

**ORIGINAL
FILE COPY**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 930885-EU

**PREPARED REBUTTAL TESTIMONY
AND EXHIBITS OF**

WILLIAM C. WEINTRITT

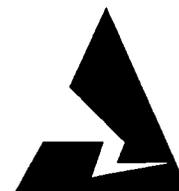
DECEMBER 20, 1996

DOCUMENT NUMBER - DATE

13584 DEC 20 1996

FPSC-REG/REG/REPORTING

GULF POWER



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: December 20, 1996

7 Q. What is your name and job title with Gulf Power Company?

8 A. My name is William C. Weintritt and my job title is
9 Power Delivery Manager.

10 Q. Are you the same William C. Weintritt that prepared
11 direct testimony in this docket?

12 A. Yes, I am.

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

14 A. The purpose of my rebuttal testimony is to respond to
15 statements made by Archie W. Gordon and explain why a
16 continuous boundary line fully encircling Gulf Power's
17 facilities is not in the best interests of the electric
18 customers in Bay and Washington counties or Gulf Power.

19 I also will respond to statements made by Stephen
20 Page Daniel and Todd F. Bohrmann and explain how utility
21 lines may cross one another safely.

22
23 Q. Do you have any exhibits to which you will refer in the
24 course of your testimony?

25 A. Yes. I have two exhibits, each having three subparts.

1 Counsel: We ask that Mr. Weintritt's two
2 exhibits, WCW-6 and WCW-7, be marked
3 as Exhibits ____ and _____,
4 respectively.
5

6 Q. On page 4, line 20 through 24 of Mr. Gordon's testimony,
7 he describes Gulf Power's distribution lines as "scarce"
8 in rural areas. Do you agree with that description?

9 A. No, even Mr. Gordon admits that prior to 1950, a Gulf
10 Power line was present from College Station (north of
11 Panama City) approximately 14 miles along US 231 to
12 Youngstown. This is the same general area of Bay County
13 being considered in this docket. It should also be
14 remembered that Gulf Power was providing the energy
15 being distributed by GCEC through its Bayou George
16 delivery point. This fact is demonstrated by exhibit
17 WCW-3 to my direct testimony. Gulf Power's first
18 electrical system was established in 1926 in the then
19 rural area of Chipley, Florida. It is misleading to
20 state that our distribution lines were then or are now
21 "scarce" in rural areas.
22

23 Q. Do you agree with Mr. Gordon's statement on page 6,
24 line 14 of his testimony characterizing the frequency of

1 territorial disputes between Gulf Power and GCEC as
2 being "continuous"?

3 A. No. The only dispute between these two utilities in
4 over ten years occurred over service to the Washington
5 County Correctional Institute when GCEC duplicated the
6 existing lines of Gulf Power along Highway 279. I
7 hardly consider one dispute in over ten years as being
8 "continuous".

9

10 Q. Page 7, lines 11 through 15 of Mr. Gordon's testimony,
11 refers to a Department of Transportation map of Bay
12 County, Florida, Exhibit No. ____ (AWG-2) where Mr. Gordon
13 attempts to depict Gulf Power and GCEC electric
14 facilities. Does this exhibit accurately depict Gulf
15 Power's facilities?

16 A. No. I would estimate that less than one tenth of Gulf
17 Power's facilities in Bay County are shown on
18 Mr. Gordon's exhibit. The scale would not allow Gulf
19 Power's facilities to be shown properly. This is an
20 obvious attempt to distort the amount of facilities
21 being shown as owned by Gulf Power in Bay County.

22

23 Q. Pages 8, 9 and 10 of Mr. Gordon's testimony are devoted
24 to drawing a continuous boundary in Bay County to, as
25 Mr. Gordon says, "provide closure". Is it necessary to

1 have a continuous boundary line throughout Bay County to
2 prevent uneconomic duplication of facilities?

