State of Florida



Public Service Commission -FPSO

CAPITAL CIRCLE OFFICE CENTER \$2540 SHUMARI PACFOULEVARD 2: 27
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M- COMMISSION CLERK

DATE:

October 4, 2011

TO:

Office of Commission Clerk

FROM:

Clarence J. Prestwood, Chief of Auditing, Office of Auditing and Performance

Analysis

RE:

Docket No.: 110138-EI

Company Name: Gulf Power Company

Company Code: EI804 Audit Purpose: Rate Case Audit Control No: 11-200-1-1

Attached is the final audit report for the Utility stated above. I am sending the Utility a copy of this memo and the audit report. If the Utility desires to file a response to the audit report, it should send a response to the Office of Commission Clerk. There were confidential work papers associated with this audit.

CJP/klh

Attachment: Audit Report

cc: Office of Auditing and Performance Analysis File

DOCUMENT NUMBER - DATE

07211 OCT-4=

State of Florida



Public Service Commission

Office of Auditing and Performance Analysis
Bureau of Auditing
Tallahassee District Office

Auditor's Report

Gulf Power Company Rate Case Audit

Historical Year Ended December 31, 2010

Docket No. 110138-EI Audit Control No. 11-200-1-1 October 3, 2011

> Debra M. Dobiac Audit Manager

Donna D. Brown

Audit Staff

Andrew Von Euw

Audit Staff

Jerry M. Hallenstein

Audit Staff

Lynn M. Deamer

Reviewer

DOCUMENT REMBER DAT

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FPSC-COMMISSION CLERK

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Purpose

To: Florida Public Service Commission

We have performed the procedures described later in this report to meet the agreed-upon objectives set forth by the Division of Economic Regulation in its audit service request dated July 19, 2011. We have applied these procedures to the attached schedules prepared by Gulf Power Company in support of its filing for rate relief in Docket No. 110138-EI.

This audit was performed following General Standards and Fieldwork Standards found in the AICPA Statements on Standards for Attestation Engagements. Our report is based on agreed-upon procedures. The report is intended only for internal Commission use.

Objectives and Procedures

General

Definitions

The historical year ended December 31, 2010 is the audit period unless otherwise specified.

The Utility or GPC refers to Gulf Power Company, which is a wholly owned subsidiary of Southern Company. The Utility's last rate case order PSC-02-0787-FOF-EI was issued June 10, 2002 in Docket No. 010949-EI.

Utility Books and Records

Objectives: The objective was to verify the amounts shown as the "per book" balances for rate base, net operating income, and capital structure for the audit period.

Procedures: We developed a 13-month trial balance from the Utility's general ledger and reconciled it to the Minimum Filing Requirements (MFRs) for rate base, net operating income, and capital structure. No variances were noted

Objectives: The objective was to verify that the adjustments to rate base and net operating income for the audit period were consistent with the Commission's findings in prior cases.

Procedures: Audit staff reconciled the adjustments to the general ledger or other supporting documentation. We verified that all necessary adjustments were made and that they were correctly calculated based on past orders or rules.

Rate Base

Utility Plant in Service and Accumulated Depreciation

Objectives: The objective was to verify the 13-month average plant balances, reserve balances, and depreciation expense for each plant account for the audit period. In addition, we were to verify the plant additions, retirements, and adjustments from the last rate case date through the most recent actual data.

Procedures: Audit staff obtained the Utility's December 31, 2000 trial balance from the last rate case audit, Docket No. 010949-EI, for the plant and reserve beginning balances. We scheduled the plant and reserve balances from the monthly operating reports through December 31, 2010 and traced the ending balance to the general ledger and the MFRs. We judgmentally selected work orders added since the last rate case and tested additions to supporting documentation. No exceptions were noted.

Property Held for Future Use

Objectives: The objective is to verify land held for future use.

Procedures: We obtained a list of all property held for future use and the corresponding deeds, closing statements, and property tax bills. We traced the land balances to the monthly operating

reports, the general ledger, and the MFRs. Audit findings 1 and 2 discuss land used for a substation and a timber sale.

Construction Work in Progress

Objectives: The objective was to determine if the Utility has included any Construction Work in Progress (CWIP) projects in rate base that are eligible for the allowance for funds used during construction (AFUCD) pursuant to Rule 25-6.0141, Florida Administrative Code (F.A.C.).

