EXHIBIT "B"

ORIGINAL

060251-EI

REDACTED

CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
RCA _____
SCR _____
SGA _____
SEC 1
OTH _____

Please provide copies of customer surveys and results the company has conducted, or contracted to be completed, to survey customer opinion regarding Gulf Power's service quality and reliability during the period 1999-2005.

Annual Public Opinion Questions

1999 - 2005

Please tell me if you agree, disagree, or have no opinion as to whether Gulf Power is doing a good job on (ATTRIBUTE).

	Agree	Disagree	No Opinion
Maintaining Reliable Service	1	2	3
Restoring service quickly when it goes out	1	2	3

Annual Public Opinion Results

Public Confidence Results by Year
(% who strongly/somewhat agree with statements)

Attributes (Base)	Jan./ Feb. (200) %	March/ April (200) %	May/ June (200) %	July/ August (200) %	Sept./ Oct. (200) %	Nov./ Dec. (200) %
1999						
Maintaining reliable service	88	94	94	94	92	96
Restoring service quickly when it goes out	84	90	82	94	89	86
2000						
Maintaining reliable service	95	93	92	94	89	92
Restoring service quickly when it goes out	87	91	88	88	84	89
2001						
Maintaining reliable service	92	91	96	94	94	92
Restoring service quickly when it goes out	88	88	90	88	93	88
2002						
Maintaining reliable service	92	94	92	92	94	90
Restoring service quickly when it goes out	86	87	81	86	88	88
2003						
Maintaining reliable service	90	92	90	92	92	94
Restoring service quickly when it goes out	86	86	84	88	88	90
2004						
Maintaining reliable service	92	92	90	94	93	92
Restoring service quickly when it goes out	86	86	86	88	88	92
2005						
Maintaining reliable service	94	94	95	93		
Restoring service quickly when it goes out	91	90	90	88		

F. Distribution and Transmission Ongoing, Remedial and Targeted Improvement Programs

Lightning Programs

21. Provide a current copy of the company's lightning protection procedures for distribution, transmission and substation facilities.

ANSWER:

Distribution

See attached distribution construction plates:

Plate	Page
OBZ-4	3
ODZ-1	4
OKZ-1	5
SOE01002	6
SOF00501	7
SOG01001	8

Transmission

Gulf Power does not have a written procedure for transmission lightning protection.

Substation

Gulf Power does not have a written procedure for substation lightning protection.

Provide a copy of company animal protection procedures or guidelines for distribution transmission and substation facilities.

ANSWER: See attached documents listed below:

Gulf Specific Specification Plate OTZ-1
Gulf Specific Specification Plate OTZ-2
Southern Company Specification Plate SOE-02.001
Southern Company Specification Plate SOE-03.001
Southern Company Specification Plate SOE-03.501
Southern Company Specification Plate SOE-03.801
Southern Company Specification Plate SOE-04.001
Southern Company Specification Plate SOE-05.001
Southern Company Specification Plate SOE-06.001
Southern Company Specification Plate SOE-07.001
Southern Company Specification Plate SOE-08.001
Southern Company Specification Plate SOE-09.001
Southern Company Specification Plate SOG-02.001
Southern Company Specification Plate SOG-03.001

F. Distribution and Transmission Ongoing, Remedial and Targeted Improvement Programs

Transformer Loading

30. a. List separately the types of distribution, transmission and substation transformers used by the company, if not previously described, and the current load characteristics and assumptions for the use of each.

ANSWER:

Distribution Transformers

The types of distribution transformers are:

- Single phase overhead (10 kVA to 167 kVA)
- Single phase underground (25 kVA to 167 kVA)
- Three phase padmount (112.5 kVA to 2500 kVA)

For loading guidelines see charts on pages 3 thru 7.

Transmission and Substation Transformers

The types of transmission and substation transformers are:

- Single phase medium power (60 MVA or less)
- Three phase medium power (60 MVA or less)
- Three phase auto banks (Greater than 100 MVA)
- Three phase station service (60 MVA or less)
- Three phase generator step up (various - sized to Generator unit)
- Single Phase Station Service (Distribution Class)

For loading guidelines see charts on pages 8 and 9.

Gulf Power Company
Electric Service and Reliability Management Review
Document Request Number DR-1
Question #32
Exhibit #1
Company Procedures relative to Substation Inspection Programs

Exhibit #1 to DR-1.32 consists of 80 pages.
Each of those pages has been redacted in its entirety.

Gulf Power Company
Electric Service and Reliability Management Review
Document Request Number DR-1
Question # 33a
Exhibit 1
Pole and Overhead Line Inspection,
Wood Pole Treatment and Wood Pole Reinforcement
Technical Specifications

Exhibit #1 to DR-1.33a consists of 38 pages.
Each of those pages has been redacted in its entirety.

Gulf Power Company
Electric Service and Reliability Management Review
Document Request Number DR-1
Question # 33a
Exhibit 2
Transmission Lines
Maintenance Standards

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-1
Question # 33a
Exhibit 2

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-1
Question # 33a
Exhibit 2

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-1
Question # 33a
Exhibit 2

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-1
Question # 33a
Exhibit 2

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Question # 33a
Exhibit 2

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Question # 33a
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Exhibit 2

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Question # 33a
Exhibit 2

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Document Request Number: DR-1
Question # 33a
Exhibit 2

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-1
Question # 33a
Exhibit 2

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Electric Service Quality & Reliability Management Review
Document Request Number: DR-1
Question # 33a
Exhibit 2

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-1
Question # 33a
Exhibit 2

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-1
Question # 33a
Exhibit 2

Document Request DR-2

3. Explain Gulf Power's annual employee incentive program that relates to reliability and quality of service including:
   a) When Gulf Power first began employee incentive programs for reliability and quality of service.
   b) Whether incentives are based on individual, group or company-wide results.
   c) An explanation of available annual incentive amount ranges for management and non-management employees.
   d) An explanation of how management and non-management employee annual incentive amounts are calculated against performance.
   e) Gulf Power's employee incentive targets each year 1999-2005 with actual achieved results.
   f) Annual dollars paid for these incentives to management and non-management employees during 1999-2005.
   g) An explanation of any administrative or other changes or revisions made to the employee incentive program during the period 1999-2005.

ANSWER:

Gulf Power does not have an annual employee incentive program that is strictly related to reliability and quality of service. Rather, Gulf incorporates goals regarding reliability and quality of service among the list of goals that are considered as part of Gulf's compensation program which involves paying employees based on performance. This program divides employee pay into two components: base pay or salary and performance pay. The performance pay component is a target award opportunity expressed as a percent of base pay or salary. The actual amount of performance pay is determined annually based on whether and to what degree annual operational, financial and individual goals are met. Based on achievement of company goals, an employee may earn up to two times their target award opportunity. This amount is subject to reduction if an employee's individual goals during a plan year are not achieved. Performance pay under the program is paid as a lump sum by March 15th for the previous fiscal year's performance.

a) Reliability and quality of service have been determining factors for goal achievement in Gulf's program for performance pay since 1989.

b) Gulf's program for performance pay is designed to reward all employees for achieving annual operational, financial and individual goals.

c) Gulf's program for performance pay is a broad based annual program for which all employees are eligible. Each salary grade is assigned a target award opportunity expressed as a percent of salary. As a result, employees in the same grade have the same award opportunity.

d) Annually, operational goals (including customer satisfaction, transmission and distribution reliability, power plant availability, safety, cost and workforce diversity) and financial goals are established. At the end of the fiscal year, performance is measured against goals and goal achievement is determined. A factor is then applied against the employee's target award opportunity.

e) [redacted]

Employee Group	Target Award Opportunity
[redacted]	

Year Paid	Performance Pay Program Goal Achievement
[redacted]	

f) [redacted]

Year	Group	Annual Dollars	% Total
[redacted]			

[redacted]

g) During the period 1999 – 2005, the following changes have been made to the program:

- For fiscal year 2000, paid in 2001, separate programs regarding performance pay for non-management and management were

combined into a single program. The newly redesigned program combined the target award opportunities of the former programs. This change was made to:

- To improve the ability to attract and retain high performing employees
- To provide a more market competitive plan design
- To create better alignment with business drivers.

- The operational goals were amended in 2001 to include workforce diversity and in 2004 to include safety.
- Bargaining-unit employees elected not to participate in 2003 and 2004, as determined by the collective bargaining agreement.

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-3
Question # 3.b.

Provide copies of any externally-prepared hurricane assessments or critiques completed for Gulf Power during the period 1999-2005.

ANSWER:

Hurricanes 2004
Southern Company Emergency Ops Review

Hurricanes 2004
Southern Company Emergency Ops Review

Hurricanes 2004
Southern Company Emergency Ops Review

Hurricanes 2004
Southern Company Emergency Ops Review

Hurricanes 2004
Southern Company Emergency Ops Review

Hurricanes 2004
Southern Company Emergency Ops Review

Hurricanes 2004
Southern Company Emergency Ops Review

Hurricanes 2004
Southern Company Emergency Ops Review

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-4
Question # 4a

Please provide the company operational and financial targeted goals for employee performance incentives during the period 1999-2005.

