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June 6, 1996

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 960214-EU

Dear Ms. Bayo:

Enclosed are the original and fifteen (15) copies of the Comments of Gulf Power Company in the docket referred to above. Please accept this package for official filing as part of the record in this matter.

We have also enclosed a 3.5 inch high density computer diskette containing the enclosed document. The document is on the diskette in two different formats. The document was prepared using WordPerfect for Windows 6.1. This version of the document is located on the enclosed diskette with a *.wpd file extension. In an effort to assist the Staff, we have also converted the document to WordPerfect for DOS 5.1. This version of the document is located on the enclosed diskette with a *.w51 extension. Because the WordPerfect 5.1 version of the document is the result of a conversion, some of the formatting contained in the original document may have been lost.

Please mark the enclosed extra copy of this letter with the date and time that the material was accepted in your office for filing, and return same to the undersigned. Thank you for your assistance in this matter.

Very truly yours,
[Signature]
Jeffrey A. Stone
For the Firm

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Enclosures

DOCUMENT NUMBER-DATE
06193 JUN-7 96
FPSC-RECORDS/REPORTING

Ms. Blanca Bayo, Director
Division of Records & Reporting
Re: Docket No. 960214-EU
June 6, 1996
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cc: David Smith, Esquire
Director, Division of Appeals

James D. Beasley, Esquire
Frederick Bryant, Esquire
Matthew M. Childs, Esquire
James A. McGee, Esquire

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Proposed Revisions to Rule 25-6.035, F.A.C.,
Adequacy of Supply

) Docket No. 960214-EU
) Date Filed: June 7, 1996
)

COMMENTS OF GULF POWER COMPANY

Gulf Power Company, ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned attorneys, and pursuant to Order No. PSC-96-0628-NOR-EU, issued May 9, 1996, Gulf Power Company submits the following written comments or suggestions on the proposed amendments to the Florida Public Service Commission's rule regarding adequacy of supply. These comments are submitted in lieu of a request for hearing.

As stated on page 3 of the May 9 Order, the intended purpose and effect of the proposed rule change is to codify "... reserve margin criteria and other policies concerning the planning practices and operating reserves of Peninsular Florida's generating electric utilities in Commission Order No. PSC- 94-1256-FOF-EU." [Emphasis added] That order was issued October 11, 1994 in Docket No. 940345-EU which was entitled "Investigation into Planning and Operating Reserve Practices of Peninsular Florida Generating Electric Utilities." Gulf Power was neither a party to nor included within the scope of that proceeding.

DOCUMENT NUMBER-DATE

06193 JUN-7 1996

FPSC-RECORDS/REPORTING

In order to make the proposed rule fully consistent with the stated intent, Gulf Power Company suggests the following minor modification to the proposed rule as stated in Order No. PSC-96-0628-NOR-EU¹:

25-6.035 Adequacy of ~~Resources Supply~~. (1) Each utility shall maintain sufficient generating capacity, supplemented by regularly available generating and non-generating resources, in order to meet all reasonable demands for service and provide a reasonable reserve for emergencies. Each utility in Peninsular Florida shall also coordinate the sharing of energy reserves with other utilities in Peninsular Florida.²

The change suggested above would avoid an apparent unintentional implied broadening of the scope of the order that is being codified by the proposed rule. Gulf Power is suggesting this slight modification to the proposed rule in order to avoid the need for a hearing on this matter.

Respectfully submitted this 6th day of June, 1996.



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¹Gulf's suggested change is indicated by redline shading. The underlined and ~~strikethrough~~ text appears in the original proposed rule as set forth in Commission Order No. PSC-96-0628-NOR-EU.

²The remaining text of the proposed rule as set forth in Order No. PSC-96-0628-NOR-EU is omitted for brevity. No further changes are suggested.