	473	524	527	513	490	496	512	509	511	516	522	524	518	502	504	523	550	543	546	539	487
091493	453	449	447	471	530	526	524	505	519	526	529	532	550	551	522	527	516	517	526	538	539	540	531	481
091593	441	430	437	461	524	520	515	480	503	533	510	494	496	512	519	510	501	507	518	540	542	545	537	487
091693	440	437	433	446	516	515	509	443	505	527	514	508	518	522	520	514	505	511	519	542	545	550	543	489
091793	447	441	440	454	527	519	516	477	496	528	512	510	512	528	517	508	499	506	512	530	541	540	534	476
091893	441	435	431	450	502	494	468	451	461	466	465	480	497	498	491	499	495	512	509	547	550	547	536	486
091993	447	441	443	464	514	496	472	453	456	469	468	475	494	501	494	497	491	504	523	550	554	553	544	491
092093	453	447	446	467	522	509	517	496	512	534	523	528	527	543	522	523	523	526	535	553	556	552	536	483
092193	446	442	445	464	527	521	522	518	524	536	532	522	537	535	531	528	525	531	531	552	555	546	535	489
092293	445	443	438	459	519	499	501	458	496	490	491	481	503	504	500	488	482	482	498	527	530	527	518	464
092393	427	421	424	446	506	498	497	439	478	490	498	497	507	509	509	501	505	505	511	536	536	537	522	473
092493	433	420	424	449	512	503	507	495	501	517	508	498	516	519	512	509	505	509	528	556	563	566	546	500
092593	460	449	454	480	530	533	506	474	475	493	486	486	490	478	500	474	485	493	502	523	529	531	523	471
092693	437	426	427	449	517	516	494	459	464	479	472	473	476	482	484	473	481	488	504	528	531	536	530	479
092793	437	432	431	454	512	351	430	505	476	488	488	474	489	484	474	462	460	464	480	492	490	488	474	431
092893	386	382	382	396	459	448	451	420	421	433	426	427	441	434	437	427	426	431	449	477	477	477	463	418
092993	379	374	375	400	450	443	445	430	442	456	453	445	453	419	312	310	308	309	318	344	345	348	341	292
093093	264	261	343	450	506	457	481	428	446	456	447	441	460	450	452	449	445	441	457	483	482	483	467	414
100193	382	377	380	398	465	456	455	415	425	436	433	426	434	428	440	437	420	428	451	473	473	477	465	415
100293	378	372	372	392	455	451	438	391	393	423	405	424	429	430	440	435	436	451	461	487	488	487	475	424
100393	388	382	384	401	466	457	451	415	408	415	409	419	427	424	430	438	440	450	464	491	493	499	485	433
100493	396	387	387	411	472	460	470	451	449	422	457	453	468	473	469	461	461	471	477	497	504	504	490	439
100593	397	392	387	405	474	469	476	427	442	452	454	449	455	399	480	460	450	455	479	487	486	490	478	426
100693	390	389	390	407	479	462	477	444	489	480	458	459	468	461	480	473	458	461	476	491	487	488	481	433
100793	393	390	396	414	477	463	463	410	416	375	472	460	456	464	448	448	432	434	449	416	342	343	340	294
100893	258	258	260	280	350	337	391	492	447	482	466	429	405	319	276	388	472	463	494	502	505	505	496	444
100993	410	401	400	434	489	474	458	425	441	441	444	438	454	453	454	452	443	464	497	504	504	509	497	453
101093	411	392	385	394	457	444	428	382	388	396	397	401	408	424	419	423	419	426	447	459	449	451	433	384
101193	348	348	345	377	433	427	429	391	392	404	397	399	422	442	417	415	419	371	455	455	453	451	436	389
101293	354	351	350	364	430	424	459	404	407	415	401	400	404	415	407	406	408	407	426	448	445	446	432	382
101393	350	349	350	371	436	434	445	406	400	422	424	418	419	429	409	413	416	428	447	452	455	456	450	395
101493	365	358	360	378	449	455	477	395	422	429	415	420	433	436	438	441	443	455	468	480	486	487	474	421
101593	383	383	388	405	476	478	492	447	432	448	449	446	442	446	451	456	454	463	486	492	487	490	480	421
101693	386	375	381	408	462	451	448	408	407	415	411	418	429	435	309	295	423	463	481	494	495	497	483	430
101793	389	385	383	404	461	443	440	403	398	422	421	425	452	458	418	452	453	464	489	497	495	493	490	438
101893	399	391	392	415	474	459	469	441	468	481	477	473	486	498	475	472	467	469	499	508	511	509	500	451
101993	411	402	404	420	491	482	497	459	456	477	484	482	508	496	481	485	479	495	511	515	514	512	512	459
102093	418	413	412	431	497	495	507	482	492	495	500	491	499	507	490	486	484	496	527	528	528	526	517	471
102193	429	423	423	432	509	501	524	459	476	488	480	487	506	508	493	490	500	504	512	507	509	507	506	444
102293	401	390	387	407	471	458	462	446	418	427	416	399	405	420	420	413	424	432	458	450	451	450	446	389
102393	355	352	352	367	441	436	434	392	374	374	379	380	385	390	375	375	391	408	437	435	437	432	429	375
102493	341	336	338	354	428	421	418	381	379	374	370	382	395	411	403	410	415	436	463	461	457	453	450	394
102593	354	354	355	378	446	442	455	420	412	411	412	404	411	432	428	418	422	423	450	459	458	458	450	401
102693	364	362	363	376	440	428	437	422	428	429	428	423	437	461	438	438	441	446	472	477	456	355	352	306
102793	274	273	270	296	361	343	429	443	432	437	443	440	450	454	451	446	440	439	473	468	471	464	459	399
102893	364	361	361	375	443	431	445	374	407	419	420	409	420	432	414	411	421	425	449	450	447	445	446	394
102993	355	353	355	381	451	430	443	453	417	424	413	413	425	431	447	450	455	467	486	476	487	489	487	431
103093	388	372	373	390	472	453	444	421	388	394	395	394	384	378	383	391	413	429	451	449	450	449	447	395
103193	361	717	362	378	444	433	386	398	378	399	387	393	401	396	387	386	400	454	446	445	449	445	435	390
110193	353	351	353	376	448	435	411	397	408	427	412	413	414	425	422	414	432	465	461	451	453	453	445	395
110293	354	354	358	377	450	442	404	397	415	422	420	429	429	436	416	403	412	449	440	436	438	436	427	373
110393	337	337	354	361	433	446	411	400	409	404	404	328	391	422	383	379	393	427	428	418	418	418	414	368

Response to GCEC's Third
 Set of Interrogatories
 Docket No. 930885 - EU
 GULF POWER COMPANY
 October 10, 1994
 Item 3
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HOURLY LOAD DATA FOR THE ESCAMBA COUNTY JAIL