3 A. Absolutely not. The obvious intent of Mr. Gordon's
4 proposed continuous boundary line in Bay County is to
5 completely encircle Gulf Power's lines and prevent us
6 from growing beyond where we presently have facilities.
7 The "closure" that would be provided is that Gulf Power
8 would be closed off from serving the vast amount of
9 unserved area in Bay County and GCEC would be free to
10 expand at will.

11

12 Q. What other problems do you have with this proposed
13 "continuous" boundary line"?

14 A. Mr. Gordon's method establishes a fixed boundary line to
15 be utilized in determining which company will provide
16 service to all future customer loads based on the
17 presence of distribution lines existing at this point in
18 time without regard to the size and characteristics of
19 the load that may develop in the future and regardless
20 of the adequacy of those lines to serve future load.
21 Mr. Gordon's method also eliminates customer choice and
22 will deny many customers lower priced electric service
23 with higher reliability even if uneconomic duplication
24 of facilities is not an issue. Quite simply,
25 Mr. Gordon's method prematurely determines the electric

1 supplier for an area without knowing which conditions
2 might change drastically long before the service is
3 needed.

4
5 Q. On page 11, Mr. Gordon describes six factors he
6 considered in establishing a proposed territorial
7 boundary line. Did Mr. Gordon fully utilize these
8 factors in establishing his proposed boundary line?

9 A. No. In many instances topographical and geographical
10 features were totally ignored. One such instance is on
11 Map 2633. Mr. Gordon departs from Bayou George Creek
12 then strikes out cross-country near the north end of
13 Cemetery Road. This contrived boundary passes within
14 100 feet of Gulf Power's facilities yet GCEC's lines are
15 several thousand feet away. There are many other
16 instances where the boundary was drawn immediately
17 adjacent to Gulf Power's lines with GCEC's lines being a
18 great distance away. One other such instance is on Map
19 2731. In this case, Mr. Gordon has drawn a boundary
20 within 100 feet of Gulf Power's facilities in Cedarwood
21 Subdivision while GCEC's lines are thousands of feet
22 distant. Other examples include utilizing through
23 feeders to establish service rights where no service is
24 presently being provided by GCEC. One such instance is
25 shown on Map 2633 where, just east of the US Highway 231

1 bridge over Bayou George, Mr. Gordon's proposed boundary
2 departs from the creek and apparently uses the presence
3 of a "through feeder" to claim a parcel long served by
4 Gulf Power. These three examples are shown in my
5 exhibit WCW-6, pages a, b, and c, respectively.

6
7 Q. Do the problems previously described for Mr. Gordon's
8 continuous boundary line in Bay County also apply to his
9 description of a continuous boundary line in Washington
10 County?

11 A. Yes. Again, one such example is on Map 2521 where
12 Mr. Gordon's proposed boundary confines Gulf Power to
13 Sunny Hills proper and allocates several square miles of
14 unserved territory to GCEC. This is done
15 notwithstanding GCEC's scant presence on this map.
16 Another instance occurs at the west side of Map 2519.
17 Here Mr. Gordon's arbitrary line lops off a Gulf Power
18 line section with GCEC not even present on this portion
19 of the map. Moreover, that Gulf Power line continues
20 onto Map 2419 yet Mr. Gordon assigns Map 2419 in it's
21 entirety to GCEC. GCEC is present only in the immediate
22 vicinity of Highway 77, yet claims three and one-half
23 square miles. These three examples are shown in my
24 exhibit WCW-7, pages a, b, and c, respectively.

25

1 Q. Pages 11 and 12 of Mr. Daniel's testimony describe
2 examples of the adverse impact of "needless
3 duplication". Do you agree with Mr. Daniel's opinion?
4 A. No, I do not. Mr. Daniel's examples do not completely
5 describe any of the situations he proposes. Mr.
6 Daniel's example of an automobile leaving the roadway
7 implies that this risk is greater only where duplicate
8 electrical distribution lines exist. In fact, there
9 almost always will be utility poles along both sides of
10 any roadway which also has dwellings or businesses on
11 both sides of that road. This situation is common
12 throughout the entire country. In fact, where joint use
13 agreements exist, those "duplicate" pole lines often
14 have different owners, one being an electrical utility
15 and the other a telecommunication utility. Poles on
16 both sides of roads are necessary to provide sufficient
17 safe clearance over the roadway for power and
18 telecommunication lines crossing to serve consumers
19 opposite the main line. There are numerous regulations
20 governing the safe placement of any poles on public
21 right-of-way. These include the Florida Department of
22 Transportation Utility Accommodation Guide as well as
23 County and Municipal ordinances adopting similar
24 standards. These Guides contain permitting provisions
25 which cause review and approval of most proposed pole

