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Pensacola, Florida 32520

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January 25, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 991779-EI

Enclosed are an original and fifteen copies of the Preliminary Statement of Gulf Power Company Regarding Issues and Positions to be filed in the above docket.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Petition in WordPerfect for Windows 8 format as prepared on a Windows NT based computer.

Sincerely,

Susan D. Ritenour

AFA	1	Susan D. Ritenour
AFA	15	Assistant Secretary and Assistant Treasurer
APP		
CAT		
CIV		lw
CIB		
EC		Enclosure
REG		
AMS	5	
OPD		cc: Beggs and Lane
RFR		Jeffrey A. Stone, Esquire
SEC	1	
YAW		
OTH		

DOCUMENT NUMBER-DATE

01152 JAN 26 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of the appropriate application)
of incentives to wholesale power sales by) Docket No.: 991779-EI
investor-owned electric utilities.) Filed: January 26, 2000
_____)

**PRELIMINARY STATEMENT OF GULF POWER COMPANY
REGARDING ISSUES AND POSITIONS**

GULF POWER COMPANY ("Gulf Power," "Gulf," or "the Company"), by and through its undersigned counsel, and pursuant to the Case Assignment and Scheduling Record issued December 10, 1999, hereby files this preliminary statement of issues and positions, saying¹:

ISSUE 1: Should the Commission eliminate the 20 percent shareholder incentive set forth in Order No. 12923, issued January 24, 1984, in Docket No. 830001-EU-B?

GULF: No.

ISSUE 2: If the Commission should decide to maintain the 20 percent shareholder incentive set forth in Order No. 12923, issued January 24, 1984, in Docket No. 830001-EU-B, what types of economy energy sales should be eligible for the 20 percent shareholder incentive?

GULF: The 20 shareholder incentive for economy energy sales should be applied to all non-separated wholesale economy energy sales regardless of whether they are made "off-broker" or through the EBN. Gulf Power Company's non-separated wholesale economy energy sales are categorized for internal purposes as "economy" sales and "external" sales to differentiate the sales based on whether they are made to non-affiliated utilities that are directly interconnected to the Southern electric system ("economy") or to non-affiliated utilities and power marketers that are not directly interconnected to the Southern electric system

¹This docket was opened at the direction of the panel of the Commission assigned to Docket No. 990001-EI (see discussion at pages 4 through 5 of Order No. PSC-99-2512-FOF-EI, issued December 22, 1999 in Docket No. 990001-EI). The issues listed in this document were taken from Order No. PSC-99-2271-PHO-EI, issued November 18, 1999 in Docket No. 990001-EI. Gulf reserves its opportunity to raise additional issues during the prehearing process in this docket.

DOCUMENT NUMBER-DATE

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("external"). Regardless of internal designation, the 20 percent shareholder incentive should be applied to all of Gulf's non-separated wholesale economy energy sales.

Respectfully submitted the 25th day of January 2000.



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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of the appropriate application)
of incentives to wholesale power sales by)
investor-owned electric utilities)
_____)

Docket No. 991779-EI

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail this 25th day of January 2000 on the following:

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