Gulf Power Company
Electric Service Quality & Reliability Management Review
Document Request Number: DR-4
Question # 4b

Please provide the company achieved operational and financial performance results during the period 1999-2005.

ANSWER:

See answer to DR-4 question 4a.

10/19/05 Audits – Reliability Review

① Review of Asplundh (underground) Contract 3/30/99

Auditing recommended Power Delivery

1) determine time reqmts for Aspl coordinators to monitor work sites
2) review Aspl. coordinators' job responsibilities & detern whether tasks need to be reassigned to meet monitoring responsibilities under the contract or if additional resources are needed.
3) suggested Aspl. coordinators record their O.T. hrs (Power Delivery mgt concurred)

Recommended Warehouse & P. Delivery

4) Establish an effective method to monitor inventory provided to Aspl.

Noted numerous minor billing errors by Aspl. early 1998 ; noted reduction in recent months, recommended

1) Aspl. field coord's should perform thorough reviews of timesheets 2) should use invoice control totals 3) be authorized to make minor invoice corrections ($150 or less) to expedite processing

Overall, noted "adequate controls have been established & are in place"

Audits (cont)

(2) Power Delivery Compliance Audit (FPC-99-020) (4th Qtr 99)

Compliance w/ OSHA, Health + Safety, Environmental, HR + Employment Laws

Overall - No areas of signif. improvement needed (red)
- all others "Adequate" (green) or "Caution - minor issue" (yellow)

(3) Capital Project mgt (FPC-99-005) 2/3/00

Findings: 1) Personnel (Project Owner) assigned ownerships of cap projects should be provided w/ defined proj. mgt responsibilities
2) Actual cost reports should be avail to P.O.s to assist them in meeting budget goals
3) Accountability for the work order closeout process should be reviewed

mgt agreed + provided action plans for completion in Feb + Mar '00.

(4) Joint Use Audits (FPC-99-014) 2/25/00

(audit of Cable TV + Telephone pole joint use contracts

reviewed billing + payment processes, compared billings to contracts

Overall: Adequate controls established + are in place to ensure contract compliance

Audits (Cont)

(5) Review of the Line Equipment Service Center (FPC 199800.3)

(svc center that repairs tx's, paints + repairs other property)

Overall:

Concluded adequate controls, noted some opportunities for improvement had been noted + appropriate action already taken by mgt (no elaboration as seen in follow up audit below)

followed up here

(5) Line Equipment Svc Center (FPC 99-009) 3/6/00

[Follow up ↓ on 1998-003]

meeting held 4/19/99 discussed status of items ~~from~~

"No process in place to track the effectiveness of repairs." Rick Sanchez advised that a manual log had been implemented in 1999 for all units returned for repair. Premature to judge effectiveness.

"Communicate the mission/Vision of the LESC"

Rick [Sanchez] stated that he thinks the LESC is only about at 50% productivity ... Rick stated that Charlie Jordan occasionally asks him what his opinion is ~~of~~ regarding the LESC as being of value

(6) Review of Outdoor/Street Lighting (FPC 2000-08) 12/21/00

Overall: adequate controls ... we noted opportunities to strengthen overall effectiveness (10 page attachment)

Audits (cont)

Street Lights p.6 "Item No 3 - Tracking of Lights
Gulf has no current tracking system for its outdoor lights, street lights and additional facilities. Power Delivery has initiated efforts to explore feas. of developing a tracking system"

"Outdoor lights + customer-owned lights are not mapped"
"There are no controls to ensure all W.O's are mapped in FAMS"

mgt agreed with above findings indicating a guideline for sending W.O.'s to Drafting for mapping had been drafted + that the "Powerful Ideas" team was assessing cost/benefits for a tracking systems for outdoor lights

p. 7 "One important tool no longer available since the implementation of CSS is the "On + Unbilled" report

mgt replies issue being worked on by CSS Support + they are discussing best route to take (WFM vs a report)

p. 12 "Auditor recommends...establishing a plan to periodically audit lighting accounts and specific geographical locations."

mgt. agreed

Audits (cont)

(7) Power Delivery Compliance Audit (FPC 2000-023) Oct? 2000 (exit 10/13/00)

Health & Safety and Environmental, OSHA

Recommendations

- continue efforts to increase awareness of & adherence to safe work practices
- completion of training to be included in Gulf's Corrective Action Plan

Mgt agreed to comply

(8) Underground Locates (FPC 2000-30) 11/00 (? exit" 11/6/00)

"All Clear, a contractor was acquired by Aspland in 3/00 it performs field audits of all employees

Utiliquest, another contractor, also performs quality checks covering about 5% of tickets per month

(9) Strategic Systems Plans (SSP) Transmission (work order 870BF (mentions Internal Auditing but not necessarily an audit per se)

Recs: · Define ownership & version control of SSP
· major initiatives shld be eval a functional level
· SSP recs should include cost analysis & less expen options
· Any E-commerce initiative should be in line

Audits (cont)

(10) Power Delivery Compliance Audit (FPC 2001-20)

Health + Safety and Environmental regs

Recommendations:

- Gulf continue its efforts to increase awareness + adherence to "safe work practices"
  (noted 2 incidents observed of safety rules not followed)

(11) Transmission Line Maintenance System TLMS
DSAM Compliance Review Summary
(SCS 2001-60) March 14, 2002

Evaluation of TLMS project mgt.
on a So Co wide basis
(Not really relevant for our purposes)

[Took some of Lynn's stack]

(20) District Substations Compliance Audit Follow Up
(FPC 2005-07) March 14, 2005

1 page report confirming that re-audit shows prior audit's finding of deficiency was resolved.
That finding related to annual review of Permit Required

Audits (cont)

(21) Mastec Contract Review (FPC 2004-08) 9/12/05

Operational review of Gulf's contract w/ Mastec for underground distrib. work

Adequate controls have been established to ensure effective contract mgt.

Recommendations:

- 1) refine process of inventory reconciliation continue to ensure functional area responsibilities are clearly defined & supporting documentation is retained as evidence of an effectively working control (?)
  2) an evaluation of method of issuing & accounting for material in Pensacola area should be conducted before awarding new contract to establish consistency of oprns.

[Mgt agreed to do by 9/30/05]

- Each underground Coordinator should review & approve timesheets for accuracy & completeness

[Mgt agreed to do by 1st Qtr 05]

- UG Coordinator should sign each work order

[Mgt agreed to require U.G. Coords to approve W.O.'s returned from field by mastec.

(22) TRIMS / Line Clearing (FPC 2000-13) 11/27/00

Audit of Gulf contract w/ Asplundh

[redacted]

Compliance w/ Contract

~~Our audit work~~

"Certain processes are in place to help ensure Asplundh crews are adequately staffed and productive including a cost per mile goal, regular communication between the coordinators and the Asplundh general foremen, and field observations by the coordinators. Our audit work indicated the time available and allocated to field visits is limited. Lack of appropriate company oversight could lead to crew performance inefficiencies, decreases in quality, unsafe work practices, and improper billing. To reduce the potential risks to Gulf, Auditing suggests work activities be reviewed to ensure coordinator's time observing Asplundh crews is maximized.

In our opinions, adequate controls have been established & are in place...

1. Pensacola Dist. Compliance Audit Unannounced
Overall adequate compliance mgmt. programs for areas reviewed & reasonable assurance of ongoing compliance w/ fed, state & local

1. Hazard Communication - unauthorized chemicals used by employees
2. Compliance Assurance - reemphasize ongoing self-monitoring inspections of vehicles

2. Contract Admin. - Asplundh (Transmission)
rebuild 40 miles of transmission line (8/01 - 5/02)
four jobs ($3.7 million) Farley - Sinai Cemetery U & B Smith Highland City & Smith - Brentwood, and Callaway - Highland City. Contract included project mgmt to assist in oversight of Asplundh crews operations
- Effective controls to ensure contract work was awarded using Co. policy & procedure
- Compliance w/ contract specs; adequate # of trained employees on site to supervise
- Opportunities for enhancement in invoice approval & payment process
  - Project Mgrs. did not have Asplundh bidy rates to verify extra work invoices
  - Several minor billing errors in unit price & extra work invoices
  - lack of supporting documentation (timesheets) on extra work invoices
  - original invoices submitted only to contracted Project Mgrs.
  - Recommend Gulf project Mgr. maintain resp. for verification of invoices, accuracy and timeliness

(Have begun to originate to AP w/ copies)

Delayed Billing – Applandh was slow to submit invoices for work performed + extra work ($167,000)

Rec. that Gulf mgmt. communicate and exercise penalty for slow contractor invoicing in future (Trans mgmt agreed)

Contract Svcs Services – Lunch is separated from normal work hrs daily and per diem separated

