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GULF POWER COMPANY

Before the Florida Public Service Commission  
Rebuttal Testimony of  
William C. Weintritt  
Docket No. ~~920005-ED~~  
Date of Filing June 3, 1994

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FPSC-RECORDS&REPORTING

1 GULF POWER COMPANY  
2 Before the Florida Public Service Commission  
3 Rebuttal Testimony of  
4 William C. Weintritt  
5 Docket No. 930885-EU  
6 Date of Filing June 3, 1994

7 Q. Please state your name and business address.

8 A. My name is William C. Weintritt, and my business  
9 address is 1230 East 15th Street, Panama City, Florida  
10 32405.

11 Q. Are you the same William C. Weintritt who prefiled  
12 direct testimony in this docket on May 10, 1994?

13 A. Yes.

14

15 Q. Do you have an exhibit to which you will refer in your  
16 testimony?

17 A. Yes.

18 Counsel: We ask that Mr. Weintritt's  
19 exhibit, consisting of 1 schedule,  
20 be marked for identification as  
21 Exhibit \_\_\_\_ (WCW-2).

22

23 Q. What is the purpose of your rebuttal testimony?

24 A. My testimony will respond to the prefiled direct  
25 testimony of Gulf Coast Electrical Cooperative, Inc.'s

1 ["the Coop"] witness William S. Dykes, specifically as  
2 to Mr. Dykes' testimony concerns Gulf Power Company's  
3 provision of electric service in the vicinity of the  
4 disputed area, and the relative cost to Gulf Power of  
5 providing service to the correctional facility at the  
6 disputed area. I will also respond to the testimony of  
7 Mr. Dykes and of Coop witness Jeff Parish, concerning  
8 the relative reliability of Gulf Power's service. I  
9 will also respond to the testimony of Archie Gordon  
10 concerning the rate comparison between Gulf Power and  
11 the Coop.

12

13 Q. Does Mr. Dykes disagree with your description of the  
14 area in dispute as stated in your prefiled direct  
15 testimony in this docket?

16 A. Apparently not. On page 2, lines 13-14, Mr. Dykes  
17 describes the "disputed area" as being "the area lying  
18 between County Road 279 and State Road 77 near their  
19 intersection...". This corresponds with the site of  
20 the correctional facility being built by the Department  
21 of Corrections in south Washington County, which is the  
22 description of the "disputed area" contained in my  
23 prefiled direct testimony.

24

25 Q. How do you respond to Mr. Dykes' statement that the

1 Coop has maintained service at the site itself since  
2 1950?

3 A. The statement is misleading and untrue. While the Coop  
4 had a single phase line located on the disputed area,  
5 prior to the Department of Corrections commencing  
6 construction of the correctional facility there was no  
7 customer at the site which the Coop could serve. The  
8 State of Florida Department of Transportation traffic  
9 signal located at the intersection of Highway 279 and  
10 Highway 77 is, however, served by Gulf Power. Gulf  
11 Power also serves residential and commercial customers  
12 along these highways, both north and west of the  
13 disputed area.

14  
15 Q. On page 5, lines 11-12 and 13-14 of his direct  
16 testimony, Mr. Dykes contends that, if Gulf Power were  
17 awarded the right to serve the correctional facility,  
18 then Gulf Power would have had to pay the Coop for  
19 removal of the single phase line located on the  
20 disputed area. Is this contention correct?

21 A. No. The location of the Red Sapp line to which Mr.  
22 Dykes refers would not affect Gulf Power's ability to  
23 provide service to the correctional facility. The only  
24 impact of this existing line would be on the  
25 construction plans of the Department of Corrections.

1 If the line had to be relocated in order to build the  
2 correctional facility, the cost of relocation would be  
3 a matter between the Coop and the Department, and would  
4 not concern Gulf Power.

5

6 Q. What is the cost to the Coop of relocating the Red Sapp  
7 Road line?

8 A. I don't know. On page 5, line 16 of his direct  
9 testimony Mr. Dykes is asked the same question, but he  
10 never provides the answer. Instead, he refers to the  
11 cost differential of \$14,582.54 to "convert" a single  
12 phase line to three phase. What he fails to provide is  
13 the Coop's cost of removing the Red Sapp Road line and  
14 the Coop's cost of constructing a new single phase line  
15 at a different location to replace the Red Sapp Road  
16 line. In a letter to the attorney for the Washington  
17 County Commission, the Coop's General Manager,  
18 H. W. Norris, stated that relocation costs would be  
19 approximately \$42,000. A copy of that letter is  
20 attached as Schedule 1 of my exhibit.

