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September 15, 2005

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:

Enclosed for official filing in Docket No. 050001-EI are an original and ten copies of the following:

- 08743-05 1. The Petition of Gulf Power Company.
- 08744-05 2. Prepared direct testimony and exhibit of H. R. Ball.
- Prepared direct testimony and exhibit of L. S. Noack. 08745-053.
- Prepared direct testimony and exhibit of T. A. Davis. 08746-05 4.

Also enclosed is a 3.5 inch double sided, double density diskette containing the Petition in Microsoft Word for Windows format as prepared on a NT computer. 1+57

Sincerely,

CMP

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CC:

Enclosures

Beggs and Lane Jeffrey A. Stone, Esquire

> DOCUMENT NUMBER-DATE 08743 SEP 16 g

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor

Docket No. 050001-El

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail this $\frac{15+1}{1000}$ day of September 2005 on the following:

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JEFFREY A. STONE Florida Bar No. 325953 RUSSELL A. BADDERS Florida Bar No. 0007455 BEGGS & LANE P. O. Box 12950 Pensacola FL 32591-2950 (850) 432-2451 Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost Recovery Clauses and Generating Performance Incentive Factor

Docket No.: 050001-EI Filed: September 16, 2005

PETITION OF GULF POWER COMPANY FOR APPROVAL OF FINAL FUEL COST TRUE-UP AMOUNTS AND GPIF ADJUSTMENT FOR JANUARY 2004 THROUGH DECEMBER 2004; **ESTIMATED FUEL COST TRUE-UP AMOUNTS** FOR JANUARY 2005 THROUGH DECEMBER 2005: **PROJECTED FUEL COST RECOVERY AMOUNTS** FOR JANUARY 2006 THROUGH DECEMBER 2006; FINAL PURCHASED POWER CAPACITY COST TRUE-UP AMOUNTS FOR JANUARY 2004 THROUGH DECEMBER 2004; ESTIMATED PURCHASED POWER CAPACITY COST TRUE-UP AMOUNTS FOR JANUARY 2005 THROUGH DECEMBER 2005; PROJECTED PURCHASED POWER CAPACITY COST RECOVERY AMOUNTS FOR JANUARY 2006 THROUGH DECEMBER 2006; **ESTIMATED AS-AVAILABLE AVOIDED ENERGY COSTS: GPIF TARGETS AND RANGES FOR JANUARY 2006 THROUGH DECEMBER 2006;** FUEL COST RECOVERY FACTORS TO BE APPLIED BEGINNING WITH THE PERIOD JANUARY 2006 THROUGH DECEMBER 2006; AND CAPACITY COST RECOVERY FACTORS TO BE APPLIED BEGINNING WITH THE PERIOD JANUARY 2006 THROUGH DECEMBER 2006

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

Jeffrey A. Stone Russell A. Badders Steven R. Griffin 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

GULF POWER COMPANY ("Gulf Power", "Gulf", or "the Company"), by and through

its undersigned counsel, hereby petitions this Commission for approval of the Company's final

fuel adjustment true-up amounts and GPIF adjustment for the period January 2004 through

DOCUMENT NUMBER-DATE

08743 SEP 168

FPSC-COMMISSION OF FAX

December 2004; for approval of its estimated fuel cost true-up amounts for the period January 2005 through December 2005; for approval of its projected fuel cost recovery amounts for the period January 2006 through December 2006; for approval of its final purchased power capacity cost true-up amounts for the period January 2004 through December 2004; for approval of its estimated purchased power capacity cost true-up amounts for the period January 2005 through December 2005; for approval of its projected purchased power capacity cost true-up amounts for the period January 2005 through December 2005; for approval of its projected purchased power capacity cost recovery amounts for the period January 2006 through December 2006; for approval of its GPIF targets and ranges for January 2006 through December 2006; for approval of its estimated as-available avoided energy costs for QFs; for approval of its fuel cost recovery factors to be applied beginning with the period January 2006 through December 2006; and for approval of its capacity cost recovery factors to be applied beginning with the period January 2006 through December 2006; and for approval of its capacity cost recovery factors to be applied beginning with the period January 2006 through December 2006; and for approval of its capacity cost recovery factors to be applied beginning with the period January 2006 through December 2006; and for approval of its capacity cost recovery factors to be applied beginning with the period January 2006 through December 2006; and for approval of its capacity cost recovery factors to be applied beginning with the period January 2006 through December 2006; and for approval of its capacity cost recovery factors to be applied beginning with the period January 2006 through December 2006; and for approval of its capacity cost recovery factors to be applied beginning with the period January 2006 through December 2006.