Procedures: We obtained a list of projects included in CWIP and determined which projects were eligible for AFUDC according to the rule. We recalculated AFUDC for the work orders tested. We noted that the Utility is not requesting AFUDC-eligible CWIP in rate base.

Working Capital

Objectives: The objective was to determine if any working capital accounts are interest bearing. If so, we were to determine the corresponding interest revenue or interest expense, the supporting calculation, and its location in the filing.

Procedures: We reviewed the accounts included in working capital for items that may earn interest. We reviewed the interest income and interest expense accounts, and verified that the interest accrued on these accounts was also included.

Objectives: The objective was to review transactions in clearing accounts, stores expense, prepayments, deferred debits, deferred credits, and accrued liabilities to determine if they were utility in nature, and that expenses were not overstated. We were also to review materials and supplies and other accounts receivable for non-utility items.

Procedures: We determined which of these accounts were included in working capital, and then selected accounts with material balances. Audit staff judgmentally sampled these accounts, traced items to source documentation, verified if utility-related, and included appropriately in working capital. No exceptions were noted.

Objectives: The objective was to determine whether the Utility complies with the provisions of Rule 25-6.0143, F.A.C. for accounts 228.1 – Accumulated Provision for Property Insurance, 228.2 – Accumulated Provision for Injuries and Damages, and 228.4 – Accumulated Miscellaneous Operating Provisions.

Procedures: We judgmentally sampled these accounts, traced items to source documentation, verified if utility-related, and determined if they were included appropriately in working capital. No exceptions were noted.

Net Operating Income

Operating Revenue

Objectives: The objectives were to verify that unbilled revenues were correctly calculated, to determine that the revenues filed by the Utility for the audit period agreed to the general ledger, and that the appropriate tariffs are used to bill customers.

Procedures: We recalculated the unbilled revenue for the audit period and traced it to the MFRs and the general ledger. Audit staff recalculated a judgmental sample of customer bills and traced the rates to the appropriate clause factors and tariffs. No exceptions were noted.

Operation and Maintenance Expense

Objectives: The objective was to verify that the audit period operation and maintenance transactions were reasonable, adequately supported, and recorded in compliance with the Uniform System of Accounts (USOA).

Procedures: Audit staff prepared an analytical review of the Utility's expenses. We compared the expenses from 2006 to 2010 noting any large increases in accounts. We selected a judgmental sample based on the analytical review and tested as per the criteria listed above. No exceptions were noted.

Objectives: The objectives were to review the types of advertisements included in operating expense during the audit period, and determine if they are image enhancing in nature, promotional, and related to non-utility operations or one of the recovery clauses.

Procedures: We selected a judgmental sample from the advertising account and reviewed the advertisements noting the criteria listed above. No exceptions were noted.

Objectives: The objective was to review details of legal fees, other outside service expenses, sales expenses, customer service expenses, office supplies and expense, and miscellaneous general expenses.

Procedures: We selected a judgmental sample of these expenses and tested them to see that they were reasonable, adequately supported, and recorded in compliance with the USOA. No exceptions were noted.

Objectives: The objective was to review liability, health, and life insurance expense during and subsequent to the audit period to determine if the Utility received refunds based on loss experience.

Procedures: Audit staff reviewed the applicable expense accounts and requested information from the Utility concerning refunds it had received based on loss experience. Audit finding 3 discusses these refunds.

<u>Depreciation Expense</u>

Objectives: The objective was to verify that the depreciation rates used for the audit period were those approved in Order No. PSC-10-0458-PAA-EI.¹

Procedures: We obtained depreciation schedules, reconciled them to the general ledger and the MFRs. We compared the rates used to the above Order. No exceptions were noted.

¹ <u>See</u> Order No. PSC-10-0458-PAA-EI, issued July 19, 2010, Docket No. 090319-EI, In Re: <u>Depreciation and dismantlement study at December 31, 2009, by Gulf Power Company.</u>

Taxes Other than Income

Objectives: The objective was to verify that sales tax collection discounts are recorded above the line.

Procedures: We obtained the sales tax reports and compared them to the sales tax accounts to determine where the discounts were reported. We recalculated sales tax collection discounts for the year 2010, and traced the discounts from the general ledger to sales and use tax returns and utility payment vouchers. No exceptions were noted.