DATE (M/H/Y)	1AM	2AM	3AM	4AM	5AM	6AM	7AM	8AM	9AM	10AM	11AM	NOON	1PM	2PM	3PM	4PM	5PM	6PM	7PM	8PM	9PM	10PM	11PM	MN
110493	325	324	328	348	414	407	397	337	383	387	389	391	388	395	401	409	422	447	441	438	441	440	435	387
110593	349	347	345	368	437	431	414	416	419	426	418	433	435	444	442	450	446	480	477	464	465	466	460	419
110693	379	374	378	403	462	448	412	382	379	387	379	387	386	401	386	402	415	457	454	438	442	441	431	375
110793	338	337	335	354	426	406	364	354	348	366	364	368	370	384	375	375	387	441	431	426	423	424	416	370
110893	327	327	329	352	413	409	395	382	399	398	400	398	414	399	396	401	409	446	433	433	435	430	420	373
110993	329	333	333	347	415	412	411	386	392	389	380	396	388	401	391	397	418	442	440	429	428	431	426	375
111093	335	333	335	359	423	426	418	391	400	411	403	407	380	420	408	417	415	452	450	440	436	433	428	379
111193	336	334	336	351	424	424	383	364	360	382	379	386	379	402	392	393	400	446	443	437	441	439	429	383
111293	341	342	341	357	432	435	405	377	391	406	408	402	397	400	407	410	424	462	460	452	454	453	447	391
111393	355	353	355	369	431	424	386	366	389	403	401	401	405	411	397	398	417	476	476	462	467	462	455	411
111493	369	373	371	387	460	449	416	410	404	413	398	406	403	419	412	413	436	474	476	464	465	464	457	413
111593	377	376	381	406	463	451	444	424	441	452	440	439	454	454	434	430	448	487	472	467	468	468	459	411
111693	376	380	376	402	469	463	443	430	437	446	433	430	453	455	434	442	449	486	488	474	468	469	463	414
111793	381	383	382	404	479	472	460	440	450	462	458	451	441	441	450	441	454	487	477	467	469	468	452	399
111893	365	360	362	378	440	447	410	369	402	412	417	409	408	417	422	430	423	458	460	455	452	448	441	386
111993	351	350	348	378	430	424	406	401	413	417	415	416	427	426	419	420	429	462	455	445	450	452	441	391
112093	352	352	354	381	442	441	387	372	370	382	385	382	378	402	395	386	405	445	444	428	432	429	418	363
112193	328	327	331	351	419	422	381	379	381	369	365	370	373	384	392	392	409	450	444	433	436	431	423	367
112293	333	335	330	363	426	424	395	383	395	400	394	392	407	419	425	414	409	448	447	435	435	436	427	372
112393	336	333	344	361	427	423	402	386	400	424	404	408	422	431	419	412	410	446	447	441	442	434	426	379
112493	341	336	335	361	414	412	396	384	391	399	390	391	400	412	411	413	408	456	447	440	442	440	429	380
112593	339	339	340	359	423	407	382	362	371	390	365	377	378	387	382	394	404	451	449	437	435	437	430	377
112693	337	337	340	364	429	416	410	371	360	370	367	381	382	390	384	392	405	442	443	437	435	435	430	379
112793	341	338	340	360	413	413	402	363	357	360	358	372	376	379	369	376	395	432	422	418	415	410	407	362
112893	324	321	323	342	400	395	374	351	344	354	350	358	369	365	365	370	391	433	425	414	411	412	405	359
112993	321	319	320	348	401	394	392	373	383	390	396	385	399	402	401	395	417	442	428	421	429	427	418	368
113093	336	332	334	354	424	421	406	381	399	402	397	400	404	403	412	402	417	450	433	427	426	430	420	368
120193	333	334	335	359	425	421	368	310	330	314	297	305	418	417	414	400	415	442	444	435	436	432	427	377
120293	338	334	334	356	417	415	423	355	386	406	402	391	391	407	392	387	405	443	436	438	437	432	428	374
120393	336	334	341	368	431	418	416	393	403	416	407	401	407	403	395	402	423	456	441	443	447	449	439	393
120493	353	357	355	386	452	440	420	382	412	402	396	397	415	402	408	418	453	443	439	436	438	423	369	
120593	338	334	332	359	431	415	395	360	365	374	368	366	368	371	383	375	403	438	436	434	436	434	427	378
120693	333	334	337	357	423	397	398	384	389	397	391	387	397	417	394	391	400	444	439	432	435	434	424	373
120793	336	334	336	366	419	411	411	384	388	405	397	395	392	404	394	384	403	440	429	426	422	424	413	370
120893	330	327	342	354	414	404	418	391	392	400	393	395	397	405	395	398	417	452	455	438	441	442	431	381
120993	343	340	341	363	438	429	421	358	407	418	411	407	408	415	426	415	435	458	456	448	448	452	447	396
121093	361	359	364	382	446	447	458	429	437	434	428	431	424	430	423	422	443	472	466	465	467	457	447	395
121193	352	345	343	366	424	411	393	359	378	370	368	375	381	382	378	379	397	449	448	442	440	438	424	370
121293	334	339	341	364	420	411	391	358	362	363	367	371	376	393	376	384	400	448	436	432	433	432	426	360
121393	343	343	344	368	426	421	435	400	423	424	427	429	446	432	428	435	453	468	459	452	457	456	446	399
121493	358	356	357	372	446	427	435	409	422	423	415	399	433	418	415	428	434	462	453	446	447	445	440	384
121593	348	344	346	364	437	427	409	418	431	410	395	385	377	382	384	372	384	425	433	420	420	422	413	361
121693	326	323	327	345	414	404	402	342	398	413	379	389	392	407	380	383	385	435	429	421	424	423	412	360
121793	325	321	320	359	411	406	417	398	400	414	408	396	399	410	408	396	405	440	432	429	432	432	427	377
121893	337	334	337	354	428	424	413	361	352	362	361	366	387	374	372	373	398	437	430	428	427	423	414	370
121993	333	332	332	360	429	421	417	409	384	380	373	368	373	372	385	370	390	436	432	430	429	430	421	373
122093	341	342	344	371	432	426	434	429	435	349	338	424	415	420	410	406	420	455	444	445	449	446	432	369
122193	341	340	343	367	437	426	416	400	392	399	390	404	394	392	398	380	377	425	422	418	418	422	415	355
122293	329	329	333	351	419	415	408	402	407	393	391	378	379	378	383	389	413	434	424	423	423	423	418	376
122393	337	334	333	356	428	414	409	377	353	358	358	359	368	370	352	369	395	431	418	419	419	419	414	369
122493	332	331	339	365	428	411	404	385	364	369	369	372	364	363	369	377	402	432	424	423	426	420	414	364
122593	328	326	332	354	401	393	397	358	355	361	353	357	363	366	361	368	374	414	413	414	413	418	413	366
122693	327	325	325	348	406	409	403	370	354	359	364	358	364	362	361	374	382	431	424	414	413	417	410	360
122793	325	325	324	360	410	412	406	383	383	394	395	390	398	399	403	388	398	437	430	428	431	430	426	373
122893	337	339	342	370	428	420	416	383	393	401	407	406	413	420	406	408	413	442	436	428	429	433	428	373
122993	341	345	346	373	445	441	441	428	440	440	418	400	418	408	405	398	401	436	423	422	418	421	413	359
123093	330	320	326	353	410	404	410	393	384	393	383	388	387	403	389	387	393	419	414	408	409	406	405	350
123193	318	318	332	343	402	379	378	342	366	369	350	351	355	369	355	365	383	425	419	420	424	419	417	373

