ORIGINAL

RECEIVED - FPSC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

CO MAY -3 AM 9:35

IN RE: Gulf Power Company's petition for a financing order pursuant to Section 366.8260 of the Florida Statutes (2005) relating to storm-recovery financing.

Docket No.: 060154 EMMISSION Date filed: May 1, 2006 CLERK

GULF POWER COMPANY'S RESPONSES TO THE CITIZENS' THIRD REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 16- 18)

GULF POWER COMPANY ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned counsel, hereby submits the Company's responses to the Office of Public Counsel's Third Request for Production of Documents (Nos. 16-18) in the attached Appendix, as detailed/indexed on the following pages.

Respectfully submitted the 1st day of May, 2006.

1 Belle JEFFREY A. STONE

Florida Bar No. 325953 **RUSSELL A. BADDERS** Florida Bar No. 007455 **STEVEN R. GRIFFIN** Florida Bar No. 627569 **Beggs & Lane** 501 Commendencia Street P. O. Box 12950 Pensacola, FL 32591 (850) 432-2451 **Attorneys for Gulf Power Company**

CMP _____

.

- COM _____
- CTR _____
- GCL
- OPC
- RCA
- SCR ____
- SGA
- SEC _
- ОТН

DOCUMENT NUMBER-DATE

03896 MAY-38

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail and United States Mail on the 1st day of May, 2006, to the following:

FPSC Staff:

Jennifer Brubaker, Esquire <u>ibrubake@psc.state.fl.us</u> Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0863

FIPUG:

Timothy J. Perry, Esquire <u>tperry@mac-law.com</u> McWhirter Reeves & Davidson, P.A. 117 S. Gadsden Street Tallahassee, FL 32301

FRF:

Robert Scheffel Wright, Esquire <u>swright@yvlaw.net</u> John Thomas LaVia, III, Esquire <u>jlavia@yvlaw.net</u> Young van Assenderp, P.A. 225 S. Adams St., Suite 200 Tallahassee, FL 32301

Office of Public Counsel:

Harold A. McLean, Esquire <u>mclean.harold@leg.state.fl.us</u> Patricia A. Christensen, Esquire <u>christensen.patty@leg.state.fl.us</u> Office of Public Counsel 111 W. Madison St., Suite 812 Tallahassee, FL 32399-1400

FIPUG:

John W. McWhirter, Jr., Esquire <u>imcwhirter@mac-law.com</u> McWhirter Reeves & Davidson, P.S. 400 N Tampa St Suite 2450 Tampa, FL 33602

AARP:*

Michael P. Twomey, Esquire <u>miketwomey@talstar.com</u> P. O. Box 5256 Tallahassee, FL 32314-5256

* Indicates not an official party of record as of the date of this filing

By:

Russell A. Badders, Esquire Florida Bar No. 007455