



January 27, 2017

Via U.S. postal mail

Carlotta Stauffer
Director, Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket numbers 160186-EI, 160170-EI

Dear Ms. Stauffer:

Pursuant to Sierra Club's filing of Document No. 00489-17, enclosed are the original declarations of Sierra Club's Standing Witnesses Kanfer, Fashho, Adams, Chamblin, Rothstein, W. DuBois, and M. DuBois.

Should you or your staff have any questions regarding this filing, please contact me.

Sincerely,

/s/ Diana A. Csank

Diana A. Csank
Staff Attorney
Sierra Club
50 F St. NW, 8th Floor
Washington, DC 20001
202-548-4595 (direct)
Diana.Csank@SierraClub.org

Qualified Representative for Sierra Club

Enc.

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2017 FEB -1 AM 8:21
COMMISSION
CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served electronically on this 27th day of January, 2017 on:

<p>Lee Eng Tan/Bianca Lherisson/Kelley Corbari /Stephanie Cuello Office of the General Counsel Florida Public Service Commission ltan@psc.state.fl.us kcorbari@psc.state.fl.us blheriss@psc.state.fl.us scuello@psc.state.fl.us</p>	<p>J.R. Kelly/Charles J. Rehwinkel/ Stephanie Morse Office of Public Counsel kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us morse.stephanie@leg.state.fl.us</p>
<p>Bradley Marshall; Alisa Coe Earthjustice bmarshall@earthjustice.org acoe@earthjustice.org ruhland@earthjustice.org <i>Attorneys for Southern Alliance for Clean Energy, League of Women Voters of Florida</i></p>	<p>T. Jernigan/A. Unsicker/L. Zieman/N. C Federal Executive Agencies c/o AFCEC/JA-ULFSC Thomas.Jernigan.3@us.af.mil Andrew.Unsicker@us.af.mil Lanny.Zieman.1@us.af.mil Natalie.Cepak.2@us.af.mil Ebony.Payton.ctr@us.af.mil</p>
<p>Jon C. Moyle, Jr./Karen A. Putnal Moyle Law Firm, P.A. jmoyle@moylelaw.com kputnal@moylelaw.com <i>Attorneys for FIPUG</i></p>	<p>Mr. Robert L. McGee , Jr. Gulf Power Company rlmcgee@southernco.com</p>
<p>J. Stone/R. Badders/S. Griffin Beggs Law Firm jas@beggslane.com srg@beggslane.com rab@beggslane.com <i>Attorneys for Gulf Power Company</i></p>	<p>Robert Scheffel Wright/John T. La Via, Gardner Law Firm schef@gbwlegal.com jlavia@gbwlegal.com <i>Attorneys for Wal-Mart</i></p>
<p>Steve W. Chriss Wal-Mart Stores East, LP; Sam's East, Inc. stephen-chriss@wal-mart.com</p>	

This 27th day of January, 2017.

/s/ Diana A. Csanik

Diana A. Csanik

Qualified Representative for Sierra Club

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Gulf Power Company

Docket No. 160186

In re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization, by Gulf Power Company

Docket No. 160170

Filed: January 13, 2017

DECLARATION OF NAHALIEL (“NACHY”) KANFER

I, Nahaliel (“Nachy”) Kanfer, declare as follows:

1. My name is Nachy Kanfer, and I am of legal age and competent to give this declaration. All information herein is based on my own personal knowledge unless otherwise indicated.

2. I am a Sierra Club employee. I serve as the Deputy Director (East Region) for Sierra Club’s Beyond Coal Campaign. I am responsible for ensuring that all of Sierra Club’s state-based teams in the East Region successfully execute the campaign’s goals. I supervise four employees who each manage project teams and/or other employees throughout the thirteen states in the campaign’s East Region, including Florida. I regularly interact with dozens of employees and volunteers as part of my job responsibilities.

3. Sierra Club is a national non-profit membership organization. The Florida Chapter of Sierra Club has over 30,000 members, including many who are Gulf Power Company customers.