HOURLY LOAD DATA FOR THE EXCAMBIA COUNTY JAIL

DATE (M/D/Y)	1 AM	2 AM	3 AM	4 AM	5 AM	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	NOON	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	MN
010194	329	320	326	352	409	406	396	379	371	366	357	363	355	360	360	366	388	433	421	418	422	424	418	373
010294	334	332	325	348	413	397	391	371	365	370	371	382	379	372	379	373	393	436	439	427	423	422	421	378
010394	343	341	341	367	422	413	426	401	406	411	410	402	401	417	399	407	425	447	433	430	428	427	424	374
010494	337	335	338	354	416	405	411	395	396	399	390	392	395	396	408	393	396	420	428	427	423	424	419	379
010594	338	333	342	352	423	414	417	380	386	398	320	395	381	401	383	378	395	422	426	422	425	426	420	372
010694	336	336	339	360	431	424	428	356	398	404	412	399	393	401	414	399	414	446	437	438	441	440	433	382
010794	344	346	342	366	435	434	447	421	408	420	404	401	400	408	406	407	407	441	442	429	433	431	422	375
010894	329	327	328	340	406	402	383	357	365	358	354	357	357	356	363	367	375	418	421	416	415	416	407	355
010994	317	318	320	335	399	388	375	359	343	344	330	340	346	356	365	355	361	411	423	414	411	410	405	355
011094	320	316	320	338	405	399	399	364	364	382	386	387	382	399	381	375	388	423	421	417	420	416	411	367
011194	325	327	327	337	409	407	417	413	395	397	400	392	408	412	396	375	404	428	434	419	419	419	418	377
011294	333	332	328	341	411	412	420	399	380	399	386	389	384	393	395	388	400	429	425	426	425	420	413	367
011394	324	327	325	342	412	397	409	372	401	385	381	388	384	405	385	389	399	428	423	415	418	416	415	360
011494	326	323	321	342	397	395	410	383	395	384	379	377	390	398	386	379	388	417	428	418	419	420	417	363
011594	327	326	327	342	411	394	382	342	340	343	340	348	373	364	377	354	374	417	421	420	416	413	410	361
011694	316	322	322	336	419	406	419	384	351	349	342	347	350	360	351	347	370	413	417	410	413	407	405	359
011794	328	329	329	349	418	411	407	394	370	375	367	372	381	374	370	377	390	423	423	421	420	413	409	358
011894	321	323	322	338	410	393	409	384	394	389	387	378	389	396	379	373	377	409	421	419	415	413	406	354
011994	324	324	319	346	409	399	409	384	385	388	375	371	367	361	356	328	313	360	398	426	412	408	407	350
012094	315	317	315	338	410	410	421	357	391	382	375	376	381	406	383	384	388	412	418	415	419	415	412	366
012194	325	325	324	337	410	413	404	379	373	384	382	373	375	396	383	378	386	404	425	417	420	411	409	362
012294	321	327	321	338	404	398	381	343	337	344	339	349	347	356	351	349	364	387	413	408	411	406	399	354
012394	316	318	316	337	405	394	385	357	361	355	348	356	363	371	356	364	377	407	420	414	414	408	405	356
012494	322	327	323	339	409	397	400	382	382	395	393	391	390	395	410	384	402	415	428	419	417	415	414	362
012594	328	328	332	350	427	429	417	390	393	398	408	402	396	408	401	399	405	427	440	434	431	421	424	373
012694	337	343	345	362	435	440	435	422	416	426	408	407	395	417	398	393	397	425	439	433	433	426	424	371
012794	339	339	338	362	431	405	409	362	400	407	401	400	394	404	397	395	410	437	435	433	436	435	431	378
012894	344	346	344	367	430	429	425	404	406	404	398	405	404	408	403	397	404	435	434	432	434	432	426	383
012994	338	337	337	358	425	418	410	396	356	366	359	363	358	362	356	362	377	409	420	417	415	412	407	358
013094	321	322	322	340	411	400	393	362	346	357	355	357	356	357	364	365	381	401	410	407	409	406	405	360
013194	323	325	320	341	409	400	406	383	375	383	382	383	394	397	377	372	378	395	419	424	420	411	411	364
020194	319	318	320	332	409	391	393	369	377	369	375	377	393	387	382	371	383	403	419	417	414	410	405	357
020294	317	321	318	341	395	389	396	361	373	387	387	378	379	391	374	366	373	399	422	416	417	415	412	364
020394	320	324	325	333	408	395	408	372	374	386	385	374	398	386	377	372	384	405	420	419	417	415	415	363
020494	325	328	324	339	424	402	412	372	376	384	383	374	377	388	387	381	386	405	416	422	420	418	414	360
020594	326	327	327	349	412	411	386	372	376	383	375	375	372	372	373	368	400	426	434	435	433	429	426	377
020694	340	342	342	361	417	417	411	378	374	381	380	384	378	384	382	377	388	418	437	438	435	428	424	366
020794	332	336	333	363	421	401	416	389	398	409	399	396	402	402	393	393	418	425	432	431	431	433	431	381
020894	343	345	342	361	434	428	433	400	410	421	409	404	414	416	407	403	421	439	450	449	447	441	442	390
020994	350	355	363	370	446	441	454	414	424	427	427	428	427	432	430	413	436	444	456	453	453	449	446	394
021094	358	364	363	377	451	449	449	396	432	429	438	428	428	433	432	430	447	458	463	461	462	461	457	412
021194	373	365	360	378	446	440	454	442	417	422	408	399	390	391	390	380	384	409	429	425	426	421	417	367
021294	329	341	351	341	421	414	401	355	341	350	356	352	355	366	362	366	382	405	435	426	423	426	417	373
021394	329	333	330	345	413	405	386	357	359	372	371	365	357	361	360	360	380	409	426	421	417	413	415	363
021494	325	328	323	346	409	404	402	386	382	386	389	384	389	396	387	384	384	403	425	417	416	417	407	361
021594	322	323	325	343	411	401	398	386	385	400	393	387	405	417	394	391	400	417	428	427	429	424	420	368
021694	328	335	331	350	413	404	415	400	384	392	393	387	396	395	391	390	400	421	433	435	433	432	433	381
021794	342	343	340	352	427	403	431	350	387	390	393	396	394	412	405	396	405	422	439	441	437	434	430	382
021894	339	341	344	355	436	426	421	401	403	410	408	408	408	420	404	393	397	414	442	440	442	437	433	377
021994	344	343	340	353	433	424	400	369	371	381	389	390	388	393	391	412	425	444	449	450	444	441	390	
022094	352	352	354	370	445	426	396	387	387	388	391	389	398	401	399	391	413	419	445	450	445	442	432	384
022194	350	353	352	370	441	428	410	412	406	412	422	419	424	434	423	412	415	422	448	447	452	450	441	387
022294	355	358	355	366	442	439	441	416	409	422	425	419	414	433	419	411	420	433	449	450	446	444	448	392
022394	360	362	360	379	453	444	437	443	446	424	424	413	445	447	427	429	436	451	443	440	442	434	434	382
022494	343	345	346	365	423	425	401	347	388	383	390	393	389	388	395	389	395	405	436	433	429	425	423	370
022594	328	332	328	341	410	405	384	384	390	387	386	380	395	405	381	384	388	392	430	429	426	423	424	370

