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August 10, 2018

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

RE: Docket No. 20180125-EU

Dear Ms. Stauffer:

Attached for official filing in the above-referenced docket is the sworn affidavit of Joshua R. Rogers as required by Order No. PSC-2018-035-PCO-EU.

Sincerely,

A handwritten signature in blue ink that reads "Rhonda J. Alexander".

Rhonda J. Alexander
Regulatory, Forecasting and Pricing Manager

md
Attachments

cc: Gulf Power Company
Jeffrey A. Stone, Esq.
Beggs & Lane
Russell Badders, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint against Gulf Power Company
for expedited enforcement of territorial
order by Gulf Coast Electric Cooperative,
Inc.

Docket No. 20180125-EU
Date: August 10, 2018

AFFIDAVIT OF JOSHUA R. ROGERS

Before me, the undersigned authority, personally appeared Joshua R. Rogers, who after being sworn, deposes and says the following:

1. My name is Joshua R. Rogers. I am over 18 years of age and in all other respects competent to testify. I have personal knowledge of the matters set forth herein.
2. I have been employed by Gulf Power Company ("Gulf Power") in various capacities since January 2006. Since December 2017, I have been employed as the District Engineering Supervisor at Gulf Power's Panama City office located at 1230 15th St, Panama City, FL 32405. Prior to this, I served as the Engineering Supervisor II at the Panama City Beach office located at 12425 Hutchison Blvd, Panama City Beach, FL 32407. During my tenure with Gulf Power, I have been involved in the costing, design, engineering and construction of thousands of electric distribution construction projects.
3. Part of my job responsibilities as the Engineering Supervisor II and the District Engineering Supervisor involve working with customers in the Panama City service area concerning requests for new electric service from Gulf Power. On or about October 11, 2017, I met with several representatives from the St. Joe Company ("St. Joe") to discuss, among other projects, the provision of electrical service to two new sewage lift stations which were being constructed by St. Joe on Highway 388 in unincorporated Bay County. These discussions resulted in a request from St. Joe that Gulf Power provide electric

service to these lift stations. The first lift station was identified by St. Joe as being located on Parcel ID # 26508-000-000 having a physical address of 3815 W. Hwy 388 ("First Lift Station"). The second lift station was identified by St. Joe as being located on Parcel ID # 26597-000-000 having a physical address of 1900 W. Hwy 388 ("Second Lift Station").


4. Upon receipt of the lift station locations, I evaluated their load and distance criteria relative to Gulf Power's and Gulf Coast Electric Cooperative's existing electrical facilities as required by the territorial agreement between Gulf Power and GCEC ("Territorial Agreement"). This evaluation revealed that the First Lift station was in an area currently being served by Gulf Power's existing facilities and bordered on Highway 388 with an existing distribution line sufficient to provide service. Therefore, Gulf Power could honor the customer's request for electric service to the First Lift Station without providing notice to GCEC under section 2.3(a) of the Territorial Agreement. This evaluation also revealed that the Second Lift Station was located in an area which was not in close proximity to either utility's existing facilities. Specifically, the Second Lift Station was located approximately 11,000 feet from Gulf Power's nearest existing facilities to the west on Highway 388 and approximately 8,000 feet from GCEC's nearest existing facilities to the east on Highway 388.
5. Based on the respective distances between Gulf Power's and GCEC's existing facilities, and based on my experience in estimating, designing and overseeing the construction of electric distribution facilities, I concluded that Gulf Power's cost to serve the customer likely would not exceed GCEC's cost by the 25% threshold contained in section 2.3(d)(ii) of the Territorial Agreement.

