BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 060154-EI

TESTIMONY AND EXHIBIT

OF

STEVEN P. HARRIS

In Support of Storm-Recovery Financing

GULF POWER

A SOUTHERN COMPANY

GULF POWER COMPANY
Before the Florida Public Service Commission
Prepared Direct Testimony of
Steven P. Harris
Docket No. 060154-EI
In Support of Storm Recovery financing
Date of Filing: February 22, 2006

Q. Please state your name and business address.

A. My name is Steven P. Harris. My business address is ABSG Consulting, Inc. (ABS Consulting), 475 14th Street, Oakland, California 94612.

Q. By whom are you employed and what is your position?

A. I am a Vice President with ABS Consulting, an affiliated company of EQECAT, Inc. both of which are subsidiaries of the ABS Group of Companies, Inc. Together these two companies are leading global providers of catastrophic risk management services, including software and consulting, to major insurers, reinsurers, corporations, governments and other financial institutions. In addition, these companies develop and license catastrophic underwriting, pricing, risk management and risk transfer models that are used extensively in the insurance industry. The companies provide the financial, insurance and brokerage communities with a science and technology-based source of independent quantitative risk information. ABS Group acquired EQE International Inc. and EQECAT, Inc. in January 2000.

Q. Please describe your educational background and business experience.

A. I hold Bachelors and Masters degrees in engineering from the University of California at Berkeley. I am a licensed civil engineer in California. Over the past 22 years, I have conducted and supervised independent risk and financial studies for public utilities, insurance companies and other entities, both regulated and unregulated. My areas of expertise include natural hazard risk analysis, operational risk analysis, risk profiling and financial analysis, insurance loss analysis, loss prevention and control, business continuity planning and risk transfer.

A significant portion of my consulting experience has involved the performance of multi-hazard risk studies, including earthquake, ice storm and windstorm perils, for electric, water and telephone utility companies, as well as insurance companies.

I have performed or supervised windstorm (tropical storm or hurricane) loss and solvency analyses for utilities including Gulf Power Company (Gulf or the Company). Additionally, I have performed loss analyses for earthquake hazard for utilities including the Los Angeles Department of Water and Power, the California-Oregon Transmission Project, Big Rivers Electric and Anchorage Municipal Light and Power.

For energy companies that have assets in a wide array of geographic locations, I have performed or supervised multi-peril analyses for all natural hazards, including earthquakes, windstorms and ice storms.

Q. Are you sponsoring an exhibit in this case?

A. Yes. I have one exhibit consisting of two schedules to which I will refer. This exhibit was prepared under my supervision and direction.

Counsel: We ask that Mr. Harris's Exhibit consisting of two schedules be marked as Exhibit No. _____(SPH-1)

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to present the results of ABS Consulting's independent analyses of risk of uninsured loss to Gulf's transmission and distribution assets. The study includes storm loss analysis and Reserve solvency analysis.

Q. Please briefly describe these studies performed for the Company.

A. ABS Consulting performed two analyses relative to the Gulf's Reserve: the Hurricane Loss Analysis and the Reserve Solvency Analysis, which are included as Schedule 1 of my exhibit. The Loss Analysis is a probabilistic storm analysis that uses proprietary software to develop an estimate of the expected annual amount of uninsured hurricane losses to which Gulf is exposed. The Solvency Analysis is a dynamic financial simulation analysis that evaluates the performance of the Reserve in terms of the expected balance of the Reserve and the likelihood of insolvency over an eight-year period, given the potential uninsured losses determined from the Loss Analysis, at given initial Reserve balance and annual accrual levels.

Q. Please summarize the results of your analyses.

A. The Loss Analysis concluded that the total expected annual uninsured cost to Gulf's system from all hurricanes is estimated to be $6.4 million annually. The Solvency Analysis demonstrated that, assuming an $80 million initial Reserve balance and an accrual level of $3.5 million would result in an expected Reserve Balance of $63 million and a probability of insolvency of 15% at the end of the eight-year simulation time horizon.

LOSS ANALYSIS

Q. Please explain the Loss Analysis you performed.

A. The Loss Analysis determined the expected magnitude of hurricane losses to Gulf's transmission and distribution (T&D) system. Hurricane losses include the Operations and Maintenance (O&M) portion of the cost, exclusive of capital and nominal labor, associated with repair and/or replacement of Gulf's T&D assets necessary to promptly restore service in a post storm environment.

Q. Please describe the computer software used to perform the Loss Analysis.

A. USWIND™ is a probabilistic model designed to estimate damage and losses due to the occurrence of hurricanes. EQECAT proprietary computer software USWIND™ is one of only four models evaluated and determined acceptable by the Florida Commission on Hurricane Loss Projection Methodology (FCHLPM) for projecting hurricane loss costs.

Probabilistic Annual Damage & Loss is computed using the results of over 100,000 random variable storms. Annual damage and loss estimates are developed for each individual site and aggregated to overall

portfolio damage and loss amounts. USWIND's™ climatological models are based on the National Oceanic and Atmospheric Administration's (NOAA) National Weather Service (NWS) Technical Reports.

The version of USWIND™ currently reviewed by the FCHLPM utilizes the FCHLPM's Official Storm Set of November 1, 2003, which includes hurricanes affecting Florida during the period 1900 through 2002.

Q. Does USWIND™ take into account storm frequency and severity?

A. Yes. The analysis is based on storm frequency and severity distributions developed from the entire 103-year historical record. Year-to-year variability in storm frequency and severity distributions has not been included.

Q. Do the storm frequency assumptions include the possibility of having multiple hurricanes making landfall within Florida in any given year?

A. Yes. The current version of USWIND™ does include the possibility of having multiple hurricane landfalls within Florida in any given year, including the impact of such landfalls on aggregate losses, consistent with the 2004-2005 hurricane seasons.

Q. Did the Loss Analysis take into account the frequency of storms during the 2004 and 2005 storm seasons?

A. No. The storm database used by USWIND™ is a combination of historical and random variable storms. NOAA/NWS must update the data set before historical data becomes a part of the storm database used by

USWIND™. The version of USWIND™ utilizing the updated data set must, then, be evaluated and approved by the FCHLPM. Information from the 2003 through 2005 hurricane seasons is likely to be incorporated into future versions of USWIND™, consistent with scientific opinion and subject to review by the FCHLPM and its professional team.

Q. Do you expect the frequency of storms during 2004-2005 will significantly impact the frequency estimate?

A. No. There could be a slight increase in the frequency estimate as a result of including data points reflecting the 2004-2005 storm seasons in the storm database. Given the size of the storm database, however, the increase is not likely to be large.

Q. Did the 2004-2005 storm seasons have any effect on the Loss Analysis?

A. Yes. While the frequency and severity of the 2004-2005 storm seasons have not yet been incorporated into the USWIND™ model, Gulf's costs of storm restoration from the 2004-2005 storm seasons were incorporated into the Loss Analysis. The 2004-2005 storm restoration costs provide data points on the losses associated with specific levels of damage.

Q. What were the results of the Loss Analysis?

A. I concluded that the total expected annual uninsured cost to Gulf's system from all hurricanes is estimated to be $6.4 million annually.

Q. What does this expected annual loss estimate represent?

A. The expected annual loss estimate represents the average annual cost associated with damage to transmission and distribution assets, resulting from hurricanes over a long period of time.

Q. Is the Loss Analysis performed for Gulf the same analysis performed for insurance companies to price an insurance premium?

A. Yes. The natural hazards loss modeling and analysis would be similar for an insurance company, electric utility, or other entity. The expected annual loss is also known as the "Pure Premium," which when insurance is available is the insurance premium level needed to pay just the expected losses. Insurance companies add their expenses and profit margin to the Pure Premium to develop the premium charged to customers.

SOLVENCY ANALYSIS

Q. Please explain the Solvency Analysis you performed.

A. ABS Consulting performed a dynamic financial simulation analysis of the impact of the estimated windstorm losses on Gulf's Reserve for the specified initial Reserve balance and level of annual funding. The starting assumption for the Solvency Analysis was a Reserve balance of $80 million. This Solvency Analysis performed 10,000 simulations of windstorm losses within the Gulf service territory, each covering an eight-year period, to determine the effect of the charges for loss on the Reserve. Monte Carlo simulations were used to generate loss samples consistent with the expected $6.4 million annual Loss Analysis results. The analysis

provides the expected balance of the Reserve in each year of the simulation accounting for the annual accrual, investment income, expenses, and losses using a financial model.