3. Capital Project Mgmt. – Trans.

- Goal is to maintain spending w/in ± 1% - 3%
- Trans cap budget $44 million in '01 $25 million in '02
  Act/budget ~~to~~ variance 1% in '01 and 4% in 02

- Effective controls established to prepare budget est + monitor actual cost

Recs; Proj. Mgmt. – Mgmt should assign a Project Mgr. at the PE level, document responsibilities of personnel

Mgmt. Response – Single individ to be designated as overall PE mgrs. for admin + budget purposes

Cost Estimating – Rec. detailed documentation to support calculation of estimated labor costs to serve as an aid to more accurately estimate future projects; Mgmt agreed

Budget Deviation – Rec criteria for variance criteria ± of 10% or $10,000 whichever is more be reviewed; Mgmt procedure should be updated; Corp Planning will monitor PE expenditures in the same manner as they have in the past and ensure proper approval of variance

Work Closeout – Rec - Trans mgmt should establish and

Communicate deadline by which orders are to be closed ~~complete~~ out; exceptions to be reviewed by mgmt or functional area. Trans agrees & will coord w/ Plant Acctg. to resolve outstanding orders and establish guidelines & ensure future WOs closed on time

4. Trans Contract Governance Review

Scope - Trans line & substation constr. + selected maint. contracts
- adequate & effective process & controls over majority of trans. contract procurement & admin. activities

Recs - improve existing process & controls
Properly Acct. for & Control Materials Not Installed on Trans Constr. projects & Close CWOs in a Timely Manner
- CWOs not closed by Trans personnel & uninstalled materials stored @ substation facilities; overstatement of plant assets & corresponding depreciation expense.

Corrected per Ken

Rec. - physical inventory of materials stored @ substation facilities to properly acct. for & control Materials; Trans mgmt should establish criteria to ensure CWOs are closed in timely manner
Trans agreed & Ken Trump (Trans Syst. Supv.) to coordinate action plan for compliance by 11/15/03

Ken Trump

Rec - Improve Contractor Perf. Eval. Proces - Rec. SCEG & Trans Mgmt. implement a process providing documentation and retention of perf. evaluation for contractors both lump sum & T&M; Agree & name Ken Trump prepare action plan by 11/15/03 & all evaluations for 2003 to be completed by 12/31/03

This was done per Ken

15. Simi Equip. Svc. Center (Unannounced)
Rec. – Training SH&PS training records indicate not all have received safety training related to respective jobs
Rec. compliance personnel develop training matrix & provide non existant & out of date training be provided ASA Mgmt agreed & developed a LESC training plan & Training to be sched by 12/31/03 & documented upon completion

16.

7. So. Co. Svcs Bus. Assurance 2003 Assessment
N/A So. Co. Svcs. review of Governance & Bus.
Continuity; At So. Co level regarding implementation of
Systems w/in Southern system dealing w/ EMS & CSS

8. Joint Use Findings Control Improvements Required
Corrective Action Due By 12/31/03

Pole Attach Survey w/attach from BellSouth & Sprint & ~~[illegible]~~
Due to litigation did not audit Cable TV Period 2000-2002
- Audit Rec to develop a process to track detachments to
support total detachments & credits
Project Svcs implemented change & has applied to 2003 billing
Effective controls established & in place

5/05 9. FU Joint Use Findings; prior Deficiency Resolved
Gulf mgmt has adequately addressed control improvements
associated w/ the finding from the prior audit. Mgmt
responded to rec.

10. Dist. Substa. Compliance Audit ~~[illegible]~~ Finding;
Control Improvement Reqd. Corrective Action 10/8/04
Rec. - controls should be implemented to ensure required
annual review of permit required confined Space permits be
performed & documented;
Answer: Mgt will develop a process or procedure to
ensure approp. annual review of Permit Required
Confined Space permits is performed and documented
Ken Sims, Dist. Substation and Transmission Mgr. & Robt. Hobbs,
Safety and Health Mgr. 10/8/04

DOCUMENT SUMMARY AND CONTROL LOG

Division of Competitive Markets and Enforcement

Bureau of Performance Analysis

Company: Gulf Power Company	**Workload Control #: RR-04-07-001**
Area: Electric Service Quality	**File Name: i:\esq3\doclog\gulf\DR-1log.doc**
Auditor(s): L. Fisher	

Document #: DR-1.1 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Please provide the most current organizational box chart of Gulf Power's executive level management structure and the direct reporting responsibilities to Southern Company. b. Please provide the most current organizational box chart of Gulf Power's executive level management structure showing reporting responsibilities for transmission and distribution. c. Please provide the most current organizational box chart for Gulf Power's transmission and distribution organizations showing functional responsibilities for each management level. d. Provide the total number of Gulf Power's management and non-management employees within each functional reporting group for the period 1999-2005.e. Provide the total number of transmission and distribution management and non-management employees, by function, within each operating division, during the period 1999-2005. f. Please describe any changes in Gulf's executive level management structure or reporting structure during the period 1999-2005.g. Please describe any management structure or reporting structure changes in Gulf Power's distribution and transmission organizations during the period 1999-2005.
	Summary of Contents: a.) The President & CEO of Gulf Power reports directly to the President & CEO, Chairman of Southern Company; The President & CEO of Gulf Power has four direct reporting vice presidents of External Affairs & Corp. Svcs., CFO & Controller, VP&SPO, and Customer Operations. b.) Distribution reports directly up through the Distribution Operations Manager to the Power Delivery General Manager to the Customer Operations VP; transmission reports through the Transmission Manager dotted line to the Power Delivery General Manager and direct line to the Sr. VP & Chief Transmission Officer at Southern Company; c.) The Distribution Operations Center, Dispatch Center and Distribution Operations report to the Distribution Operations Manager; Distribution Engineering and Construction for each of the districts report to the Distribution Engineering & Constr. Manager d.) the number of management and non-management employees for GPC in 1999-2005 are: 1999-nm 1171-mgmt. 149; 2000-nm 1165-mgmt. 152 ; 2001- nm 1145- mgmt. 159 : 2002- nm 1163- mgmt. 163 ; 2003-nm 1163- mgmt. 161 ; 2004- nm 1171-mgmt. 159 ; 2005- nm 1171- mgmt. 169 e.) Data provided for 1999-9/05 shows employees by function and district are: 1999- nm 386- mgmt. 32 ; 2000- nm.391- mgmt. 36 ; 2001-nm 385- mgmt. 38 ; 2002-nm 394-mgmt. 38 ; 2003- nm 401- mgmt. 39 ; 2004- nm 415-mgmt. 37 ; 2005-nm 405- mgmt 47 f.&g) 7/1/00, Finance re-organized into two functions, Comptroller & CFO and Secretary/Treasury & Regional CIO; 3/30/02 Transmission and System Control moved from Power Generation to the Power Delivery &Customer Operations function; 7/1/03 Changed reporting business units to External Affairs & Corporate Services Organization; Human Resources reports to Gulf Power President & CEO; Marketing reports to VP Customer Operations; 9/1/03 Secretary/Treasury and Regulatory reports to VP CFO & Comptroller; 4/4/04 T&D functions combined 4/28/04 Safety & Health reports to VP External Affairs & Corporate Services; 1/1/05 The Distribution Operations Dept. is formed containing the Operations Center and Dispatch Center; All transmission constr., operation, and maintenance began reporting to the Transmission Manager; Distribution was restructured as power Delivery Services and functions as Corporate Transmission & Distribution Service Organization; 4/8/05 Transmission changed reporting relationship from Customer Operations to Southern Company Services Sr. VP & Chief Transmission Officer.
	Conclusions: a&b.) President &CEO of gulf reports directly to President of Southern Co.; Distribution function reports to Gulf Power VP of Customer Operations, while Transmission directly reports to Sr. VP & Chief Transmission Officer at Southern and dotted line to Gulf Power VP of Customer Operations c.) Distribution Operations Center, Dispatch Center and Distribution Operations report to the Distribution Operations Manager; Distribution Engineering and Construction for each of the districts report to the Distribution Engineering & Constr. Manager d.) Number of total employees dropped from 1999-2001, but has increased by 20 over 1999 level during the period 2002-2005. e.) T&D division/function total employees has increased from 1999-2004 and remained the same in 2005. f&g.) Gulf changed the reporting structure and operational structure during the period to place distribution under the VP Customer Operations and the transmission Group under Services Sr. VP & Chief Transmission Officer.
	Data Request(s) Generated: No. Description:

