

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company's petition for approval of purchased power arrangement regarding Smith Unit 3 for cost recovery through recovery clauses dealing with purchased capacity and purchased energy.

Docket No.: 010827 -EI
Date Filed: June 8, 2001

MOTION FOR EXPEDITED TREATMENT AND REQUEST FOR PROCEDURAL SCHEDULE

1. Notices and communications with respect to this Notice should be addressed to:

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2. Gulf Power Company's ("Gulf Power", "Gulf", or the "Company") petition for approval of purchased power arrangement regarding Smith Unit 3 for cost recovery through recovery clauses dealing with purchased capacity and purchased energy, hereinafter "the Petition", is being filed simultaneously with this document. As mentioned in paragraph 17 of the petition, Gulf seeks Florida Public Service Commission ("Commission") approval of an expedited procedural schedule and expedited decision on the petition.

3. The relief requested by Gulf in the Petition is time sensitive in nature due to the deadline for filing Gulf's cost recovery clause projections for the 2002 time period. Such projections are due to be filed by September 20, 2001. Gulf requests a final ruling on this petition with regard to whether the proposed purchased power arrangement is appropriate for cost recovery through both the capacity cost recovery clause and the fuel and purchased power energy

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clause prior to the end of August in order to allow the Company to consider the results in the upcoming projection filings due in September and also to provide an opportunity to obtain approval of the agreement by the FERC prior to the cost recovery hearings set for November in Docket No. 010001-EI. The Company specifically requests that the Commission set this matter for an early hearing during the week of July 23 and issue a final decision on this proposal no later than the August 14, 2001 Commission Conference Agenda. This time frame will allow for the inclusion of such costs in the calculations of cost recovery factors effective during calendar year 2002 consistent with the June 1, 2002 projected in-service date of Smith Unit 3. This schedule is also necessary so that an appropriate request for approval can be filed with the FERC after this Commission has indicated that it approves the arrangement. In order to implement the proposed purchased power arrangement, it is necessary to ensure that all required regulatory approvals are finalized in time to facilitate the transfer of ownership of Smith Unit 3 on or before the commercial in-service date. As is the case with all costs recovered through the cost recovery clauses, costs incurred by Gulf pursuant to the proposed purchased power arrangement regarding Smith Unit 3 would be subject to true-up if the actual in-service date varies from the projected in-service date.

4. Exhibit "A" to this motion is a proposed procedural schedule that would allow Gulf to meet the deadlines expressed in paragraph 3 above.

5. Gulf is mindful of the numerous dockets and complex issues that are currently before the Commission, and the burden that seeking expedited treatment of its petition may place on Commissioners, staff and interested parties such as OPC. Unfortunately many of those dockets and related issues are likely to continue to take a significant amount of Commission

attention for some time. We recognize that the suggested expedited procedural schedule is tight and we are willing to work with all parties to address any concerns or issues as necessary to provide an opportunity for the petition to be addressed in a timely manner. A copy of our petition, notice of intent to seek confidential status for the PPA, and this motion have been hand delivered to the parties shown on the Certificate of Service, and we are available to meet with interested parties on short notice to facilitate progress on the procedural aspects of this petition. Gulf represents to the Commission that the Company intends to provide responses to all reasonable data requests on an expedited basis and is willing to meet with the Commission Staff and others upon request to address questions regarding the proposal.

6. Gulf hereby requests that the Chairman appoint a prehearing officer to handle procedural matters including scheduling and confidentiality issues as soon as reasonably possible so that all parties can review relevant information and be prepared for the proposed July 27, 2001 hearing date.

Respectfully submitted this 8<sup>th</sup> day of June, 2001.



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**EXHIBIT "A"**

**PROPOSED EXPEDITED PROCEDURAL SCHEDULE**

<u>Event/Activity</u>	<u>Date</u>
Petition filed	6/08/01
Issue ID Meeting	6/13/01
Direct Testimony of GPC Due	6/18/01
Responses to Discovery Complete	7/02/01
Intervenor/Staff Testimony Due	7/09/01
Rebuttal Testimony Due	7/12/01
Prehearing Statements Due	7/12/01
Prehearing Conference	7/20/01
Prehearing Order	7/25/01
Hearing	7/27/01
Closing Arguments/Bench Decision	7/27/01
Staff Recommendation if no Bench Decision	8/02/01
FPSC Decision at Agenda Conference	8/14/01
Final Order Issued	8/24/01, or earlier if bench decision

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Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 21th day of June 2001 by U.S. Mail or hand delivery to the following:

Delivered by Hand:

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Delivered by Mail:

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[Handwritten signature of Jeffrey A. Stone]

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