Q. What is a Monte Carlo analysis?

A. Monte Carlo analysis is a technique used to model multiple storm seasons and simulate variable storm losses consistent with the results of the Loss Analysis. Because storm seasons and losses are highly variable, 10,000 eight-year simulations are performed to estimate the performance of the Reserve with the given balance and accrual levels.

Q. Are the results of the Loss Analysis incorporated in the Solvency Analysis?

A. Yes. Both the likelihoods and amounts of uninsured annual losses determined in the Loss Analysis are used to simulate losses in each of the eight years in the Solvency Analysis in order to determine the likelihood of insolvency.

Q. Did the 2004-2005 storm seasons affect the Solvency Analysis?

A. Yes. The costs of Gulf's storm restoration activities from the 2004-2005 storm seasons are reflected in the Loss Analysis and are included in the expected annual losses. These results are inputs to the Solvency Analysis. Each year of the eight-year Solvency analyses uses these projected losses to simulate the cost of annual storm restoration from the

Reserve fund. These costs reflect past Gulf storm restoration experience including those from the most recent 2004-2005 seasons.

Q. Please describe the assumptions that were included in the Solvency Analysis.

A. Solvency computations were performed with an initial Reserve balance of $80 million and an annual accrual of $3.5 million. Further, all results are shown in constant 2005 dollars. Investment earnings were assumed to earn at a rate of 2.76%, and negative Reserve balances were assumed to be financed with an unlimited line of credit costing 7.95%. Also, the analysis performed included certain assumptions regarding loss exposures. These include assumptions regarding storm frequency and severity, future Gulf system growth, and future increased cost for system restoration due to inflation.

Q. Please describe the assumptions regarding future Gulf system growth and future cost for system restoration due to inflation.

A. The analysis considered future growth of the Gulf customer base, inflation of system assets and future system restoration cost at a combined rate 4% per year.

Q. Did you make a recommendation for a specific Reserve level?

A. No. My role is not to recommend a Reserve level. It is to present probabilities to Gulf regarding Reserve solvency based on various financial assumptions. There are large uncertainties associated with the

hurricane hazard and the specific storm outcomes have large variances. There could be hurricane seasons with no loss at all and hurricane seasons with hundreds of millions in losses. The Solvency Analysis presents information about the likelihood of insolvency that can be used to make decisions about the Reserve.

Q. Please summarize the results of the Solvency Analysis.

A. The Reserve performance can be viewed in terms of the expected balance of the Reserve and the likelihood of insolvency occurring in any year of the eight-year period. Based on an initial Reserve balance of $80 million and an annual accrual of $3.5 million, the expected balance of the Reserve at the end of eight years is $63 million and there is a 15% chance of insolvency during this period.

Q. The Company's request for an additional $70 million is expected to result in a reserve level of approximately $80 million at the time the bonds are issued. Based upon your analyses, is this a reasonable reserve level?

A. Yes. Schedule 2 of my exhibit shows the frequency-weighted average transmission and distribution storm damages from single storms that are rated Category 3 and 4 on the Saffir-Simpson Intensity (SSI) Scale that could make landfall within ten nautical miles of the specified milepost (horizontal or x axis) in or near Gulf's service territory. These damage amounts are based upon the values in my Schedule 1, Figure 2-4 and Figure 2-5. As shown in Schedule 2, the initial reserve balance of $80 million and the expected value at the end of eight years of $63 million

would cover most but not all single SSI-3 T&D storm damages based upon the landfall locations as shown on page 1 of 2. These Reserve levels would cover only some SSI-4 T&D storm damages as shown on page 2 of 2.

In summary, based on the current value of Gulf's T&D assets, an initial Reserve balance of $80 million would be adequate to cover the uninsured T&D storm losses for some, but not all storms.

Q. Does this conclude your direct testimony?

A. Yes.

AFFIDAVIT

STATE OF CALIFORNIA)
)
COUNTY OF ALAMEDA)

Docket No. _____

Before me the undersigned authority, personally appeared Steven P. Harris, who being first duly sworn, deposes, and says that the foregoing testimony is true and correct to the best of his knowledge, information, and belief.

Steven P. Harris

Sworn to and subscribed before me this 17 day of February, 2006.

Notary Public

HOWARD LEONG
COMM. # 1362761
NOTARY PUBLIC – CALIFORNIA
ALAMEDA COUNTY
My Comm. Expires JUN 28, 2006

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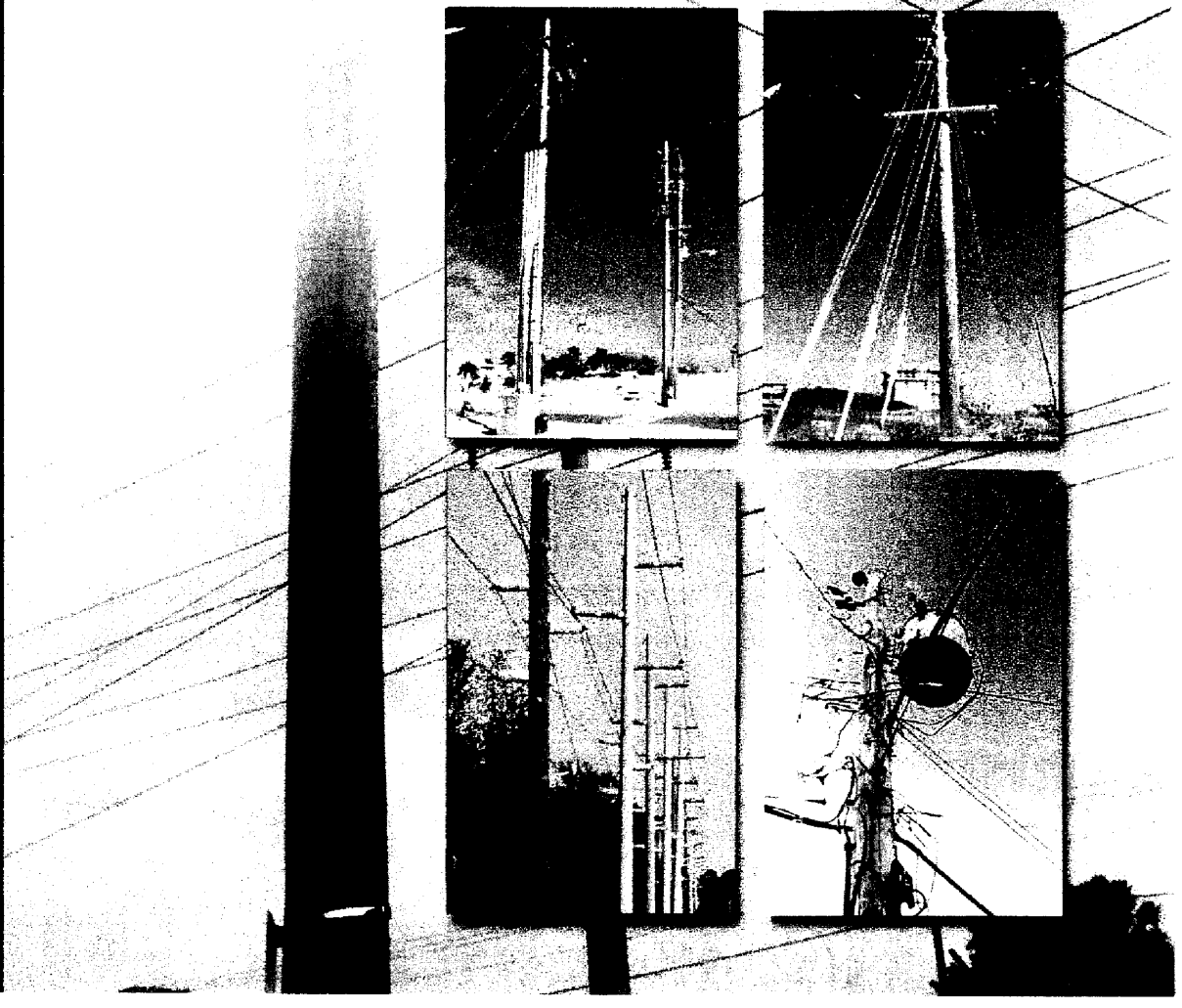
GULF POWER

Gulf Power Company

Hurricane Loss and Reserve Solvency Analyses



ABS Consulting

February 2006

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Risk Profile

The following is a summary description of analyses performed by ABS Consulting of Gulf Power Company's (Gulf) storm loss exposure and Reserve solvency. This report is intended to be used solely by Gulf and the Florida Public Service Commission for estimation of potential future Gulf losses to the Reserve and the estimation of the performance of the Reserve fund.