	Follow-up Required: 1.) Follow-up on Division/function employee data to clarify 2.) follow-up on changes in T&D and reasons for making those 3.) determine the reasoning and benefit for moving transmission under Southern Co. and whether this is done corporately with Alabama Power, etc.
Document #:DR-1.2 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Provide a list of all internal and external audits conducted on Gulf Power transmission and distribution functions during the period 1999-2005. (Include the date of audit, brief scope description, and name of the internal or external auditor or company conducting the audit.) b. Please provide a list of any internal or external audits focusing on company reliability and service quality measurements, systems, processes, procedures, programs, budgets, costs, improvements, or other reliability-related topic, during the period 1999-2005, and include the audit report date, title of audit, brief audit topic description and name of the performing auditor. c. Please provide a list of any internal or external audits focusing on company vegetation management, pole inspection or lightning protection programs or processes. (Include the date of audit, brief scope description, and name of the internal or external auditor or company conducting the audit.)
	Summary of Contents: a.) Company listed 27 audits conducted during the period 1999-2005 that meet the requirements requested; one audit is listed under the attorney Client privilege (4th Qtr. FERC standards of Conduct) ; All internal audits are conducted by Southern Company Services; b.) No external audits have been conducted on Gulf Power transmission and distribution functions during the period 1999-2005.c.) One internal audit was conducted on line clearing in November 2000, but no additional audits of line clearing was conducted during the period.; no external audits focusing on company vegetation management, pole inspection or lightning protection programs or processes were conducted during 1999-2005.
	Conclusions: a.) Twenty-two possible audits are of interest, including the audit under attorney Client privilege. b). no internal or external audits were performed on company reliability and service quality measurements, systems, processes, procedures, programs, budgets, costs, improvements, or other reliability-related topics during 1999-2005. c.) One internal audit was conducted on line clearing in November 2000, no external audits focusing on company vegetation management, pole inspection or lightning protection programs or processes were conducted during 1999-2005
	Data Request(s) Generated: No. _____ Description:
	Follow-up Required: Get copies of audits to review at Gulf Power during trip 1
Document #:DR-1.3 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review**: a. Provide a copy of the most current company procedures documenting statistical measurement and reporting processes and responsibilities for Gulf Power's distribution and transmission organizations. b. List and describe any distribution and transmission reliability and quality performance measurements used by Gulf Power other than those reported annually to the FPSC. c. Explain any additions or modifications made to Gulf Power reliability and quality performance measurements during the period 1999-2005. d. Please provide a list and brief explanation of internal management reports used by Gulf Power to report distribution and transmission reliability and quality results and improvements.
	Summary of Contents: a.) Gulf's distribution organization uses the current FPSC rules and IEEE guidelines for statistical measurements and reporting processes. Gulf's transmission organization uses a modified calculation of the IEEE guidelines. The responsibilities for Gulf Power distribution and transmission organizations are in DR-1.1 b.) in addition to FPSC reported indices Gulf's distribution organization reports Outages Per 100 Miles and Tree Outages Per 100 Miles and uses customer surveys compared to peer utilities and industry leading companies ; Transmission uses two main indices for reporting to management T-SAIDI and T-SAIFI an explanation of the calculation is provided c.) Since 1999, Gulf's distribution reliability and quality performance measurements have evolved to the standards contained in the IEEE guidelines and FPSC rules concerning reliability. Some measures under the old Distribution Trouble Reporting System are not measured any longer ; Gulf no longer tracks or uses "percent of customers interrupted monthly" or the "reliability index", but has added MAIFIe, L-Bar and CEMI5; There have been no additions or modifications to Gulf's transmission reliability and quality performance measurements during the period 1999-2005. d.) Gulf uses the Distribution Outage Summary report containing ten measurements by district and company totals; Measurements include Total outages, Outages per 100 Miles, Number of Customers interrupted, Total outage Time, CAIDI,SAIDI, SAIFI, L-Bar, Tree Outages/100 Miles, Dig-Ins/100 Miles; Outage by Cause summary report gives a list of outage causes and their impact on SAIDI, CAIDI, SAIFI and L-Bar; Gulf does not have management reports for MAIFIe and CEMI5, but results are monitored and reported to the FPSC; Gulf Power uses two customer survey types to measure customer opinion and also measure Gulf's performance against peer companies and stry leading utilities.; Transmission uses two internal management repc ne

	provided by Southern Co. the other is the Monthly Performance Report that calculates the T-SAIDI and the T-SAIFI reliability indices and is used as a check against the data from STOMP.
	Conclusions: Gulf Power does not have documented procedures documenting the processes for statistical measurement of performance indices, but contends that it uses FPSC and IEEE guidelines to calculate and report measures to management
	Data Request(s) Generated: No. _____ Description:
	Follow-up Required: 1.) Follow-up on the process Gulf Power uses to document results for both distribution and transmission. 2.) request other measurements used for T&D performance for the period 1999-2005 3) determine how distribution uses the distribution outage summary and verifies its reliability 4) determine how Gulf uses the customer survey and peer utility information to measure its performance 5) determine how transmission uses the Monthly Performance Report and Southern Co. report to check against data from STOMP
Document #:DR-1.4 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Describe the level of automated measurement the company is capable of monitoring for distribution and transmission service, reliability, and quality (i.e., substation, feeder, lateral, device and customer levels). b. Describe any company improvements made in automated measurement capabilities during 1999-2005.
	Summary of Contents: a.) For distribution gulf's Trouble Call Management System (TCMS) captures outage data from the substation breaker level down to the meter level; for transmission Gulf's energy Management System (EMS) provides the ability to monitor and control the power grid from the transmission line level down to the feeder level; outage data is manually entered into Standard Transmission and Operations Maintenance Program (STOMP) based on the data received from EMS. b.) in 1999 Gulf was fully transitioned to its Trouble Call Management System (TCMS) for distribution. In 1999, Gulf upgraded from the Power Management System (PMS) to EMS for transmission.
	Conclusions: a.) For distribution Gulf Power captures outage data from the substation breaker level down to the meter level; for transmission Gulf has the ability to monitor and control the power grid from the transmission line level down to the feeder level; outage data is manually entered into STOMP b.) In1999 Gulf replaced its call management system with TCMS and the transmission management system was upgraded from PMS to EMS.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) determine how the changes impacted results indices immediately after 2.) determine why transmission outage data is manually entered into STOMP and how STOMP uses that data 3) determine whether any future changes, modifications or upgrades are being pursued.
Document #:DR-1.5 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** Describe any levels of manual measurement or estimating used by the company in monitoring and reporting distribution and transmission service reliability and quality (i.e., substation, feeder, lateral, device and customer levels).b. Describe any changes or improvements in company manual measurement capabilities during the period 1999-2005.
	Summary of Contents: For distribution, Gulf has to manually review and compile operation data from EMS in order to calculate MAIFIe which is part of the FPSC reporting rules; For transmission, outages for those facilities without telemetry are based upon when the first customer call is received and ended based upon the actual restoration time.
	Conclusions: Manual calculation of MAIFIe is used in distribution and for transmission non-telemetry facilities are based on customer first call in.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) Get further explanation of the timing involved in the repair restoration measurement process 2.) determine how Gulf measures dispatch to arrival and total restoration 3.) Determine when Gulf places telemetry on transmission circuits and when it would not. 4.) determine how customer first call-in is captured.
Document #:DR-1.6 **Date Requested: 9/15/05** **Date Rece' 9/28/05**	***Document Title and Purpose of Review***: a. Please provide copies of customer surveys and results the company has conducted, or contracted to be completed, to survey customer opinion regarding Gulf Power's service quality and reliability during the period 1999-2005.b. Please explain how often ·ys are conducted, who conducts the surveys, how company manager ·ises survey

