

SEP 12 1997

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: September 12, 1997

**POST HEARING STATEMENT OF ISSUES AND POSITIONS OF
GULF COAST ELECTRIC COOPERATIVE, INC.**

Gulf Coast Electric Cooperative, Inc. in compliance with the Pre-hearing Order PSC-97-0466-PHO-EU issued April 23, 1997, and pursuant to Rule 25-22.056(3), Florida Administrative Code, submits herewith its post hearing statement of issues and positions limiting its position statement for each issue to fifty (50) words or less:

Issue 1: What are the areas of South Washington and Bay Counties where the electric facilities of Gulf Power and Gulf Coast are co-mingled and in close proximity?

Gulf Coast's position: Those areas identified in Exhibit 2 (AWG-2, AWG-3, AWG-5 and AWG-6) and on the following maps: Washington County - 2218NW, 2218NE, 2218SW, 2218SE, 2220, 2221, 2320, 2321, 2322, 2418-2421, 2518-2521, 2618, 2619, 2620, 2717-2720. Bay County - 2828NW, NE, SW, and SE, 2830NW, NE, and SW, 2731, 2733, 2632-2634, 2533, 2534, 2433, and 2639.

Issue 2: What are the areas in South Washington and Bay Counties where further uneconomic duplication of electric facilities is likely to occur?

Gulf Coast's position: Those areas identified on Exhibit 2 (AWG-2, AWG-3, AWG-5 and AWG-6) where the facilities of the two utilities are parallel, intermingled, in close proximity, or cross each other. Future uneconomic duplication of facilities in South

Washington and Bay Counties is likely to occur in the same areas as identified in Issue 1.

Issue 3: What is the expected customer load, energy, and population growth in the areas identified in response to Issues 1 and 2 above?

Gulf Coast's position: The expected customer load, energy, and population growth are as identified in Exhibit 2 (AWG-8) and Exhibit 4 (SPD-3, SPD-4 and SPD-5).

Issue 4: What is the location, type, and capacity of each utility's facilities in the areas identified in response to Issues 1 and 2 above?

Gulf Coast's position: Washington County: Crystal Lake substation near the Bay/Washington County line, 7,500kva, 115kv/25kv. Distribution facilities served at 25kv backup available from north circuit Southport substation/Bay County.

Bay County: Bayou George South 8,000kva, 46kv to 25kv; Bayou George North 10,000kva, 115kv/25kv; Fountain 7,500kva, 115kv/25kv; Southport 15,000kva, 115kv/25kv.

Distribution facilities served by main distribution feeders from substations at 25kv from flexible switching system.

Issue 5: Is each utility capable of providing adequate and reliable electric service to the areas identified in response to Issues 1 and 2 above?

Gulf Coast's position: Yes.

Issue 6: How should the Commission establish the territorial boundary between

Gulf Power and Gulf Coast in South Washington and Bay Counties where the electric facilities are co-mingled, and in close proximity and further uneconomic duplication of facilities is likely to occur?

Gulf Coast's position: Review maps furnished by the utilities Exhibit 2 (AWG-2, AWG-3, AWG-5 and AWG-6), Exhibit 4 (SPD-3, SPD-4 and SPD-5), Exhibit 6 (WCW-1). Draw a territorial boundary so that further co-mingling, crossing, construction of facilities in close proximity, and where further uneconomic duplication is likely, will be avoided following Gordon criteria T-26/1-14 and Daniel criteria T-64/1-15.

Issue 7: Where should the territorial boundary be established?

Gulf Coast's position: The territorial boundary should be established as described in Mr. Gordon's direct testimony and as detailed on Exhibit 2 (AWG-3 and AWG-6 and the written description in AWG-4 and AWG-7).



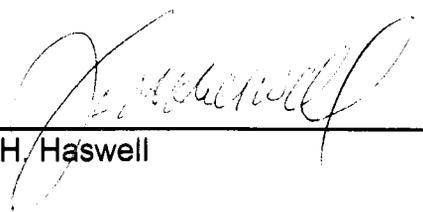
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. mail to the following:

| | |
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this 12 day of September, 1997.



John H. Haswell