HOURLY LOAD DATA FOR THE EXCAMBIA COUNTY JAIL

DATE (M/D/Y)	1AM	2AM	3AM	4AM	5AM	6AM	7AM	8AM	9AM	10AM	11AM	NOON	1PM	2PM	3PM	4PM	5PM	6PM	7PM	8PM	9PM	10PM	11PM	MN
022694	332	336	332	346	421	423	390	378	354	361	361	357	360	363	380	365	375	402	431	431	427	419	417	363
022794	325	327	329	348	422	410	378	356	350	354	356	373	382	378	369	369	374	397	436	433	422	423	418	368
022894	330	334	329	347	419	424	399	391	392	393	392	391	391	408	401	391	397	409	436	434	432	428	424	374
030194	337	337	339	354	426	422	424	437	424	425	413	443	434	435	432	420	425	429	447	450	451	446	441	384
030294	350	348	346	361	437	424	423	405	402	401	407	410	413	427	417	407	405	412	442	441	438	433	428	379
030394	336	340	337	344	423	422	397	336	378	393	392	397	399	403	400	391	397	408	441	415	356	350	350	298
030494	262	267	270	283	351	357	381	375	318	324	350	409	398	400	399	399	398	412	445	441	437	436	432	375
030594	343	342	342	356	420	403	365	357	372	371	366	382	378	393	396	396	399	424	462	455	454	452	449	394
030694	354	354	353	370	432	421	374	366	369	372	382	382	381	390	401	393	409	433	458	458	450	449	449	394
030794	360	358	361	375	449	430	412	413	415	415	416	412	422	433	412	414	415	421	454	449	453	445	447	391
030894	354	356	353	374	446	435	415	402	413	423	426	423	420	426	427	417	415	429	459	458	454	451	449	400
030994	361	359	361	372	450	447	432	427	420	427	431	435	442	442	430	431	465	464	456	452	449	437	433	375
031094	335	338	332	350	423	403	429	421	400	397	391	387	393	393	388	381	391	383	421	426	426	422	415	364
031194	326	329	328	353	406	406	379	356	385	395	387	419	399	395	403	377	385	392	417	419	424	421	417	366
031294	325	327	321	334	410	395	363	362	368	361	366	366	371	383	379	374	389	410	438	437	435	431	432	379
031394	338	338	339	349	421	409	406	393	396	369	376	397	400	405	399	383	406	417	438	439	440	434	432	384
031494	341	345	341	357	430	418	388	385	402	410	416	397	400	413	422	393	399	402	436	440	441	439	435	380
031594	345	346	348	362	435	417	389	399	411	419	420	422	435	418	417	400	407	418	445	449	447	442	439	388
031694	350	350	351	367	429	408	411	412	395	406	408	400	398	399	396	396	400	408	440	438	436	429	426	370
031794	339	341	334	361	426	403	375	346	389	398	397	398	408	405	411	401	406	409	437	439	435	431	426	381
031894	341	343	342	364	442	439	382	400	407	414	415	411	411	417	419	409	416	428	457	459	455	451	450	395
031994	365	366	366	386	453	451	397	393	392	400	400	402	408	393	390	390	411	427	453	457	452	452	448	397
032094	365	365	365	382	457	430	400	392	399	387	388	386	394	395	402	394	410	428	456	454	448	442	443	391
032194	364	365	369	387	450	446	422	427	430	427	427	425	424	432	421	414	412	428	453	459	456	454	451	403
032294	365	365	364	377	460	442	406	410	417	425	422	422	428	444	419	415	412	417	452	452	448	445	449	400
032394	358	363	361	382	456	452	428	416	420	431	426	428	445	426	421	418	434	440	456	452	447	445	446	405
032494	363	366	366	383	453	435	422	424	436	436	431	420	429	427	406	414	420	430	455	453	453	452	452	404
032594	369	371	370	385	447	428	432	422	462	498	480	471	467	469	423	408	397	414	446	448	444	439	433	377
032694	338	335	332	359	426	415	356	386	379	380	378	373	376	391	385	395	410	420	440	442	444	441	437	384
032794	350	349	346	368	443	427	381	382	387	392	393	388	404	391	397	395	399	420	446	448	448	445	442	394
032894	355	349	340	364	429	416	417	404	399	406	413	410	432	407	409	426	419	406	421	423	424	415	413	354
032994	320	321	320	338	410	388	366	366	365	376	383	385	378	365	381	363	374	374	401	413	411	406	407	352
033094	315	316	315	336	411	395	363	331	371	374	365	368	374	370	384	361	365	376	402	402	409	406	399	357
033194	314	317	320	345	408	402	368	355	366	369	366	363	363	355	372	348	359	374	395	400	406	400	395	348
040194	309	309	312	326	404	387	331	320	333	338	345	348	340	339	338	340	356	360	391	409	409	404	401	350
040294	316	316	316	336	403	375	342	330	346	341	352	352	345	347	350	351	356	364	401	414	414	410	409	354
040394	321	321	0	334	407	398	377	335	350	353	353	355	360	355	365	365	375	396	402	417	423	421	421	373
040494	326	324	325	342	400	399	394	369	374	379	379	381	381	376	375	369	370	367	379	410	421	418	417	368
040594	329	326	336	339	406	404	418	372	375	387	387	385	394	390	392	390	395	394	399	420	433	434	431	388
040694	343	343	339	350	420	419	430	386	394	386	395	398	401	397	397	392	400	394	395	418	423	419	414	362
040794	328	321	325	334	411	408	391	315	364	379	368	371	366	366	374	365	375	365	378	396	411	413	408	360
040894	323	319	322	332	407	400	391	365	360	375	379	382	381	387	372	376	365	376	387	410	421	414	413	365
040994	330	325	329	341	409	400	395	347	348	355	362	367	369	377	376	364	372	391	409	422	432	436	429	386
041094	341	338	341	353	433	425	401	371	369	383	374	380	384	387	383	386	388	398	411	423	437	438	431	384
041194	344	342	344	364	433	421	405	387	400	406	413	408	415	414	419	412	396	404	428	440	450	451	447	400
041294	359	354	353	361	429	420	427	401	411	426	424	427	424	420	427	410	424	428	436	444	457	458	455	411
041394	374	369	361	387	437	429	429	413	405	414	417	416	416	413	403	398	397	405	414	427	441	437	432	387
041494	345	339	337	347	422	415	415	358	401	414	413	410	430	413	423	413	422	424	434	444	455	458	453	412
041594	372	370	372	384	454	445	451	416	431	434	432	428	456	476	479	468	475	475	478	495	505	366	357	312
041694	285	282	283	319	367	372	364	447	420	419	418	417	421	416	420	402	410	421	440	450	467	462	451	395
041794	360	354	356	372	442	440	416	378	379	382	384	388	389	390	387	383	400	409	424	442	449	444	443	395
041894	360	351	356	377	439	436	418	417	434	431	429	429	425	430	435	422	432	425	432	444	459	461	454	405
041994	367	366	366	379	449	442	431	413	415	435	433	438	444	448	447	453	445	447	447	467	479	482	480	426
042094	385	384	385	393	485	471	459	426	433	439	444	441	441	436	443	446	444	455	454	461	475	475	469	415
042194	376	370	373	397	453	448	446	388	429	444	448	445	452	449	440	443	462	460	445	468	472	466	412	

