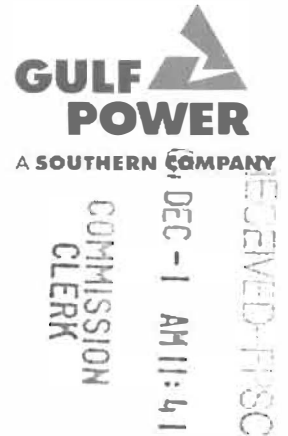


Susan D. Ritenour  
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Public Utility Manager

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ORIGINAL



November 30, 2004

Ms. Blanca S. Bayo, Director  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 040032-EG

Enclosed are an original and fifteen copies of the Petition for Approval of Numeric Conservation Goals by Gulf Power Company and the 2005 Demand-Side Management Plan and Program Standards to be filed in the above referenced docket.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Petition in Microsoft Word format as prepared on a Windows NT based computer.

Sincerely,

CMP \_\_\_\_\_  
COM \_\_\_\_\_ *Susan D. Ritenour*

CTR \_\_\_\_\_ db

ECR \_\_\_\_\_  
GCL \_\_\_\_\_ Enclosures

OPC \_\_\_\_\_ cc: Beggs and Lane  
MMS \_\_\_\_\_ Jeffrey A. Stone, Esquire

RCA \_\_\_\_\_

SCR \_\_\_\_\_

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for approval of )  
numeric conservation goals )  
by Gulf Power Company )

Docket No. 040032-EG

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail this 30<sup>th</sup> day of November 2004 on the following:

Adrienne Vining, Esquire  
FL Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee FL 32399-0863

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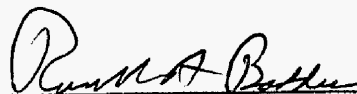
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FL Public Service Commission  
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Office of Planning and Budget  
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(850) 432-2451  
Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Approval of Demand-Side )  
Management Plan of Gulf Power Company )  
)

Docket No.: 040032-EG  
Filed: December 1, 2004

**GULF POWER COMPANY'S PETITION FOR APPROVAL  
OF PROPOSED DEMAND-SIDE MANAGEMENT PLAN**

GULF POWER COMPANY ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned counsel and pursuant to Sections 366.82 and 366.06, Florida Statutes, hereby petitions the Florida Public Service Commission ("Commission") for approval of its Demand-Side Management ("DSM") Plan and authorization to recover reasonable and prudent expenditures associated with the implementation of such plan through the Energy Conservation Cost Recovery ("ECCR") clause. As grounds for the relief requested by this petition, the Company respectfully shows:

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

Jeffrey A. Stone  
Russell A. Badders  
Beggs & Lane  
P. O. Box 12950  
Pensacola, FL 32591

Susan D. Ritenour  
Secretary and Treasurer  
Gulf Power Company  
One Energy Place  
Pensacola, FL 32520-0780

2. Gulf Power Company is an investor-owned electric utility with corporate headquarters located at 500 Bayfront Parkway, Pensacola, Florida. The company owns, maintains and operates an electric generation, transmission and distribution system within the state of Florida through which it provides retail electric service to customers. Gulf is subject to the Florida Energy Efficiency and Conservation Act ("FEECA") and it recovers certain costs

associated with its conservation activities through an ECCR clause that is subject to the Commission's jurisdiction.

3. Gulf Power currently has a DSM plan which was approved by the Commission through Order No. PSC-00-0753-PAA-EG.

4. DSM goals were recently approved by the Commission for Gulf Power in Order No. PSC-04-0764-PAA-EG, in Docket No. 040032-EG.

5. Gulf Power, through this petition, formally files a plan that is designed to meet the numeric goals established by the Commission in Order No. PSC-04-0764-PAA-EG. The Company's DSM plan will achieve the goals set forth in FEECA and in Florida Administrative Code Rule 25-17.001. Gulf's proposed DSM plan is described in detail in the 10 Year DSM Plan and Program Standards document filed contemporaneously with this petition and made a part hereof by reference. Gulf Power has also included the Program Standards for the proposed 10 Year DSM Plan in the accompanying document.

6. Gulf Power's proposed DSM plan is cost-effective and reasonably monitorable. Gulf has utilized the Commission approved cost-effectiveness methodology to evaluate the proposed programs.

7. The Company submits that its proposed DSM plan should be approved and the Commission should authorize recovery of the reasonable and prudent expenditures associated with the Company's DSM plan through the ECCR clause, subject to the ongoing review and approval of the Commission in conjunction therewith.

WHEREFORE, Gulf Power requests the Commission to approve the Company's proposed DSM plan which accompanies this petition and authorize Gulf Power to recover

reasonable and prudent expenditures associated with the implementation of the Company's proposed DSM plan through the ECCR clause, subject to the ongoing review and approval of the Commission in conjunction therewith.

Respectfully submitted this 1<sup>st</sup> day of December, 2004.



**JEFFREY A. STONE**

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