Objectives: The objective was to reconcile property taxes, gross receipts tax, regulatory assessment fees, and any taxes other than income (TOTI) to the general ledger and the MFRs.

Procedures: We traced the MFR schedule for TOTI to the general ledger and reconciled it to the applicable tax returns. No exceptions were noted.

Income Taxes

Objectives: The objective was to reconcile the federal and state income taxes to the MFRs and the general ledger, and to verify that deferred income tax expense and deferred tax balances include proper bonus depreciation treatment of property additions.

Procedures: The Utility's 2010 federal and state tax returns were filed on September 15, 2011. We attempted to trace MFR amounts for the taxable income per books, the temporary and permanent differences, and the deferred income tax balances to the general ledger and tax returns. Audit finding 4 discusses the variances noted.

Capital Structure

Objectives: The objective was to verify how non-utility assets supported by the Utility's capital structure are removed in the rate base/capital structure reconciliation by obtaining a list of all non-regulated/non-utility services that the Utility is currently providing.

Procedures: We obtained the rate base/capital structure reconciliation and determined that the non-utility adjustments removed in rate base were removed in the capital structure.

Objectives: The objective was to verify that the Utility's book amounts for average balance sheet items included in the capital structure agree with the general ledger.

Procedures: We developed a 13-month average trial balance from the Utility's general ledger and reconciled it to the cost of capital MFRs.

Objectives: The objective was to verify that the cost rates used in the computation of the cost of capital are appropriate.

Procedures: Audit staff reconciled the cost of capital cost rates for the audit period to the debt documentation.

Objectives: The objective was to determine how the rate base adjustments were adjusted in the capital structure and to reconcile them to the MFRs and the general ledger.

Procedures: We obtained a reconciliation of the rate base adjustments in the capital structure and traced it to the MFRs and the general ledger. No exceptions were noted.

Other

Affiliate Transactions

Objectives: The objective was to review intercompany charges to and from divisions, affiliated companies, and non-regulated operations to determine if an appropriate amount of costs were allocated pursuant to Rule 25-6.1351, Florida Administrative Code (F.A.C.). We were also to determine the original amounts allocated, whether the methodology was reasonable, and to check for accuracy and consistent application.

Procedures: Audit staff reviewed the Utility's policies and procedures relating to the recording of affiliate transactions and the cost/allocation manual for employees. During the review of rate base and net operating income, we examined items that were allocated as per the Utility's policies and procedures. No exceptions were noted.

Federal Energy Regulatory Commission Audit

Objectives: The objective was to follow-up on exceptions and disclosures noted in the last Federal Energy Regulatory Commission (FERC) audit to determine if they were applicable to this case.

Procedures: We read the FERC audit, dated May 4, 2004, pertaining to the industry-wide audit of Account 154, Plant Materials and Operating Supplies, and Account 163, Stores Expenses Undistributed, and determined that no corrective action was required.

Internal and External Audits

Objectives: The objective was to follow-up on exceptions and disclosures noted in any internal or external audits to determine if they were applicable to this case.

Procedures: We reviewed the internal and external audits to determine if any adjustments materially affected the audit period. We noted that the Utility had performed any required corrective action in the applicable follow-up audit.

Budget Analysis

Objectives: The objective was to perform a variance analysis of the Utility's actual to budget capital expenditures.

Procedures: We requested comparisons of actual to budget capital expenditures and variance explanations for each month from January 2010 to June 2011. Audit staff scheduled the actual to budget capital expenditures noting significant variances and traced them to the Utility's explanations. All variances were explained to audit staff's satisfaction.

Objectives: The objective was to perform a variance analysis of the Utility's actual to budget operation and maintenance (O&M) expenditures.

Procedures: We requested comparisons of actual to budget O&M expenditures and variance explanations for each month from January 2010 to June 2011. We scheduled the actual to budget O&M expenditures noting significant variances and traced them to the Utility's explanations. All variances were explained to audit staff's satisfaction.

Objectives: The objective was to perform a variance analysis of the Utility's actual to budget O&M budget for Special Projects, such as the Gemguard System and the Fuel Handling Structures.

Procedures: Audit staff requested a breakdown of the Production O&M budget for Special Projects for the Historical Year Ended December 31, 2010, the Prior Year Ended December 31, 2011, and the Projected Test Year Ended December 31, 2012. We reviewed the data for any atypical projects and any significant variances from year to year. All variances were explained to audit staff's satisfaction.

