

One Energy Place
Pensacola, Florida 32520

850.444.6111



January 27, 1999

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. 990001-EI
Transmission Reconsideration

Enclosed are an original and ten copies of Susan Ritenour's revised testimony to be filed in the above docket. Please replace the original testimony that was filed on October 14, 1998 in my former name, Cranmer, with this revised testimony.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Ritenour".

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

Enclosures

cc: Beggs & Lane
Jeffrey A. Stone, Esquire

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE
COMMISSION

DOCKET NO. 990001-EI

PREPARED DIRECT TESTIMONY
OF
SUSAN D. RITENOUR

**TRANSMISSION
RECONSIDERATION**

January 27, 1999



1 GULF POWER COMPANY

2 Before the Florida Public Service Commission
3 Prepared Direct Testimony of
4 Susan D. Ritenour
5 Docket No. 990001-EI
6 Transmission Reconsideration
7 Date of Filing: Revised January 27, 1999

8 Q. Please state your name, business address and occupation.

9 A. My name is Susan Ritenour. My business address is One
10 Energy Place, Pensacola, Florida 32520-0780. I hold the
11 position of Assistant Secretary and Assistant Treasurer
12 for Gulf Power Company.

13 Q. Please briefly describe your educational background and
14 business experience.

15 A. I graduated from Wake Forest University in
16 Winston-Salem, North Carolina in 1981 with a Bachelor of
17 Science Degree in Business and from the University of
18 West Florida in 1982 with a Bachelor of Arts Degree in
19 Accounting. I am also a Certified Public Accountant
20 licensed in the State of Florida. I joined Gulf Power
21 Company in 1983 as a Financial Analyst. Prior to
22 assuming my current position, I have held various
23 positions with Gulf including Computer Modeling Analyst,
24 Senior Financial Analyst, and Supervisor of Rate
25 Services.

1 My responsibilities include supervision of: tariff
2 administration, cost of service activities, calculation
3 of cost recovery factors, the regulatory filing function
4 of the Rates and Regulatory Matters Department, and
5 various treasury activities.

6

7 Q. Have you previously filed testimony before this
8 Commission in Docket No. 990001-EI?

9 A. Yes, I have.

10

11 Q. What is the purpose of your testimony?

12 A. The purpose of my testimony is to discuss the allocation
13 of transmission revenues associated with economy sales
14 transactions between the retail and wholesale
15 jurisdictions.

16

17 Q. What is the proper jurisdictional separation factor for
18 allocating transmission revenues between the retail and
19 wholesale jurisdictions?

20 A. A transmission-related separation factor, based on
21 coincident peak demand, properly allocates transmission
22 revenues between the retail and wholesale jurisdictions.
23 This is consistent with the way in which the
24 transmission-related plant costs and operation and
25 maintenance expenses were allocated in Gulf's last rate

1 case.

2

3 Q. Does Gulf propose to use a demand allocator to calculate
4 the amount of transmission revenues to flow through the
5 fuel clause?

6 A. No. For administrative simplicity, Gulf proposes to
7 allocate the transmission revenues flowed through the
8 fuel clause based on energy sales adjusted for line
9 losses, as it has been doing for transmission revenues
10 related to economy sales effective January 1997 pursuant
11 to Commission Order No. PSC-98-0073-FOF-EI dated
12 January 13, 1998. For Gulf Power, the energy allocator
13 and the demand allocator are very similar. For 1997,
14 the average energy allocator was 96.61503%, and for 1998
15 through August, the average energy allocator was
16 96.63689%. In Gulf's last rate case, the transmission-
17 related investment and expenses were allocated based on
18 coincident peak demand. For the period January 1997
19 through August 1998, the corresponding demand allocator
20 was 96.31890% based on 1995 actual load data. This same
21 allocator was used in the capacity and environmental
22 cost recovery clause filings. For the period January
23 1997 through August 1998, \$522,868 of transmission
24 revenues would have been allocated to the retail
25 jurisdiction using the 96.31890% demand allocator. The

1 actual revenue flowed through the fuel clause during
2 that 20-month period based on energy allocators was
3 \$524,260, or \$1,392 more than would have been returned
4 to the customer using the demand allocator. Changing
5 the allocation for these transmission revenues would
6 require fairly substantial changes to Gulf's over/under
7 recovery calculation each month, and to the actual "A"
8 schedules filed each month and the final true-up and
9 projection schedules, each filed annually. In summary,
10 due to the immateriality of the difference in the energy
11 and demand allocators for Gulf Power and the
12 administrative costs involved with changing the
13 allocator for the transmission revenues associated with
14 economy sales, Gulf is proposing to continue using the
15 energy allocator to flow these transmission revenues
16 through the fuel clause to its customers.

17

18 Q. Ms. Ritenour, does this complete your testimony?

19 A. Yes, it does.

20

21

22

23

24

25

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

Docket No. 990001-EI

Before me the undersigned authority, personally appeared Susan D. Ritenour, who being first duly sworn, deposes, and says that she is the Assistant Secretary and Assistant Treasurer of Gulf Power Company, a Maine corporation, that the foregoing is true and correct to the best of her knowledge, information, and belief. She is personally known to me.

Susan D. Ritenour
Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

Sworn to and subscribed before me this 27th day of January,
1999.

Linda C. Webb
Notary Public, State of Florida at Large



LINDA C. WEBB
Notary Public-State of FL
Comm. Exp: May 31, 2002
Comm. No: CC 725900

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost)
Recovery Clause with Generating)
Performance Incentive Factor)
_____)

Docket No. 990001-EI
TRANSMISSION RECONSIDERATION

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail this 27th day of January 1999 on the following:

Leslie J. Paugh, Esquire
FL Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0863

Lee L. Willis, Esquire
James D. Beasley, Esquire
Ausley & McMullen
P. O. Box 391
Tallahassee FL 32302

Jack Shreve, Esquire
Office of Public Counsel
111 W. Madison St., Suite 812
Tallahassee FL 32399-1400

John W. McWhirter, Jr., Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
P. O. Box 3350
Tampa FL 33601-3350

James McGee, Esquire
Florida Power Corporation
P. O. Box 14042
St. Petersburg FL 33733-4042

Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee FL 32302-0551

Matthew M. Childs, Esquire
Steel, Hector & Davis
215 South Monroe, Suite 601
Tallahassee FL 32301-1804

Suzanne Brownless, Esquire
Miller & Brownless, P.A.
1311-B Paul Russell Road
Suite 201
Tallahassee FL 32301

Joseph A. McGlothlin, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 S. Gadsden Street
Tallahassee FL 32301



JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 0007455
BEGGS & LANE
P. O. Box 12950
Pensacola FL 32576
(850) 432-2451
Attorneys for Gulf Power Company