Comments: (i.e., Confidential)	information, and how results are used to measure and improve service reliability and quality. c. If the company does not periodically survey perceived customer opinion of service reliability and quality, please explain the company's reasoning for not using such surveys.
	Summary of Contents: a.) Customer survey information in 6a has been requested CONFIDENTIAL by the company and is in a locked file cabinet b.) Surveys are conducted annually during the spring for three distinct segments of customers: residential, general business and large business. Different companies conduct the surveys, NFO does residential, TQS does general and large business; company management uses the results of the surveys to gauge Gulf Power's performance against other major southeast utilities with reputations for high customer satisfaction; Gulf Power has corporate goals including being a leader in the industry;; in addition, a public opinion survey is conducted monthly and results are distributed every two months; the Marketing Workshop completes these surveys and Gulf Power management uses this survey to gauge public perception and assist the company in placing emphasis in particular areas. c.) N/A
	Conclusions: Gulf uses both peer surveys and customer surveys to measure its performance against industry leaders and customer opinion.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1) Review surveys and results in more detail 2) dertermine whether any employee incentives are paid for improved customer survey data
Document #:DR-1.7 Date Requested: 9/15/05 Date Received: 9/28/05 Comments: (i.e., Confidential)	***Document Title and Purpose of Review:*** a. Please provide a copy of current company design and loading procedures explaining design philosophy and loading characteristics for distribution and transmission services. b. Explain any changes made to company distribution and transmission design philosophy and loading characteristics during the period 1999-2005. c. Explain how the company evaluates and determines initial loading for distribution and transmission line and substation transformers. d. Explain how the company monitors and adapts load characteristics to account for ongoing increases in customer loads for distribution and transmission services. e. Explain how the company assures that service reliability and quality are not compromised by increased transmission and distribution load use over the years.
	Summary of Contents: a.) For distribution, Gulf does not have a specific procedural document that delineates between procedures and standards. Based on the company standards, overhead conductors are designed to operate at 85 degrees Celsius incorporating the industry engineering standard parameters which are required to determine the specific ratings; ratings for underground cables are individually determined by a cable ampacity program which adheres to the industry standards. All other equipment is operated up to 100% of the design ratings; for transmission the company does not have a specific document that delineates its transmission line design criterion, however, it is Gulf's practice that all lines are designed to operate with sufficient safe clearances at a particular conductor temperature under certain assumptions of ambient temperature, wind speed and direction, and sun angle. Likewise all substation equipment is manufactured with a particular maximum current and voltage rating. The company plans its system based on operating these facilities up to their designed ratings. b.) N/A c.) computer load flow models are established for initial loading of the system. An engineering analysis of those models indicates the initial condition of the system. d.) for distribution, forecast cases are established from the computer feeder models projecting out 7 years. these cases are combined to cover specific geographical areas throughout the service area; these studies are known as Long Range Area Distribution Studies ; recommendations are made from these studies and incorporated into the capital construction budget to address future concerns of increases in customer loads; for transmission computer load flow models for a ten year future period are used to study the transmission system annually to determine loading on all components of the transmission network.; these studies identify line overloads and low voltage conditions on the system; models are updated each year to account for changes in load forecast, generation additions, facility improvements and the latest assumptions; these planning models are periodically checked against the actual operating characteristics of the transmission system as monitored by Gulf's EMS computer
	Conclusions: a.) Gulf does not have specific procedural document for transmission and distribution system loading; they use industry standards for design of new construction; All other distribution equipment is operated up to 100% of the design ratings ; The company plans its system based on operating these facilities up to their designed ratings d.) Gulf uses computer feeder models projecting out 7 years known as Long Range Area Distribution Studies; recommendations are made in the studies and incorporated into the capital construction budget to address future concerns of increases in customer loads; for transmission computer load flow models for a ten year future period are u' 'o study the transmission system annually to determine loading on all co' ients of the

	transmission network.; these studies identify line overloads and low voltage conditions on the system; models are updated each year.
	Data Request(s) Generated: No _____ Description: No. _____ Description:
	Follow-up Required: 1.) Determine how many Long Range Area Distribution Studies have been completed during the period and what recommendations came from the studies each year and whether they were implemented 2.) Copies of recommendations of transmission load flow during period 1999-2005 and how many implemented 3) how often are planning models checked against actual operating characteristics of transmission system?
Document #:DR-1.8 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Explain how the company monitors and assures voltage levels and grounding standards are consistent with Florida Public Service Commission rules. b. Explain which department or group is responsible for monitoring, inspecting, measuring, reporting and adjusting voltage when necessary and how often voltage levels are checked and adjusted. C. Describe the reports used to report voltage and grounding results to management and how often results are reported.
	Summary of Contents: a.) Gulf uses the following to assure compliance of voltage standards specified in FPSC rules: a computer modeling package called Feeder Analysis Combined Systems (FACS) to perform load flow analysis studies on distribution; the distribution operations center continuously monitors the distribution system; the Southern Company Engineering Toolkit (SOCKET) is used to ensure distribution facilities for new or added customer loads; Gulf's field personnel complete spot checks of voltage levels throughout the year in conjunction with work assignments; Grounding standards are incorporated at the time of construction based on company construction practices; Transmission's EMS computer monitors the voltages throughout the system; there is no regular program to check transmission system grounding, bur periodically some lines are checked if there are operating situations or problems, such as high incidences of lightning to warrant inspecting the pole grounds. b.) the areas responsible for monitoring and adjusting voltage is for distribution: the Distribution Control Center, the District Engineering group, Technical Services and Planning; Distribution Control Center checks and adjusts voltage levels on a continuous basis through monitoring substation voltages using Gulf's SCADA system; the remaining groups check and analyze voltage levels on an as needed basis and through distribution studies; For Transmission the System Control Department monitors voltages on the system and adjusts the system as needed each day to keep the system operating as expected. c.) N/A
	Conclusions: a.) It appears that although computer monitoring and modeling of the distribution and transmission system is used by Gulf Power, system distribution and transmission grounding is only evaluated and incorporated with new construction; methods to regularly inspect for grounding in either area does not appear to be completed b.) areas responsible for monitoring and adjusting voltage is for distribution: the Distribution Control Center, the District Engineering group, Technical Services and Planning; For Transmission the System Control Department monitors voltages on the system and adjusts the system.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) Determine how FACS flow analysis studies identify low voltages in the distribution system and how SOCKET is used for added customer loads 2.) Determine whether system grounding is incorporated into any physical distribution or transmission inspections of facilities
Document #:DR-1.9 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Explain how the Company verifies constant current street lighting is meeting voltage standards and Florida Public Service Commission rules. b. Explain how often street lighting voltage is checked and adjusted, and what entity is responsible for monitoring, measuring, reporting and adjusting the voltage when necessary. c. If the Company does not verify constant current street light voltage and make necessary adjustments as required in rule 25-6.047, please explain what the company does to assure proper voltages and its reasoning for using any alternative methods.
	Summary of Contents: a-c) Gulf Power Company does not use constant current street lighting; Gulf's street lights are installed on the distribution system itself and not dedicated street lighting circuits. Each light has its own photocell which eliminates the need to control light from a single point; each light has a ballast for its own voltage and current adjustments; the ballast contained in each light makes it possible to provide correct starting current and voltage for consistent lighting.
	Conclusions: Gulf does not use constant current lighting technology for street lights.
	Data Request(s) Generated: No. _____ Description:

	No. _____ Description:
	Follow-up Required: 1. Which group is responsible for the installation, maintenance and repair of streetlights? Is there an inspection program for street lighting? 3) how often are lights inspected and what is the inspection cycle time?
Document #:DR-1.10 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Provide a copy of current company procedures, codes and definitions used to categorize distribution and transmission outages. b. Please describe the current company processes and systems used to capture data for both distribution and transmission outages. c. Explain any updates, modifications, revisions or replacements to company processes and systems, and their impact on capturing and reporting distribution and transmission outage data, during the period 1999-2005.
	Summary of Contents: a.) When a service crew restores power to a customer, the service crew calls the Distribution Operations Center (DOC) via radio and details the cause, restore time, and exact location of the problem.; definitions of distribution outage categories are provided and more detailed codes under each major code are listed ; ten primary categories are 10- Planned Outage, 20- Weather Conditions, 30- Right-of-way Conditions, 40- Erroneous Operations, 50-Contact, 60-System Conditions, 70-Vandalism, 80-Other and 00- Line Equipment and 50-Substation Equipment; b.) Systems used to capture outage information for distribution include: once entered into the Customer Service System (CSS) the outage is picked up by the Trouble Call Management System (TCMS) in use by the Distribution Operations Center (DOC) ; A DOC operator routes the trouble information via two-way radio to a service crew in the field. Once the customer is restored, the service crews relay information back to the DOC detailing the cause, restore time, and exact location of the problem. After the trouble is cleared in the TCMS it is written into a database for archival and reporting; For transmission outages, the EMS monitors the power grid. All equipment operations are transmitted from the substations to EMS terminals. EMS is a SCADA system with the capability to record events and any time a device changes state. From this information, facility outages are determined and recorded in STOMP. STOMP is the application used to record all transmission related outages. It also provides a historical database for all outages. c.) there have been no major updates, modifications, revisions or replacements made to the TCMS in use at Gulf Power during 1999-2005; TCMS has received some minor operating system and hardware updates to increase system security and reliability during 1999-2005; Transmission has started using STOMP to record all outage information. The biggest impact of using STOMP to store the outage data is that it allows for greater flexibility in analyzing any outage information
	Conclusions: a.) The outage restoration process and outage causes are provided; the ten codes have additional breakdown codes for detailed analysis of a category; Distribution routes outage calls through CSS to TCMS and the DOC takes over once the call is entered into TCMS; for transmission EMS monitors the system for outages and any operations are transmitted to EMS from the substations; outages are identified in EMS and reported in STOMP which acts as the database for transmission outages
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) what changes have been made to TCMS to improve security and reliability and what were the reasons for making the changes? 2.) find out when transmission started using STOMP for all transmission outages 3.) what kind of additional "flexibility" STOMP provides in analyzing outage data.
Document #:DR-1.11 Date Requested: 9/15/05 Date Received: 10/05/05 Comments: (i.e., Confidential)	***Document Title and Purpose of Review***: a. Explain how weather-related outages are captured and coded, and how these outages impact distribution and transmission reliability and quality measurements and indices b. Explain how outages categorized as "Unknown" are captured and coded, and how these outages impact distribution and transmission reliability and quality measurements and indices. c. Explain how outages categorized as "Other" are captured and coded, and how these outages impact distribution and transmission reliability and quality measurements and indices. d. Provide the total number of distribution outages annually by cause code and by district, for any year in which data was revised from annual reliability reports submitted to the Florida Public Service Commission, during the period 1999-2005. e. Provide the total number of transmission outages annually, by cause code and by district, for the period 1999-2005. f. Provide the total number of substation outages annually, by code and by district, for the period 1999-2005.
	Summary of Contents: a.) for distribution, weather-related outages include Ice/Snow, Lightning and Wind/Rain conditions; distribution weather-related outages account for approximately 30% of SAIDI and 25% of SAIFI over the past 6 years; for transmission, weather-related outages are based upon known weather systems in the area of the outage; these outages accounted for approximately 10% of SAIDI and 15% of SAIFI for Gulf's transmission over the last 6 years. b.) unknown outages are classified as such when the cause of the outage cann[illegible] determined; unknown outages account for approximately 3% of Gulf's [illegible]I and

