

Gulf Power Company
500 Bayfront Parkway
Post Office Box 1151
Pensacola, FL 32520-0781
Telephone 904 444-6231

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FILE COPY

97
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the southern electric system

Susan D. Cranmer
Assistant Secretary and
Assistant Treasurer

January 22, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 930885-EU

Enclosed for official filing are an original and fifteen copies of Gulf Power Company's Response to GCEC's Motion to Strike Direct Testimony of Gulf Power Witnesses, Spangenberg, Holland, Weintritt, and Klepper.

Sincerely,

Susan D. Cranmer

ACK _____
AFA _____
APP 1
CAF _____ lw
CMU _____ Enclosure
CTR _____
EAG Dudley
LEG 1
LIN 3
OPC _____
RCH _____
SEC 1
WAS _____
OTH _____

Beggs and Lane
Jeffrey A. Stone, Esquire

"Our business is customer satisfaction"

DOCUMENT NUMBER-DATE

00917 JAN 24 97

FPSC-RECORDS/REPORTING

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
Filed: January 23, 1997

**GULF POWER COMPANY'S RESPONSE TO GCEC'S
MOTION TO STRIKE DIRECT TESTIMONY OF
GULF POWER WITNESSES, SPANGENBERG,
HOLLAND, WEINTRITT AND KLEPPER**

GULF POWER COMPANY ("Gulf Power," "Gulf," or "the Company"), by and through its undersigned attorneys, hereby responds in writing to the motion to strike testimony of Gulf Power Company filed by Gulf Coast Electric Cooperative ("GCEC") as follows:

1. Gulf Power Company asserts that the direct testimony of Theodore S. Spangenberg, Jr. at page 9, lines 2-6 is relevant and material to issues numbered 6 and 7, as set forth in Florida Public Service Commission Order No. PSC-96-1274-PCO-EU.
2. Gulf Power asserts that the direct testimony of G. Edison Holland, Jr., at page 4, lines 23-25, page 5, lines 1-25, and page 6, lines 1-7 is relevant and material to issues numbered 6 and 7, as listed in Commission Order No. PSC-96-1274-PCO-EU.
3. Gulf Power responds that the direct testimony of G. Edison Holland, Jr., at page 10, lines 7-18 and page 11, lines 13-25 continuing to Page 12, lines 1-2 and 4-21 is relevant and material to issues numbered 6 and 7, as listed in Commission Order No. PSC-96-1274-PCO-EU.
4. Gulf responds that the direct testimony of G. Edison Holland, Jr., at page 14, line 23 to page 15, line 1-8, is relevant and material to issues numbered 6 and 7, as listed in Commission Order No. PSC-96-1274-PCO-EU.

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5. Gulf responds that the direct testimony of G. EDISON Holland, Jr., at pages 7-10 and 15-25 is relevant and material to issues numbered 6 and 7, as listed in Commission Order No. PSC-96-1274-PCO-EU.

6. Gulf responds that Exhibits GEH-1, GEH-2 and GEH-5 to the direct testimony of G. Edison Holland, Jr., are relevant and material to issues numbered 2, 6 and 7, as listed in Commission Order No. PSC-96-1274-PCO-EU.

7. Gulf responds that the direct testimony of William Weintritt at page 7, line 12-25, page 8, lines 1-25 and page 9, lines 1-5 and 14-21 is relevant to issues numbered 2, 6 and 7, as listed in Commission Order No. PSC-96-1274-PCO-EU.

8. Gulf responds that Exhibits WCW-3, WCW-4 and WCW-5 to the direct testimony of William Weintritt are relevant to issues numbered 2, 6 and 7, as listed in Commission Order No. PSC-96-1274-PCO-EU.

9. Gulf responds that the direct testimony of Russell L. Klepper is relevant to issues numbered 2, 5, 6 and 7, as listed in Commission Order No. PSC-96-1274-PCO-EU.

WHEREFORE, Gulf Power Company respectfully requests that the Florida Public Service Commission deny GCEC's Motion to Strike Direct Testimony of Gulf Power Witnesses Spangenberg, Holland, Weintritt and Klepper.

Respectfully submitted this 22th day of January 1997



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 7455

Beggs & Lane

Post Office Box 12950

Pensacola, Florida 32576-2950

(904) 432-2451

Attorneys for Gulf Power Company

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 22nd day of January 1997 by hand delivery or U. S. Mail to the following:

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

Patrick Floyd, Esquire
Gulf Coast Electric Coop.
408 Long Avenue
Port St. Joe FL 32456

John Haswell, Esquire
Chandler, Lang & Haswell
P. O. Box 23879
Gainesville FL 32602

Russell A. Badders
JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 7455
Beggs & Lane
P. O. Box 12950
Pensacola FL 32576
904 432-2451
Attorneys for Gulf Power Company

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