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042294	374	371	375	395	449	437	432	412	432	441	447	453	447	440	442	442	440	435	441	458	478	473	472	424
042394	374	366	370	382	446	441	431	384	386	399	396	402	411	405	418	422	427	435	435	451	463	464	456	406
042494	363	356	361	376	453	438	409	375	383	388	391	409	418	411	420	419	420	430	435	451	469	466	464	410
042594	369	362	367	389	452	444	448	422	427	448	444	447	447	444	447	441	444	441	450	464	489	487	481	427
042694	393	383	383	399	472	460	444	431	443	452	455	459	467	468	466	455	460	469	460	467	490	485	482	424
042794	390	381	377	391	459	447	440	436	444	467	463	457	461	471	465	454	463	463	477	478	496	497	488	435
042894	402	388	388	402	476	463	435	401	447	460	454	461	468	470	465	467	452	452	459	475	494	498	486	431
042994	389	383	383	397	469	458	446	447	456	476	469	465	468	476	466	460	459	467	459	459	483	479	474	415
043094	382	376	372	397	457	460	425	399	407	424	420	429	440	436	447	448	467	481	471	480	478	482	472	415
050194	379	375	372	388	459	449	408	398	405	416	419	410	460	451	442	433	447	465	466	476	491	484	473	415
050294	376	369	364	392	443	448	453	422	422	436	418	421	428	432	432	421	429	435	445	454	478	478	469	420
050394	379	372	368	389	475	459	435	428	469	456	461	467	441	467	448	449	453	444	440	456	477	479	473	414
050494	375	367	362	377	450	454	437	432	433	449	446	455	456	447	437	433	429	429	435	444	468	467	460	404
050594	366	360	364	377	449	446	410	405	409	428	423	421	424	429	426	427	424	426	420	437	467	463	458	410
050694	370	364	365	379	454	441	415	414	419	436	437	437	427	426	429	431	433	436	437	447	478	472	464	412
050794	372	366	367	389	459	444	397	395	398	418	421	423	422	431	429	436	440	436	456	465	490	494	486	437
050894	403	396	400	418	489	494	437	426	422	426	434	443	440	438	434	439	450	459	460	488	501	498	492	437
050994	394	388	382	399	468	462	441	438	439	445	444	452	462	451	392	408	413	417	424	433	449	450	446	400
051094	369	361	369	391	448	433	418	410	421	422	424	424	427	424	509	485	478	478	491	494	516	515	507	454
051194	417	410	408	425	494	473	447	451	462	473	478	480	483	469	473	478	471	474	490	490	516	514	512	465
051294	423	417	416	437	504	492	468	428	473	494	483	481	492	498	496	496	477	483	493	510	523	528	523	464
051394	424	423	417	430	508	499	478	474	485	493	482	487	478	474	478	475	465	476	490	504	531	527	522	469
051494	432	426	423	437	507	491	456	444	442	456	458	456	458	475	455	465	459	474	488	499	525	523	519	467
051594	432	428	427	439	513	502	463	447	453	468	460	479	494	463	471	474	467	477	490	504	525	525	518	461
051694	424	420	415	443	503	499	460	489	495	506	486	478	486	493	481	479	481	489	492	496	524	524	516	460
051794	423	416	418	429	502	495	450	455	465	481	477	475	472	472	476	461	457	468	466	473	502	499	485	436
051894	398	390	386	398	476	469	439	456	449	447	439	440	457	445	455	461	449	458	459	449	482	477	473	422
051994	388	383	380	390	459	455	418	413	428	445	440	442	445	444	448	439	435	444	433	443	471	467	462	409
052094	371	366	366	385	449	444	414	415	427	429	427	428	424	426	426	419	415	418	423	437	471	466	463	408
052194	369	364	363	386	460	450	396	389	393	399	396	411	413	427	408	407	410	424	428	443	469	467	465	406
052294	368	361	360	382	454	445	396	390	387	408	404	435	445	414	426	409	428	445	433	444	474	471	466	410
052394	374	367	366	387	464	446	414	422	434	454	457	446	454	446	445	445	437	441	453	456	487	486	480	428
052494	388	381	381	392	461	460	428	441	448	460	461	476	471	460	457	451	457	458	467	464	495	496	489	434
052594	401	393	394	401	474	486	470	471	479	476	471	475	465	457	465	454	453	463	469	473	506	497	494	451
052694	411	405	400	413	483	478	456	463	472	495	496	479	483	482	478	466	476	483	480	477	511	510	507	459
052794	418	412	411	422	501	496	467	387	464	482	475	483	487	480	477	472	486	490	480	486	499	499	494	444
052894	399	391	388	407	473	459	409	405	418	420	422	437	442	442	438	443	454	468	464	471	507	502	499	443
052994	408	400	401	413	480	458	415	424	423	440	441	456	467	450	453	454	485	496	486	482	511	508	500	450
053094	414	409	408	433	485	462	423	426	425	438	433	439	449	451	442	440	447	454	453	471	494	491	494	441
053194	397	390	391	406	477	479	455	442	469	471	471	470	479	481	477	467	472	481	485	489	518	518	508	452
060194	410	401	399	413	479	471	436	441	463	483	491	484	478	467	475	458	458	472	473	481	509	514	514	459
060294	423	416	410	422	508	499	471	455	462	483	475	476	481	483	482	472	480	489	485	489	518	516	515	463
060394	422	419	415	427	501	480	468	468	470	491	479	482	486	484	484	470	482	483	481	487	516	522	516	465
060494	426	417	418	435	514	487	436	438	444	455	451	459	457	462	460	453	458	466	468	480	514	512	514	463
060594	420	418	417	435	509	497	454	449	456	466	469	471	473	460	465	461	483	494	489	494	511	509	505	454
060694	414	411	413	434	504	512	489	490	497	503	522	504	510	480	482	477	481	481	477	482	517	518	512	459
060794	424	417	417	436	501	498	465	475	479	484	486	489	499	499	509	486	482	485	492	491	521	521	517	465
060894	431	421	423	443	512	498	474	481	477	489	501	492	498	501	499	491	490	493	505	515	550	547	544	501
060994	453	451	449	454	530	517	486	495	501	513	519	509	519	512	509	499	492	502	499	510	548	551	529	476
061094	436	429	433	437	517	507	481	485	483	500	492	502	501	499	494	498	486	486	490	498	525	525	519	466
061194	424	418	421	434	503	487	465	437	440	463	457	482	489	473	470	471	478	487	478	478	514	510	504	452
061294	419	412	417	429	501	487	448	429	435	446	451	462	471	463	465	467	477	496	488	481	507	511	499	453
061394	418	418	418	441	502	489	461	480	484	500	507	505	525	511	503	498	504	504	509	511	533	521	511	471
061494	428	427	437	442	517	516	472	475	484	504	509	505	518	526	492	486	510	507	505	506	543	546	537	490
061594	445	444	446	459	527	537	497	482	494	504	507	495	506	510	507	506	491	497	509	510	545	547	534	479
061694	446	439	436	454	515	492	470	478	493	500	506	516	521	527	518	528	515	523	527	524	551	549	541	485
061794	449	440	440	449	521	508	497	491	490	506	498	506	517	505	495	488	486	491	498	502	537	535	534	483