1 locations prior to any actual installation. The
2 National Electrical Safety Code also contains language
3 addressing safe placement of utility poles. Compliance
4 with these safety standards will mitigate the hazard to
5 the motoring public no matter the ownership or purpose
6 of any utility pole.

7 Mr. Daniel also states that crossing lines can
8 lead to voltage problems and equipment damage. It is
9 true that unusual voltages can damage equipment, but the
10 number of times when sagging lines cause the damage is
11 so small as to be almost nonexistent. In my experience
12 during the more than thirty years I have been associated
13 with the electrical power industry in the southeastern
14 states, the total number of damage cases due to crossing
15 lines sagging into one another does not equal the damage
16 caused by any average individual thunderstorm. In fact,
17 one of the most frequent "crossers" of electrical
18 distribution lines is the State of Florida. There are
19 hundreds of traffic signals owned by the Florida
20 Department of Transportation supported by messenger
21 cables which cross in close proximity to Gulf Power's
22 electrical lines. I am unaware of any instances of
23 damage to those facilities due to sagging into each
24 other. I suppose that the Department of
25 Transportation's (DOT) engineers share my belief or they

1 would not have perpetuated these conditions for so many
2 years. In addition to the Florida DOT, GCEC's own
3 engineers seem indifferent to this supposed hazard.
4 They have constructed a distribution system which
5 crosses back and forth under Gulf Power's 115,000 volt
6 and 230,000 volt transmission lines at many locations.
7 Again, I suppose if they really thought that lines
8 sagging into one another was a problem they would have
9 pursued alternative designs. In any case, the NESC
10 specifically addresses the grade of construction and
11 clearance distances to be used when erecting crossing
12 lines. Compliance with these design criteria will
13 mitigate any risk to consumers or utilities alike.

14
15
16
17
18
19
20
21
22
23
24
25

Q. Does this conclude your rebuttal testimony?

A. Yes, it does.

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

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 for 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.

