BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 010001-EI

FUEL COST AND PURCHASED POWER COST RECOVERY CLAUSE

PREPARED DIRECT TESTIMONY AND EXHIBIT

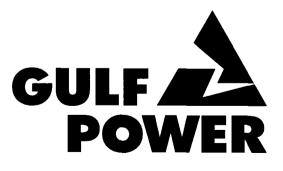
OF

M. W. HOWELL

FUEL COST RECOVERY
JANUARY 2002 – DECEMBER 2002

CAPACITY COST RECOVERY JANUARY 2002 – DECEMBER 2002

SEPTEMBER 20, 2001



A SOUTHERN COMPANY

11732 SEP 20 = FPSC-COMMISSION CLERK

1		GULF POWER COMPANY
2		Before the Florida Public Service Commission Direct Testimony and Exhibit of
3		M. W. Howell
4		Docket No. 010001-EI Date of Filing: September 20, 2001
5		
6	Q.	Please state your name, business address and occupation.
7	A.	My name is M. W. Howell, and my business address is One Energy Place
8		Pensacola, Florida 32520. I am Transmission and System Control
9		Manager for Gulf Power Company.
10		
11	Q.	Have you previously testified before this Commission?
12	A.	Yes. I have testified in various rate case, cogeneration, territorial dispute,
13		planning hearing, need determination, fuel clause adjustment, and
14		purchased power capacity cost recovery dockets.
15		
16	Q.	Please summarize your educational and professional background.
17	A.	I graduated from the University of Florida in 1966 with a Bachelor of
18		Science Degree in Electrical Engineering. I received my Masters Degree
19		in Electrical Engineering from the University of Florida in 1967, and then
20		joined Gulf Power Company as a Distribution Engineer. I have since
21		served as Relay Engineer, Manager of Transmission, Manager of System
22		Planning, Manager of Fuel and System Planning, and Transmission and
23		System Control Manager. My experience with the Company has included
24		all areas of distribution operation, maintenance, and construction;
25		transmission operation, maintenance, and construction; relaying and

11732 SEP 20 = FPSC-COMMISSION CLERK

protection of the generation, transmission, and distribution systems; planning the generation, transmission, and distribution systems; bulk power interchange administration; overall management of fuel planning and procurement; and operation of the system dispatch center.

I am a member of the Engineering Committees and the Operating Committees of the Southeastern Electric Reliability Council and the Florida Reliability Coordinating Council, and have served as chairman of the Generation Subcommittee of the Edison Electric Institute System Planning Committee. I have served as chairman or member of many technical committees and task forces within the Southern electric system, the Florida Electric Power Coordinating Group, and the North American Electric Reliability Council. These have dealt with a variety of technical issues including bulk power security, system operations, bulk power contracts, generation expansion, transmission expansion, transmission interconnection requirements, central dispatch, transmission system operation, transient stability, underfrequency operation, generator underfrequency protection, and system production costing.

- Q. What is the purpose of your testimony in this proceeding?
- 20 A. The purpose of my testimony is to support Gulf Power Company's (Gulf)
 21 projection of purchased power recoverable costs for energy purchases
 22 and sales for the period January 2002 December 2002. I will also
 23 support Gulf's projection of purchased power capacity costs for the
 24 January 2002 December 2002 recovery period. I will address the issues
 25 raised by the Commission Staff related to managing wholesale energy

1		transaction risks and the outage at Crist Unit 2. Finally, I will discuss a		
2		recent outage at Gulf's Plant Crist that will impact Gulf's actual purchased		
3		power costs for the remainder of 2001.		
4				
5	Q.	Have you prepared an exhibit that contains information to which you will		
6		refer in your testimony?		
7	A.	Yes. I have one exhibit to which I will refer. This exhibit was prepared		
8		under my supervision and direction.		
9				
10		Counsel: We ask that Mr. Howell's Exhibit MWH-1		
11		be marked for identification as		
12		Exhibit(MWH-1).		
13				
14	Q.	What is Gulf's projected purchased power recoverable cost for energy		
15		purchases for the January 2002 - December 2002 recovery period?		
16	A.	Gulf's projected recoverable cost for energy purchases, shown on line 12		
17		of Schedule E-1 of the fuel filing, is \$21,710,832. These purchases result		
18		from Gulf's participation in the coordinated operation of the Southern		
19		electric system (SES) power pool, as well as the cogeneration purchased		
20		power contract with Solutia, Inc. (Solutia) and market power purchases.		
21		This amount is used by Gulf's witness Ms. Davis as an input in the		
22		calculation of the fuel and purchased power cost adjustment factor.		
23				
24				
25				

- Q. 1 What is Gulf's projected purchased power fuel cost for energy sales for 2 the January 2002 - December 2002 recovery period?
- 3 Α. The projected fuel cost for energy sales, shown on line 18 of Schedule 4 E-1, is \$105,918,000. These sales also result from Gulf's participation in 5 the coordinated operation of the SES power pool. This amount is used by Gulf's witness Ms. Davis as an input in the calculation of the fuel and 6 7 purchased power cost adjustment factor.

