



**West Florida Electric  
Cooperative Association, Inc.**

A Touchstone Energy<sup>SM</sup> Partner



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July 30, 2001

Blanca S. Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0985

RECEIVED - FPSC  
01 JUL 30 PM 4:14  
COMMISSION  
CLERK

RE: Docket No.: 010441-EU

Dear Ms. Bayo:

Enclosed is the original and 15 copies of the Direct Testimony of the following individuals:

- William S. Rimes** - 09271-01
- Russell L. Dunaway** - 09272-01
- Gary F. Clark** - 09273-01
- Joseph E. Perry, III P.E.** 09274-01
- Jeff Parish** 09275-01
- Damon Morgan** 09276-01
- James A. Brook** 09277-01

Also, enclosed herewith the direct testimonies is a self-addressed stamped envelope and a copy of this letter. Will you kindly date stamp and return the copy to the address printed on the envelope.

If you have any questions, please call.

Sincerely,

Gary F. Clark, C.E.M.  
Vice President, Member Services

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM 308
- CTR \_\_\_\_\_
- EGR \_\_\_\_\_
- LEG T
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC T
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

/bma

Enclosure

xc: John H. Haswell, Esquire  
Jeffrey A. Stone, Esquire

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Territorial Dispute Between  
West Florida Electric Cooperative  
Association, Inc. and Gulf Power  
Company in Washington County,  
Florida.

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Docket No.: 010441-EU

Date Filed: July 30, 2001

**DIRECT PREFILED TESTIMONY**

**OF**

**JOSEPH E. PERRY, III, P.E.**

**FOR**

**WEST FLORIDA ELECTRIC  
COOPERATIVE ASSOCIATION, INC.**

DOCUMENT NUMBER-DATE

09274 JUL 30 01

FPSC-COMMISSION CLERK

1 West Florida Electric Cooperative Association, Inc.

2 Before the Florida Public Service Commission

3 Prepared Direct Testimony of

4 Joseph E. Perry, III, P.E.

5 Docket No. 010441-EU

6 Date of Filing: July 30, 2001

7

8 Q. Would you please state your name and business address?

9 A. My name is Joseph E. Perry, III, P.E. and my business address is  
10 2685 Millscott Drive, Decatur, Georgia 30033.

11 Q. By whom are you employed?

12 A. I am employed by Patterson & Dewar Engineers, Inc. as a  
13 professional engineer, Vice President, and Chief Electrical  
14 Engineer. I have worked for my employer since 1973.

15 Q. Could you please provide us with a summary of your educational  
16 and professional background?

17 A. I am a graduate Engineer and received a B.S. Degree in Electrical  
18 Engineering from Old Dominion University, Norfolk, Virginia in  
19 1967. I also completed courses in Protective Relaying for Electric  
20 Utilities at the Electrical Graduate School, Georgia Institute of  
21 Technology, Atlanta, Georgia in 1979 and 1980. I am a  
22 Professional Engineer and I am licensed in Alabama, Florida,  
23 Georgia, Kentucky, Mississippi, North Carolina and Tennessee.

24 Q. Please briefly review your employment history.

25 A. In 1967 I was an Electrical Engineer at NASA Langley Research

1 Center, Hampton, Virginia; from 1968 to 1972 I was an Electrical  
2 Engineer at the U.S. Air Force System's Command, Cape  
3 Kennedy, Florida; from 1972 to 1973 I was a Systems Engineer at  
4 Boeing's Atlanta Test Center at the Kennedy Space Center in  
5 Florida; from 1973 to 1986 I was a Senior Electrical Engineer at  
6 Patterson & Dewar Engineers, Inc.; and from 1986 to the present  
7 time, I am Vice President and Chief Electrical Engineer at  
8 Patterson & Dewar Engineers, Inc. I am a member of Pi Kappa  
9 Phi National Fraternity; a Senior Member of the Power  
10 Engineering Society of the Institute of Electrical & Electronic  
11 Engineers (IEEE).

12 Q. What are your primary job functions?

13 A. I am a consulting electrical engineer for various electric  
14 cooperatives in the Southeast, assisting in the following broad  
15 areas: engineering planning, system load modeling and analysis,  
16 economic justification of capital outlays, budgeting, system  
17 mapping, substation design, equipment specifications, system  
18 protection, construction contract development and bidding, load  
19 forecast, motor starting calculations, support efforts for securing  
20 loan capital, etc. At Patterson & Dewar, I am responsible for  
21 engineering methods and procedures, standards and  
22 specifications required for engineering consulting work.

23 Q. What is the purpose of your testimony?

24 A. The purpose of my testimony is to review the existing and planned  
25 load to be served in the disputed area involved in the territorial

1           dispute between West Florida Electric Cooperative Association,  
2           Inc. and Gulf Power Company in Docket No. 010441-EU.

