



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

A Touchstone EnergySM Partner



ORIGINAL

P.O. Box 127
Graceville, FL 32440-0127
(850) 263-3231
Toll Free Florida: 1-800-342-7400
Web Address: www.wfeca.net

P.O. Box 37
Bonifay, FL 32425-0037
(850) 547-9325

P.O. Box 1100
Sneads, FL 32460-1100
(850) 593-6491

August 22, 2001

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FPSC-COMMISSION CLERK

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

VIA HAND DELIVERY

RE: In Re: Territorial Dispute Between West Florida Electric Cooperative Association, Inc. and Gulf Power Company in Washington County, Florida
Docket No.: 010441-EU

Dear Ms. Bayo:

I am enclosing herewith the originals and fifteen (15) copies of the Rebuttal Testimony of Jeff Parish, Joseph E. Perry, III, P.E., Mark A. Cicchetti, Michael K. Moore, P.E. and Russell L. Dunaway filed on behalf of West Florida Electric Cooperative Association, Inc.

I am also enclosing a copy of this letter as an acknowledgement copy and would appreciate it if you would file stamp it and return it to me in the enclosed self-addressed/stamped envelope as an acknowledgement of the date the above Rebuttals were filed. Please call me if you have any questions regarding this matter.

Very truly yours,

Gary F. Clark

10407-01 thru 10411-01

GFC/daj
Enclosures

- cc: John H. Haswell, Esquire
Attorney for West Florida Electric Cooperative Association, Inc.
- Frank E. Bondurant, Esquire
Attorney for West Florida Electric Cooperative Association, Inc.
- William S. Rimes, Executive Vice President and CEO
West Florida Electric Cooperative Association, Inc.
- Jeffrey A. Stone, Esquire
Attorney for Gulf Power Company
- Russell A. Badders, Esquire
Attorney for Gulf Power Company

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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.

Docket No.: 010441-EU

Date Filed: August ____, 2001

PREPARED REBUTTAL

OF

JEFF PARISH

FOR

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

DOCUMENT NUMBER-DATE

10407 AUG 22 2001

FPSC-COMMISSION CLERK

1 West Florida Electric Cooperative Association, Inc.

2 Before the Florida Public Service Commission

3 Prepared Rebuttal Testimony of

4 Jeff Parish

5 Docket No. 010441-EU

6 Date of Filing: August 22, 2001

7

8 Q: Please state your name, business address and occupation.

9 A: My name is Jeff Parish, business address P. O. Box 550,
10 Andalusia, AL 36420. I am Vice President Bulk Power and
11 Delivery for Alabama Electric Cooperative, Inc. ("AEC").

12 Q: Are you the same Jeff Parish who submitted direct testimony in
13 this case dated July 30, 2001?

14 A: Yes.

15 Q: What is the purpose of your rebuttal testimony in this proceeding?

16 A: I will address a portion of the Joint Petition for Declaratory
17 Statement attached as an exhibit to the testimony of Tim Anthony,
18 certain allegations of Ted Spangenberg, Jr., and one aspect of the
19 testimony of M. W. Howell.

20 Q: What are your comments regarding the Joint Petition for
21 Declaratory Statement?

22 A: In my direct testimony, I went into considerable detail describing
23 AEC's transmission arrangements and its wheeling agreement
24 under the Southern Company Open Access Transmission Tariff
25 which gives AEC access to the transmission systems of all of the

1 Southern Company member operating companies, including Gulf
2 Power. I described the proposed method of service by AEC and
3 West Florida to Station 13A and AEC's application to Southern
4 Company Services, Inc. for transmission service to Station 13A. I
5 explained why I believe that AEC has access to Gulf Power's
6 transmission system to wheel power to this load at Station 13A
7 regardless of the "retail wheeling" issue raised by John Lucas of
8 Southern Company Services, Inc. I attached my letter of June 18,
9 2001, to Mr. Lucas and his reply of June 28, 2001, on this issue as
10 exhibits to my testimony, and described why I concluded that
11 transmission access could not be denied by Southern or Gulf
12 Power in this case. In the Joint Petition for Declaratory Statement,
13 paragraph 8, Gulf Power states that it owns and operates the only
14 existing 230kV transmission line in the area and that it owns,
15 maintains and operates all existing 230kV transmission facilities
16 that are located in Northwest Florida. Similarly, in paragraph 11,
17 Gulf Power alleges that its existing 230kV transmission line in
18 relatively close proximity of the site was instrumental in creating
19 this load. Gulf Power implied to this Commission that it is the only
20 party capable of serving this load because of its 230kV facilities in
21 the area, completely ignoring AEC's transmission access to the
22 same 230kV line. We suspect that Gulf also led ECS to believe
23 that Gulf Power is the only party capable of providing the 230kV
24 service, ignoring AEC's transmission access rights.