As grounds for the relief requested by this petition, the Company would respectfully show:

FINAL FUEL ADJUSTMENT TRUE-UP

(1) By vote of the Commission at the November 2004 hearings, estimated fuel true-up amounts were approved by the Commission, subject to establishing the final fuel true-up amounts. According to the data filed by Gulf for the period ending December 31, 2004, the actual fuel true-up amount for the subject twelve months should be an under recovery of \$10,466,238 instead of the estimated under recovery of \$29,107,969 as approved previously by this Commission. The difference between these two amounts, \$18,641,731, is submitted for approval by the Commission to be refunded in the next period. The supporting data has been prepared in accordance with the uniform system of accounts as applicable to the Company's fuel

cost procedures and fairly presents the Company's fuel and purchased energy expenses for the period. Amounts spent by the Company for fuel and purchased energy are reasonable and prudent, and the Company makes every effort to secure the most favorable price for all of the fuel it purchases and for its energy purchases.

GPIF ADJUSTMENT

(2) On April 1, 2005, Gulf filed the testimony and exhibit of L.S. Noack containing the Company's actual operating results for the period January 2004 through December 2004. Based on the actual operating results for the period January 2004 through December 2004, Gulf should receive a reward in the amount of \$441,988. The methodology used by Gulf in determining the various factors required to compute the GPIF is in accordance with the requirements of the Commission.

ESTIMATED FUEL COST TRUE-UP

(3) Gulf has calculated its estimated fuel cost true-up amount for the period January 2005 through December 2005. Based on seven months actual experience and five months projected data, the Company's estimated fuel cost true-up amount for the current period (January 2005 through December 2005) is an under recovery of \$30,102,348. The supporting data is provided in the testimony and schedules of T. A. Davis filed herewith. The estimated fuel cost true-up for the current period is combined with the net final fuel adjustment true-up for the period ending December 2004 to reach the total fuel cost true-up to be addressed in the factors for the next fuel cost recovery period. The proposed fuel cost recovery factors reflect the collection of this total true-up amount, \$11,460,617, during the period of January 2006 through December 2006.

PROJECTED FUEL COST RECOVERY AMOUNTS

(4) Gulf has calculated its projected fuel cost recovery amounts for the months January 2006 through December 2006 for fuel and purchased energy in accordance with the procedures set out in this Commission's Orders Nos. 6357, 7890, 7501, and 9273 of Docket No. 74680-EI and with the orders entered in this ongoing cost recovery docket. The computations thereof are attached as Schedule E-1 of the exhibit to the testimony of T. A. Davis filed herewith. The supporting data prepared in accordance with the Commission Staff's suggested procedures and format is attached as Schedules E-1 through E-11 and H-1 of the exhibit to the testimony of T. A. Davis filed herewith. Said schedules are by reference made a part hereof. The proposed amounts and supporting data have been prepared in accordance with the uniform system of accounts as applicable to the Company's fuel cost projection procedures and fairly present the Company's best estimate of fuel and purchased energy expense for the projected period. Amounts projected by the Company for fuel and purchased energy are reasonable and prudent, and the Company continues to make every effort to secure the most favorable price for all of the fuel it purchases and for its purchased energy.

FINAL PURCHASED POWER CAPACITY COST TRUE-UP

(5) By vote of the Commission at the November 2004 hearings, estimated purchased power capacity cost true-up amounts were approved by the Commission, subject to establishing the final purchased power capacity cost true-up amounts. According to the data filed by Gulf for the twelve-month period ending December 2004, the final purchased power capacity cost true-up amount for the subject twelve months should be an actual over recovery of \$2,225,705 instead of the estimated over recovery of \$1,797,696 as approved previously by this Commission. The difference between these two amounts, \$428,009, is submitted for approval by the Commission to be refunded in the next period. The supporting data has been prepared in accordance with the uniform system of accounts and fairly presents the Company's purchased power capacity expenses for the period. Amounts spent by the Company for purchased power capacity are reasonable and prudent, and in the best long-term interests of Gulf's general body of ratepayers.

ESTIMATED PURCHASED POWER CAPACITY COST TRUE-UP

(6) Gulf has calculated its estimated purchased power capacity cost true-up amount for the period January 2005 through December 2005. Based on six months actual and six months projected data, the Company's estimated capacity cost true-up amount for the current period is an over recovery of \$913,842. The net estimated capacity cost true-up for the current period is combined with the net final capacity cost true-up for the period ending December 2004 to reach the total capacity cost true-up to be addressed in the factors for the next cost recovery period. The proposed capacity cost recovery factors reflect the refund of this total capacity cost true-up amount, \$1,341,851, during the period of January 2006 through December 2006.

PROJECTED PURCHASED POWER CAPACITY COST RECOVERY AMOUNTS

(7) Gulf has calculated its projected purchased power capacity cost recovery amounts for the months January 2006 through December 2006 in accordance with the procedures set out in Order No. 25773, Order No. PSC-93-0047-FOF-EI and Order No. PSC-99-2512-FOF-EI. The proposed factors reflect the recovery of the net capacity cost recovery amount of \$27,149,254 projected for the period January 2006 through December 2006.