6. Therefore, on October 20, 2017, I prepared written notice to GCEC of the customer's request for service for the Second Lift Station and sent the notice via electronic mail to Mr. Peyton Gleaton, GCEC's Vice President of Engineering, at the email address listed on GCEC's corporate website.
7. While I had not personally communicated with Mr. Gleaton prior to October 20, 2017, I did reach out to another Gulf Power employee, Steve Bottoms, who communicates more regularly with GCEC regarding engineering matters. Mr. Bottoms recommended that I contact Mr. Gleaton. I also visited GCEC's website (www.gcec.com) to confirm Mr. Bottoms' recommendation. When I visited GCEC's website, the website featured a "Contact Us" page. A copy of the relevant portion of the "Contact Us" page is attached hereto as Schedule "1." The "Contact Us" page contained a section titled "E-mail Directory." The directory indicated that Mr. Gleaton was GCEC's Vice President of Engineering, and contained a hyperlink to Mr. Gleaton's e-mail address. The fact that Mr. Gleaton was identified on the "Contact Us" link of GCEC's corporate website as one of five contact persons for the company and the fact that he was identified as GCEC's Vice President of Engineering -- which, in my experience, is a position involving oversight of the location and design of distribution construction activities -- reinforced and confirmed Mr. Bottoms' recommendation.
8. The October 20, 2017, notice identified the fact that Gulf Power had received a request for electrical service to a lift station located on Parcel # 26597-000-000 and the fact that the notice was being issued pursuant to section 2.3(a) of the Territorial Agreement. I did not include reference to the physical address of 1900 W. Hwy 388 because an internet

search of the physical address depicted the location of the subject property as being four driving miles and more than three aerial miles away from its actual location.

9. The Territorial Agreement is silent with respect to the manner of providing notice and the person to receive notice on behalf of the parties. Therefore, I exercised what I consider to be reasonable judgment in providing notice to Mr. Gleaton using the method identified on GCEC's corporate website.


FURTHER AFFIANT SAYETH NOT.

By: 
Joshua R. Rogers
District Engineering Supervisor

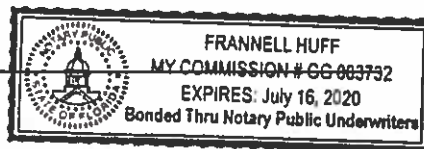
STATE OF FLORIDA
COUNTY OF BAY

Sworn and subscribed before me, at the time of notarization, by Joshua R. Rogers, who is ✓ personally known to me or _____ produced a valid form of identification, this 10th day of August, 2018.


NOTARY PUBLIC


[Print Name]

My Commission Expires: _____



SCHEDULE 1

The screenshot shows the website for Gulf Coast Electric Cooperative. The browser address bar displays "www.gcec.com/contact-us". The page features a navigation menu with items: About Us, Our Services, Knowledge Is Power, Community Commitment, Emergency Response, and News & Events. A search bar is located in the top right corner. A vertical sidebar on the left contains a list of links: Annual Members' Meeting, Careers, Contact Us, Generation & Transmission, Our Staff, Memberships, Taxes, Touchstone Energy, and Trustees. Below this list is a calendar for August 2018. The main content area is titled "Contact Us" and includes social media icons for YouTube, Facebook, and Twitter. It features an "Email Directory" section with a search bar and a list of key personnel: Chief Executive Officer/General Manager, Chief Operating Officer, Vice President of Engineering, Vice President of Marketing & Communications, and Vice President of Member Services. An "Important Numbers" section lists contact information for three offices: Southport District Office, Wewahitchka Headquarter Office, and Panama City District Office.

Gulf Coast Electric Cooperative

Search

Contact Us | Map

About Us | Our Services | Knowledge Is Power | Community Commitment | Emergency Response | News & Events

Annual Members' Meeting
Careers
Contact Us
Generation & Transmission
Our Staff
Memberships
Taxes
Touchstone Energy
Trustees

August 2018

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Contact Us

Contact Us

Email Directory

Chief Executive Officer/General Manager

Chief Operating Officer

Vice President of Engineering

Vice President of Marketing & Communications

Vice President of Member Services

Important Numbers:

Southport District Office
(850) 265 3631 – office
(850) 265 3634 – fax
(800) 568 3667 – after hours outages/toll free

Wewahitchka Headquarter Office
(850) 639 2216 – office
(850) 639 5061 – fax
(800) 333 0392 – after hours outages/toll free

Panama City District Office
(904) 481-1160 – office
(850) 481-1164 – fax

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Complaint against Gulf Power Company**)
for expedited enforcement of territorial order,)
by Gulf Coast Electric Cooperative, Inc.)

Docket No.: 20180125-EU

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 10th day of August, 2018 to the following:

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