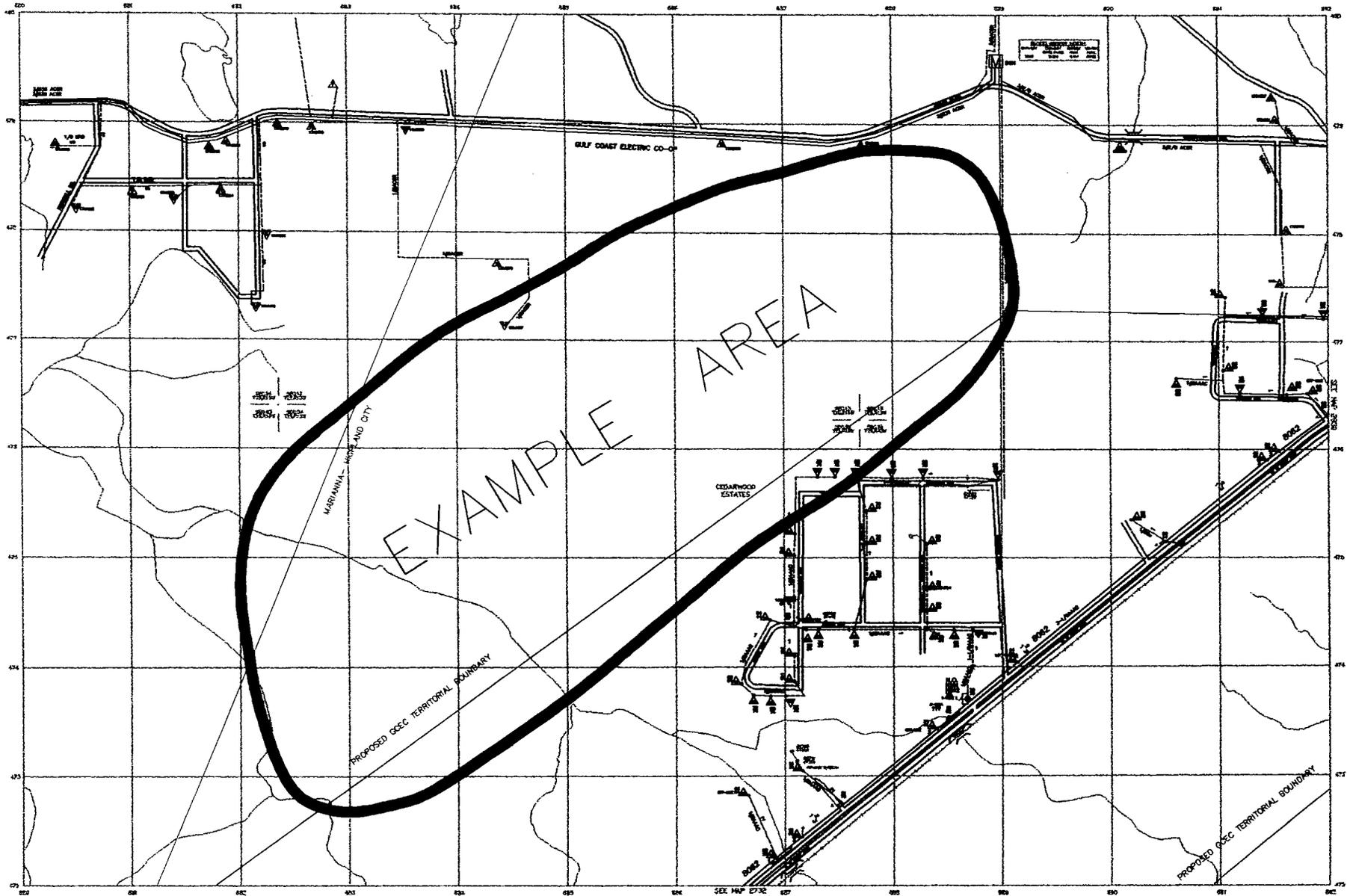
William C. Weintritt
William C. Weintritt
Power Delivery Manager

Sworn to and subscribed before me this 17th day of December,

1996.

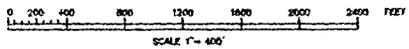
Karon Henson
Notary Public, State of Florida at Large





LEGEND

THREE PHASE PRIMARY	OPEN	CLOSED	REGULATOR	POWER CABLES/POLES
ONE PHASE PRIMARY	POLE SWITCH	DISCONNECT	DISCONNECTED	OPEN END ONE PHASE
ONE PHASE PRIMARY TRANSFORMER	OPEN OPERATOR ON BREAK	OPERATOR SWITCH	TRANSFORMER	OPEN BOLT ONE PHASE
THREE PHASE TRANSFORMER	OPERATOR SWITCH	OPERATOR SWITCH	TRANSFORMER CROSSING	CLOSED BOLT ONE PHASE
ONE PHASE TRANSFORMER	OPERATOR SWITCH	OPERATOR SWITCH	CONDUCTOR CROSSING	ONE PHASE ONE
ONE PHASE TRANSFORMER	OPERATOR SWITCH	OPERATOR SWITCH	CONDUCTOR CROSSING	ONE PHASE TWO
ONE PHASE TRANSFORMER	OPERATOR SWITCH	OPERATOR SWITCH	CONDUCTOR CROSSING	ONE PHASE THREE
ONE PHASE TRANSFORMER	OPERATOR SWITCH	OPERATOR SWITCH	CONDUCTOR CROSSING	ONE PHASE FOUR



