

Susan D. Ritenour
Secretary and Treasurer
and Regulatory Manager

One Energy Place
Pensacola, Florida 32520-0781

Tel 850.444.6231
Fax 850.444.6026
SDRITENO@southernco.com



October 4, 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:

RE: Docket No. 050002-EG

Enclosed are an original and ten copies of the Preliminary Statement of Gulf Power Company Regarding Issues and Positions to be filed in the above docket.

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

Sincerely,

Susan D. Ritenour

lw

Enclosure

cc: Beggs and Lane
J. A. Stone, Esquire

DOCUMENT NUMBER-DATE

09482 OCT-5 '05

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Conservation Cost Recovery
Clause

Docket No. 050002-EG
Filed: October 5, 2005

PRELIMINARY STATEMENT OF GULF POWER COMPANY
REGARDING ISSUES AND POSITIONS

Gulf Power Company, ("Gulf Power", "Gulf", or "the "Company"), by and through its undersigned attorneys, files this preliminary statement of issues and positions, saying:

Generic Energy Conservation Cost Recovery Issues

ISSUE 1: What is the appropriate final conservation cost recovery true-up amount for the period January 2004 through December 2004?

GULF: Over recovery \$396,983. (Eggart)

ISSUE 2: What are the appropriate conservation cost recovery factors for the period January 2006 through December 2006?

GULF: The Company's proposed conservation cost recovery factors by customer class for the period January 2006 through December 2006 are as follows:

RATE CLASS	CONSERVATION COST RECOVERY FACTORS ¢/kWh
RS, RSVP	0.088
GS	0.087
GSD, GSDT, GSTOU	0.084
LP, LPT	0.079
PX, PXT, RTP, CSA, SBS	0.074
OSI/II	0.069
OSIII	0.077

(Eggart).

ISSUE 4: What should be the effective date of the new conservation cost recovery factors for billing purposes?

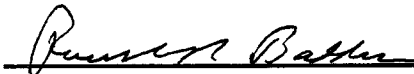
GULF: The new conservation cost recovery factors should be effective beginning with the first billing cycle for January 2006 and thereafter through the last billing cycle for December 2006. The first billing cycle may start before January 1, 2006, and the last cycle may be read after December 31, 2006, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. (Eggart)

Gulf Power Company-Specific Conservation Cost Recovery Issues

NONE RAISED BY GULF POWER COMPANY

Dated this 4th day of October, 2005

Respectfully submitted,



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 7455

Steven R. Griffin

Florida Bar No. 0627569

Beggs & Lane

P. O. Box 12950

Pensacola, FL 32591

(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery)
_____)

Docket No. 050002-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 4th day of October 2005 to the following:

Norman Horton, Jr., Esquire
Messer, Caparello, & Self, P.A.
P. O. Box 1876
Tallahassee FL 32302-1876

Robert Vandiver, Esquire
Patricia Ann Christensen, Esquire
Office of Public Counsel
111 W. Madison St., Suite 812
Tallahassee FL 32399-1400

R. Wade Litchfield, Esquire
Natalie F. Smith, Esquire
Florida Power & Light Company
700 Universe Boulevard
Juno Beach FL 33408

Lee L. Willis, Esquire
James D. Beasley, Esquire
Ausley & McMullen
P. O. Box 391
Tallahassee FL 32302

Ansley Watson, Jr., Esquire
Macfarlane Ferguson & McMullen
P. O. Box 1531
Tampa FL 33601-1531

Timothy J. Perry, Esquire
McWhirter Reeves
117 S. Gadsden Street
Tallahassee FL 32301

Martha Brown, Esquire
Staff Counsel
FL Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0863

James McGee, Esquire
Progress Energy Service Co., LLC
P. O. Box 14042
St. Petersburg FL 33733-4042

John W. McWhirter, Jr., Esq.
McWhirter Reeves
400 N Tampa St Suite 2450
Tampa FL 33602

Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P. O. Box 551
Tallahassee FL 32302-0551

Gary V. Perko, Esquire
Hopping Green & Sams, P. A.
P. O. Box 6526
Tallahassee FL 32314



JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
STEVEN R. GRIFFIN
Florida Bar No. 0627569
Florida Bar No. 0007455
Beggs & Lane
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power Company