9

- Q. What information is contained in your exhibit?
- 10 Α. My exhibit lists the long-term power contracts that are included for 11 capacity cost recovery, their associated megawatt amounts, the resulting 12 capacity dollar amounts, and the cost of market capacity purchases.

13

16

17

18

20

21

22

25

- Which power contracts produce capacity transactions that are recovered 14 Q. 15 through Gulf's purchased power capacity cost adjustment factor?
- Two power contracts that produce recoverable capacity transactions Α. through Gulf's purchased power capacity adjustment factor are the SES Intercompany Interchange Contract (IIC) and Gulf's cogeneration 19 purchased power contract with Solutia. The Commission has authorized the Company to include capacity transactions under the IIC for recovery through the purchased power capacity cost adjustment factor. Gulf will continue to have IIC capacity transactions during the January 2002 -23 December 2002 recovery period. The energy transactions under this 24 contract are handled for cost recovery purposes through the fuel cost adjustment factor.

1		The Gulf Power/Solutia cogeneration purchased power contract
2		enables Gulf to purchase 19 megawatts of firm capacity until June 1,
3		2005. Gulf has included the contract's annual costs for the January 2002
4		through December 2002 recovery period in this projection. The energy
5		transactions under this contract have also been approved by the
6		Commission for recovery, and these costs are handled for cost recovery
7		purposes through the fuel cost adjustment factor.
8		
9	Q.	Are there any other arrangements that produce capacity transactions that
10		are recovered through Gulf's purchased power capacity cost adjustment
11		factor?
12	A.	Yes. Gulf and other SES operating companies have purchased market
13		capacity for 2002, and these purchases will continue through May 2002.
14		Gulf will have monthly costs associated with these market purchases for
15		the January 2002 - December 2002 recovery period. Again, the energy
16		transactions related to these purchases are handled for cost recovery
17		purposes through the fuel cost adjustment factor.
18		
19	Q.	What are Gulf's IIC capacity transactions that are projected for the
20		January 2002 - December 2002 recovery period?
21	Α.	As shown on my Exhibit MWH-1, capacity transactions under the IIC vary
22		during each month of the recovery period. IIC capacity purchases in the
23		amount of \$2,881,897 are projected for the year. IIC capacity sales
24		during the same period are projected to be \$1.031.220. Therefore, the

Company's net capacity transactions under the IIC for the recovery period

Τ		are net purchases amounting to \$1,850,677.	
2			
3	Q.	What is the cost of Gulf's capacity purchase from Solutia that is projecte	
4		for the January 2002 - December 2002 recovery period?	
5	Α.	As shown on my Exhibit MWH-1, Gulf is projected to pay \$746,424, or	
6		\$62,202 per month, to Solutia for the firm capacity purchase made	
7		pursuant to the Commission approved contract.	
8			
9	Q.	What is the cost of Gulf's market capacity purchases that is projected for	
10		the January 2002 - December 2002 recovery period?	
11	A.	As shown on my Exhibit MWH-1, Gulf is projected to pay a total net cost	
12		of \$1,065,504 for the committed market capacity purchases. Capacity will	
13		be purchased during the months of January through May of 2002. Smith	
14		Unit 3 is scheduled to be in service by June 1, 2002, and Gulf's market	
15		capacity purchases will end at that time. The individual suppliers and	
16		megawatt amounts are not shown, since this is highly sensitive and	
17		confidential information. Public availability of this information would	
18		seriously undermine our competitive position and cause our customers	
19		increased cost.	
20			
21	Q.	What are Gulf's total projected net capacity transactions for the January	
22		2002 - December 2002 recovery period?	
23	A.	As shown on my Exhibit MWH-1, the net purchases under the IIC, the	
24		Solutia contract purchases, and the net committed market capacity	
25		purchases will result in a projected net capacity cost of \$3,662,605. This	

1		figure is used by Gulf's witness Ms. Davis as an input into the calculation
2		of the total capacity transactions to be recovered through the purchased
3		power capacity cost adjustment factor for this annual recovery period. As
4		shown on Schedule CCE-2 of Ms. Davis' testimony, the purchased power
5		capacity cost adjustment factor is 0.032 ¢/KWH. This represents an 85%
6		decrease over the January 2001 - December 2001 recovery period cost
7		adjustment factor.
8		
9	Q.	Please explain the reason for the decrease in Gulf's purchased power
10		capacity cost adjustment factor for the January 2002 - December 2002
11		recovery period.
12	A.	The decrease in the projected capacity cost adjustment factor is a result
13		of Gulf's lower 2002 IIC capacity cost and a reduction of capacity costs
14		due to the expiration of several market capacity purchase contracts. The
15		IIC cost is projected to be \$1,420,740 lower than the 2001 IIC capacity
16		cost projection due to increased owned capacity from Gulf's Smith Unit 3
17		capacity addition that is needed to meet growing customer loads.
18		The major reason for the overall decrease, however, is Gulf's
19		reduced market capacity purchase costs that are estimated to be
20		\$12,412,060 lower than the costs contained in the 2001 projection. When
21		Gulf's combined cycle unit, Smith Unit 3, comes on-line in June 2002, the
22		capacity from these market capacity contracts will no longer be needed.
23		
24		