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061894	440	432	431	444	521	512	469	453	461	477	472	472	479	469	480	462	468	484	492	500	531	535	520	475
061994	434	419	411	428	507	504	468	441	446	449	446	464	463	463	467	460	468	474	490	487	516	518	515	468
062094	432	424	418	445	517	504	499	444	477	494	498	507	501	495	486	483	485	492	498	495	526	534	526	466
062194	431	419	418	430	503	493	463	478	492	509	513	490	502	516	495	483	478	495	489	495	534	541	533	476
062294	436	437	432	448	529	503	473	498	490	501	503	494	495	495	504	492	494	494	489	493	522	521	514	465
062394	420	418	418	437	517	512	480	485	487	500	491	494	479	484	477	471	488	491	494	496	521	529	519	481
062494	432	425	428	449	532	518	499	487	497	517	507	500	499	494	478	468	474	474	476	489	522	520	519	467
062594	419	418	422	444	505	489	455	447	456	437	425	441	442	436	456	450	451	456	462	475	507	520	512	465
062694	427	430	429	449	522	505	452	451	450	464	463	472	474	474	472	469	473	490	498	504	530	537	533	480
062794	434	437	436	458	520	501	483	476	503	524	521	506	504	505	500	493	485	495	506	500	531	537	529	484
062894	439	439	437	454	530	527	510	490	488	503	503	517	516	508	500	512	515	520	506	518	548	561	554	500
062994	458	458	458	471	547	530	505	503	508	520	518	508	519	514	507	503	514	524	515	517	546	551	545	492
063094	459	454	449	458	523	506	476	472	477	493	492	492	495	516	510	495	490	513	505	511	550	555	542	486
070194	450	441	445	462	532	516	488	498	501	515	499	491	493	508	491	491	485	490	495	501	539	542	538	486
070294	438	438	438	449	528	507	457	456	460	469	471	482	493	504	494	495	499	509	501	505	540	544	537	482
070394	441	438	438	461	529	534	474	483	470	468	464	470	481	468	474	476	482	492	489	497	527	532	526	478
070494	438	433	438	464	534	522	473	458	469	483	478	487	481	486	489	492	486	496	509	513	541	540	542	486
070594	444	442	448	458	532	522	494	487	495	507	508	516	522	523	527	518	504	526	524	518	546	543	543	501
070694	459	453	463	476	535	523	499	497	503	516	510	517	530	514	518	530	531	542	528	538	554	552	547	491
070794	450	442	445	459	530	523	522	516	501	501	500	495	496	508	500	483	482	494	490	497	532	534	526	476
070894	438	435	436	450	534	516	499	479	489	509	496	495	494	489	487	482	482	495	499	499	528	535	530	479
070994	447	440	441	464	528	521	493	469	474	478	479	489	493	492	499	486	496	501	506	516	548	544	536	481
071094	444	438	440	458	527	518	468	464	462	469	472	482	478	471	487	481	483	499	492	495	523	522	512	467
071194	435	431	431	451	523	513	504	456	497	502	512	512	513	517	514	492	491	501	501	513	544	536	539	490
071294	449	447	447	459	528	528	499	497	492	510	497	508	512	497	498	490	498	495	499	508	538	537	539	487
071394	441	440	441	476	540	525	481	478	505	515	506	503	507	506	502	494	489	499	506	512	542	543	538	485
071494	445	443	443	462	524	519	498	493	495	503	505	501	510	501	506	498	494	502	505	505	534	532	529	480
071594	437	428	434	449	516	504	482	484	502	525	519	516	509	514	509	504	502	503	508	523	557	556	555	498
071694	455	450	452	465	537	518	477	465	476	481	478	482	477	479	494	487	495	509	510	514	544	545	538	488
071794	443	441	444	459	535	527	483	466	457	476	482	486	492	482	409	497	503	517	507	513	548	544	538	492
071894	446	442	446	468	536	525	490	455	499	518	516	512	517	523	524	522	537	519	520	515	548	549	545	488
071994	445	442	444	460	535	528	486	490	504	513	510	514	533	529	523	519	520	525	526	531	560	554	554	500
072094	460	455	456	469	540	550	505	507	532	546	527	519	529	536	513	505	508	514	525	530	564	559	552	503
072194	457	456	456	465	542	545	498	503	523	536	518	526	526	531	530	530	513	517	529	524	546	547	547	501
072294	459	460	461	478	546	549	517	515	505	523	538	535	534	526	500	505	512	521	510	508	543	541	535	488
072394	445	436	437	460	518	509	464	459	460	476	477	481	491	484	491	473	490	497	495	505	537	539	531	483
072494	444	441	439	459	524	514	466	464	477	490	483	504	518	485	490	490	500	513	518	522	550	544	544	495
072594	459	454	458	484	534	535	507	472	518	532	533	527	526	537	525	507	503	516	516	511	540	539	531	487
072694	454	449	453	470	545	533	514	521	525	532	527	529	508	522	519	509	507	513	513	523	555	557	551	500
072794	454	457	458	467	527	526	510	489	502	508	503	500	501	507	499	490	489	495	503	505	541	544	539	476
072894	438	436	435	445	515	508	468	470	481	491	494	488	497	501	501	498	492	499	492	487	518	517	511	463
072994	423	419	424	434	512	500	464	467	479	495	496	491	487	488	487	478	472	482	481	487	522	522	518	467
073094	425	421	420	438	502	501	445	432	449	454	454	464	465	464	480	477	481	499	504	508	542	540	537	481
073194	442	438	440	455	528	525	489	474	478	485	472	469	470	469	471	483	501	509	509	515	543	535	531	485
080194	433	430	428	443	515	522	486	437	486	494	497	495	503	521	503	500	497	501	508	504	542	544	537	483
080294	447	441	442	454	523	523	482	483	499	501	509	507	399	513	503	490	484	484	491	498	526	534	527	474
080394	423	415	419	435	498	505	481	463	480	492	492	490	490	495	506	491	492	511	516	517	554	555	545	496
080494	458	452	452	463	540	530	493	489	508	515	509	513	512	527	517	509	510	516	524	536	564	563	556	509
080594	466	461	459	501	546	541	508	517	514	523	518	516	507	521	526	480	501	516	531	523	546	544	539	489
080694	455	447	452	463	525	518	481	459	464	473	466	470	478	479	485	487	492	518	523	516	547	548	537	487
080794	441	438	443	452	527	514	496	462	461	465	462	467	471	468	473	472	479	511	509	504	525	521	513	465
080894	424	415	418	442	495	493	467	470	473	504	498	503	494	519	501	501	497	501	503	509	540	532	524	470
080994	428	426	429	438	505	503	457	458	474	483	482	481	493	495	509	490	490	493	501	517	538	541	538	481
081094	438	436	433	441	517	520	490	488	496	505	488	488	491	490	498	489	493	496	512	517	546	540	537	491
081194	445	440	436	445	502	514	477	467	488	514	518	513	514	526	534	512	500	510	526	528	551	551	550	499
081294	458	452	450	464	508	512	488	477	497	516	520	510	510	509	516	506	491	503	510	518	546	544	543	491
081394	447	446	444	457	526	516	479	469	478	477	473	480	483	490	484	480	490	500	508	516	549	546	536	487

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DATE (MDYY)	1 AM	2 AM	3 AM	4 AM	5 AM	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	NOON	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	MN
081494	449	441	445	460	528	525	490	478	480	483	481	483	483	496	496	493	505	524	521	522	549	549	546	492
081594	451	446	447	466	528	526	516	459	491	500	511	507	502	511	505	506	508	509	515	521	546	544	530	479
081694	446	442	441	451	523	525	494	480	490	499	507	508	523	523	503	504	498	500	499	518	550	548	546	501
081794	458	455	456	471	535	558	526	509	518	533	528	512	489	520	517	513	507	505	512	525	550	550	544	496
081894	455	448	451	466	534	535	521	497	504	515	507	526	516	520	526	512	511	519	529	533	557	554	545	498
081994	451	449	451	487	544	533	509	510	519	518	501	508	515	516	511	509	501	515	527	535	561	554	550	500
082094	463	457	462	481	535	529	481	469	476	474	480	500	492	495	504	482	482	492	508	524	550	549	542	493
082194	450	441	444	460	517	517	476	463	483	482	483	490	482	490	499	491	500	521	522	517	637	532	535	482
082294	444	439	442	464	504	505	492	444	491	497	426	497	514	508	497	491	486	501	517	528	553	545	535	484
082394	441	437	434	455	517	527	492	499	514	511	503	501	502	511	491	497	491	507	512	524	541	542	535	480
082494	440	437	434	449	516	516	493	489	491	512	500	510	508	496	504	489	497	506	528	535	557	552	544	507
082594	463	457	451	466	534	525	496	492	518	527	498	498	500	522	510	495	492	506	602	517	534	537	520	472
082694	436	426	425	434	502	490	472	470	481	504	507	505	510	526	523	527	494	501	519	524	544	545	533	491
082794	448	442	440	463	520	528	488	458	467	481	476	485	488	489	489	482	482	489	501	523	548	549	546	495
082894	459	453	455	469	538	538	496	473	490	498	486	481	480	488	487	482	499	518	523	639	652	542	543	496
082994	455	449	450	464	539	537	507	499	510	525	526	512	509	541	508	501	500	502	522	634	659	654	547	500
083094	453	449	449	464	527	515	498	497	509	528	522	527	523	536	526	518	508	518	619	638	656	654	548	500
083194	455	449	447	467	525	528	505	505	523	521	524	516	512	513	518	506	502	506	625	639	653	654	544	495
090194	451	450	445	459	532	531	513	500	499	517	514	516	524	532	531	621	513	529	632	639	654	649	542	497
090294	452	449	446	460	528	527	518	498	509	516	515	513	512	512	510	508	506	515	611	625	645	644	541	492
090394	450	444	440	451	519	520	491	458	457	467	467	483	491	489	473	472	472	483	486	510	525	525	517	462
090494	427	422	424	436	503	493	457	327	467	449	446	454	454	445	453	450	455	462	462	489	606	602	495	445
090594	410	403	406	424	486	478	435	422	429	447	445	449	458	466	459	460	473	475	479	500	517	517	512	466
090694	423	421	423	432	507	499	483	436	483	495	496	495	495	504	506	489	482	495	611	627	635	634	625	480
090794	440	439	438	441	514	542	557	518	494	503	509	502	503	513	497	491	499	520	515	526	633	639	632	485
090894	445	437	437	453	521	517	496	488	502	510	507	510	518	518	529	514	508	514	518	525	627	627	625	476
090994	438	431	441	457	514	495	477	474	487	512	519	517	527	515	527	513	521	524	523	642	648	648	641	489
091094	445	444	447	459	531	525	491	461	468	478	481	486	445	478	483	469	479	494	499	525	635	635	620	474
091194	433	430	431	444	519	505	491	455	461	467	462	479	475	479	472	471	485	499	507	524	635	628	620	469
091294	431	422	421	446	518	508	505	481	438	511	488	484	495	499	489	482	477	490	490	519	631	635	626	473
091394	431	428	425	442	507	502	495	466	479	489	497	497	490	503	491	494	488	501	508	622	634	620	606	458
091494	417	418	418	432	497	496	481	469	460	468	476	487	482	482	470	469	478	490	498	522	630	632	623	480
091594	436	433	433	449	519	519	519	515	498	500	502	500	501	505	499	500	501	510	514	633	639	638	631	484
091694	445	444	446	459	533	519	513	485	499	502	512	470	513	508	508	500	491	512	523	641	648	645	637	492
091794	455	448	446	467	521	513	484	459	470	476	480	481	483	483	489	487	488	500	503	636	648	645	637	491
091894	445	438	438	451	509	490	465	419	463	449	453	478	496	495	491	482	476	496	503	625	636	625	609	460
091994	420	415	414	433	483	474	462	444	457	478	477	482	492	504	487	480	482	492	495	519	631	625	618	472
092094	438	432	429	449	519	496	500	479	499	483	480	488	484	482	486	487	480	482	491	520	625	621	609	467
092194	420	411	416	420	491	487	474	454	460	479	477	488	483	503	489	483	475	479	492	521	625	625	617	467