OWNER	**Gulf Power Company**	
ASSETS	Transmission and Distribution (T & D) System consisting of: Transmission towers, and conductors; Distribution poles, transformers, conductors, lighting and other miscellaneous assets	
LOCATION	All T & D assets located within State of Florida	
ASSET VALUE	Normal replacement value is approximately $ 1.8 billion, of which approximately 25% is transmission and 75% is distribution	
LOSS PERIL	Hurricane Windstorm (SSI 1 to 5)	
EXPECTED ANNUAL DAMAGE	$6.4 million	
1% AGGREGATE DAMAGE EXCEEDANCE VALUE	$125 million (one year)	
	RESERVE PERFORMANCE	
Storm Fund Initial Balance	**Expected Fund Balance at 8 years**	**Probability of Insolvency within 8 years**
$80 million	$63 million	15%

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1. Hurricane Loss Analysis

Gulf Power (Gulf) transmission and distribution (T & D) systems are exposed to and in the past have sustained damage from hurricanes. The exposure of these assets to hurricane damage is described and potential losses are quantified. Loss analyses were performed by ABS Consulting, using an advanced computer model simulation program USWIND ™ developed by EQECAT, an ABS Group Company. All results which are presented here have been calculated using USWIND, and the Gulf provided T & D asset portfolio data.

The hurricane exposure is analyzed from a probabilistic approach, which considers the full range of potential storm characteristics and corresponding losses. Probabilistic analyses identify the probability of damage exceeding a specific dollar amount. USWIND™ is a probabilistic model designed to estimate damage and losses due to the occurrence of hurricanes. EQECAT proprietary computer software USWIND is one of only four models evaluated and determined acceptable by the Florida Commission on Hurricane Loss Projection Methodology (FCHLPM) for projecting hurricane loss costs (Reference 1).

Probabilistic Annual Damage & Loss is computed using the results of thousands of random variable storms. Annual damage and loss estimates are developed for each individual site and aggregated to overall portfolio damage and loss amounts. Damage is defined as the Operations and Maintenance (O&M) portion of the cost, exclusive of capital and nominal labor, associated with repair and/or replacement of T & D assets necessary to promptly restore service in a post storm environment. This cost is typically larger than the costs associated with scheduled repair and replacement programs.

Factors considered in the analysis include the location of Gulf's overhead and underground T & D assets, the probability of storms of different intensities and/or landfall points impacting those assets, the vulnerability of those assets to storm damage, and the costs to repair assets and restore electrical service.

Transmission and Distribution asset data are provided in the Tables 1-1 and 1-2 below. Distribution asset values are shown in Figure 1-1.

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Table 1-1

Distribution Asset Replacement Values by County

County	Replacement Value
Escambia	$479,746,894
Santa Rosa	$278,411,444
Okaloosa	$236,430,006
Bay	$228,189,305
Washington	$69,418,366
Walton	$59,874,984
Holmes	$20,168,270
Jackson	$11,728,531
Gadsden	$187,595
Total	$1,384,155,396

Table 1-2

Transmission Asset Replacement Value

	Replacement Value
Total	$455,479,998

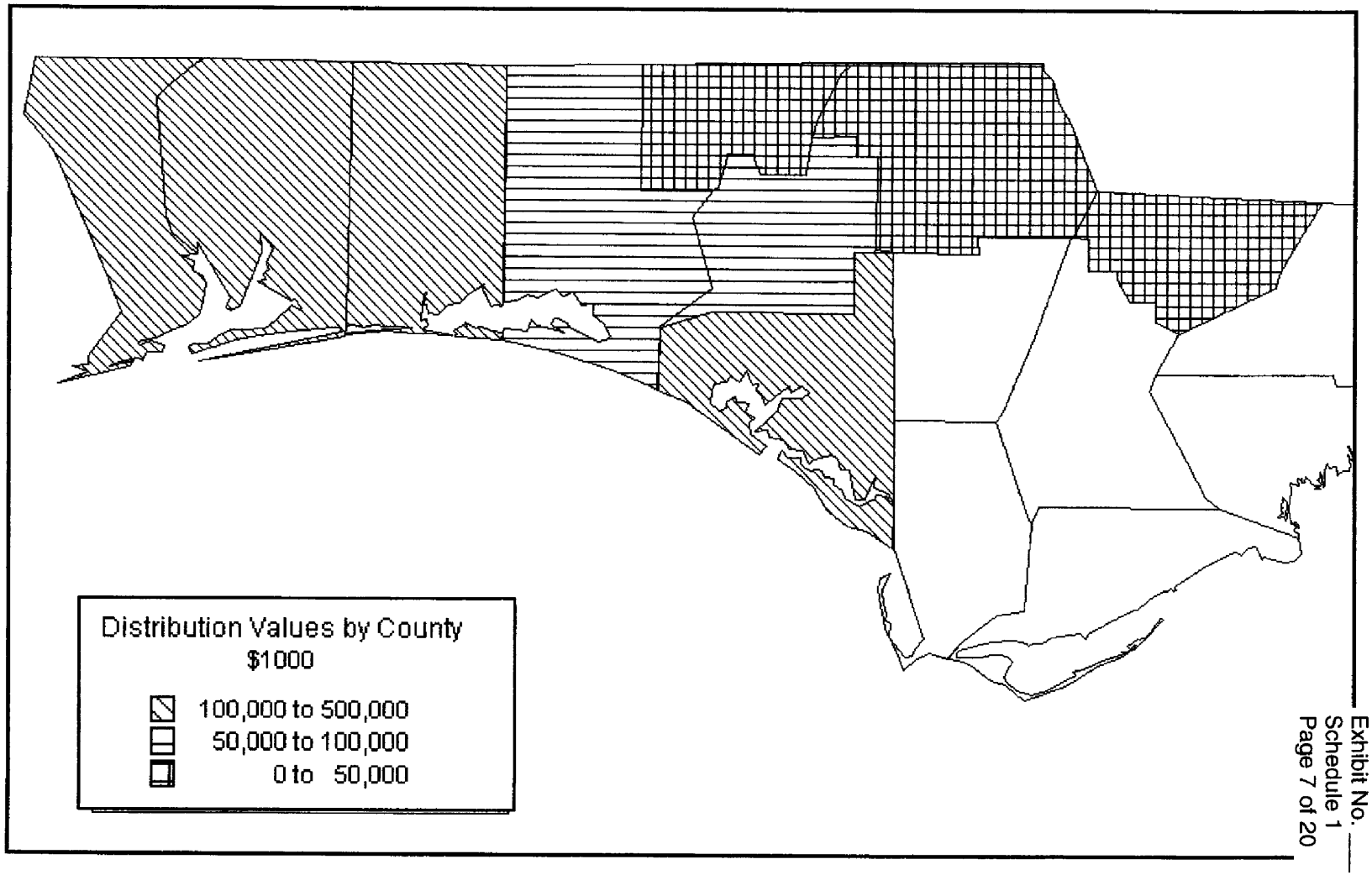

Figure 1-1: Distribution Asset Values by County

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Transmission and Distribution Asset Vulnerabilities

The Gulf loss history from the 2004 Hurricane Ivan and 2005 Hurricane Dennis were considered in the calibration of the storm loss model. These hurricanes provide data on recent storm recovery costs from moderate intensity events. The 2004-05 storm loss experience includes the effects of many factors including the post hurricane costs of labor, mutual aid and other factors associated with the storm restoration process utilized by Gulf Power. The 2004-05 loss history is believed to be most reflective of the current Gulf storm restoration practices and cost experience.