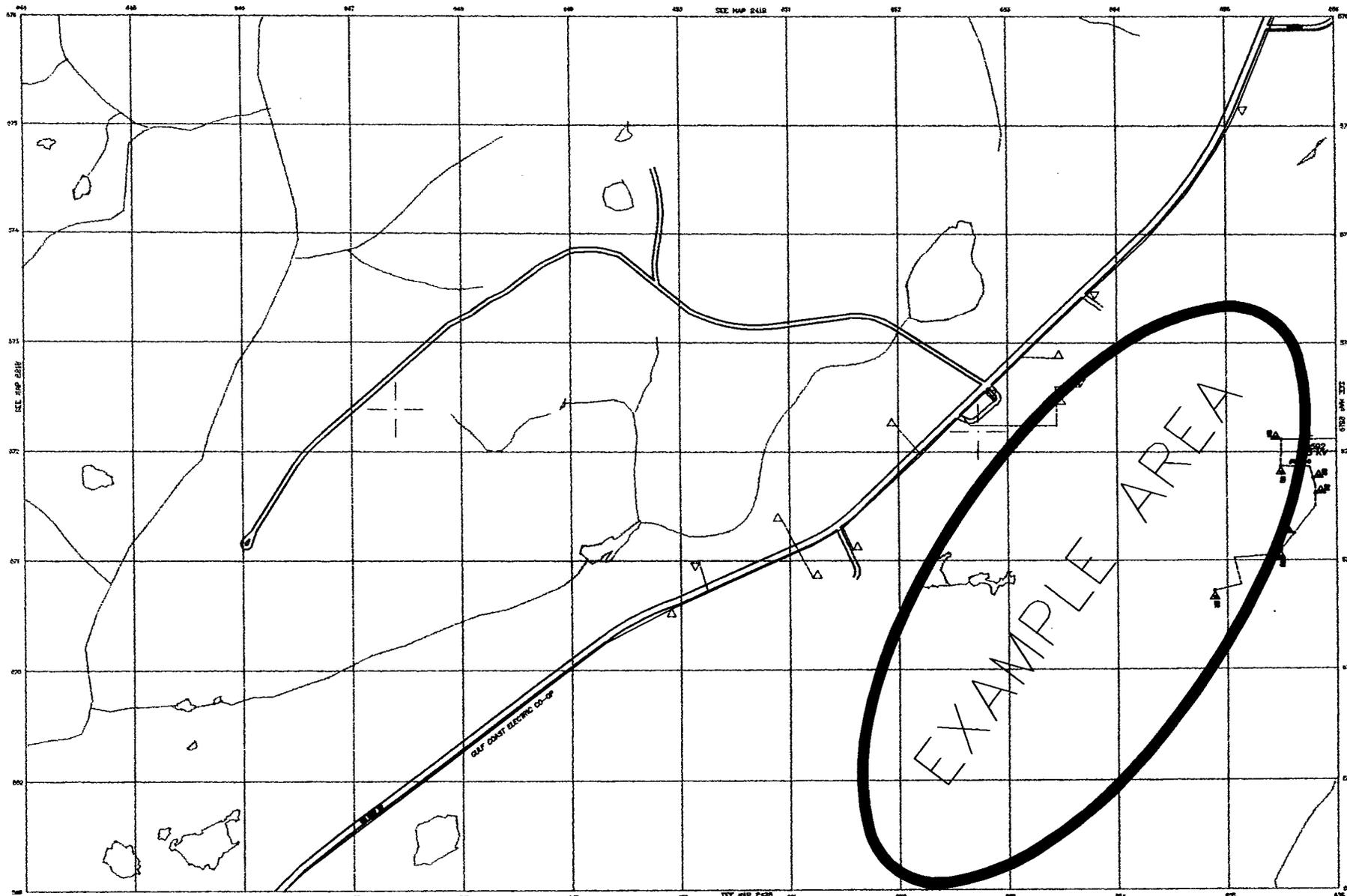
Gulf Power
Eastern Division

SECTION SYMBOLS USE MAP
 Single Phase
 Two Phase
 Three Phase
 Not Shown

SECTION SYMBOLS USE MAP
 Single Phase
 Two Phase
 Three Phase
 Not Shown

680-472-B4
 05/22/95
 2731
 CEDARWOOD ESTATES

Exhibit MCW-6
 B



LEGEND

--- 33KV PRIMARY	--- 15KV	--- 10KV	--- 6KV	--- 3KV	--- 1.5KV	--- 0.75KV	--- 0.375KV	--- 0.1875KV	--- 0.09375KV	--- 0.046875KV	--- 0.0234375KV	--- 0.01171875KV	--- 0.005859375KV	--- 0.0029296875KV	--- 0.00146484375KV	--- 0.000732421875KV	--- 0.0003662109375KV	--- 0.00018310546875KV	--- 0.000091552734375KV	--- 0.0000457763671875KV	--- 0.00002288818359375KV	--- 0.000011444091796875KV	--- 0.0000057220458984375KV	--- 0.00000286102294921875KV	--- 0.000001430511474609375KV	--- 0.0000007152557373046875KV	--- 0.00000035762786865234375KV	--- 0.000000178813934326171875KV	--- 0.0000000894069671630859375KV	--- 0.00000004470348358154296875KV	--- 0.00000002235174179077146484375KV	--- 0.0000000111758708953857221875KV	--- 0.000000005587935447692859375KV	--- 0.0000000027939677238464296875KV	--- 0.00000000139698386192321484375KV	--- 0.000000000698491930961607221875KV	--- 0.0000000003492459654808536109375KV	--- 0.00000000017462298274042655546875KV	--- 0.000000000087311491370213277734375KV	--- 0.0000000000436557456851066388671875KV	--- 0.000000000021827872842553344434375KV	--- 0.000000000010913936421276672217171875KV	--- 0.0000000000054569682106383361085859375KV	--- 0.000000000002728484105319167554296875KV	--- 0.0000000000013642420526595837771484375KV	--- 0.000000000000682121026329791888671875KV	--- 0.00000000000034106051316489594434375KV	--- 0.00000000000017053025658244772217171875KV	--- 0.000000000000085265128291238861085859375KV	--- 0.000000000000042632564145619054296875KV	--- 0.0000000000000213162820728095271484375KV	--- 0.0000000000000106581410364047635722171875KV	--- 0.000000000000005329070518202381788610859375KV	--- 0.00000000000000266453525910119089594434375KV	--- 0.000000000000001332267629550595447722171875KV	--- 0.0000000000000006661338147752977388610859375KV	--- 0.00000000000000033306690738764889594434375KV	--- 0.000000000000000166533453693824447722171875KV	--- 0.0000000000000000832667268469122388610859375KV	--- 0.000000000000000041633363423456119089594434375KV	--- 0.000000000000000020816681711728095271484375KV	--- 0.000000000000000010408340855864047722171875KV	--- 0.0000000000000000052041704279322388610859375KV	--- 0.000000000000000002602085213966119089594434375KV	--- 0.00000000000000000130104260698305447722171875KV	--- 0.00000000000000000065052130349152977388610859375KV	--- 0.000000000000000000325260651745764889594434375KV	--- 0.0000000000000000001626303258728824447722171875KV	--- 0.00000000000000000008131516293644119089594434375KV	--- 0.000000000000000000040657581468220595447722171875KV	