Objectives: The objective was to review all internal and external audits performed on the Utility's budget function.

Procedures: We requested copies of any internal, external, quality review, or industry peer reviews conducted during the past five years relating to the budget function. The Utility provided one internal audit that reported no significant findings.

Audit Findings

Finding 1: Property Held for Future Use – Substation

Audit Analysis: A parcel of land, which had been recorded in Plant Held for Future Use (PHFU), was actually in use by a substation. In April 2011, the Utility transferred the \$85,464 land basis from PHFU to Plant in Service. The PHFU 13-month average on MFR Schedule B-15 does not reflect this adjustment due to timing.

Effect on the General Ledger: None.

Effect on the Filing: The finding is for informational purposes only.

Finding 2: Property Held for Future Use – Timber Sale

Audit Analysis: In 2008, the Utility made a reduction of \$18,340 to the Mossy Head property included in PHFU for the value of a timber harvest. According to the FERC 18 CFR Ch. 1 (4/1/10 Edition), Pt. 101, Account 105, part B, electric plant held for future use includes the original cost of land and land rights owned and held for future use in electric service. It also states under general instructions, Item 7, Section C:

The net profit from the sale of timber, cord, wood, sand, gravel, other resources or other property acquired with the right-of-way or other lands shall be credited to the appropriate plant account to which related. Where land is held for a considerable period of time and timber and other natural resources on the land at the time of purchase increases in value, the net profit (after giving effect to the cost of the natural resources) from the sales of the timber or its products or other natural resources shall be credited to the appropriate utility operating income account when such land has been recorded in account 105, Electric Plant Held for Future Use or classified as plant in service, otherwise to account 421, Miscellaneous Non-operating Income.

The Utility informed us that timber will have an effect on the per acre value of property depending on its merchantability and volume, however, it does not place separate values on timber and land during the acquisition period. The Utility also stated that it relies on 18 CFR Ch. 1, Pt. 101, Electric Plant Instructions, Item 7, Section C, for its handling of the PHFU timber sales transaction for the Mossy Head property. FERC Instruction 7 states that if the land is held for a "considerable period of time", the "net profit" is credited to operating income. There is no specific guidance from FERC on what a "considerable period of time" should be. The Utility follows the internal procedure below:

- If the land has been held for 40 years or more, 100 percent of the proceeds are credited to revenue account 456-00700.
- If the land has been held for 15-39 years, 90 percent of the proceeds are credited to revenue account 456-00700 and 10 percent of the proceeds are credited to the property account.
- If the land has been held for less than 15 years, the percentage applied to revenue account 456-00700 is determined by dividing the number of months from the date the land was acquired to the sale date by 180. The remaining amount is credited to the property account.

The accounting for the sale of the Mossy Head timber was based on the internal procedures for land held less than 15 years as described above. The Mossy Head land was acquired in 1998 and 1999, and the weighted age of the land was ten years, based on the purchased acreage. As the land was held less than fifteen years, a .667 revenue multiplier was calculated. This multiplier was the ratio of 10 years owned to the 15 years outlined in the Utility's internal procedure. This multiplier was then applied to the \$55,020 received for the timber harvested and yielded \$36,680 that was booked to revenue account 456-00700. The remaining proceeds of \$18,340 were removed from the Mossy Head PHFU investment, account 105.

Effect on the General Ledger: None.

Effect on the Filing: The finding is for information purposes only.

Finding 3: Refunds Based on Loss Experience

Audit Analysis: Audit staff reviewed liability, health, and life insurance expense during and subsequent to the audit period, and requested information from the Utility concerning refunds it had received based on loss experience. The Utility disclosed that no refunds were received during the audit period. However, the following refunds/payments were received in 2011.

	FERC			
	Account	YTD August 2011		
Liability	N/A	\$ -		
Health	242-00999	\$ 4,791 (A)		
Worker's Compensation	228-20101	\$ 89,287		
	228-22104	\$166,213		
Life	N/A	\$ -		

(A) Included in the \$4,791 health refund is \$853 that will be recorded in September 2011.

Effect on the General Ledger: None

Effect on the Filing: The finding is for informational purposes only.