3           Basically the staff has identified nine issues and my responsibility  
4           is to address at least issues 3, 5 and 8.

5    Q.    What is the existing and planned load to be served in the disputed  
6           area prior to the discovery that FGT/Enron was planning on  
7           adding additional capacity to its compressor station at Station 13?

8    A.    The existing West Florida Electric Cooperative Association's  
9           ("West Florida") load is approximately 3000 kw. The load is  
10          projected to grow approximately 2% per year reaching the level of  
11          4500 in the next 18 to 20 years.

12   Q.    Are the planned electrical facility additions and other utility  
13          services to be provided within the disputed area reasonably  
14          expected to cause a decline in the reliability of the service to  
15          existing and future utility customers of West Florida?

16   A.    No, as the new Hinson Crossroads delivery point is being  
17          constructed to serve exclusively the load requirements of the new  
18          consumer and is not anticipated for the existing electric utility load  
19          in related service area.

20   Q.    Will the actions of either West Florida or Gulf Power Company  
21          cause uneconomic duplication of electric facilities with regard to  
22          serving the load in the disputed area?

23   A.    Constructing a new Hinson Crossroad substation, including the  
24          transmission and distribution lines associated with such a new  
25          substation delivery point would not cause uneconomic duplication

1 of electric facilities. A new strong power source is required to  
2 serve the new Enron load in question, and cannot be served  
3 without the new facility.

4 Q. What is your relationship with West Florida Electric Cooperative  
5 Association, Inc. ("WFEC") of Graceville, Florida?

6 A. I have been their consultant since approximately 1975 assisting  
7 them as their professional client engineer performing the various  
8 tasks indicated above on an "as needed" basis. I am thoroughly  
9 familiar with WFEC's system both for their current, as well as their  
10 long range needs. I completed their long range system study in  
11 1992 and recently completed their 2001-2003 Construction Work  
12 Plan identifying the needed projects and capital outlays for the  
13 next three years.

14 Q. Are you familiar with Alabama Electric Cooperative, Inc. ("AEC") of  
15 Andalusia, Alabama?

16 A. Yes. AEC is a generating and transmission ("G&T") cooperative  
17 serving the electric supply needs to over 16 cooperatives, 4  
18 municipalities and 1 industry. I have worked with them over the  
19 last 25 years negotiating new delivery points, substation upratings,  
20 and system protection schemes, and recloser control settings for  
21 my clients. As a matter of fact, I was involved in the initial  
22 decision of WFEC becoming a member of AEC back in the late  
23 70's. I have been a part of their engineering planning meetings for  
24 their member systems, and find the organization to be highly  
25 professional, and very capable of providing whatever needs an

1 electric distributor may have. This is with my knowledge of other  
2 G&T's in the states of Florida, Kentucky, Mississippi, and Georgia.

3 Q. Based on your knowledge and experience in dealing with West  
4 Florida, understanding its system, its transmission and distribution  
5 facilities, work plans and long-range planning, can you state  
6 whether or not West Florida is currently providing adequate and  
7 reliable service to its customers, and is capable of providing  
8 adequate and reliable service to the FGT/Enron compressor  
9 Station 13-A.

10 A. Yes. West Florida is currently providing adequate and reliable  
11 service to its members, and with its power supplier AEC, will  
12 definitely be capable of providing adequate and reliable service to  
13 the FGT/Enron Station 13-A.

14 Q. Does this conclude your testimony?

15 A. Yes, at this time it does.

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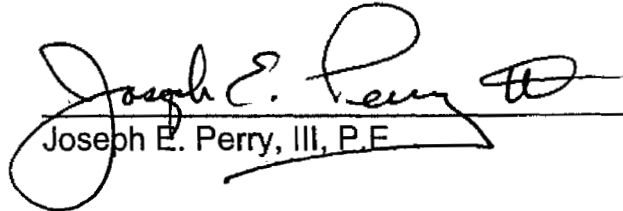
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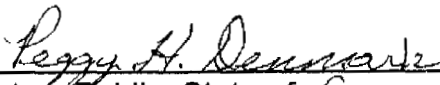
STATE OF GEORGIA

COUNTY OF DEKALB

BEFORE ME, the undersigned authority personally appeared JOSEPH E. PERRY, III, P.E., who being by me first duly sworn and who is personally known to me, deposed and says that the foregoing Pre-Filed Direct Testimony and Exhibits, if any, are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
Joseph E. Perry, III, P.E.

Sworn to and subscribed before me this 25<sup>th</sup> day of July, 2001.

  
\_\_\_\_\_  
Notary Public, State of Georgia  
Print Name: Peggy H. Denmark  
Commission Number: \_\_\_\_\_  
Commission Expiration Date: \_\_\_\_\_  
Notary Public, DeKalb County, Georgia  
My Commission Expires August 31, 2002