--- 0.0000000000000000000203287907341122977388610859375KV	--- 0.000000000000000000010164395367056119089594434375KV	--- 0.00000000000000000000508219768352764889594434375KV	--- 0.000000000000000000002541098841763824447722171875KV	--- 0.0000000000000000000012705494208819122388610859375KV	--- 0.000000000000000000000635274710440956119089594434375KV	--- 0.0000000000000000000003176373552202977388610859375KV	--- 0.00000000000000000000015881867761014889594434375KV	--- 0.000000000000000000000079409338805074447722171875KV	--- 0.00000000000000000000003970466940253824447722171875KV	--- 0.000000000000000000000019852334701269122388610859375KV	--- 0.00000000000000000000000992616735063456119089594434375KV	--- 0.00000000000000000000000496308367531728095271484375KV	--- 0.00000000000000000000000248154183765864047722171875KV	--- 0.000000000000000000000001240770918829322388610859375KV	--- 0.0000000000000000000000006203854594146824447722171875KV	--- 0.000000000000000000000000310192729707341122977388610859375KV	--- 0.00000000000000000000000015509636485367056119089594434375KV	--- 0.0000000000000000000000000775481824268352764889594434375KV	--- 0.00000000000000000000000003877409121341763824447722171875KV	--- 0.000000000000000000000000019387045606708819122388610859375KV	--- 0.0000000000000000000000000096935228033544119089594434375KV	--- 0.00000000000000000000000000484676140167722171875KV	--- 0.000000000000000000000000002423380700838610859375KV	--- 0.00000000000000000000000000121169035041928095271484375KV	--- 0.00000000000000000000000000060584517520956119089594434375KV	--- 0.0000000000000000000000000003029225876047722171875KV	--- 0.000000000000000000000000000151461293802388610859375KV	--- 0.00000000000000000000000000007573064690119089594434375KV	--- 0.000000000000000000000000000037865323450595447722171875KV	--- 0.0000000000000000000000000000189326617252977388610859375KV	--- 0.00000000000000000000000000000946633086264889594434375KV	--- 0.000000000000000000000000000004733165431322388610859375KV	--- 0.0000000000000000000000000000023665827156119089594434375KV	--- 0.00000000000000000000000000000118329135765864047722171875KV	--- 0.000000000000000000000000000000591645678829322388610859375KV	--- 0.0000000000000000000000000000002958228394146824447722171875KV	--- 0.000000000000000000000000000000147911419707341122977388610859375KV	--- 0.00000000000000000000000000000007395570985367056119089594434375KV	--- 0.0000000000000000000000000000000369778549268352764889594434375KV	--- 0.00000000000000000000000000000001848892746341763824447722171875KV	--- 0.0000000000000000000000000000000092444637316824447722171875KV	--- 0.00000000000000000000000000000000462223186584119089594434375KV	--- 0.000000000000000000000000000000002311115932920956119089594434375KV	--- 