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ORIGINAL



August 6, 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. 971006-EG

Enclosed is an original and fifteen copies of the Prehearing Statement of Gulf Power Company to be filed in the above docket.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Statement in WordPerfect for Windows 8 format as prepared on a Windows NT based computer.

Sincerely,

Susan D. Ritenour

AFA	_____	
APP	_____	Susan D. Ritenour
CAF	_____	Assistant Secretary and Assistant Treasurer
CMJ	_____	
CTR	_____	
EAG	<i>Staff</i>	W
LEG	_____	
MAS	<u>5</u>	Enclosures
OPC	_____	
RRR	_____	
SEC	<u>1</u>	cc: Beggs and Lane
WAW	_____	Jeffrey A. Stone, Esquire
OTH	_____	

DOCUMENT NUMBER-DATE

09448 AUG-99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Adoption of numeric conservation goals by Gulf Power Company

Docket No.: 971006-EG
Filed: August 9, 1999

PREHEARING STATEMENT OF GULF POWER COMPANY

Gulf Power Company, ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned attorneys, and pursuant to Rule 25-22.038(3), Florida Administrative Code, files this prehearing statement, saying:

A. APPEARANCES:

JEFFREY A. STONE, Esquire, and RUSSELL A. BADDERS, Esquire, of Beggs & Lane, 700 Blount Building, 3 West Garden Street, P.O. Box 12950, Pensacola, FL 32576-2950
On behalf of Gulf Power Company.

B. WITNESSES: All witnesses known at this time, who may be called by Gulf Power Company, along with the subject matter and issue numbers which will be covered by the witness' testimony, are as follows:

	<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
<u>(Direct)</u>			
1.	M. D. Neyman (Gulf)	Propose seasonal peak demand and annual energy conservation goals for period 2000 through 2009	1, 2
2.	M. J. McCarthy (Gulf)	Cost-effectiveness evaluation	1, 2

C. EXHIBITS:

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>
<u> </u> (MDN-1)	Neyman	Gulf Power Company Residential, Commercial/Industrial goals, comparison of current and proposed goals, and comparison of achieved kW and kWh reductions
<u> </u> (MJM-1)	McCarthy	Total residential, commercial and industrial goals. Residential, commercial and industrial proposed goals and measures.

D. STATEMENT OF BASIC POSITION:

Gulf Power Company's Statement of Basic Position:

It is the basic position of Gulf Power Company that the proposed goals are reasonably achievable for the residential and commercial/industrial classes during the period 2000 through 2009 and that said goals should be approved by the Florida Public Service Commission.

E. STATEMENT OF ISSUES AND POSITIONS:

Gulf Power Company Issues

ISSUE 5: What should be Gulf's annual residential winter KW, and KWh conservation goals for the period 2000 - 2009?

GULF: The following table contains the overall goals Gulf deems reasonably achievable for the residential classes during the period 2000 through 2009.

<u>Year</u>	<u>Summer Peak KW Reduction (at Generator)</u>	<u>Winter Peak KW Reduction (at Generator)</u>	<u>Annual MWH Reduction (at Generator)</u>
2000	22,331	26,009	16,719
2001	43,092	50,008	31,770
2002	67,894	78,744	49,753
2003	89,031	103,234	65,238
2004	107,465	124,603	78,904
2005	123,197	142,850	90,751
2006	135,075	156,606	99,885
2007	146,953	170,363	109,018
2008	154,977	179,628	115,437
2009	163,002	188,894	121,857

ISSUE 6: What should be Gulf's annual commercial/industrial winter KW, summer KW, and KWh conservation goals for the period 2000 - 2009?

GULF: The following table contains the overall goals Gulf deems reasonably achievable for the commercial/industrial classes during the period 2000 through 2009.

<u>Year</u>	<u>Summer Peak KW Reduction (at Generator)</u>	<u>Winter Peak KW Reduction (at Generator)</u>	<u>Annual MWH Reduction (at Generator)</u>
2000	46,069	36,130	2,103
2001	47,395	37,274	4,172
2002	48,718	38,415	6,239
2003	50,041	39,555	8,307
2004	51,365	40,696	10,378
2005	52,689	41,838	12,452
2006	54,014	42,980	14,529
2007	55,340	44,123	16,608
2008	56,666	45,266	18,690
2009	57,993	46,410	20,774

F. STIPULATED ISSUES:

GULF: On June 11, 1999, Gulf and the Legal Environmental Assistance Foundation, Inc. (LEAF), entered into a stipulation resolving all issues between them in this docket. LEAF agreed to withdraw from this docket upon the Commission's approval of the stipulation. On June 29, 1999, the Commission voted to approve the stipulation between Gulf and LEAF. Gulf is willing to stipulate that the testimony of all witnesses whom no one wishes to cross examine be inserted into the record as though read, cross examination be waived, and the witness's attendance at the hearing be excused.

G. PENDING MOTIONS:

GULF: Addendum to Petition for approval of numeric conservation goals by Gulf power Company was filed on July 14, 1999.

H. OTHER MATTERS:

GULF: To the best knowledge of counsel, Gulf has complied, or is able to comply, with all requirements set forth in the orders on procedure and/or the Commission rules governing this prehearing statement. If other issues are raised for determination at the hearings set for August 17, 1999, Gulf respectfully requests an opportunity to submit additional statements of position and, if necessary, file additional testimony.

Dated this 6 th day of August, 1999.

Respectfully submitted,



JEFFREY A. STONE

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Florida Bar No. 7455

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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Adoption of numeric Conservation Goals by Gulf Power Company)
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Docket No. 971006-EG

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 6th day of August 1999 by U.S. Mail or hand delivery to the following:

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