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PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

ORIGINAL

c/o The Florida Legislature  
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Tallahassee, Florida 32399-1400  
850-488-9330

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RECORDS AND  
REPORTING

April 16, 2001

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

RE: Docket No. 000808-EI

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Public Counsel's Requests for Admission Propounded to Gulf Power Company for filing in the above-referenced docket.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Robert D. Vandiver  
Associate Public Counsel

RDV/dsb  
Enclosures

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DOCUMENT NUMBER-DATE  
04653 APR 16 01  
FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for approval of Consumptive )  
Water Use Monitoring Activity and Smith )  
Wetlands Mitigation Plan as New Programs )  
for cost recovery through the Environmental )  
Cost Recovery Clause by Gulf Power Company )  
\_\_\_\_\_ )

Docket No. 000808-EI  
Filed: April 16, 2001


**PUBLIC COUNSEL'S REQUESTS FOR ADMISSION  
PROPOUNDED TO GULF POWER COMPANY**

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to Rule 1.370, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, propound the following requests for admission to Gulf Power Company:

**REQUESTS FOR ADMISSION**

1. Prior to this docket, no utility has requested recovery of new plant construction costs through the Environmental Cost Recovery Clause.
2. The Florida Public Service Commission has not previously approved new plant construction costs for Gulf Power Company through the Environmental Cost Recovery Clause.
3. The Florida Public Service Commission has not previously approved new plant construction costs for any utility through the Environmental Cost Recovery Clause.

Respectfully submitted,

  
\_\_\_\_\_  
Robert D. Vandiver  
Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

(850) 488-9330

DOCUMENT NUMBER-DATE

04653 APR 16 2001

FPSC-RECORDS/REPORTING

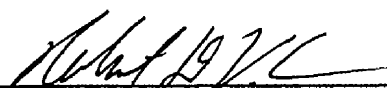
**CERTIFICATE OF SERVICE  
DOCKET NO. 000808-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing PUBLIC COUNSEL'S REQUESTS FOR ADMISSION PROPOUNDED TO GULF POWER COMPANY has been furnished by U.S. Mail or \*Hand-delivery to the following parties on this 16th day of April, 2001.

Robert V. Elias, Esquire\*  
Marlene Stern, Esquire\*  
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Florida Public Service Commission  
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\_\_\_\_\_  
Robert D. Vandiver  
Associate Public Counsel