Loss Estimation Methodology

The basic components of the hurricane risk analysis include:

- **Assets at risk:** define and locate
- **Storm hazard**: apply probabilistic storm model for the region
- **Asset vulnerabilities:** severity (wind speed) versus damage
- **Portfolio Analysis:** probabilistic analysis -damage/ loss

Aggregate Damage Exceedance and Expected Annual Damage

A probabilistic database of losses is developed using the storm hazard, assets at risk and their vulnerabilities. For each hurricane, the center, shape, geographical orientation, track and wind speeds were defined. The wind field for each storm is integrated with the asset vulnerability and the asset locations to compute the damage. The annual frequency and the portfolio damage for each simulated hurricane is determined. By manipulating this database of thousands of hurricane losses, various loss exceedance or non-exceedance distributions are generated.

The frequencies and computed damage for all hurricanes are combined to calculate the expected annual loss and the annual aggregate exceedance relations.

Aggregate damage exceedance calculations are developed by keeping a running total of damage from ***all possible events*** in a given time period. At the end of each time period, the aggregate damage for all events is then determined by probabilistically summing the damage distribution from each event, taking into account the event frequency. The process considers the probability of having zero events, one event, two events, etc. during the time period.

A series of probabilistic analyses were performed, using the vulnerability curves derived for Gulf assets and the computer program USWIND™. A summary of the analysis is presented in Table 1-3, which shows the aggregate damage (i.e. deductible is "0") exceedance probability for damage layers between zero and over $250 million dollars.

For each damage layer shown, the probability of damage exceeding a specified value is shown. For example, the probability of damage exceeding $100 million in one year is 1.4%. The analysis calculates the probability of damage from all storms and aggregates the total.

Table 1-3 provides the aggregate damage exceedance probabilities for the Gulf T & D assets analyzed for a series of layers. Each layer has a layer amount of $10 million, except for the final layer which represents all damage $250 million and greater. The value in the first column, labeled Damage Layer, is the attachment point for each layer, with the exception of the last layer, for which the attachment point is $250 million.

The second column of the table, labeled 1 year Exceedance Probability, provides the 1-year modeled probability of penetrating each layer, i.e. the probability that the total damage from all events in a 1 year period will exceed the attachment point of the layer.

The expected annual damage (EAD) and exposure to Gulf's Reserve from hurricanes is $6.4 million. This value represents the average damage from all simulated storms. The EAD is not expected to occur each and every year. Some years will have no damage from hurricanes, some years will have small amounts of damage and a few years will have large amounts of damage. The EAD represents the average of all storm years over a long period of time.

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Table 1-3

GULF POWER T & D ASSETS
AGGREGATE DAMAGE EXCEEDANCE PROBABILITIES

Damage Layer ($millions)	1 Year Exceedance Probability
0 (≥.01)	30.9%
10	13.0%
20	6.6%
30	4.7%
40	3.8%
50	3.1%
60	2.6%
70	2.2%
80	1.9%
90	1.6%
100	1.4%
110	1.2%
120	1.1%
130	0.9%
140	0.8%
150	0.7%
160	0.6%
170	0.6%
180	0.5%
190	0.4%
200	0.4%
210	0.4%
220	0.3%
230	0.3%
240	0.3%
>250	0.2%

2. Hurricane Landfall Analyses for SSI Ranges

In order to provide further insight into Gulf's risk profile, the full set of stochastic hurricane events were analyzed by landfall for four storm intensities, SSI 1 through 4. The landfall locations are at mile posts 800 through 1000. Figure 2-1 illustrates the landfall locations. These mile posts extend east from Pascagoula, MS to Apalachicola, FL at approximately 10 mile intervals.

The full set of stochastic storms within each SSI category was analyzed on Gulf's T&D portfolio. For each milepost and SSI category, the frequency-weighted average damage was computed from all stochastic storms making landfall within 10 nautical miles of a given milepost and within that SSI category. Figures 2-2 through 2-5 provide these results graphically.