4. Sierra Club and its Florida members are dedicated to reducing pollution through equitable public health and environmental safeguards, and through the rapid transition away from fossil fuel-burning generation to clean, low-cost, and low-risk energy resources. Sierra Club advocates for such policies and regulations nationwide, including in Florida, by intervening, submitting comments, providing testimony, and presenting experts in state and federal energy-related proceedings; participating in public hearings and workshops; speaking to students, civic organizations, and other stakeholders; and holding seminars and symposia—all to ensure that clean energy solutions reach all communities.

5. Sierra Club members have a substantial interest in promoting clean, low-cost, and low-risk energy resources and, thus, minimizing their monthly electric bills. To protect its members' substantial interest, Sierra Club has petitioned to intervene in the above-captioned proceeding. An adverse ruling by the Commission to approve Gulf Power Company's request in this proceeding would result in direct, concrete harm to the members' substantial interest since Gulf has requested cost recovery for high-cost, high-risk fossil fuel generation, which, if approved, will increase the members' monthly electric bills.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Cincinnati, Ohio on Jan. 10, 2017.



Nahaliel ("Nachy") Kanfer

STATE OF OHIO

COUNTY OF Hamilton

BEFORE ME, the undersigned authority, personally appeared Nananiel Kanfer who is personally known or produced Driver License as identification, and who was sworn and says that the foregoing averments are true.

Sworn to and subscribed before this 10th day of January, 2017.

Alicia Tallant
Notary Public



ALICIA TALLANT
Notary Public, State of Ohio
My Commission Expires
December 15, 2020

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Gulf Power Company

Docket No. 160186

In re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization, by Gulf Power Company

Docket No. 160170

Filed: January 13, 2017

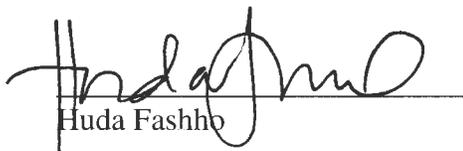
DECLARATION OF HUDA FASHHO

I, Huda Fashho, declare as follows:

1. My name is Huda Fashho, and I am of legal age and competent to give this declaration. All information herein is based on my own personal knowledge unless otherwise indicated.
2. Sierra Club is a non-profit membership organization.
3. I am Sierra Club's Member Services Associate Director. I have held this position for five years.
4. As Member Services Associate Director, I manage Sierra Club's customer service functions for members, including maintaining an accurate list of members and managing Sierra Club's member databases.
5. When an individual becomes a Sierra Club member, his or her current residential address is recorded in our membership database. This database entry reflecting the member's residential address is verified or updated as needed.

6. The Sierra Club currently has over 30,000 members in Florida, including nearly 1,000 members in counties served by Gulf Power Company.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in San Francisco, California on January 11, 2017.


Huda Fashho

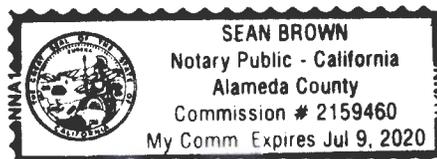
STATE OF CALIFORNIA

COUNTY OF Alameda

BEFORE ME, the undersigned authority, personally appeared Huda Fashho who is personally known or produced _____ as identification, and who was sworn and says that the foregoing averments are true.

Sworn to and subscribed before this 11th day of January, 2017.


Notary Public





BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Gulf Power Company

Docket No. 160186

In re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization, by Gulf Power Company

Docket No. 160170

Filed: January 13, 2017

DECLARATION OF SIERRA CLUB MEMBER SANDRA LYNN ADAMS

1. I, Sandra Lynn Adams, am over 18 years of age and have personal knowledge of the following facts:
2. I reside at 6746 East Bay Blvd., Navarre, FL 32566, and have done so for the past 4 years. I have been a Gulf Power customer for approximately 18 years in total.
3. I am a Sierra Club member. I first joined in April 2002 and am currently and active member. I joined because I truly love and care about the environment and want to do everything I can to help protect and preserve it. I have always enjoyed nature and wildlife and I believe that climate change is one of our country's greatest concerns. I want the planet to be habitable for future generations. I think we need to be doing everything possible to minimize carbon emissions and avoid the worst impacts of climate change.
4. I work as a psychologist with my own private practice. Outside of work, I spend much of my time engaging in activities to help protect the environment. I am a member of environmental organizations, including 350.org, where I am a board member for the local Pensacola branch.