25 Q: What about Mr. Howell's testimony?

1 A: Mr. Howell indicates that Gulf concluded that the "only" way the
2 service could be provided "in accordance with the customer's
3 requirements" was from the 230kV line and that the starting
4 current rendered 115kV service impractical. As I indicated in my
5 direct testimony, it may very well be that it is impractical to serve
6 this load from Gulf Power's 115kV line with "across the line"
7 starting or a soft start. However, it is not clear that any
8 investigation was ever made using a soft start approach to starting
9 these motors on the 115kV system. Normally, a utility would be
10 interested in minimizing its investment and the impact on its
11 system by using a soft starting technique. It is unclear why that
12 was not considered here. Apparently, only "across the line"
13 starting was considered from Gulf's 115kV system. We can only
14 wonder if part of the reason for considering only "across the line"
15 starting was to support Gulf Power's contention to this
16 Commission and ECS that only Gulf can provide the service since
17 Gulf has the only 230kV source nearby. We have asked Southern
18 Company Services, Inc., in our transmission service request
19 regarding this load, to investigate "across the line" and soft start
20 from both Gulf Power's 115kV and 230kV lines nearby.

21 Q: What about Mr. Spangenberg's testimony?

22 A: Mr. Spangenberg alleges on page 13, lines 20-24, that West
23 Florida would have no ownership of facilities associated with this
24 service to Station 13A. As I stated in my direct testimony, AEC
25 intends to own the transmission facilities. West Florida intends to

1 own the distribution substation. Both AEC and West Florida would
2 make commitments to provide service to Station 13A. AEC would
3 be providing the same service here that it does for all its
4 members: generating capacity and energy plus transmission
5 service. In some cases, AEC owns the distribution substations
6 involved, but in some cases AEC's member systems choose to
7 own the distribution substations. West Florida is no more a front
8 for AEC here than in the other service AEC provides to West
9 Florida and its other members. The "vested interest" in serving
10 Station 13A is with West Florida. AEC will provide service to West
11 Florida under the same rate and terms and conditions as any
12 other member for any other load. West Florida will serve the retail
13 customer at Station 13A and charge a rate associated with its cost
14 of service.

15 Q: Spangenberg claims service by WFEC/AEC would result in
16 operating risks to ECS. Is that a correct statement?

17 A: No, it is not. First, our service reliability to the added load at
18 Station 13A will be at least as reliable as Gulf Power's, and likely
19 will present less risks to ECS due to the nearby location of AEC's
20 and WFEC's service centers.

21 Q: Do you have any concluding remarks?

22 A: Yes. Briefly, Mr. Spangenberg has attempted to mischaracterize
23 WFEC as an inept, out-of-date, social welfare operation, with no
24 ability to adequately serve its own member-consumers. It is
25 unfortunate that he tried to do that, but it may speak volumes

1 about Gulf Power's weak position. West Florida EC and AEC
2 together are not only capable of providing the service to ECS, they
3 can do it at least as well as Gulf Power or any other electric
4 service provider, for that matter.

5 Q: Does this conclude your rebuttal testimony?

6 A: Yes, it does.

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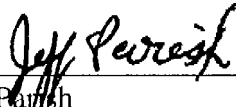
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AFFIDAVIT

STATE OF ALABAMA


COUNTY OF COVINGTON

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



Jeff Parish

Sworn to and subscribed before me this 22nd day of August, 2001.



Notary Public, State of ALABAMA
Print Name: Trisha Grissatt
Commission Number:
Commission Expiration Date: _____