The computations and supporting data for the Company's purchased power capacity cost

recovery factors are set forth on Schedules CCE-1 (including CCE-1a and CCE-1b) and CCE-2 attached as part of the exhibit to the testimony of T. A. Davis filed herewith. Additional supporting data for the purchased power capacity cost recovery factors is provided in the testimony and exhibit of H. R. Ball also filed herewith. The methodology used by Gulf in determining the amounts to include in these factors and the allocation to rate classes, based 12/13th on demand and 1/13th on energy, is in accordance with the requirements of the Commission as set forth in Order No. 25773. The amounts included in the factors for this projection period are based on reasonable projections of the capacity transactions that are expected to occur during the period January 2006 through December 2006. The proposed factors and supporting data have been prepared in accordance with the uniform system of accounts and fairly present the Company's best estimate of purchased power capacity costs for the projected period. Amounts projected by the Company for purchased power capacity are reasonable and prudent, and in the best long-term interests of Gulf's general body of ratepayers.

ESTIMATED AS-AVAILABLE AVOIDED ENERGY COSTS

(8) Pursuant to Order 13247 (entered May 1, 1984) in Docket No. 830377-EI and Order No. 19548 (entered June 21, 1988) in Docket No. 880001-EI, Gulf has calculated estimates of as-available avoided energy costs for QF's in accordance with the procedures required in said orders. The resultant costs are attached to the testimony of T. A. Davis as Schedule E-11 and by reference made a part hereof. Gulf Power requests that the Commission approve the estimates for these costs set forth on Schedule E-11.

GPIF TARGETS AND RANGES

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(9) Gulf also seeks approval of the GPIF targets and ranges for the period January 2006 through December 2006 set forth below:

Unit	EAF	POF	EUOF	Heat Rate	
Crist 4	87.1	12.1	0.8	10,493	
Crist 5	92.4	6.3	1.3	10,375	
Crist 6	90.2	0.0	9.8	10,171	
Crist 7	80.8	8.2	11.0	10,268	
Smith 1	98.1	0.0	1.9	10,176	
Smith 2	84.1	6.3	9.6	10,222	
Daniel 1	93.6	2.5	3.9	10,181	
Daniel 2	81.5	15.3	3.2	10,027	
EAF = Equival POF = Planned		•	<u> </u>		

POF = Planned Outage Factor EUOF = Equivalent Unplanned Outage Factor

FUEL COST RECOVERY FACTORS

(10) The proposed levelized fuel and purchased energy cost recovery factor, including GPIF and True-Up, herein requested is 3.076¢/KWH. The proposed factors by rate schedule are:

			Fuel Cost Factors ¢/KWH		
	Rate	Line Loss	Standard	Time of Use	
Group Schedules*	Multipliers		On-Peak	Off-Peak	
А	RS, GS, GSD, SBS, OSIII	1.00526	3.092	3.615	2.869
В	LP, LPT, SBS	0.98890	3.042	3.557	2.823
С	PX, PXT, RTP, SBS	0.98063	3.016	3.527	2.799
D	OSI/II	1.00529	3.060	N/A	N/A

*The recovery factor applicable to customers taking service under Rate Schedule SBS is determined as follows: customers with a Contract Demand in the range of 100 to 499 KW will use the recovery factor applicable to Rate Schedule GSD; customers with a Contract Demand in the range of 500 to 7,499 KW will use the recovery factor applicable to Rate Schedule LP; and customers with a Contract Demand over 7,499 KW will use the recovery factor applicable to Rate Schedule PX.

CAPACITY COST RECOVERY FACTORS

(11) The proposed purchased power capacity cost recovery factors by rate class herein

requested, including true-up, are:

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RATE CLASS	CAPACITY COST RECOVERY FACTORS ¢/KWH		
RS, RSVP	0.272		
GS	0.263		
GSD, GSDT, GSTOU	0.233		
LP, LPT	0.202		
PX, PXT, RTP, SBS	0.169		
OS-I/II	0.116		
OSIII	0.175		

WHEREFORE, Gulf Power Company respectfully requests the Commission to approve the final fuel adjustment true-up for the period January 2004 through December 2004; the GPIF adjustment for the period January 2004 through December 2004; the estimated fuel cost true-up for the period January 2005 through December 2005; the projected fuel cost recovery amount for the period January 2006 through December 2006; the final purchased power capacity cost true-up amount for the period January 2004 through December 2004; the estimated purchased power capacity cost recovery true-up amount for the period January 2005 through December 2005; the projected purchased power capacity cost recovery amount for the period January 2006 through December 2006; the estimated as-available avoided energy costs for QF's; the GPIF targets and ranges for the period January 2006 through December 2006; the fuel cost recovery factors to be applied beginning with the period January 2006 through December 2006; and the capacity cost recovery factors to be applied beginning with the period January 2006 through December 2006; and the capacity cost

Dated the 15^{th} day of September, 2005.

JEFFREY A. STONE Florida Bar No. 325953 RUSSELL A. BADDERS Florida Bar No. 007455 Steven R. Griffin Florida Bar No. 0627569 Beggs & Lane P. O. Box 12950 Pensacola, FL 32591 (850) 432-2451 Attorneys for Gulf Power Company