5. I am aware that Gulf Power Company has requested authorization from the Florida Public Service Commission for a rate increase. This rate increase would allow Gulf Power to charge customers like me for its share of a Georgia coal-burning power plant, Plant Scherer. I am alarmed by this request because not only would it increase my monthly electric bills, but it also would divert time and capital from Gulf Power's pursuit of much cleaner, lower-cost, and lower-risk options that would help minimize my bills.

6. I am very concerned that if the Florida Public Service Commission approves Gulf Power's request, the company will needlessly rely on dirty, higher-cost, and higher-risk fossil fuels, and pass those costs and risks onto customers like me.

7. I am aware that Gulf Power is also requesting to increase the fixed rate for its residential customers. I know that a higher fixed rate will deter many customers from investing time and money installing energy efficiency, solar rooftop panels, solar water heaters, and other measures. I am very concerned about such a deterrent because I have first-hand experiences with the value of these measures, as I have installed them in my own home. For example, in my home I have installed energy-saving technologies such as solar panels on our roof, geothermal heating and air conditioning, spray-in insulation, a tank-less gas water heater, and standard energy efficient appliances. A higher fixed rate will penalize people like me and deter others because even if we save more energy and reduce our monthly electric bills, we will still have to pay high fixed charges on our bills.

8. If the Commission approves Gulf Power's proposed fixed rate increase, the company will harm me by increasing my monthly electric bills. Moreover, the company's fixed charges will harm my financial investments in energy efficiency and renewable energy measures by extending the payback period for these measures.

STATE OF FLORIDA

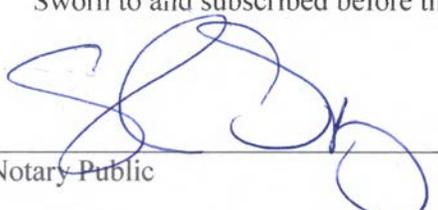
COUNTY OF Santa Rosa

BEFORE ME, the undersigned authority, personally appeared

Sandra Lynn Adams who is personally known or produced
FLDC A352792589500 as identification, and who was sworn

and says that the foregoing averments are true.

Sworn to and subscribed before this 11 day of January, 2017.



Notary Public



9. I support Sierra Club's intervention in this proceeding. If Sierra Club succeeds, I will definitely benefit. On the other hand, if the Commission approves Gulf Power's request, as I stated above, I will be directly, financially harmed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Navarre, Florida on January 11, 2017.



Sandra Lynn Adams

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Gulf Power Company

Docket No. 160186

In re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization, by Gulf Power Company

Docket No. 160170

Filed: January 13, 2017

DECLARATION OF SIERRA CLUB MEMBER LARRY CHAMBLIN

1. I, Larry N. Chamblin, declare as follows:
2. My name is Larry Chamblin and I am of legal age and am competent to give this declaration. All of the information herein is based on my own personal knowledge, unless otherwise indicated.
3. I currently live at 2130 Athens Ave. Pensacola, FL 32507 and I have lived there for sixteen years.
4. I have been a Gulf Power customer for the entire sixteen years that I have lived in my current residence.
5. I originally joined the Sierra Club in January 1998 and I am currently an active member. I originally joined the Sierra Club as a hiking and outdoor enthusiast, and I have been continually interested in environmental issues for many years. My growing concerns about climate change have reinforced this environmental interest, and I deeply

appreciate Sierra Club's work to protect the environment and transition our country to clean energy.

