



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE LEGAL OPERATIONS AGENCY



FILED FEB 22, 2017
DOCUMENT NO. 02144-17
FPSC - COMMISSION CLERK

22 February, 2017

Ms. Carlotta Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 160186-EI and 160170-EI

Dear Ms. Stauffer:

Enclosed for filing on behalf of Federal Executive Agencies ("FEA") is a page of Issues 83 through Issues 87, which were unintentionally omitted in the filed prehearing statement in the above-referenced docket, submitted by electronic mail on 21 February, 2017, PSC document number 02107-17.

If you should have any question about this filing, please do not hesitate to contact me.

Sincerely,

/s/ Thomas A. Jernigan
Thomas A. Jernigan
AFCEC/JA-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403
Thomas.Jernigan.3@us.af.mil
(850) 283-6663
Counsel for FEA

Enclosure
cc: Counsel for Parties of Record (w/enc)

BREAKING BARRIERS...SINCE 1947

Cost of Service and Rate Design

ISSUE 83: Is Gulf's proposed separation of costs and revenues between the wholesale and retail jurisdictions appropriate?

FEA: FEA has found no reason at this time to oppose the Company's proposed jurisdictional separate of costs and revenues. Sponsoring witness: Amanda M. Alderson

ISSUE 84: What is the appropriate treatment of production costs within the cost of service study?

FEA: FEA finds the Company's proposed 12 CP & 1/13th allocation method illogical and not tied to the Company's production capacity planning metrics. FEA proposes an allocation method using a 100% demand method, based either on the 4 summer CP or 4 summer / 1 winter CP. FEA also finds unexplained inconsistencies between the class demands used to develop the Company's production cost allocation factors and those demands provided in the Gulf Power 2015 Cost of Service Load Research Study filed in 2016. Sponsoring witness: Amanda M. Alderson

ISSUE 85: What is the appropriate treatment of transmission costs within the cost of service study?

FEA: FEA has found no reason at this time to oppose the Company's proposed transmission cost allocation method. Sponsoring witness: Amanda M. Alderson

ISSUE 86: What is the appropriate treatment of distribution costs within the cost of service study?

FEA: FEA supports the Company's use of the Minimum Distribution Study method for functionalizing distribution costs. Sponsoring witness: Amanda M. Alderson

ISSUE 87: How should any change in the revenue requirement approved by the Commission be allocated among the customer classes?

FEA: FEA proposes, due to the questions surrounding the production cost allocators in the Company's cost of service study that the revenue increase allocated to customer classes be done on a more equal basis than that proposed by the Company. Specifically, FEA proposes no class receive greater than a 1.1 times the system average increase in base rate revenue. Sponsoring witness: Amanda M. Alderson

CERTIFICATE OF SERVICE
Docket Nos. 16-0186-EI, 16-0170-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail and/or U.S. mail this 22nd day of February, 2017 to the following:

Gulf Power Company

Robert McGee, Jr.
One Energy Place
Pensacola, FL 32520-0780
rlmcgee@southernco.com

Sierra Club

Diana Csank
50 F. St. NW, 8th Floor
Washington, DC 20001
Diana.csank@sierraclub.org

Beggs & Lane Law Firm

Jeffrey A. Stone
Russell Badders
Steve Griffin
P.O. Box 12950
Pensacola, FL 32591-2950
jas@beggslane.com

Office of Public Counsel

c/o The Florida Legislature
J.R. Kelly
Stephanie A. Morse
111 West Madison Street, Rm 812
Tallahassee, FL 32399-1400
Kelly.jr@leg.state.fl.us
Morse.stephanie@leg.state.fl.us

ChargePoint Inc.

Kevin G. Miller
254 East Hacienda Ave.
Campbell, CA 95008
Kevin.miller@chargepoint.com

Earthjustice

Bradley Marshall
Alisa Coe
111 S. Martin Luther King Jr. Blvd.
Tallahassee FL 32301
bmarshall@earthjustice.org
acoe@earthjustice.org
ruhland@earthjustice.org

Gardner Law Firm

Robert Scheffel Wright
John T. La Via
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

League of Women Voters of Florida

540 Beverly Court
Tallahassee, FL 32301

Southern Alliance for Clean Energy

P.O. Box 1842
Knoxville, TN 37901

WalMart Stores East, LP and Sam's East Inc.

Steve W. Chriss
2001 SE 10th Street
Bentonville, AR 72716

Florida Industrial Power Users Group

Jon C. Moyle Jr
Karen A. Putnal
C/o Moyle Law Firm, PA

118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Federal Executive Agencies

Maj Andrew Unsicker
Thomas A. Jernigan
Capt Lanny Zieman
Capt Natalie Cepak
Ebony M. Payton
Ryan K. Moore
AFLOA/JACE-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403-5319
Andrew.Unsicker@us.af.mi
Thomas.Jernigan.3@us.af.mi
Lanny.Zieman.1@us.af.mil
Natalie.Cepak.2@us.af.mil
Ebony.Payton.ctr@us.af.mil
Ryan.Moore.5@us.af.mil

Dated this 22nd day of February, 2017.

Law Office of Lane Johnson

Lane A. Johnson
1722 Newton Street NW
Washington DC 20010
ljohnsonlawoffice@gmail.com

/s/ Thomas A. Jernigan
Thomas A. Jernigan
AFCEC/JA-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
Thomas.Jernigan.3@us.af.mi
(850) 283-6663

/s/ Natalie A. Cepak
Natalie A. Cepak
AFLOA/JACE-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
Natalie.Cepak.2@us.af.mi
(850) 283-6348

Counsel for FEA