	SAIFI over the last 6 years; unknown outages account for about 10% of distribution SAIDI and 13% of SAIFI over the last 6 years. c.) when the cause is known, but an appropriate cause code is not defined "other" is used to describe the outage; transmission Other outages were 7% of transmission SAIDI and 10% of transmission SAIFI over the last 6 years; Other outages for distribution were approximately 3% of distribution SAIDI and 4% of distribution SAIFI; d.) During the period 1999-2005 Gulf Power did not revise any data filed with the FPSC e.) Gulf does not track transmission outages separately from substation outages; total transmission outages during 1999-2005 were 1999-34, 2000- 40, 2001- 33, 2002- 45, 2003- 50, 2004- 31, 2005- 31 (through September); for the period Western district had 118 outages; Central had 86 outages; Eastern had 60 outages f.) see response to ques. 11e.
	Conclusions: a.) distribution weather-related outages have three set conditions related to outage conditions and account for a higher percentage of SAIDI and SAIFI than do transmission weather-related outages, which are accounted for by known weather in the area and account for a much smaller percent of SAIDI and SAIFI transmission system outages. b.) unknown outages account for approximately 3% of transmission SAIDI and SAIFI, 10% of distribution SAIDI and 13% of distribution SAIFI over the last 6 yrs. c.) Other outages were 7% of transmission SAIDI and 10% of transmission SAIFI over the last 6 years; Other outages for distribution were approximately 3% of distribution SAIDI and 4% of distribution SAIFI d.) transmission outages during 1999-2005 were 1999-34, 2000- 40, 2001- 33, 2002- 45, 2003- 50, 2004- 31, 2005- 31 (through September); for the period Western district had 118 outages; Central had 86 outages; Eastern had 60 outages.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: a,b,c.) verify other and unknown outage percentages w/ADRR; follow-up on determining T-SAIDI and T-SAIFI, how it differs from distribution calculations and how it impacts results (are distr. and trans. Comparable?) d.) determine why Western and Central transmission outages are substantially higher than Eastern over the period.
Document #:DR-1.12 **Date Requested: 9/15/05** **Date Received:9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** Provide a current copy of company procedures related to receiving and processing customer repair requests, dispatching requests, and completing repair reports.
	Summary of Contents: Gulf Power Company procedures related to receiving and processing customer repair requests are per Customer Service Standards 5.2 Trouble Reporting (12-13-04 revision).; Gulf does not have written company procedures for dispatching repair requests and completing repair reports. The process is outlined in Gulf's response to DR-1.10b.; a copy of Customer Service Standards 5.2 Trouble Reporting is attached.
	Conclusions: No written procedures are prepared for the processing of repair requests other than per Customer Service Standards, but has outlined the process in response to DR-1.10b.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) Determine whether other departments have similar procedures outlining responsibilities for trouble 2.) Determine whether other methods of reporting repair calls are used in addition to Customer service Representatives 3.) How much of reps time does the repair reporting function take vs. billing and other responsibilities ?
Document #:DR-1.13 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** Does the Company report and measure distribution and transmission substation troubles and outages separately or differently than line related troubles? If yes, please explain how and why they are reported separately or differently than line related troubles and outages.
	Summary of Contents: No.
	Conclusions:
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: Find out how substation outages are reported and analyzed
Document #:DR-1.14 **Date Requested: 9/15/05** **Date Received:10/05/05**	**Document Title and Purpose of Review:** a. Provide separately the number of distribution and transmission repair and restoration troubles completed annually, by district and trouble type, for the period 1999-2005.b. Provide the number of distribution and transmission restoration dispatches completed annually, by district and trouble type, for the period 1999-2005.

Comments: (i.e., Confidential)	**Summary of Contents**: a) the number of distribution repair and restoration troubles completed annually, by district and trouble type, for the period are provided in tables; 1999-8,550; 2000-9,547; 2001-10,259 ; 2002- 10,968; 20003- 9,817; 2004-8,808; 2005-7,731 (thru Sept.) b.) the number of distribution dispatches completed annually, by district and trouble type, is identical to the number of repair and restoration troubles completed annually as shown in 14a; transmission tracks information related to customer outages, but does not track the information for other types of dispatches where there is no customer outage.
	Conclusions: a.) distribution repair and restoration outages rose from 1999-2002 and dropped 2003-2005; b.) dispatches are the same as restoration troubles; transmission only tracks customer outages dispatches.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) Analyze cause codes by district; determine why restorations increased in 1999-2002 and dropped 2003-2005 2.) determine whether transmission outages related to customers are provided in data for 14a or whether separate numbers are kept by transmission; if so, request those numbers.
Document #:DR-1.15 Date Requested: 9/15/05 Date Received: Comments: (i.e., Confidential)	**Document Title and Purpose of Review:** Please provide separately the company annual average distribution and transmission response times (arrival on-site) and restoration time (trouble cleared), by district, for the period 1999-2005.
	Summary of Contents: Response time is not directly measured. However, response time is included in the restoration time (trouble cleared) measurement. Distribution Average restoration Time (in minutes) are provided by district for distribution and transmission.: for distribution: The Average Restoration Time (ART) for Central has increased from 84.9 to 130.5 during the period; Eastern dropped from 1999 level of 117.4 until 2003 and increased to 145.5 in September 2005; Western ART increased from 99.1 to 172.6 in 2005; Central Transmission ART increased during the period from 72.4 in 1999 to 92.6 in September 2005; Eastern transmission ART increased from 38.9 in 1999 to 94.2 in September 2005, but reached a high of 188.7 in 2000 and 131.8 in 2003; Western transmission ART reached highs of 109.8 in 1999 and 126.6 in 2001, but was at its lowest level for the period in September 2005 at 48.0 minutes
	Conclusions: All distribution ARTs are increasing for the period; Two of the three district's transmission ARTs have increased during the period; Western district, with the highest number of transmission outages has maintained the lowest ART during the period
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) determine why distribution and transmission ARTs have increased during the period 2.) determine why Western, w/most transmission outages has been able to reduce the ART during the period to the lowest in the company.
Document #:DR-1.16 Date Requested: 9/15/05 Date Received:10/05/05 Comments: (i.e., Confidential)	**Document Title and Purpose of Review:** a. Describe the current company process for planning and monitoring scheduled line and substation maintenance for distribution and transmission. b. Describe how the company handles backlogs of scheduled distribution and transmission line and substation maintenance during simultaneous peak periods of repair. c. Describe any company outsourcing, or use of contractors, to address peak maintenance periods and backlogs for distribution and transmission services.
	Summary of Contents: a.) Annually the company identifies distribution activities necessary for the upkeep and maintenance of the distribution system; work is prioritized based on most critical activities and progress is monitored throughout the year and updated as needed b.) Annually distribution activities are reviewed to allocate and organize resource requirements, schedules are reviewed throughout the year, and adjustments are made as changes require.; Transmission. line and substation schedules are jointly planned (with whom?) and completed to ensure efficient use of manpower and minimize required outages c.) during the annual planning for distribution, transmission and substation activities Gulf Power determines the need for contractor resources during scheduled transmission outages, compared to available company manpower; Gulf Power maintains contracts with multiple vendors to ensure manpower availability during scheduled transmission outages; Distribution does not have the constraint of scheduling around outages.
	Conclusions: a.) Gulf plans annually for distribution and transmission and implements those plans based on most critical needs of the system, and monitors progress throughout the year b) distribution activities are reviewed to allocate and organize resource requirements, schedules are reviewed throughout the year, and adjustments are made as changes require.; Transmission. line and substation schedules are jointly planned (with whom?) and completed to ensure efficient use of manpower and minimize required outages c.) transmission scheduled outa[illegible]e planned, and if needed, additional contractor resources are used to su[illegible]ment Gulf

