

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve territorial dispute with Gulf Coast Electric Cooperative, Inc. by Gulf Power Company.

DOCKET NO. 93-1830-EU FILED: July 8, 1994

ORIGINAL FILE COPY

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-93-1830-PCO-EU, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

None.

b. All Known Exhibits

None.

c. Staff's Statement of Basic Position

None position at this time.

d. Staff's Position on the Issues

ACK ISSUE 1: What is the geographical description of the disputed area?

AFA

APP POSITION: No position at this time.

CAF

CMH ISSUE 2: What is the expected customer load, energy, and population growth in the disputed area?

CTR

EAG POSITION: No position at this time.

LEG

LIN ISSUE 3: Which utility has historically served the disputed area?

OPC POSITION: No position at this time.

RCH

SEP

W S

OH

DOCUMENT NUMBER: DATE

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FPSC-RECORDS/REPORTING 095

**ISSUE 4:** What is the location, purpose, type, and capacity of each utility's facilities existing prior to construction of facilities built specifically to serve the correctional facility?

**POSITION:** No position at this time.

**ISSUE 5:** What additional facilities would each party have to construct in order to provide service to the correctional facility?

**POSITION:** No position at this time.

**ISSUE 6:** Is each utility capable of providing adequate and reliable electric service to the disputed area?

**POSITION:** No position at this time.

**ISSUE 7:** Which party is capable of providing more reliable electric service to the correctional facility site?

**POSITION:** No position at this time.

**ISSUE 8:** What would be the cost to each utility to provide electric service to the correctional facility?

**POSITION:** No position at this time.

**ISSUE 9:** What would be the effect on each utility's ratepayers if it were not permitted to serve the correctional facility?

**POSITION:** No position at this time.

**ISSUE 10:** Which party is capable of providing electric service to the correctional facility site at the lowest rate to the Department of Corrections?

**POSITION:** No position at this time.

**ISSUE 11:** What is the customer preference for electric service to the correctional facility?

**POSITION:** No position at this time.

**ISSUE 12:** Does unnecessary and uneconomic duplication of electric facilities exist in the disputed area?

**POSITION:** No position at this time.

**ISSUE 13:** Do the parties have a formal territorial agreement that covers the disputed area?

**POSITION:** No position at this time.

**ISSUE 14:** Which party should be permitted to serve the disputed area? What conditions, if any, should accompany the Commission's decision?

**POSITION:** No position at this time.

**ISSUE 15:** Should this docket be closed?

**POSITION:** No position at this time.

e. Pending Motions

Gulf's Motion to Strike Certain Testimony, and Gulf's Motion to Limit the Scope of the Issues are still pending.

Respectfully submitted this 8<sup>th</sup> day of July,  
1994.

Martha Carter Brown  
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Staff Counsel

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to resolve ) DOCKET NO. 930885-EU  
territorial dispute with Gulf ) FILED: July 8, 1994  
Coast Electric Cooperative, )  
Inc. by Gulf Power Company. )  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of **STAFF'S PREHEARING STATEMENT** have been served by First Class U.S. Mail Postage Prepaid to the following parties, this 8<sup>th</sup> day of July, 1994:

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