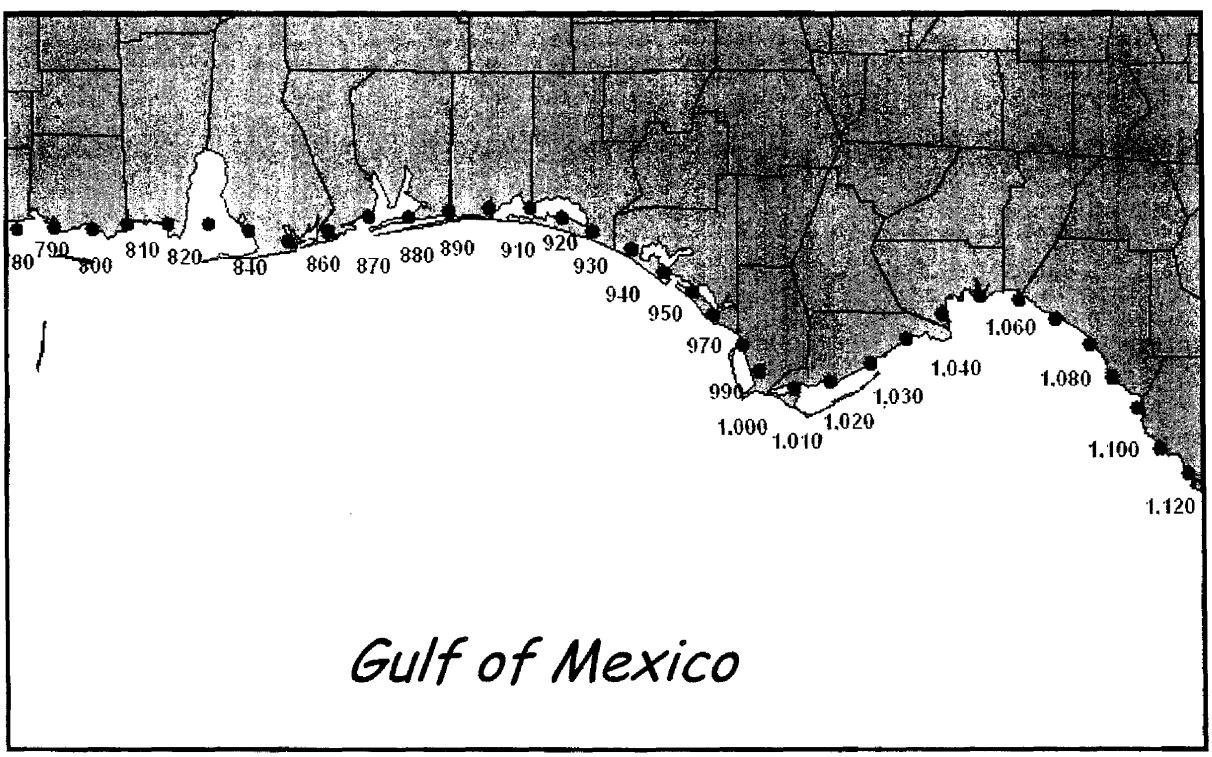

Figure 2-1: Storm Landfall Mile Post

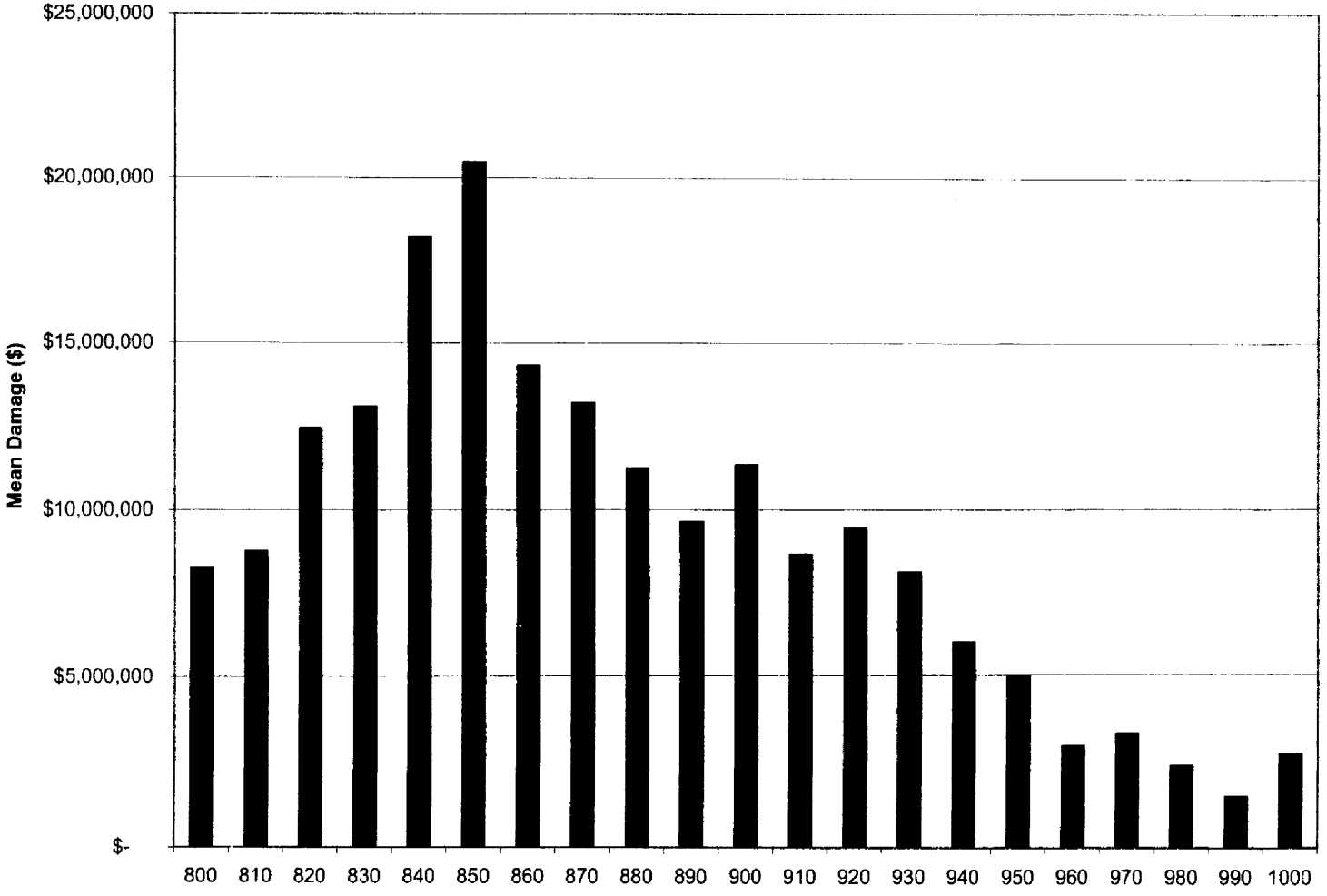

Figure 2-2: Frequency Weighted Average Transmission & Distribution Damage from SSI 1 Landfalls

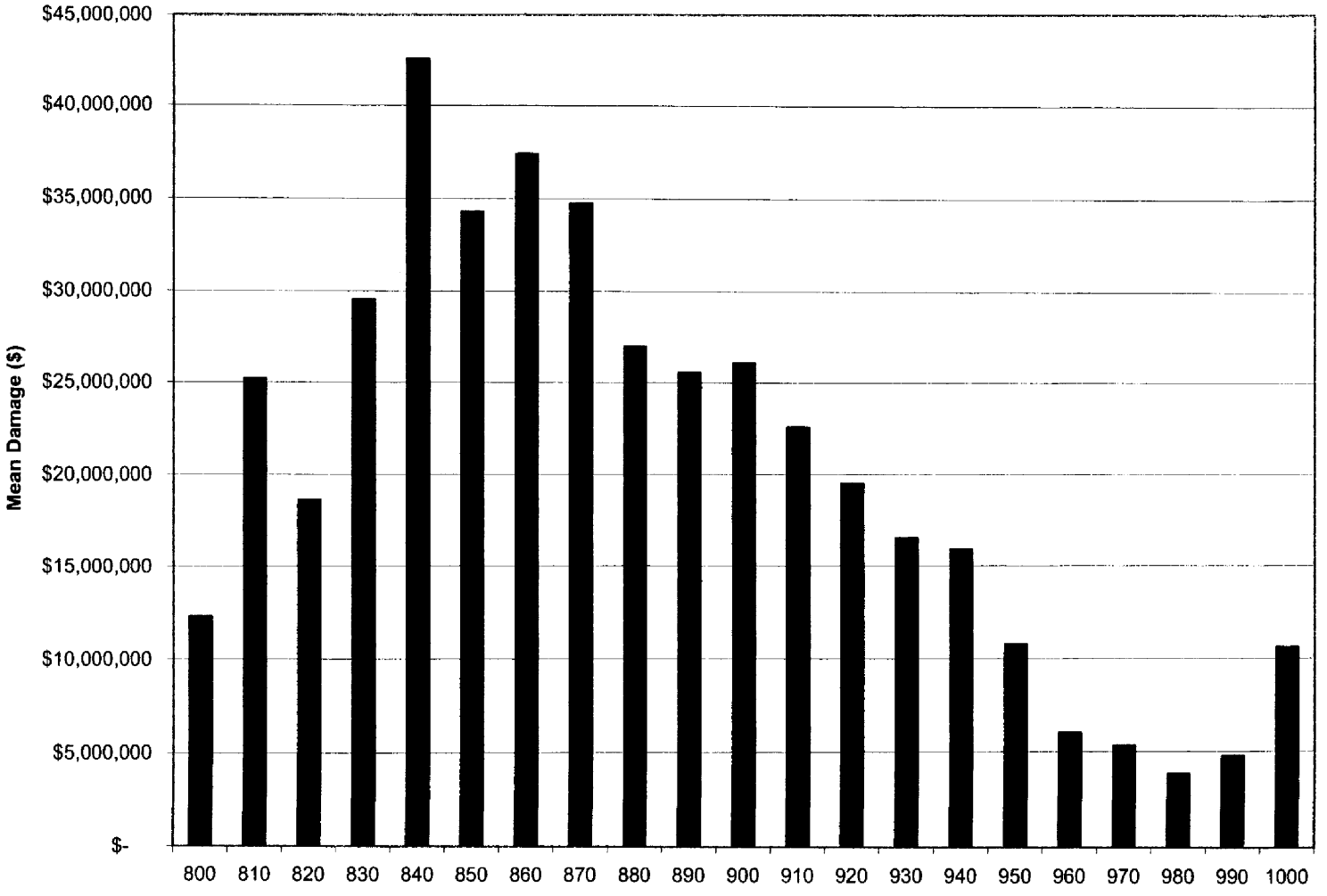

Figure 2-3: Frequency Weighted Average Transmission & Distribution Damage from SSI 2 Landfalls