6. In addition to being a member of the Sierra Club, I am a founding member and board member of 350 Pensacola, a local chapter of 350.org. Furthermore, I was previously the head of another local environmental organization, Sustainable West Florida.

7. I fully support the Sierra Club's intervention in the Gulf Power Company rate case on behalf of Sierra Club members, such as myself.

8. I oppose Gulf Power Company's requested rate increase, especially because it includes major expenditures to support coal-burning operations of Georgia Plant Scherer. It upsets me that Gulf Power does not give its customers, like me, more say or more options to avoid spending tremendous sums on a plant that perpetuates our state's reliance on out-of-state fossil fuel imports and needlessly pollutes the environment.

9. I further oppose Gulf Power Company's proposal to increase fixed charges. I have taken several steps to reduce my energy consumption, such as installing geothermal heating and air, and adding insulation to the attic. These proposed rate changes would undermine these investments of my time and money, and give me less control over my energy bill because Gulf will charge me higher costs regardless of all the energy I save. This is especially concerning because my wife and I are on a fixed income.

10. Thus, if the Commission approves Gulf Power's request to increase the fixed rate, I will not only have a worse payback on my energy saving investments in my

home, but also financial harm from higher electric bills. The approval would definitely harm me because, as I mentioned above, I am on a fixed income.

11. I would much prefer that customers' energy saving investments are rewarded, not punished. I would much prefer that my electric service come from clean, low-cost, and low-risk alternatives. This is why I am seriously considering installing solar panels on our roof. My primary deterrent is the cost, and increased fixed charges would only make the installation of solar panels less economical.

12. Depending on the Commission's decision in the Gulf Power rate case, I may face a rate increase as soon as July 1, 2017, and may have to pay for the coal power plant operation that I oppose. This is an imminent and serious harm to me as a Gulf Power customer with no plans to move, and thus no ability to opt out of buying electric service from Gulf Power.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed in Pensacola, Florida on January 11, 2017.

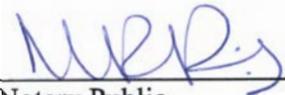

Larry Chamblin

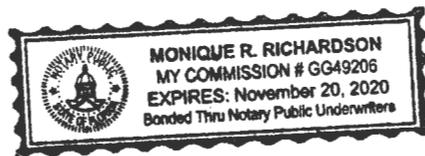
STATE OF FLORIDA

COUNTY OF Escambia

BEFORE ME, the undersigned authority, personally appeared Larry Chamblin who is personally known or produced Florida Driver's License as identification, and who was sworn and says that the foregoing averments are true.

Sworn to and subscribed before this 11th day of January, 2017.


Notary Public



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Gulf Power Company

Docket No. 160186

In re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization, by Gulf Power Company

Docket No. 160170

Filed: January 13, 2017

DECLARATION OF SIERRA CLUB MEMBER TRACY B. ROTHSTEIN

1. I, Tracy Rothstein, am over 18 years of age and have personal knowledge of the following facts:

2. I reside approximately six months out of the year at 123 B Dawson Road, Santa Rosa Beach, FL 32459. I have lived there part-time for the past two and a half years.

3. I am the sole owner of a corporation which owns a rental property at 15 Foxglove Street, Santa Rosa Beach, FL 32459. I have owned this property since 2007. I pay the electricity bill for this property. I have been a Gulf Power Company customer at this address since I purchased it.

4. I have been a Sierra Club member continuously since August 2015. I originally joined the Sierra Club out of a desire to help protect the environment. I enjoy the hiking outing opportunities provided by the Sierra Club, which I partake in whenever my schedule permits. I support the Sierra Club's advocacy for clean, low-cost sources of

electricity.

5. I am aware that Gulf Power requested Florida Public Service Commission approval for a rate increase to cover the costs for the Scherer coal-burning power plant in Georgia. I have read the letter that Gulf Power mailed to its customers about the rate increase. I am concerned that this plant is not necessary for Gulf Power to provide me with electric service, and its costs likely outweigh any benefits referenced by the company.