Witness: M. W. Howell

25

- Q. Earlier in your testimony, you stated that you would address issues
 concerning Gulf's management of wholesale energy risks that were raised
 by the Commission Staff. Would you please generally discuss these
 issues.
 - Gulf and Southern are currently evaluating the relative merits of engaging Α. in hedging practices to effectively manage risks associated with wholesale energy transactions. This is a relatively new practice in the industry, and the limits of reasonable wholesale energy transaction risks clearly need to be explored and agreed to by this Commission. Such factors as treatment of hedging losses, appropriate levels of risk, types of allowable risks, and other factors need to have general guidelines established up front. As addressed in Gulf's responses to Staff's Second Set of Interrogatories, Gulf's agent, Southern Company Generation and Energy Marketing (SCGEM), has a documented risk management policy that SCGEM energy traders must adhere to when engaging in wholesale energy transactions. SCGEM's trading activities are guided by the general principle of directing the lowest cost off-system wholesale market energy to the territorial customers of Gulf and the other SES operating companies, if such energy can reasonably be expected to result in cost savings. The SCGEM risk management policy provides the guidelines for effectively executing this energy trading strategy.

21

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

- Q. Were Gulf's replacement fuel costs for the unplanned outage at Crist Unit 2, that began on August 2, 2000, reasonable?
- 25 A. Yes. Gulf did not buy any additional fuel to specifically compensate for

1		the unavailability of this peaking unit. In the case of this particular
2		unplanned outage, Crist Unit 2 would not have been called upon in
3		economic dispatch for the majority of the outage period had it been
4		available. If the unit had been needed to meet system load requirements,
5		Gulf would have purchased replacement power from the most economical
6		resource available.
7		
8	Q.	Has Plant Crist Unit 7 experienced a recent forced outage?
9	Α.	Yes. On August 16, 2001, the unit's main power transformer failed.
10		
11	Q.	How is this outage expected to influence Gulf's fuel and purchased power
12		recovery clause?
13	Α.	There should be no impact during 2002. A spare transformer is being
14		delivered from Georgia Power Company and it will be placed in service as
15		soon as possible in 2001. This spare transformer will remain at Plant
16		Crist until a permanent replacement is secured. During the outage, Gulf's
17		recoverable energy costs will be slightly higher since Crist Unit 7 is
18		expected to be off line a total of six to eight weeks. Therefore, this outage
19		should only impact Gulf's actual purchased energy costs for the 2001
20		recovery period.
21		
22	Q.	Does this conclude your testimony?
23	A.	Yes.
24		

AFFIDAVIT

STATE OF FLORIDA		
COUNTY OF ESCAMBIA		

Docket No. 010001-EI

Before me the undersigned authority, personally appeared M. W. Howell, who being first duly sworn, deposes, and says that he is the Transmission and System Control Manager of Gulf Power Company, a Maine corporation, that the foregoing is true and correct to the best of his knowledge, information, and belief. He is personally known to me.

M. W. Howell

Transmission and System Control Manager

2001.

Notary Public, State of Florida at Large

ROLLANDA R. COTHRAN MY COMMISSION # CC 697388 EXPIRES: February 26, 2002 Bonded Thru Notary Public Underwriters

Florida Public Service Commission Docket No. 010001-El GULF POWER COMPANY Witness: M. W. Howell Exhibit No. _____ (MWH - 1) Page 1 of 2

GULF POWER COMPANY PROJECTED PURCHASED POWER CONTRACT TRANSACTIONS JANUARY 2002 - DECEMBER 2002

Contract	MW Purchase/(Sale)	Capacity (\$) Costs/(Receipts)
Southern Company Intercompany Interchange (IIC	;)	
January 2002 February March April May June July August September October November December SUBTOTAL	587.8 355.1 390.7 126.0 214.9 (64.0) (21.8) 9.8 (13.8) 41.5 (165.8) 24.4	1,588,272 383,784 422,350 68,070 232,317 (422,598) (393,120) 151,478 (116,004) 22,412 (99,498) 13,214 1,850,677
Solutia		1,000,077
January 2002 February March April May June July August September October November December SUBTOTAL	19.0 19.0 19.0 19.0 19.0 19.0 19.0 19.0	62,202 62,202 62,202 62,202 62,202 62,202 62,202 62,202 62,202 62,202 62,202 62,202

Florida Public Service Commission Docket No. 010001-El GULF POWER COMPANY Witness: M. W. Howell Exhibit No. _____ (MWH - 1) Page 2 of 2

GULF POWER COMPANY PROJECTED PURCHASED POWER CONTRACT TRANSACTIONS JANUARY 2002 - DECEMBER 2002

Contract	Capacity (\$) Costs/(Receipts)
Market Capacity Purchases	
January 2002	361,168
February	266,668
March	172,168
April	85,500
May	180,000
June	0
July	0
August	0
September	0
October	0
November	0
December	0
SUBTOTAL	1,065,504
TOTAL	3,662,605