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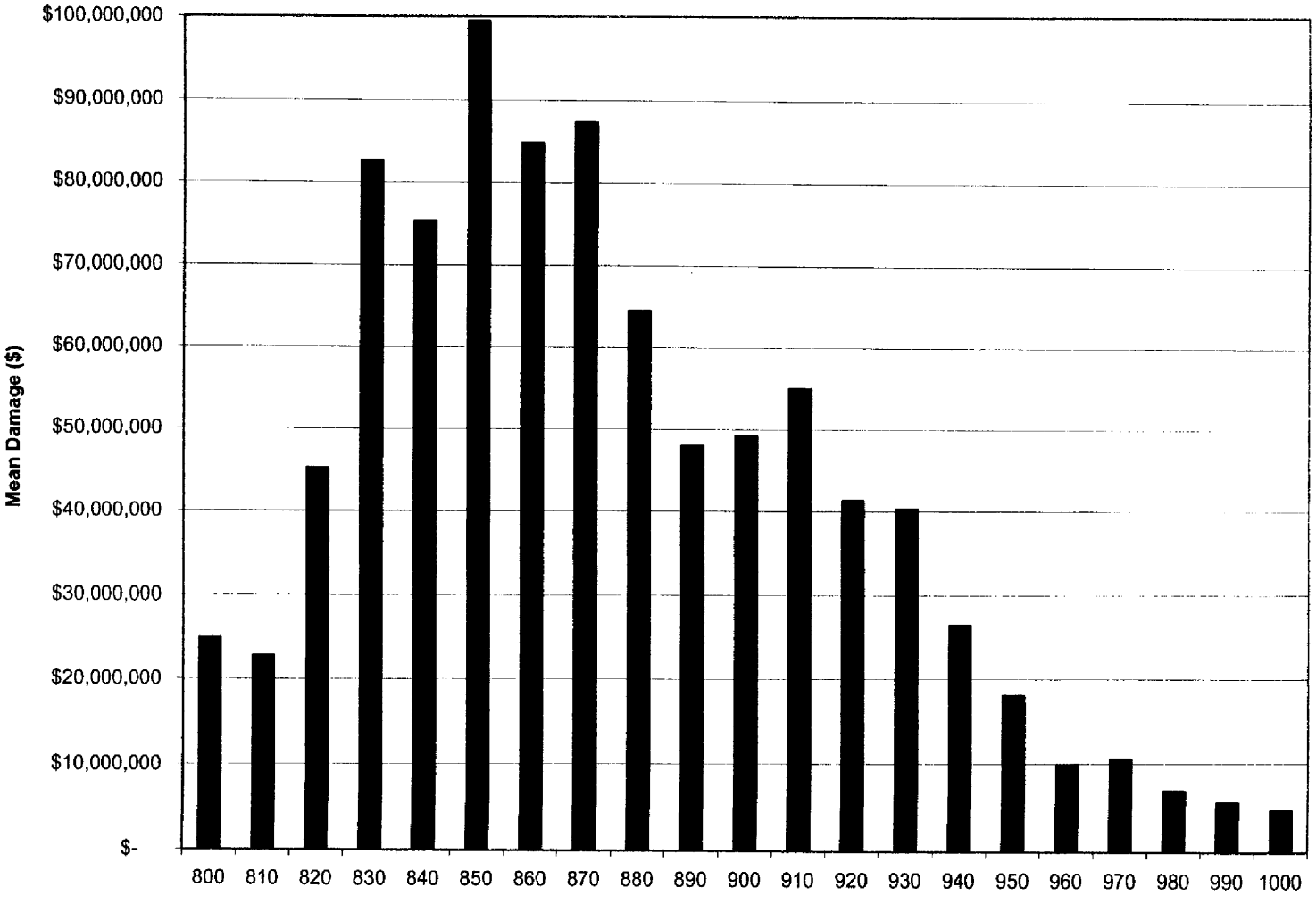

Figure 2-4: Frequency Weighted Average Transmission & Distribution Damage from SSI 3 Landfalls

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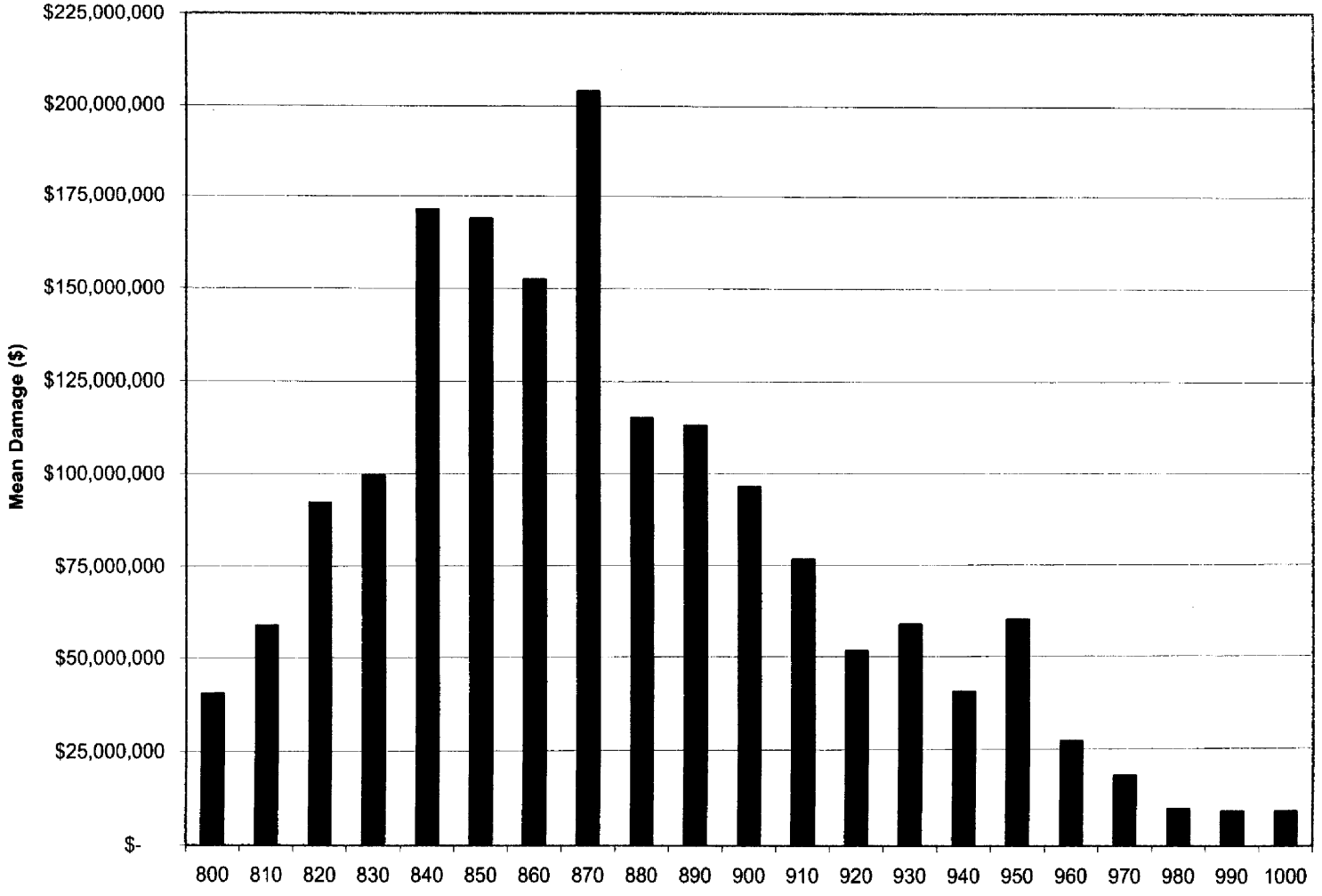

Figure 2-5: Frequency Weighted Average Transmission & Distribution Damage from SSI 4 Landfalls

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3. Reserve Solvency Analysis

A probabilistic analysis of losses from hurricanes was performed for Gulf Power (Gulf) to determine their potential impact on the Reserve fund.

Analysis

The Reserve solvency analysis consisted of performing 10,000 iterations of hurricane loss simulations within the Gulf service territory, each covering an 8-year period, to determine the effect of the charges for damage on the Gulf Reserve. Monte Carlo simulations were used to generate damage samples for the analysis. The analysis provides an estimate of the Reserve assets in each year of the simulation, accounting for the annual accrual, expenses, fund earnings when balances are positive, borrowing costs when fund balances are negative and storm damage using a dynamic financial model.

Assumptions

The analysis performed included the following assumptions:

- Computations are performed on an after tax basis.
- All results are shown in constant 2005 Reserve dollars.
- An initial Reserve balance of $80 million.
- Annual Reserve accruals of $3.5 million were assumed in the analysis.
- Negative Reserve balances are assumed to be financed with an unlimited line of credit costing 7.95% after tax.
- Positive Reserve balances are assumed to earn at an annual after tax rate of 2.76%.

The analysis results for the case analyzed are shown in Table 2-1 below. The results show the Annual Reserve Accrual amount, the mean (expected) Reserve fund balance as well as the probability that the Reserve fund balance will be negative in any one or more of the five years of the simulated time horizon.

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Table 3-1

GULF POWER T & D
RESERVE FUND ACCRUALS AND
PROBABILITY OF RESERVE FUND INSOLVENCY

Initial Reserve Balance	Annual Reserve Accrual	Expected Reserve Balance at end of 8 years	Probability of Insolvency within 8 years
($ millions)	($ millions)	($ millions)	%
$80	$3.5	$63	15%

Figure 3-1 below shows the results of the Reserve fund solvency analysis. These results show the mean (expected) Reserve fund balance as well as the 5th and 95th percentiles.