6. I strongly support the transition from burning fossil fuels for electricity generation to using clean, low-cost resources instead. I would prefer that my energy come from cleaner sources, which will also help me save money on my electric bills by putting immediate downward pressure on my rates. I do not want my energy to come from burning fossil fuels like coal, which can cause air and water pollution and climate change.

7. I am also aware that Gulf Power requested Florida Public Service Commission approval for a change in my rate structure that will increase what I pay each month in fixed charges. I have taken steps to reduce the electricity bill at the Foxglove address, including replacing the old furnace with a more energy efficient one, and ensuring that the property is well insulated and the roof is well maintained. I also encourage my tenant at the property to conserve energy. I've investigated adding solar photovoltaic panels, but have found it to be cost-prohibitive. If the new rate structure is approved, I will be forced to pay a large fixed charge regardless of how much energy I save, taking away my option to use less and pay less.

8. This proposed increase in fixed charges will cause me financial harm. I am on a fixed, low income. I make no additional income off of my Foxglove property. The

cost of electricity for the property is included in the rent, which I cannot raise because the property is located in a low-income community. I would be very challenging to find a tenant if I raise the rent.

9. If the Commission approves Gulf Power's request, I personally will pay higher fixed rates on my electric bills starting as soon as July 1, 2017. This rate increase will financially burden me.

10. I support Sierra Club's intervention in this proceeding. If Sierra Club succeeds, I will definitely benefit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in JANAROSS BEACH, FL, Florida on January 11, 2017.



TRACY B. ROTHSTEIN

STATE OF FLORIDA

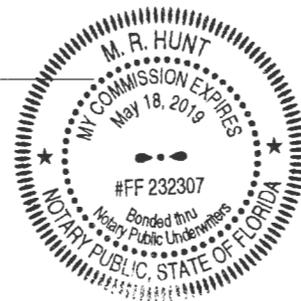
COUNTY OF Walton

BEFORE ME, the undersigned authority, personally appeared

Tracy B. Rothstein who is personally known or
produced a Florida driver license as identification, and
who was sworn and says that the foregoing averments are true.

Sworn to and subscribed before this 11th day of January, 2017.

[Signature]
Notary Public



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Gulf Power Company

Docket No. 160186

In re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization, by Gulf Power Company

Docket No. 160170

Filed: January 13, 2017

DECLARATION OF SIERRA CLUB MEMBER WILLIAM DUBOIS

1. I, William Louis DuBois, declare as follows:
2. My name is Bill DuBois and I am of legal age and am competent to give this declaration. All of the information herein is based on my own personal knowledge.
3. I currently live at 4982 Creekside Lane, Milton, FL 32570 and I have lived here full-time for fourteen and a half years with my wife.
4. I have been a Gulf Power customer for the entire fourteen and a half years that I have lived in my current residence.
5. I originally joined the Sierra Club in 2012, and I am currently an active member. I joined because, like my wife, I care about anything that threatens the national park system, and any waterway that is being threatened for that matter. Fossil fuel exploration issues are rampant now in this country. The fracking and transport systems for oil and gas across the continent also concern me.
6. I heard about the Gulf Power rate case via the news and others in Sierra

Club. My wife and I are fixed-income retirees. Our current base rate is \$216 per year for power. With the proposed rate increase, our bill would go up to \$576 per year. And while Gulf Power implies they may lower the per KWH cost, there is no assurance of this. We have completed extensive upgrades to our house to make it extremely energy efficient. Most homes have exorbitant bills in the summertime due to air conditioning costs. We've upgraded to high- efficiency windows, replaced 85% of our lightbulbs with LED lights, replaced the blown in fiberglass insulation in the attic with a foam seal system, added a solar water heater, and installed photovoltaics that provide 55% of our utility requirements. If the cost of solar panels keeps coming down, we may add more panels to the roof. Solar power covers a lot of the energy bills. We pay a lower bill because of the solar. The rate increase would be a burden on us and many of our neighbors. The base rate increase adds a significant cost burden to customers who have made energy reduction improvements, and greatly reduces the incentive to become more energy efficient.