0.00000000000000000000000000000000115555796646047722171875KV	--- 0.0000000000000000000000000000000005777789832302388610859375KV	--- 0.00000000000000000000000000000000028888949161519089594434375KV	--- 0.000000000000000000000000000000000144444745807595447722171875KV	--- 0.000000000000000000000000000000000072222372903788610859375KV	--- 0.000000000000000000000000000000000036111186451928095271484375KV	--- 0.0000000000000000000000000000000000180555932256119089594434375KV	--- 0.0000000000000000000000000000000000090277966128095271484375KV	--- 0.0000000000000000000000000000000000045138983064047722171875KV	--- 0.000000000000000000000000000000000002256949153202388610859375KV	--- 0.00000000000000000000000000000000000112847457660119089594434375KV	--- 0.000000000000000000000000000000000000564237288300595447722171875KV	--- 0.0000000000000000000000000000000000002821186441502977388610859375KV	--- 0.00000000000000000000000000000000000014105932207514889594434375KV	--- 0.00000000000000000000000000000000000007052966103788610859375KV	--- 0.000000000000000000000000000000000000035264830518928095271484375KV	--- 0.000000000000000000000000000000000000017632415259464047722171875KV	--- 0.000000000000000000000000000000000000008816207629722171875KV	--- 0.0000000000000000000000000000000000000044081038148610859375KV	--- 0.0000000000000000000000000000000000000022040519074302388610859375KV	--- 0.00000000000000000000000000000000000000110202595371519089594434375KV	--- 0.00000000000000000000000000000000000000055101297685788610859375KV	--- 0.000000000000000000000000000000000000000275506488428928095271484375KV	--- 0.000000000000000000000000000000000000000137753244214464047722171875KV	--- 0.006887662210728095271484375KV	--- 0.003443831105364047722171875KV	--- 0.00172191555268202388610859375KV	--- 0.000860957776341122977388610859375KV	--- 0.00043047888817056119089594434375KV	--- 0.0002152394440852977388610859375KV	--- 0.00010761972204264889594434375KV	--- 0.0053809861021322388610859375KV	--- 0.00269049305106119089594434375KV	--- 0.001345246525530595447722171875KV	--- 0.0006726232627652977388610859375KV	--- 0.00033631163138264889594434375KV	--- 0.00016815581569122388610859375KV	--- 0.00840779078456119089594434375KV	--- 0.00420389539228095271484375KV	--- 0.00210194769614047722171875KV	--- 0.0010509738480702388610859375KV	--- 0.00052548692403519089594434375KV	--- 0.000262743462017595447722171875KV	--- 0.000131371731008788610859375KV	--- 0.00656858655043928095271484375KV	--- 0.00328429327521964047722171875KV	--- 0.001642146637609824447722171875KV	--- 0.0008210733188049122388610859375KV	--- 0.0004105366594024606119089594434375KV	--- 0.0002052683297012302977388610859375KV	--- 0.00010263416485061519089594434375KV	--- 0.005131708242530788610859375KV	--- 0.00256585412126519089594434375KV	--- 