For example, given an initial Reserve balance of $80million and an Annual Accrual of $3.5 million, Figure 3-1 illustrates the expected performance of the Reserve. The Reserve has a mean (expected) Balance of $63 at the end of the eight year period. The 5th percentile and 95th percentile 5 year ending Reserve Balances are $130 million and negative $(141) million respectively. The Reserve fund has a 15% chance of insolvency in one or more years of the eight year simulation.

The first year of each simulation begins with a $80 million Reserve balance. The first year's annual accrual will bring the reserve balance to $83.5 million. Table 1-3, shows that the likelihood of storm damage exceeding $80 million in a single year is 1.9%.

The accrual of $3.5 million is less than the Expected Annual Damage from storms of $6.4 million. Therefore with each passing year, the Reserve ending balance has a decreasing likelihood of accumulating surpluses. The expected (mean) Reserve balance declines gradually over the eight year simulation to $63 million at eight years reflecting the annual accrual less than the expected annual damage. At the end of eight years, the likelihood of storm damage in excess of $63 million is about 2.5%.

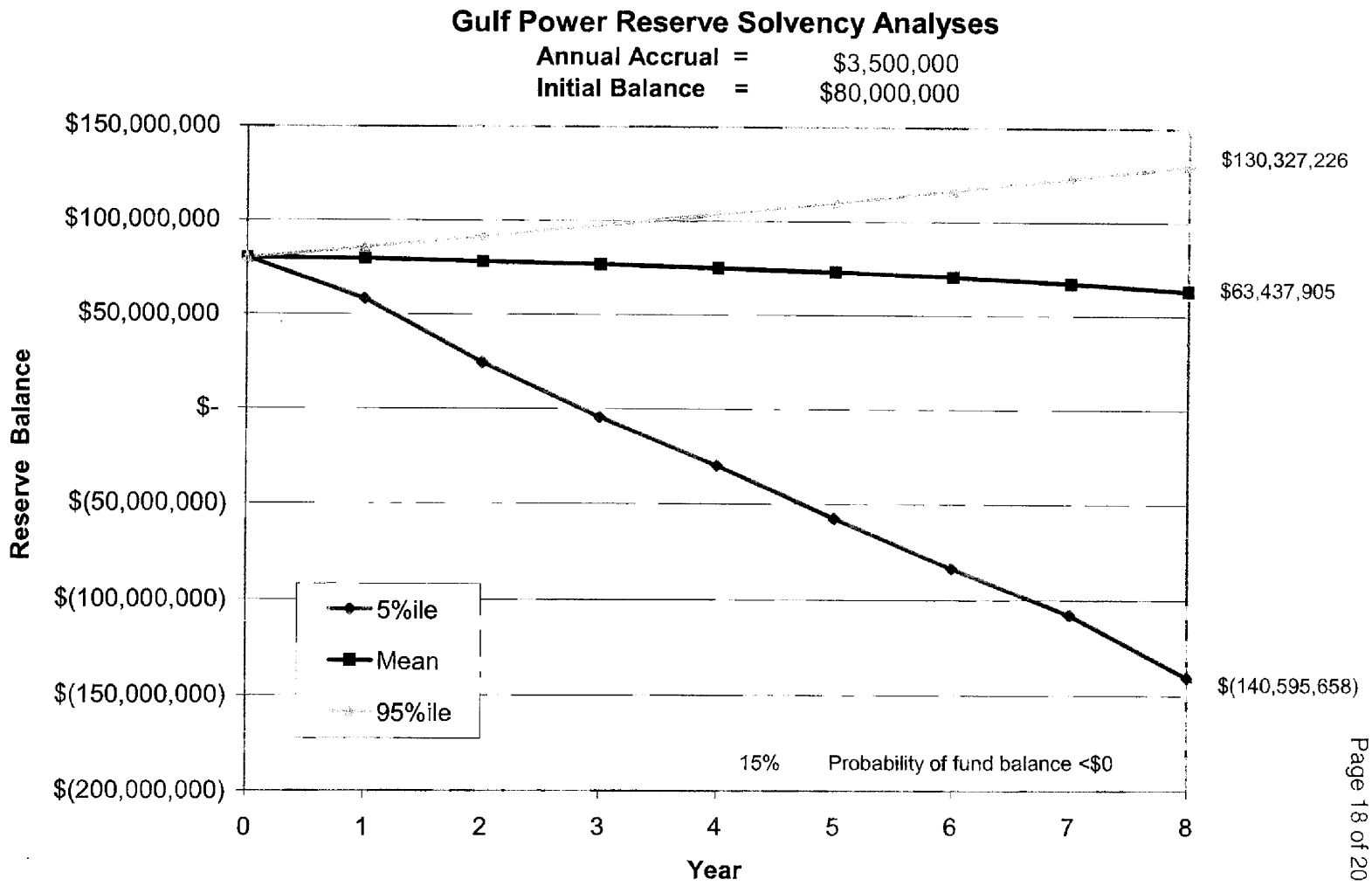
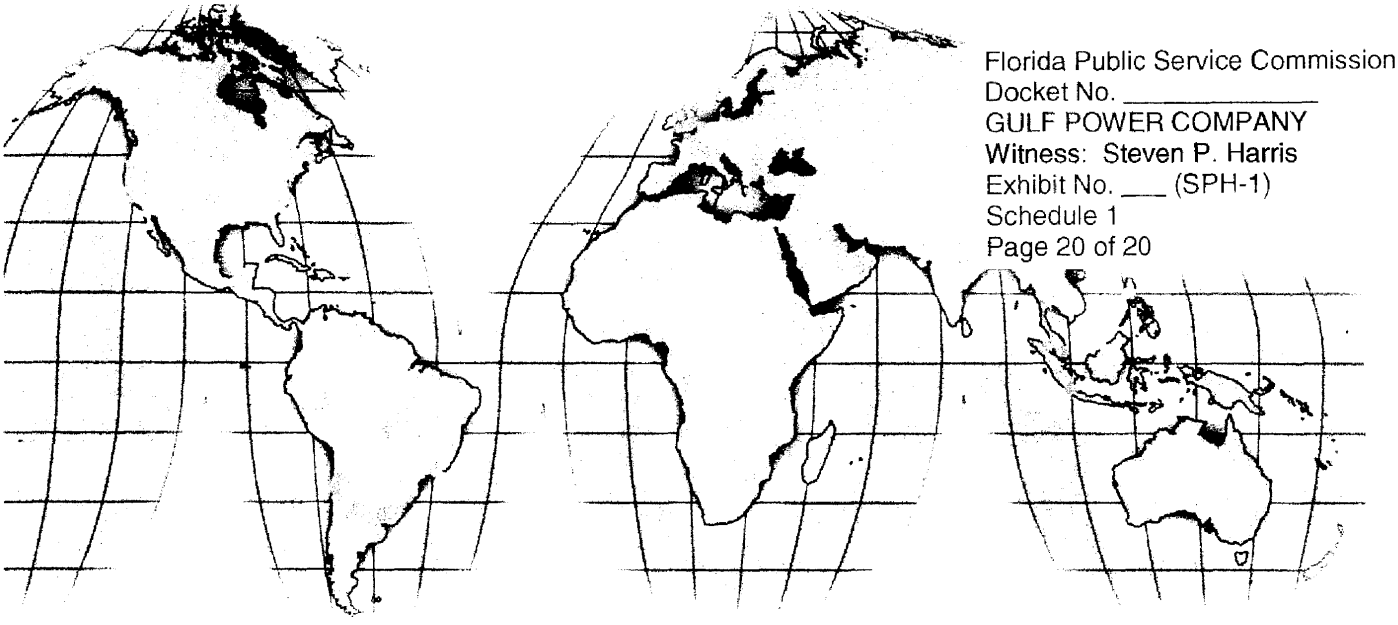


Figure 3-1: Reserve Solvency Analysis Results: $80 million Initial Balance, $3.5 million Annual Accrual

3. References

1. "Florida Commission on Hurricane Loss Projection Methodology", EQECAT, an ABS Group Company, February 2004.



