

HOPPING GREEN SAMS & SMITH

PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

FAX (850) 425-3415

Writer's Direct Dial No.

(904) 425-2313

March 24, 1999

JAMES S. ALVES
BRIAN H. BIBEAU
RICHARD S. BRIGHTMAN
KEVIN B. COVINGTON
PETER C. CUNNINGHAM
RALPH A. DEMEO
RANDOLPH M. GIDDINGS
WILLIAM H. GREEN
WADE L. HOPPING
GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
FRANK E. MATTHEWS
RICHARD D. MELSON
ANGELA R. MORRISON
GABRIEL E. NIETO
ERIC T. OLSEN

GARY V. PERKO
MICHAEL P. PETROVICH
DAVID L. POWELL
WILLIAM D. PRESTON
CAROLYN S. RAEPPLE
DOUGLAS S. ROBERTS
GARY P. SAMS
TIMOTHY G. SCHOENWALDER
ROBERT P. SMITH
DAN R. STENGLE
CHERYL G. STUART
W. STEVE SYKES
T. KENT WETHERELL, II
OF COUNSEL
ELIZABETH C. BOWMAN

Ms. Blanca S. Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Petition of Gulf Power Company to Determine Need for
Proposed Electrical Power Plant in Bay County, Florida
Docket No. 990325-EI

Dear Ms. Bayó:

Enclosed for filing on behalf of Gulf Power Company are the original and fifteen copies of its Preliminary Statement Regarding Issues and Positions.

By copy of this letter, this document has been furnished to the parties on the attached service list.

RECEIVED & FILED

Very truly yours,


FPSC-BUREAU OF RECORDS

Richard D. Melson

ACK ✓
AFA 2
APP _____
CAF _____ RDM/kcg
 _____ Enclosures
CMU _____ cc: Jeff Stone
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Gulf Power Company to
Determine Need for Proposed Electrical
Power Plant in Bay County, Florida

Docket No.: 990325-EI
Filed: March 24, 1999

**PRELIMINARY STATEMENT OF GULF POWER COMPANY
REGARDING ISSUES AND POSITIONS**

Gulf Power Company, ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned attorneys, hereby files this preliminary statement of issues and positions, saying:

Need Determination Issues

ISSUE 1: Has Gulf Power Company demonstrated a need for the proposed power plant, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, Florida Statutes?

GULF: Yes.

ISSUE 2: Has Gulf Power Company demonstrated a need for the proposed power plant, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519, Florida Statutes?

GULF: Yes.

ISSUE 3: Has Gulf Power Company demonstrated that the proposed power plant is the most cost-effective alternative available, as this criterion is used in Section 403.519, Florida Statutes?

GULF: Yes.

ISSUE 4: Are there any conservation measures taken by or reasonably available to Gulf Power Company which might mitigate the need for the proposed power plant?

GULF: No.

ISSUE 5: Should the Commission grant Gulf Power Company's petition to determine need for the proposed power plant?

GULF: Yes.

ISSUE 6: Should this docket be closed?

GULF: Yes.

RESPECTFULLY SUBMITTED this 24 th day of March, 1999.

By: *Richard D. Melson*
RICHARD D. MELSON
Fla Bar No. 201243
Hopping Green Sams & Smith, P.A.
Post Office Box 6526
Tallahassee, Florida 32314
(850) 222-7500

JEFFREY A. STONE
Fla. Bar No. 325953
RUSSELL A. BADDERS
Fla. Bar No. 007455
Beggs & Lane
P.O. Box 12950
Pensacola, FL 32576-2950
(850)432-2451

Attorneys for Gulf Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 24th day of March, 1998.

Grace Jaye (*)
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Richard D. [unclear]

Attorney