

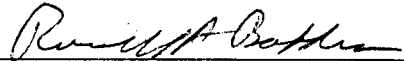
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition to resolve)
territorial dispute with Gulf)
Coast Electric Cooperative, Inc.)
By Gulf Power Company)

Docket No. 930885-EU
Served: December 10, 1996

NOTICE OF SERVING SIXTH REQUEST FOR
PRODUCTION OF DOCUMENTS

Notice is hereby given that Gulf Power Company ("Gulf Power" or "Gulf") has served its sixth request to produce numbered 16-19 by U.S. Mail on Gulf Coast Electric Cooperative, Inc., on December 10, 1996.



JEFFREY A. STONE
Florida Bar No. 32593
RUSSELL A. BADDERS
Florida Bar No. 7455
Beggs & Lane
P.O. Box 12950
Pensacola, Florida 32576-2950
(904)432-2451
Attorneys for Gulf Power Co.

DOCUMENT NUMBER-DATE

13178 DEC 11 8 000582

FPSC-RECORDS/REPORTING

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
Served: December 10, 1996

GULF POWER COMPANY'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF COAST ELECTRIC COOPERATIVE, INC.

Gulf Power Company ["Gulf Power" or "Gulf"], by and through its undersigned attorneys, and pursuant to Rule 1.340, Florida Rules of Civil Procedure, hereby serves the following Request for Production of Documents on Gulf Coast Electric Cooperative, Inc. ["GCEC"].

Please produce the documents requested to the undersigned, at Beggs & Lane, Post Office Box 12950, 3 West Garden Street, Suite 700, Pensacola, Florida 32576-2950, no later than thirty (30) days after service of this request:

DEFINITIONS AND INSTRUCTIONS

1. As used herein, "GCEC" shall mean Respondent Gulf Coast Electric Cooperative, Inc., its agents, officers, directors, representatives and employees.

2. As used herein, "documents" shall mean, without limitation, the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intra office memorandum, memorandum reflecting an oral communication, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disk, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

3. As used herein, "relating to" shall mean without limitation with respect to,

DOCUMENT NUMBER-DATE

13178 DEC 11 8000583

FPSC-RECORDS/REPORTING

referring to, concerning, embodying, establishing, evidencing, proposing, compromising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting or constituting.

4. 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.

5. 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.

6. If the Coop withholds any document(s) requested herein 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.


REQUEST TO PRODUCE

16. Please provide any document, memo, correspondence, or other written material that describe, delineate, or otherwise document Gulf Coast Electric Cooperative's distribution planning methodology and procedures, whether this planning is done by GCEC directly, or any of its agents, contractors, or consultants.

17. Please provide any document, memo, correspondence, or other written material that relates to any distribution planning study or evaluation performed by Gulf Coast Electric Cooperative, directly, or any of its agents, contractors, or consultants, from 1988 to the present time.

18. Please provide any and all transcripts, documents and/or records of any statement, verbal or written, made by Stephen Page Daniel in each of the proceedings referred to or discussed by Stephen Page Daniel in his pre-filed direct testimony at pages 3-5. This request includes, but is not limited to, the transcripts of such proceedings and pre-filed testimony.

19. Please provide any and all papers, notes, text, handouts or documents used in the preparation or presentation of the lectures and seminars listed by Stephen Page Daniel on his resume (SPD-2) attached as an exhibit to his pre-filed direct testimony.


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CERTIFICATE OF SERVICE

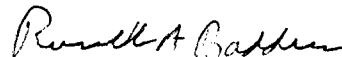
I HEREBY CERTIFY that a copy of the foregoing has been furnished this 10th day of

December, 1996 by U.S. Mail to the following:

Vicki Johnson, Esquire
Staff Counsel
FL Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0863

John Haswell, Esquire
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