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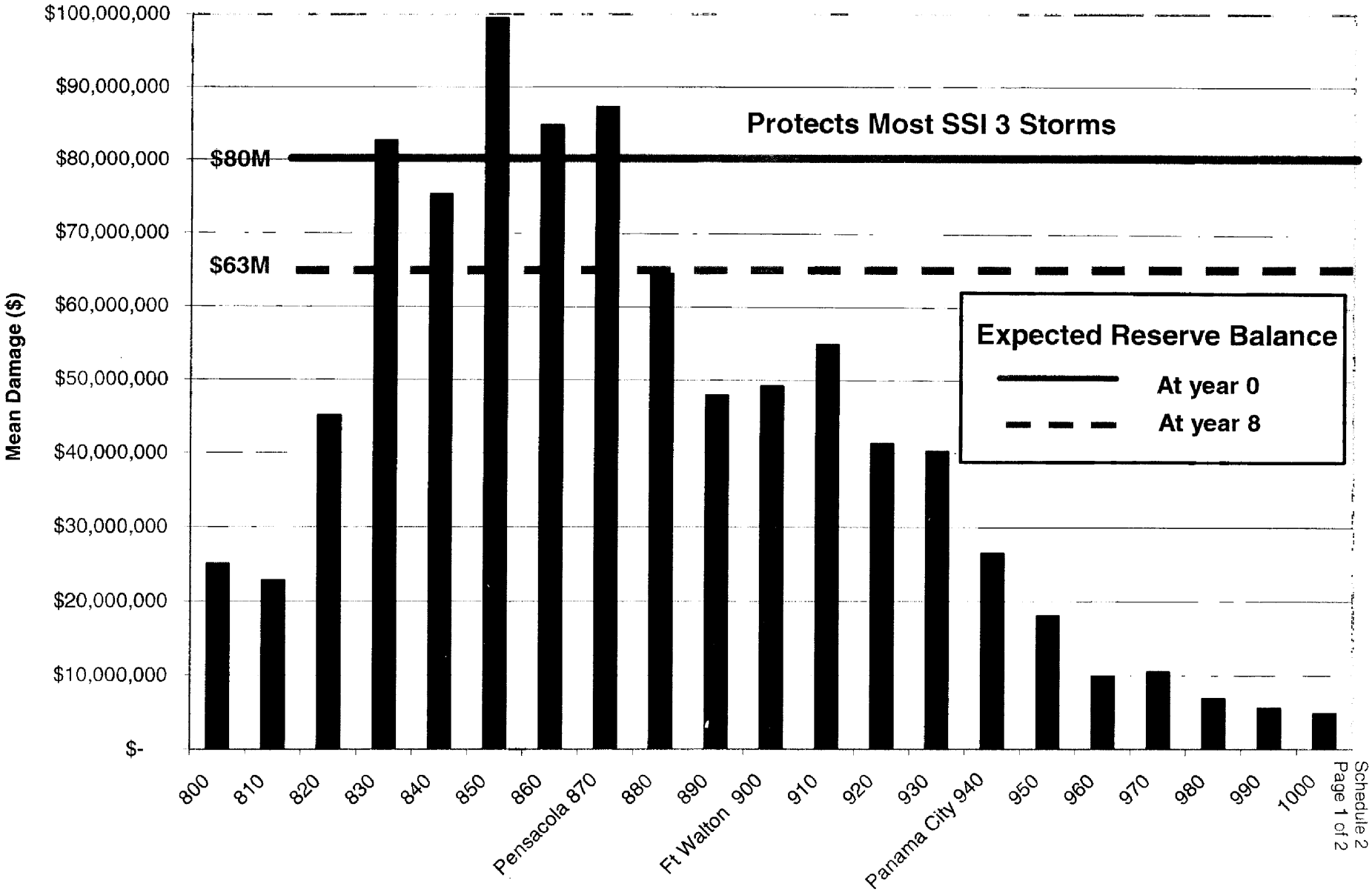

Protection afforded by $80m Initial Balance and $3.5m Annual Accrual Against Potential T&D Storms Damage from a single SSI 3 Landfall at Milepost

Florida Public Service Commission
Docket No. _____
GULF POWER COMPANY
Witness: Steven P. Harris
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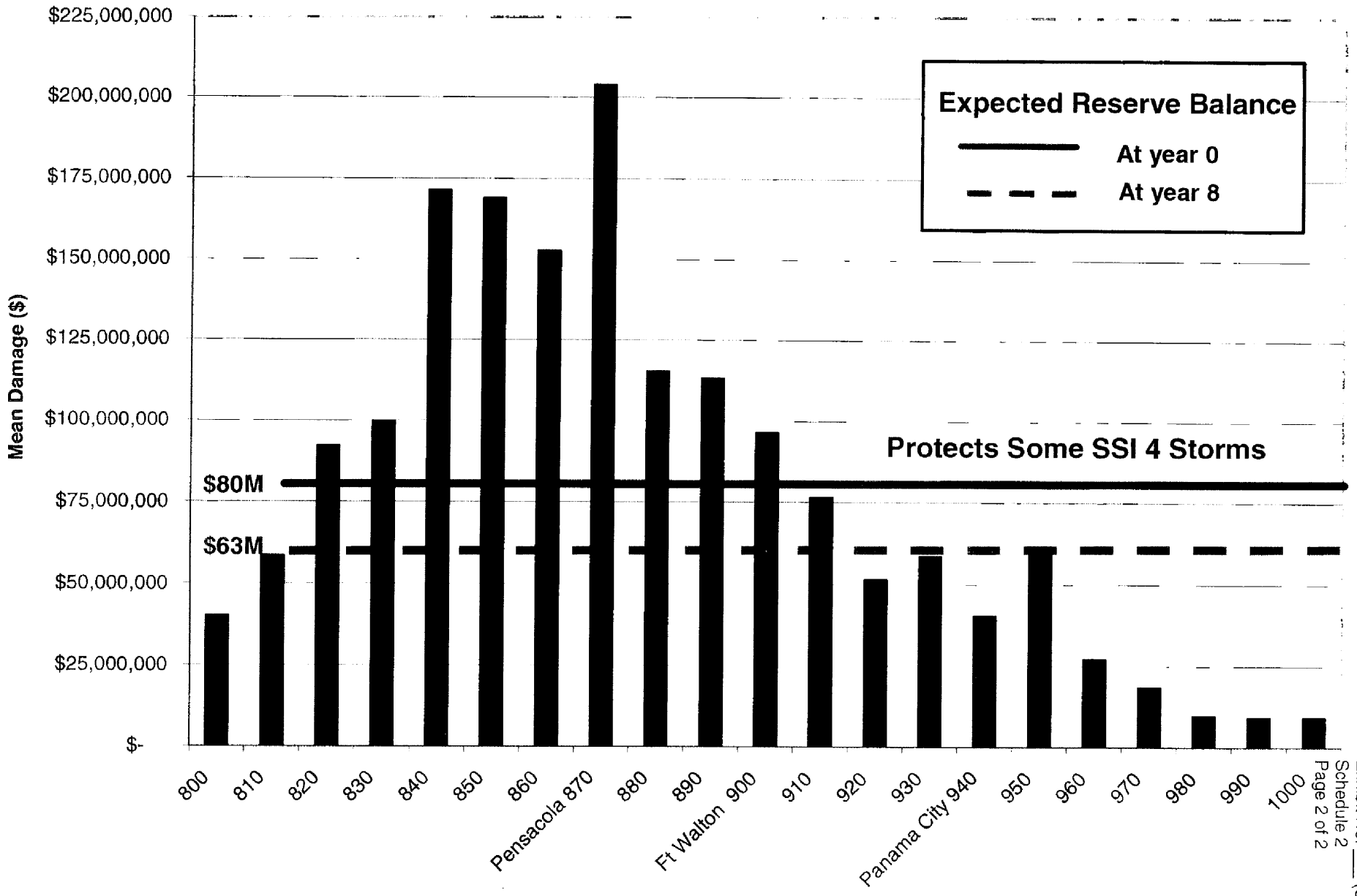

Protection afforded by $80m Initial Balance and $3.5m Annual Accrual Against Potential T&D Storms Damage from a single SSI 4 Landfall at Milepost

Florida Public Service Commission
Docket No. _____
GULF POWER COMPANY
Witness: Steven P. Harris
Exhibit No. ____ (SPH-1)
Schedule 2
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