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4. Please identify each of Gulf Power's generating units located in the State of Florida and for each, state the date each plant was constructed, the length of time of service, the type of fuel utilized for generation for the last five years, and the generating capacity of each such plant.

RESPONSE:

See attached page 2 of 2.

<u>PLANT(A)</u>	<u>UNIT No.</u>	<u>CAPACITY</u>	<u>START UP DATE</u>	<u>SERVICE YEARS</u>	<u>FUEL TYPE</u>
CRIST	1	24.0 mw	1/45	49	gas
	2	25.1 mw	6/49	45	gas
	3	37.0 mw	9/52	42	gas
	4	88.0 mw	7/59	35	coal
	5	87.0 mw	6/61	33	coal
	6	327.0 mw	5/70	24	coal
	7	517.1 mw	8/73	21	coal
SCHOLZ	1	49.6 mw	3/53	41	coal
	2	48.5 mw	10/53	41	coal
SMITH	1	162.0 mw	6/65	29	coal
	2	193.6 mw	6/67	27	coal
	A	35.2 mw	5/71	23	oil

(A) This interrogatory requested the units in the State of Florida. Gulf Power also owns approximately 750 mw of generation in other states.

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5. Which Gulf Power generating units in the State of Florida are subject to Phase I of the Clean Air Act regarding sulfur dioxide emissions allowances?

RESPONSE:

Gulf Power has two original Phase 1 units; Crist Unit 6 and 7.

6. For each Gulf Power generating unit located in the State of Florida that is subject to Phase I of the Clean Air Act regarding sulfur dioxide emissions allowances state, for each of the last five (5) years for each such unit:
- a. The number of tons of sulfur dioxide emitted.
 - b. The Phase I sulfur dioxide emissions baseline for each unit.
 - c. Briefly describe Gulf Power Company's Phase I SO₂ Emissions Compliance Plan for each such unit.
 - d. What is the estimated cost of compliance per KWH for each of the applicable Gulf Power generating units in the State of Florida that will be required to be brought into compliance with Phase I of the Clean Air Act.

RESPONSE:

- a. Sulfur dioxide emissions (tons) emitted by Gulf's Phase I plants are:

	<u>1989</u>	<u>1990</u>	<u>1991</u>	<u>1992</u>	<u>1993</u>
Crist 6	38661.92	28943.57	41941.39	42886.34	36335.22
Crist 7	60182.83	50130.86	38072.91	63738.93	37203.46

- b. Assuming that the Commission's question refers to a sulfur dioxide baseline allowance granted by EPA. The following is presented:

Phase I Annual Allowances

Crist 6	19,200
Crist 7	31,680

- c. Gulf Power's Phase I compliance strategy is a flexible plan. In general, Gulf will purchase low sulfur coal and build an allowance bank during Phase I (1995-1999) by over compliance. The allowances banked in Phase I will reduce compliance costs in Phase II.

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- (d) The jurisdictional revenue requirement during the current recovery period (October 1994 - March 1995) for Plant Crist Unit 6 to comply with the SO₂ requirements of Phase I of the Clean Air Act is .025 ¢ / KWH. The jurisdictional revenue requirement during the same period for Plant Crist Unit 7 to comply with the SO₂ requirements of Phase I of the Clean Air Act is .022 ¢ / KWH.

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7. Does Gulf Power plan in the next five (5) years to use SO₂ emissions credits which are purchased from other utilities or generated by the Southern Company from its generation plants located outside of the state of Florida to operate any of Gulf Power's generation plant's subject to Phase I of CAA in the State of Florida?

RESPONSE:

Gulf Power currently does not plan on purchasing any allowance credits or use any allowances generated by units not owned by Gulf Power within the Southern system to comply with Phase I requirements. Purchasing of allowances are however considered as an option in Gulf's Clean Air Act Amendments compliance strategy. Gulf Power's current strategy will generate extra allowances through the use of low sulfur coal in Phase I and banked for use in Phase II. Gulf Power will utilize some allowances purchased from EPA through annual auctions and through Gulf Power's participation in special programs available by EPA to reduce compliance costs. These allowances will also be banked for use in Phase II.

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8. Identify each such generation plant which Gulf Power plans for the next three (3) years to continue to operate its Phase I Units as it has been operated in the past three (3) years?

RESPONSE:

Gulf Power's CAAA compliance strategy calls for Gulf's Phase I generating units to be operated on economic dispatch.

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9. What are Gulf Power's wholesale power costs for each of the years 1992, 1993, and 1994 to date?

ANSWER:

<u>Year</u>	<u>Wholesale Revenues</u>	<u>Wholesale KWH</u>	<u>¢/KWH</u>
1992	\$12,206,670	282,852,400	4.32
1993	12,718,082	300,877,200	4.23
1994	8,841,577	206,213,800	4.29

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10. What are the number of customers of Gulf Power for each of the years 1992, 1993, and 1994?

ANSWER:

	Wholesale	Retail	Total Territorial
1992	6	301,713	301,719
1993	6	310,413	310,419
1994	6	317,331	317,337

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11. Separately state the total Federal and State income taxes, utility taxes and any other taxes paid by Gulf Power for each year from 1988 through 1993.

RESPONSE:

See attached page 2 of 2.