	Power labor for scheduled outages.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) determine how the company identifies distribution activities necessary for upkeep 2.) determine how Gulf determines the most critical projects and prioritizes them 3.) what management reports are used to monitor progress of distribution projects and make appropriate adjustments? 4.) what is Gulf Power's long term distribution planning horizon and who is responsible for long term planning? 5.) when is the annual planning for distribution and transmission started and completed each year? Who is responsible for completing the budget and monitoring its progress? 6.) is distribution substation planning completed by the distribution or transmission organization? 7.) where is transmission aerial and ground patrol data maintained? (STOMP?) 8.) how and how often are aerial and ground patrols scheduled? 9.) are written procedures and criteria for inspections available? 10.) what do aerial and ground patrol inspections review? 11.) are contractors used for any of these inspections or any repairs necessary ? 12.) how often are preventive diagnostics used to monitor substation equipment? 13.) where is this data kept? 14.) how and how often are substation inspections completed ? 15.) where are results kept? How is this data used for substation maintenance and planning? 16.) explain the process Gulf uses to schedule outages for repairs based on inspection results for transmission lines and substations
Document #:DR-1.17 **Date Requested: 9/15/05** **Date Received:10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Provide total company budgeted and actual dollars, by year and by district, for distribution reliability enhancement programs during the period 1999-2005. b. Provide total company budgeted and actual dollars, by year and by district, for transmission reliability enhancement programs during the period 1999-2005.
	Summary of Contents: a.) N/A; b.) N/A
	Conclusions: Not applicable
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) determine why company budgeted and actual dollars for distribution reliability programs are not applicable
Document #:DR-1.18 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. List separately and briefly describe company Ongoing Programs for distribution and transmission facilities conducted, by year and by district, during the period 1999-2005. b. Provide separately the distribution and transmission budgeted and actual dollars, by year and by district, for the programs above. c. Describe any distribution or transmission Ongoing Programs modified or deleted, during the period 1999-2005, and explain the specific reasons for modifying or deleting the program. d. Describe any improvements in service reliability or quality results due to the changes made in Ongoing Programs for distribution and transmission. e. Are distribution and transmission Ongoing Programs implemented uniformly across the company? f. If Ongoing Programs are not uniformly implemented, please explain how they are implemented throughout the company's districts. g. Describe any distribution and transmission Ongoing Programs, or portions of programs, outsourced or completed by contractors.
	Summary of Contents: a.) It is not practical to provide an itemized list of all activities that Gulf has included in its budget that are related to transmission and distribution reliability. Gulf's budget and accounting systems do not separately categorize and track capital expenditures or O&M expenses on the basis that they are related specifically to transmission and distribution reliability. In general, virtually all transmission and distribution functional capital projects and O&M expenses have been or will be undertaken as part of Gulf's commitment to provide customers with reliable and high quality electric service. For example, the past construction of a new distribution feeder as an additional distribution source to an area has an impact on distribution reliability and quality of service. b.) O&M activities that most directly impact transmission and distribution reliability are provided in separate tables: For O&M, the following categories are provided: OH Line Maintenance, OCR Maintenance, Pole Inspection/Replacement, Substation maint., Tree Trim Dist., Tree Trim Trans., UG Line Maintenance; for Capital the following categories are provided: Transmission Substations, Transmission Line, Distribution Substations, Distribution Line; c.) N/A d.) N/A e.) the programs listed in the response to 18b are implemented uniformly across the company f.) N/A g.) Gulf outsources tree trimming and portions of pole inspections, transmission and distribution line and substation maintenance activities.

	Conclusions: a.) It is not practical to provide an itemized list of all activities that Gulf has included in its budget that are related to transmission and distribution reliability b.) Gulf Power has provided O&M and Capital expenses most relevant to impacting distribution and transmission reliability; O&M and Capital budgeted and actual dollars are provided for certain categories of T&D related to reliability. c&d.) N/A e.) programs are implemented uniformly across the company. f.) N/A g.) Gulf outsources tree trimming and portions of pole inspections, transmission and distribution line and substation maintenance activities.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) further review budget/actual numbers for the period for O&M and Capital expense relative to distribution and transmission reliability 2.) determine trends in spending for each category. 3.) follow-up on tree trimming and inspection vendors for distribution and transmission 4.) determine whether Gulf inspects tree trimming and poles for quality assurance, how often inspections occur and how results are maintained.
Document #:DR-1.19 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. List and briefly describe remedial distribution and transmission programs, by year and by district, to improve overall company service reliability and quality during the period 1999-2005 b. Provide separately the budgeted and actual dollars, by year and by district, for any remedial distribution and transmission programs during the period 1999-2005. c. Describe any improvements in overall company service reliability or quality as a result of company remedial distribution and transmission programs.
	Summary of Contents: a.) see response to 18a b.) O&M and Capital budget and actual dollars for : O&M-Deteriorated Conductor and Network Line transformer; Capital-Distribution Projects, Distribution UG Systems Add, Distribution Misc. Line and Remote Terminal Units c.) N/A
	Conclusions: a.) see 18a b.)Gulf provided O&M and Capital programs for reliability improvement during the period. c.) N/A
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) review budget and actual dollars provided and trend remedial distribution and transmission dollars 2) determine whether response to c is because Gulf does not tie dollars spent on distribution reliability back to results.
Document #:DR-1.20 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:**. a. Identify and describe any company targeted programs to improve distribution and transmission reliability within specific geographical areas or districts during the period 1999-2005. b. Provide separately the distribution and transmission budgeted and actual dollars for company targeted programs for the length of the program, during 1999-2005. c. Provide specific improvement objectives and measurements used to monitor the performance of each targeted distribution and transmission program for the length of the program, during 1999-2005. d. Describe the measured improvement results for each targeted distribution and transmission program for the length of the program, during 1999-2005.
	Summary of Contents: a.) N/A b.) N/A c.) N/A d.) N/A
	Conclusions: Gulf power had no targeted programs to improve distribution and transmission reliability within specific geographical areas during the period 1999-2005.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) Verify that Gulf had no such programs and understands the question
Document #:DR-1.21 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** Provide a current copy of the company's lightning protection procedures for distribution transmission and substation facilities.
	Summary of Contents: Six pages of Gulf Power Plates from procedures were provided as basic information for distribution lightning protection; Data is claimed as CONFIDENTIAL by Gulf Power
	Conclusions: Gulf Power has written general guidelines for distribution lightning protection regarding neutral and grounding, lightning arresters, fusing switches and circuit breakers, lightning protection for OH distribution, OH distribution transformers, regulators, and capacitors.
	Data Request(s) Generated:

	No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) Determine whether additional procedural information is available for distribution 2.) Determine whether similar written procedures are available for transmission and substation.
Document #:DR-1.22 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a.) Describe company programs to identify lightning-related deficiencies and improve lightning protection during the period 1999-2005. b.) Provide budgeted and actual dollars, by year and by district, for distribution lightning protection programs during the period 1999-2005. c.) Provide budgeted and actual dollars, by year and by district, for transmission lightning protection programs during the period 1999-2005. d.) Provide budgeted and actual dollars, by year and by district, for substation lightning protection programs during the period 1999-2005. e.) Provide lightning-related SAIDI, CAIDI and SAIFI results for the period 1999-2005. f.) Describe the improvement results realized, by year and by district, from lightning protection programs during the period 1999-2005. g.) Describe any lightning programs modified or deleted, during the period 1999-2005, and the specific reasons for modifying or deleting the programs. h.) Describe any distribution, transmission or substation lightning programs, or portions of programs, outsourced or completed by contractors during the period 1999-2005.
	Summary of Contents: a.) Gulf does not track specific programs that pertain only to lightning protection. The company designs, builds and operates systems with reliability and protection of equipment from damage by lightning being key considerations and continues to seek opportunities for improvements. b.) Gulf does not budget for specific programs that pertain only to lightning protection. c.) same as b d.) same as b&c e.) Lightning-related SAIDI, CAIDI and SAIFI are provided for distribution and transmission during the period: Distribution SAIDI dropped from 35.7 in 1999 to 22.9 in 2003, and increased to 31.4 in 2005; Distribution CAIDI decreased from 111.9 in 1999 to 98.7 in 2003, but increased again in 2004-2005; Distribution SAIFI decreased from .3187 in 1999 to .1714 in 2004, but increased in 2005 to .2653; Transmission SAIDI decreased from 5.4 in 1999 to 1.2 in 2004 and is 1.7 in 2005; CAIDI is not measured for transmission; SAIFI decreased from .0493 in 1999 to .0092 in 2003, increased to .0431 in 2004 and decreased in 2005 to .0265. f.) Gulf does not track specific programs pertaining to lightning protection. The company designs, builds and operates systems with reliability and protection of equipment as key considerations and makes improvements when opportunities arise. g.) same as f. h) N/A
	Conclusions: a,b,c&d) Gulf does not specifically measure system improvement caused by lightning protection or track lightning protection dollars e.) Distribution SAIDI is lower than in 1999, CAIDI is higher than in 1999 and SAIFI is lower than in 1999; Transmission SAIDI is lower than in 1999 and SAIFI is lower than in 1999.f.&g) Gulf doesn't measure or budget for lightning protection separately. h.) N/A
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) has the company completed any lightning studies during the period? 2.) how often does the company evaluate "opportunities for improvements" to lightning protection. 3.) what did gulf do to reach a 17.1 lightning related distribution SAIDI in 2001? 4.) what did Gulf do to reduce CAIDI in 2005? 5.) what has Gulf done to reduce transmission SAIFI since 2001?
Document #:DR-1.23 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** Describe the types of distribution, transmission and substation lightning and fault protection devices used by the company, during the period 1999-2005, and explain any changes made in protection devices during the period.
	Summary of Contents: Trans & Substation- lightning protection for transmission and substation equipment is provided by high voltage surge arresters. These devices are connected from the phase conductor to ground and are designed to shunt the over-voltage condition caused by lightning. There have been no changes made to this protection scheme in the period 1999-2005. Transmission and substation fault protection is provided by overcurrent relays, impedance relays, and /or fuses. Although the particular relays and fuses used in these protection schemes have changed since 1999, the applications and principles of operation have not. Overhead Distribution- Lightning protection for overhead distribution equipment is typically provided by heavy duty, distribution class polymer housed metal oxide varistor surge arresters and by the use of heavy duty, under oil surge arresters in stainless steel overhead transformers, used mainly in seacoast environments. These devices are connected from the phase conductor to ground and are designed to shunt over-voltage conditions to protect OH distribution equipment There have been no changes in the types of OH distribution protection devices used during the period 1999-2005. UG Distribution – Lightning protection for underground distribution equipment is provided by heavy duty distribution class metal oxide varistor elbow surge arresters and by the use of heavy duty under oil surge arresters in pa[illegible]ounted transformers. These devices are connected from the phase conduc[illegible]r to ground