7. I support the Sierra Club's intervention in the Gulf Power rate case. If the Club is successful, we would benefit and the community would benefit.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed in MILTON, Florida on January 11, 2017.


William DuBois

STATE OF FLORIDA

COUNTY OF SANTA ROSA.

BEFORE ME, the undersigned authority, personally appeared WILLIAM DUBOIS who is personally known or produced FL DRIVERS LICENSE as identification, and who was sworn and says that the foregoing averments are true.

Sworn to and subscribed before this 11 day of January, 2017.

Kevin A Manley
Notary Public



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Gulf Power Company

Docket No. 160186

In re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization, by Gulf Power Company

Docket No. 160170

Filed: January 13, 2017

DECLARATION OF SIERRA CLUB MEMBER MITZI DUBOIS

1. I, Mitzi Laura DuBois, declare as follows:
2. My name is Mitzi DuBois and I am of legal age and am competent to give this declaration. All of the information herein is based on my own personal knowledge, unless otherwise indicated.
3. I currently live at 4982 Creekside Lane, Milton, FL 32570 and I have lived here full-time for fourteen and a half years with my husband.
4. I have been a Gulf Power customer for the entire fourteen and a half years that I have lived in my current residence. The main issue I have with Gulf Power is that company relies mainly on burning coal to produce electricity to serve me and I know that the pollution from coal, including carbon dioxide, makes coal inherently higher cost and higher risk relative to other options in the market.
5. I originally joined the Sierra Club in 2012, and I am currently an active member. I joined because I care about anything that threatens the national park system,

and any waterway that is being threatened for that matter. Fossil fuel exploration issues are rampant now in this country. In addition to coal, the fracking and transport systems for oil and gas across the continent also concern me.

6. I heard about the Gulf Power rate case via the news and others in Sierra Club. I am a fixed-income retiree. Our current base rate is \$216 per year for power. With the proposed rate increase, our bill would automatically go to \$576 per year. We have done a lot to our house to make it extremely energy efficient. Most homes have exorbitant bills in the summertime due to air conditioning costs. We upgraded to high-efficiency windows, replaced the vast majority of our lightbulbs with LED lights, replaced the blown in fiberglass insulation in the attic with a foam seal system, added a solar water heater, and installed photovoltaics that provide between 55% and 65% of our electricity requirements. If the cost of solar panels keeps coming down, we may add more panels to the roof. The rate increase would negatively impact us, but it would be an extreme burden on many of our neighbors.

7. Fossil fuels have a number of documented issues as far as their cost and conveyance. I am aware of the great pollution (air, water, land, climate), associated with coal power. Pollution translates into concrete harm and costs. This area of the state, for example, has bad air quality. The coal burning plants near us and several industrial plants all pollute the air. People say you should not come to northwest Florida if you have any kind of lung issues, breathing problems, or asthma. This threat to public health deters tourism and other economic activities in this region.

8. I support the Sierra Club's intervention in the Gulf Power Company rate case. If the Club is successful, we would benefit and the community would benefit. On

the other hand, if the Commission allows Gulf Power to further extend its reliance on coal and hike up residential fixed charges, I will be harmed through an immediately higher monthly bill and fewer ways to secure clean, low cost and low risk energy for myself and my community.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed in Milton, Florida on January 11, 2017.

Mitzi DuBois
Mitzi DuBois

STATE OF FLORIDA

COUNTY OF SANTA ROSA.

BEFORE ME, the undersigned authority, personally appeared MITZI DUBOIS who is personally known or produced FLORIDIAN'S LICENSE as identification, and who was sworn and says that the foregoing averments are true.

Sworn to and subscribed before this 11 day of January, 2017.

Kevin A. Manley
Notary Public