21

22 Q. On page 6, lines 15-17 Mr. Dykes also states that the  
23 cost to Gulf of serving the correctional facility would  
24 be the same as that to the Coop "except for the width  
25 of CR 279". Do you agree?

1 A. Absolutely not. Unlike the Coop, Gulf Power has had an  
2 existing three phase line along Highway 279 adjacent to  
3 the correctional facility site since 1971. The cost of  
4 the Coop's construction of approximately 4000 feet of  
5 three phase line along the opposite side of Highway  
6 279, parallel to Gulf Power's existing facilities, is  
7 an additional cost Gulf Power would not have expended.  
8 The Coop line is parallel to and uneconomically  
9 duplicates our existing three phase facilities that  
10 have been in place for 23 years. We are awaiting  
11 responses to interrogatories addressing the cost of  
12 this three phase extension to determine the Coop's  
13 additional cost to provide service to the correctional  
14 facility.

15

16 Q. Would Gulf Power have had to build totally new  
17 temporary service as Mr. Dykes indicated on page 7 line  
18 5?

19 A. No. Gulf Power has three phase primary distribution  
20 lines on both Highway 77 and Highway 279 adjacent to  
21 the correctional facility site. Temporary services  
22 could have easily been made available from these  
23 distribution lines at several locations.

24

25 Q. What response do you have to Mr. Dykes' and Mr.

1 Parish's testimony concerning the relative reliability  
2 of Gulf Power and the Coop?

3 A. Both of the witnesses paint an untrue picture. For the  
4 last several years, well before any plans for the  
5 prison, Gulf Power has spent substantial dollars  
6 upgrading the electrical reliability in the Vernon-  
7 Sunny Hills area to improve customer service. Gulf  
8 Power has three transmission lines which feed the area,  
9 and the prison can be fed from two completely different  
10 substations and two electrically separate distribution  
11 lines.

12 While Mr. Parish propounds the advantages of being  
13 able to switch the AEC substation source to either of  
14 only two transmission sources, this is not the real  
15 reliability issue. Lightning is the primary culprit  
16 that will cause a transmission line to trip out, and  
17 the line will almost always automatically come back  
18 successfully. For example, over the last five years,  
19 our main transmission line feeding the area has had 46  
20 occasions where it tripped and immediately reclosed.  
21 In only two instances did the outage last for 10  
22 seconds or more. AEC's lines will be subject to the  
23 same lightning in the area. Thus, transmission line  
24 reliability is really not the issue.

25 The real issue is the distribution line

1 reliability. Gulf Power's system design at this  
2 location is clearly superior to that of the Coop and  
3 will provide significantly greater reliability.  
4 If there is a problem with the Coop's lone distribution  
5 line, the customer has no power until the line is  
6 completely repaired. But Gulf Power can feed it from  
7 two different substations powering two different  
8 distribution feeders. Since most power outages are on  
9 the distribution system rather than the transmission  
10 system, Gulf Power has the decided advantage. Couple  
11 this with our aggressive preventative maintenance  
12 program and our commitment to our stated corporate goal  
13 of customer satisfaction, and Gulf Power is the clear  
14 choice on this issue. The high degree of integrity and  
15 redundancy of our total transmission, substation, and  
16 distribution systems will assure the customer the best  
17 service. For Gulf Power, the Department of Corrections  
18 back-up equipment constitutes a third, rather than a  
19 second, level of reliable service.

20 Q. At page 12 of his testimony, Mr. Archie Gordon takes  
21 issue with Gulf Power's rate comparison and indicates  
22 that the differential is "only" \$10,097.76 per year.

23 Do you agree?

24 A. Gulf Power stands by its comparison, which utilized the  
25 information contained in the Coop's tariff on file with



1 the Commission. Mr. Gordon does not take issue with  
2 the methodology or the tariffs used by Gulf Power to  
3 make its calculation, but includes an additional  
4 component entitled "return of patronage capital", which  
5 is not included in the Coop's tariff, to calculate the  
6 Coop's rate. Gulf Power is attempting to obtain  
7 through discovery the details necessary to make an  
8 accurate comparison of the rates. Regardless of the  
9 correct amount, be it \$10,000 or \$20,000, this is money  
10 being spent needlessly by the taxpayers of the state.  
11 It is also anticipated that as with similar  
12 correctional facilities in the state, there will be  
13 expansion of the facilities at this site. As the load  
14 increases, so will the differential.