**GULF POWER COMPANY
TAXES PAID AND PREPAID**

KINDS OF TAXES	12/31/88	12/31/89	12/31/90	12/31/91	12/31/92	12/31/93
PREPAID LICENSES						
Occupational Licenses	12,978.07	13,639.23	12,175.89	12,901.15	12,259.38	11,726.25
Intangible Tax	56,159.81	40,961.20	43,561.16	70,735.76	88,259.58	132,963.41
Retail Install. License	0.00	700.00	0.00	1,000.00	0.00	0.00
Total Prepaid License	69,137.88	55,300.43	55,737.05	84,636.91	100,518.96	144,689.66
GA STATE & LOCAL TAXES						
Net Worth Tax	10,000.00	5,000.00	5,000.00	(5,000.00)	5,000.00	0.00
Unemployment	(1,766.89)	1,784.27	908.63	963.80	1,364.23	1,341.65
Real & Per. Prop. Taxes	1,427,682.40	660,527.16	0.00	849,211.22	810,110.74	1,766,489.13
Intangible Tax	0.00	0.00	0.00	0.00	0.00	0.00
Total State and Local	1,435,915.51	667,311.43	5,908.63	845,175.02	816,474.97	1,767,830.78
MS STATE & LOCAL TAXES						
Real & Per. Prop. Taxes	3,952,958.80	4,193,529.90	4,593,433.48	4,363,434.51	4,579,633.11	9,162,585.20
Unemployment	729.34	1,944.67	1,910.55	769.81	679.02	6,584.12
Franchise	176,568.00	188,635.00	195,000.00	170,000.00	165,000.00	240,851.00
Total State and Local	4,130,256.14	4,384,109.57	4,790,344.03	4,534,204.32	4,745,312.13	9,410,020.32
FL STATE & LOCAL TAXES						
Use Tax - Electricity	26,199.14	31,428.40	35,361.67	33,490.48	32,248.11	37,186.50
Use Tax - Telecom	42,034.27	42,745.56	38,538.58	31,779.90	31,302.68	41,889.75
Real & Per. Prop. Taxes	7,626,369.52	8,560,259.50	3,813,081.68	14,892,099.56	9,990,897.36	10,769,142.80
Gross Receipts - Elect.	5,379,584.22	7,034,437.95	7,797,532.28	9,845,932.41	10,744,464.19	11,921,198.49
Gross Receipts - Telecom	9,737.87	10,659.88	10,686.42	11,281.35	11,276.09	11,588.18
Florida Unemployment	12,060.82	11,894.65	12,056.05	23,506.90	32,422.89	51,700.54
FPSC Tax	319,623.36	413,519.71	540,139.97	591,439.90	305,852.67	398,254.42
Muni/County Franch. Tax	4,378,395.35	5,932,154.13	12,423,293.56	12,363,826.47	7,279,193.31	6,991,166.58
Florida Doc. Stamps	(2,787.43)	(2,707.15)	(7,593.97)	(624.25)	113.45	4.16
Fla. Emerg. Excise Tax	1,476,827.00	(362,320.00)	305,000.00	8,609.00	204,335.00	(15,111.00)
County Fire Protect Assess	3,766.74	3,709.91	5,990.29	5,998.72	6,263.70	6,011.78
Special Fuels Tax	1,992.08	2,187.09	2,335.61	2,254.76	1,790.74	4,526.87
Total State & Local	19,273,802.94	21,677,969.63	24,976,422.14	37,809,595.20	28,640,160.19	30,217,559.07
STATE INCOME TAX						
Florida	2,682,708.00	3,066,014.00	2,130,536.00	3,476,888.00	5,728,581.27	2,859,500.46
Georgia	381,263.00	174,091.00	211,343.00	211,986.00	362,100.00	215,462.00
Mississippi	23,739.00	89,961.00	131,244.00	184,803.00	122,200.00	150,690.00
Total State Income Tax	3,087,710.00	3,330,066.00	2,473,123.00	3,873,677.00	6,212,881.27	3,225,652.46
FEDERAL INCOME TAX						
Total Federal Income Tax	11,571,976.00	13,042,740.00	20,673,137.00	23,041,732.00	31,355,982.00	24,639,291.00
FEDERAL TAXES						
Unemployment Ins. Tax	100,384.30	105,734.89	107,069.62	102,692.30	101,449.27	104,349.44
Old Age Benefit Tax	3,787,321.87	4,091,662.00	4,539,054.39	4,622,889.70	4,837,384.85	5,106,489.32
Use Tax on Hyw. Motor	3,891.66	3,150.00	3,272.00	3,399.17	3,048.00	4,990.00
Environ. Excise Tax	83,952.00	84,095.00	68,649.00	94,475.00	134,364.00	115,933.00
Total Other Taxes	3,975,549.83	4,284,641.89	4,718,045.01	4,823,456.17	5,076,246.12	5,331,761.76
TOTAL	43,544,348.30	47,442,138.95	57,692,716.86	75,012,476.62	76,947,575.64	74,736,805.05

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12. State for each of the years 1989-1993, the total deferred Federal income taxes of Gulf Power.

RESPONSE:

See attached page 2 of 2.

**GULF POWER COMPANY
DEFERRED INCOME TAXES - STATE AND FEDERAL
INVESTMENT TAX CREDIT BALANCES**

Year	Deferred Income Taxes			Investment Tax Credit Balances
	Federal	State	Total	
1989	182,266,000	22,267,000	204,533,000	50,109,000
1990	181,910,000	22,534,000	204,444,000	47,776,000
1991	177,503,000	22,334,000	199,837,000	45,446,000
1992	180,221,000	23,080,000	203,301,000	43,117,000
1993	181,086,000	23,632,000	204,718,000	40,770,000

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13. State for each year of the years 1989-1993, the total deferred State income taxes of Gulf Power.

RESPONSE:

See response to Item No. 12, page 2 of 2.

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14. State for each year of the years 1989-1993, the total amount of unused investment tax credits on the books of Gulf Power.

RESPONSE:

See response to Item No. 12, page 2 of 2.

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15. What would be the cost difference the D.O.C. would pay between the construction cost of the underground facilities and aerial facilities based on Gulf Power Company's response to staff's First Set of Interrogatories Item No. 3 or any other aid in construction cost?

RESPONSE:

\$13,862.00

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16. What is the estimated cost that the D.O.C./Washington County or some other entity would have to reimburse Gulf Coast to relocate its facilities from the area along Red Sapp Road?

RESPONSE:

The total cost to relocate the facilities from the area along Red Sapp Road could vary from a negative number if the salvage value exceeded the removal cost to a positive number if additional construction cost plus removal cost exceeded the salvage value of those existing facilities along Red Sapp Road. A thorough review of the legal rights of all parties involved plus the past actions for the Coop in similar matters would have to be made to determine if any compensation was due to any party in this matter.

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17. Referring to Gulf Power's response to staff's second set of interrogatories number 9 d. e. & f., during the second half of 1993 of work detailed to have occurred on the Vernon to Sunny Hills feeder, was Gulf Power Company aware of the decision having been made for the Correctional Facility to be located at its present site.

RESPONSE:

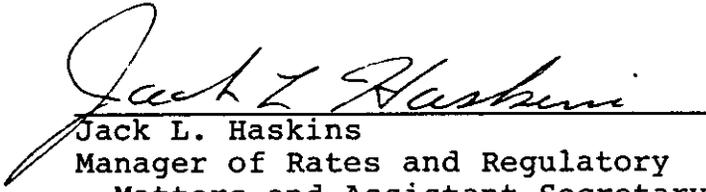
The conversion of the line from the Vernon substation to the Moss Hill autotransformer from 12kv to 25kv was part of the work done in the Vernon area from 1990 through 1993 to maintain the proper level of service to the customers in the Vernon area and had absolutely nothing to do with any correctional facility. This work was inconsequential to anything other than the final phase of the 25kv conversion project which included moving the Greenhead transformer to the Vernon substation and energizing it in May of 1993. Although Gulf Power was aware that the DOC was considering various sites in Washington County, the Company did not become aware that the DOC had committed to the present site until sometime in July, 1993.

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

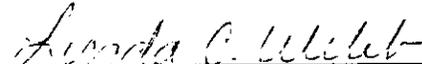
Docket No. 930885-EU

Before me the undersigned authority, personally appeared Jack L. Haskins, who being first duly sworn, deposes, and says that he is the Manager of Rates and Regulatory Matters and Assistant Secretary 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.



Jack L. Haskins
Manager of Rates and Regulatory
Matters and Assistant Secretary

Sworn to and subscribed before me this 10th day of October, 1994.



Notary Public, State of Florida at Large

Commission No. CC 362703
My Commission Expires May 31, 1998.



LINDA C. WEBB
Notary Public-State of FL
Comm. Exp: May 31, 1998
Comm. No: CC 362703

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to resolve)
territorial dispute with Gulf)
Coast Electric Cooperative, Inc.) Docket No. 930885-EU
by Gulf Power Company)
_____)

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 10th day of October 1994 by U.S. Mail or hand delivery to the following:

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