0.001282927060632595447722171875KV	--- 0.00064146353031628095271484375KV	--- 0.00032073176515814047722171875KV	--- 0.000160365882579072388610859375KV	--- 0.008018294128953928095271484375KV	--- 0.0040091470644764047722171875KV	--- 0.0020045735322388610859375KV	--- 0.001002286766119089594434375KV	--- 0.0005011433830595447722171875KV	--- 0.00025057169152977388610859375KV	--- 0.000125285845764047722171875KV	--- 0.006264292288202388610859375KV	--- 0.003132146144119089594434375KV	--- 0.0015660730720595447722171875KV	--- 0.00078303653602977388610859375KV	--- 0.000391518268014889594434375KV	--- 0.0001957591340074302977388610859375KV	--- 0.009787956700371519089594434375KV	--- 0.00489397835018595447722171875KV	--- 0.0024469891750928095271484375KV	--- 0.0012234945875464047722171875KV	--- 0.000611747293773202388610859375KV	--- 0.0003058736468866119089594434375KV	--- 0.00015293682344330595447722171875KV	--- 0.0076468411721652977388610859375KV	--- 0.00382342058608264889594434375KV	--- 0.00191171029304122388610859375KV	--- 0.000955855146520595447722171875KV	--- 0.00047
------------------	----------	----------	---------	---------	-----------	------------	-------------	--------------	---------------	----------------	-----------------	------------------	-------------------	--------------------	---------------------	----------------------	-----------------------	------------------------	-------------------------	--------------------------	---------------------------	----------------------------	-----------------------------	------------------------------	-------------------------------	--------------------------------	---------------------------------	----------------------------------	-----------------------------------	------------------------------------	---------------------------------------	--------------------------------------	-------------------------------------	--------------------------------------	---------------------------------------	--	---	--	---	--	---	--	---	--	---	--	---	--	---	--	---	--	--	---	--	---	---	--	---	---	--	--	---	---	--	---	---	--	---	--	---	--	---	--	---	---	---	---	--	--	---	---	--	--	---	--	---	--	---	--	---	---	---	--	---	--	---	---	---	--	---	---	--	---	--	---	--	---	--	---	--	--	---	---	--	--	---	--	---	--	---	--	--	--	--	---	--	--	---	---	---	---	--	--	---	--	--	--	---	---	---	---	--	---	---	--	---	--	---	---	---	---	--	--	--	---	--	---	---	---	--	---	--	--	--	---	---	--	---	---	--	--	--	---	---	--	---	---	---	---	--	---	---	--	--	---	--	--	--	---	--	---	---	---	--	---

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

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 for 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 17th day of December,

1996.

Karon Henson
Notary Public, State of Florida at Large



13584-96
12/20/96