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GULF COAST ELECTRIC COOPERATIVE, INC.

A Touchstone Energy® Partner

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October 20, 1999

Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32301

RE: DOCKET NUMBER: 930885-EU/PSC Order Numbers 98-0174-FOF-EU and
PSC 98-0793-PCO-EU

Dear Ms. Bayo:

Gulf Power Company ("GPC") recently sent a letter to the Commission dated September 2, 1999, referring to the above-listed Orders and the requirements that GPC and Gulf Coast Electric Cooperative, Inc. (GCEC) submit procedures and guidelines for resolving issues on new service requests. GPC included a letter from GCEC dated August 25, 1999, addressed to GPC, which accurately states the position of GCEC in regard to the resolution of requests for new service, and the resolution of future disputes using the current system of policies, guidelines, and procedures.

After further review of GPC's letter of September 2, 1999, GCEC deems it appropriate to advise the Commission directly that its position on the subject matter is as stated in its August 25, 1999 letter to Mr. Fisher of GPC.

While GCEC acknowledges that GPC would prefer the adoption of GEH-3 as a policy or guideline, GPC's letter of August 9, 1999 (included in its September 2, 1999 letter to the Commission) clearly states "our position has been and continues to be that future uneconomic duplication of electric facilities can be easily avoided by these two utilities through the application of and compliance with guidelines previously established by the Commission or through refinements such as those set forth in Exhibit GEH-3 or Exhibit GEH-4." (emphasis added). GCEC has acquiesced to the GPC position that: "...future uneconomic duplication of electric facilities can be easily avoided by these two utilities through the application of and compliance with guidelines previously established by the Commission...", in light of the Supreme Court's opinion on the subject matter.

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Blanca Bayo, Director
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October 20, 1999
Page 2

Please advise if any further proceedings in this matter are required.

Sincerely,

A handwritten signature in black ink that reads "Roy Barnes". The signature is written in a cursive style with a large, prominent "R" and "B".

Roy Barnes
Chief Executive Officer and General Manager of
Gulf Coast Electric Cooperative, Inc.

RB/ps

CC: Robert V. Elias, Esquire
Susan Ritenour
J. Patrick Floyd, Esquire