15

16 Q. Does this conclude your testimony?

17 A. Yes, with the proviso that we have not received the  
18 Coop's responses to our discovery requests. Based on  
19 those responses, I may need to supplement my testimony.

20

21

22

23

24

25

Florida Public Service Commission  
Docket No. 930885-EU  
Witness: William C. Weintritt  
Exhibit No. \_\_\_\_\_ (WCW-2)  
Schedule 1  
Page 1 of 2



**GULF COAST ELECTRIC COOPERATIVE, INC.**

P. O. BOX 600 • WASHINGTON, FLORIDA 32800 • PHONE (904) 284-6200

**DISTRICT OFFICE**

P. O. BOX 600 • WASHINGTON, FLORIDA 32800 • PHONE (904) 284-6200

May 19, 1993

MAY 20 1993

Mr. William S. Howell, Jr.  
Attorney at Law  
P. O. Box 98  
Chipley, FL 32428

Dear Mr. Howell:

This is in response to your letter of April 27th accepting Gulf Coast's proposal to assist Washington County in securing a Department of Corrections prison for South Washington County.

Gulf Coast Electric pledged \$48,000 toward the purchase of the land. Mr. Howell's letter ask the Board's consideration in additional funds in the amount of \$30,000. This matter as requested was taken up with Gulf Coast's Board of Directors at their regular meeting on May 18, 1993.

In our initial proposal we had also pledged to remove and relocate lines that are presently on the property and reconstruct additional lines going up the Vernon Highway. It was stated that this work would be done at no charge if Gulf Coast was allowed to serve the prison complex with electricity. At that time we had not arrived at any figures as to what this would cost, however, upon running tabulations it was determined that this removal and relocation would cost the Coop approximately \$42,000. For that reason the Board respectfully declines any additional funds based on the fact that this removal and relocation would require a significant amount of money to complete.

On Friday of last week we reviewed the rough draft of the application for the interest free loan that was offered in the initial proposal and it is nearing completion at this time. We will be getting with your folks shortly to let you review the finished product before carrying it to Washington.

We look forward to working with you all in the future and appreciate the inquiry that you made regarding these additional funds. We do hope that you as county officials will understand we are limited with regard to expenditures of this nature and having done this amount for Gulf County and the expense of line retirement and relocation, we find ourselves only able to provide what was promised in the very beginning.

Florida Public Service Commission  
Docket No. 930885-EU  
Witness: William C. Weintritt  
Exhibit No. \_\_\_\_\_ (WCW-2)  
Schedule 1  
Page 2 of 2

Mr. William S. Howell  
May 19, 1993  
Page 2

We will keep you all informed as to our progress on the loan,  
on the retiring and relocation, and other matters concerning this  
project.

Sincerely,



H. W. Morris  
General Manager

ENH/ps

CC: Lindsey Corbin, Chairman  
Helen Carter  
Roger Hacin, County Administrator

AFFIDAVIT

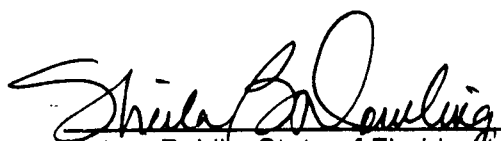
STATE OF FLORIDA     )  
                                  )  
COUNTY OF BAY        )

Docket No. 930885-EU

Before me the undersigned authority, personally appeared William C. Weintritt, who being first duly sworn, deposes, and says that he is the Power Delivery Manager of the Panama City District of Gulf Power Company, a Maine corporation, that the foregoing is true and correct to the best of his knowledge, information, and belief. He is personally known to me.

  
\_\_\_\_\_  
William C. Weintritt  
Power Delivery Manager

Sworn to and subscribed before me this 27<sup>th</sup> day of May, 1994.

  
\_\_\_\_\_  
Notary Public, State of Florida at Large  
# CC 122170

**Notary Public, State of Florida**  
**My Commission Expires June 25, 1995**  
Bonded Through Troy Fair - Insurance Inc.