Finding 4: Income Taxes

Audit Analysis: Audit staff had requested copies of the Utility's Federal and State Tax Returns on August 5, 2011. The Utility informed us that the tax returns were scheduled to be filed on September 15, 2011, and promptly provided access to copies of the tax returns after the filing date. We noted significant variances between the MFR, the general ledger, and the tax returns with respect to taxable income per books, temporary and permanent differences, state taxable income, and federal taxable income, for which we requested a reconciliation. During the normal course of business, the Utility performs a detailed actualization process in which income taxes per the return are reconciled to income tax expense recorded on the books. The actualization was not completed as of the date of this audit report, and audit staff was unable to determine what effect the variances would have on deferred taxes.

Actualization is a term the Utility uses internally to describe reconciling its tax returns to its books and records.

Effect on the General Ledger: None.

Effect on the Filing: The finding is for informational purposes only.

Adjusted 13-Month Average Rate Base (\$000's)

(1)	(2)	(3)	(4)	(5)	(6) Commission Adjustments	(7)	(8)	(9) Total Utility with	(10)	(11)	(12)	(13) Jurisdictional
Line No.	Rate Base Components	Total Company per Books	Non- Electric Utility	Electric Utility (3) + (4)	Made in Last Case as Applicable (Sch. B-2)	Adjusted per Commission (5)+(6)	Company Adjustments (Sch. B-2)	& Company Adjustments (7) + (8)	Unit Power Sales Rate Base	Total Utility Adjusted for UPS (9) - (10)	Jurisdictional Rate Base Factor	Utility Adjusted Per Company & Commission (11) x (12)
1	Plant-in-Service	3,518,325	0	3,518,325	(057,805)	2,660,520	(4,823)	2,655,697	(250,855)	2,404,842	0.9788452	2,353,968
2	Accumulated Depreciation & Amortization	(1,230,243)	0	(1,230,243)	37,329	(1,192,914)	(9,983)	(1,202,897)	104,116	(1,096,781)	0.9770686	(1,073,584)
3	Net Plant-in-Service (1) - (2)	2,288,082	0	2,268,082	(820,476)	1,467,606	(14,806)	1,452,800	(146,739)	1,306,061	0.9803401	1,280,384
4	Plant Held for Future Use	5,440	0	5,440	0	5,440	0	5,440	0	5,440	0.9664488	5,257
5	Construction Work-in-Progress	193,523	0	193,523	(57,006)	136,517	0	136,517	(86,790)	49,727	0.9727710	48,373
6	Plant Acquisition Adjustment	2,925	0	2,925	0	2,925	0	2,925	(2,925)	0		0
7	Net Utility Plant (3)+(4)+(5)+(6)	2,489,970	0	2,489,970	(877,482)	1,612,488	(14,806)	1,597,682	(236,454)	1,361,228	0.9800078	1,334,014
8	Working Capital Allowance	231,611	(13,520)	218,091	(28,914)	189,177	7,907	197,084	(8,599)	188,485	0.9682680	182,504
9	Total Rate Base (7) + (8)	2,721,581	(13,520)	2,708,061	(906,396)	1,801,685	(6,899)	1,794,766	(245,053)	1,549,713		1,516,518

Page 3 of 3

411,486

111,184

(20,981)

(15,895)

390,506

95,289

0.9735235

0.9421360

380,166

69,775

ADJUSTED JURISDICTIONAL NET OPERATING INCOME

Schedule C-1

(1)

Line

No.

2

12

13

14

15

16 17

18

19

FLORIDA PUBLIC SERVICE COMMISSION

(3)

(4)

Total

Company

per Books

1,515,178

1,590,368

776,253

47,984

8.562

34,215

264,280

123,036

101,778

(17.250)

81,047

1,416,363

174,005

4,005

1,416,363

174.005

(1,004,877)

(82.821)

411,486

111,184

4,997

(1.544)

75,190

(5)

Non-

Electric

Utility

COMPANY: GULF POWER COMPANY

DOCKET NO.: 110138-EI

Description

(2)

Operating Revenues:

Sales of Electricity

5 Operating Expenses: Recoverable Fuel

Income Taxes

20 Total Operating Expenses

21 Net Operating Income

Federal

Federal

State

State

Other Operating Revenues

Total Operating Revenues

Recoverable Capacity

Recoverable Conservation

Recoverable Environmental

Depreciation & Amortization

Deferred Income Taxas - Nel

Other Operation & Maintenance

Amortization of Investment Credit

Taxes Other Than Income Taxes