	and are designed to shunt over-voltage conditions to protect UG equipment; pad-mounted transformers, UG conductor, pad-mount switching enclosures and other UG distribution system equipment. For UG distribution line protection, cutout mounted fuses, under oil fuses, electronic sectionalizers, switchgear mounted fuses, network protectors and electronic controlled switchgear are used to isolate failed equipment and fault conditions; there have been no changes in the types of underground distribution protection devices used during the period 1999-2005.
	Conclusions: No changes have been made to lightning protection equipment types during the period 1999-2005
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1) Determine arrester issues and costs over the period for both distribution and transmission lightning protection [see DR-2]
Document #:DR-1.24 **Date Requested: 9/15/05** **Date Received:10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** Provide a copy of company animal protection procedures or guidelines for distribution transmission and substation facilities.
	Summary of Contents: Two Gulf Power specification plates and 12 Southern Company specification plates were provided: plates show different configurations for OH distribution transformers, OCR, and capacitor installations with animal guards.
	Conclusions: Gulf uses its own and Southern procedures as written guidelines for properly mounting animal guards on distribution equipment.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) determine what procedures transmission uses for installing guards for animals
Document #:DR-1.25 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Separately describe company distribution, transmission and substation programs to identify animal related deficiencies and improve protection during the period 1999-2005. b. Provide budgeted and actual dollars, by year and by district, for distribution related animal protection programs during the period 1999-2005.c. Provide budgeted and actual dollars, by year and by district, for transmission related animal protection programs during the period 1999-2005. d. Provide budgeted and actual dollars, by year and by district, for substation related animal protection programs during the period 1999-2005. e. Provide animal-related SAIDI, CAIDI and SAIFI results for the period 1999-2005.f. Describe the improvement results realized, by year and by district, from distribution, transmission, and substation animal protection programs during the period 1999-2005. g. Describe any animal protection programs that were modified or deleted, during the period 1999-2005, and the specific reasons for modifying or deleting the programs. h. Describe any distribution, transmission and substation animal programs, or portions of programs, outsourced or completed by contractors.
	Summary of Contents: Distribution- guidelines consist of company construction specifications to cover new construction(showing approved animal guards and their correct application); outage reporting to give us details as to where the animal came into contact with our equipment using the TCMS; and employee training and communication. A video tape was produced describing the guidelines and was shown at safety meetings to all personnel; These guidelines involve the use of electrostatic animal guard that can be used to retrofit existing transformers not having adequate animal protection. These are to be installed anytime a crew member does any work at a transformer station that does not have adequate animal protection. They can be installed while the transformer is energized. Transmission – Animal related outages on transmission lines are evaluated when they occur and mitigation measures are taken when appropriate. Substation- Animal related outages in substations are evaluated when they occur and mitigation measures are taken when appropriate. b.) Gulf does not specifically identify dollars for distribution related animal protection c.) same as b d.) same as c. e.) animal-related SAIDI, CAIDI and SAIFI were provided: Distribution SAIDI decreased from 7.8 in 1999 to 7.0 in 2001, but increased to its highest level in 2002 at 8.4, before decreasing substantially in 2003-2005; distribution SAIFI was its highest in 2002 at 0.131, but has decreased to 0.031 in 2005 (thru 9/05) Transmission animal-related SAIDI was higher than 1999 level of 1.0 through 2003, but decreased to 0.7 in 2004-2005 (thru 9/05); Transmission SAIFI was higher than the 1999 level of).)26 during 2000-2004, but decreased below the 1999 level in 2005 (thru 9/05).f.) During the period 1999-2004, reductions in the frequency and duration of animal outages were realized for the Company as a whole. Since the guidelines were put in place in 2003, a 68% reduction in the frequency of animal outages has occurred, and a 63.3% reduction in the duration of animal outages has occurred. Although the overall animal o[illegible]es at the Company level have trended downward since the implementatic[illegible] our

	guidelines in 2003, the results at the district level are inconclusive. We are continuing to seek opportunities at the district level to realize further improvements. Transmission - N/A; Substation- N/A .g.) Distribution see 25a, Transmission- N/A, Substation- N/A h.) Distribution- N/A, Transmission- installation of swan diverters is performed by contractors; Substation-N/A
	Conclusions: Gulf construction specifications, outage reporting, and training on guidelines for using animal guides have been used to reduce animal-related outages. Gulf Power has reduced overall animal–related outages since the implementation of new guidelines in 2003. Results at the district level are not conclusive. Gulf uses contractors to place swan diverters on transmission facilities.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) Get a copy of the 2003 guidelines leading to the decrease in animal-related outages 2.) get district level results for the period 3.) Determine what Gulf does for animal protection in transmission and in substation 4.) determine the number of electrostatic guards placed, by district, during the period, or at least since 2003. 5.) determine when and where these are used 6.) 6.) determine how many have been placed during the period [see DR-2]
Document #:DR-1.26 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** Describe the types of animal protection devices used by the company for distribution, transmission and substation protection.
	Summary of Contents: Distribution- 1) Hand wheel protector, 2) Funnel protector, 3) electrostatic animal guard, 4) wildlife wire, 5) therma-guard-protector, 6) arrester caps, 7) capacitor banks; Substation- 1) electronic motion sensing ultrasonic property guard, 2) electric fence, 3) Bus insulator squirrel guard ; Transmission- 1) bird perch discouragers, 2) swan diverters
	Conclusions: Gulf Power uses multiple varieties of animal protectors and discouragers for birds and squirrels for distribution, substation and transmission applications.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1) determine how Gulf measures the results of these protection devices.
Document #:DR-1.27 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. By distribution transformer size, provide the standard number of residential customers served from each distribution transformer the company uses. (example: 25 KVA-7 cust/trans. 50 KVA-14 cust/trans, 75 KVA-21 cust/trans). b. By distribution transformer size, provide the standard number of business customers served from distribution transformer by the Company (example: 25 KVA-7 cust/trans. 50 KVA-14 cust/trans, 75 KVA-21 cust/trans). c. Describe any changes in company transformer design philosophy or load characteristics during the period 1999-2005.
	Summary of Contents: a.) Gulf Power does not have a standard specifying the number of residential customers for each distribution transformer. Each transformer site is specifically designed for the varying load and voltage requirements of each customer premise b.) same as a c.) N/A
	Conclusions: Gulf Power individually determines the required need of every customer and conforms its transformer use to meet those requirements.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) Determine what guideline is used for new developments and used for the URD tariff
Document #:DR-1.28 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a.) Provide separately the total number of distribution line and substation transformer related outages, by year and by district, for the period 1999-2005.b.) Provide separately the total number of transmission line and substation transformer related outages, by year and by district, for the period 1999-2005.
	Summary of Contents: a.) Distribution Transformer related outages for the period 1999-2005, by district , were:

District	1999	2000	2001	2002	2003	2004	2005 (thru 9/05)
Central	1025	1156	1265	1364	1287	968	704
Eastern	687	636	648	677	746	605	444
Western	2951	3095	3590	3518	2971	2443	1858
Total	4663	4887	`3	5559	5004	4016	3006

b.) Gulf Power does not track transmission line outages separately from substation outages. All transmission and substation data is included below:

District	1999	2000	2001	2002	2003	2004	2005 (thru 9/05)
Central	8	11	16	17	11	6	15
Eastern	10	6	5	12	9	8	12
Western	16	23	12	16	30	17	4
Total	34	40	33	45	50	31	31

Conclusions: Distribution transformer–related outages increased from the 1999 level of 4663 until 2004 when it decreased to 4016 and further decreased in 2005 (thru 9/05). Central district has seen reduced transformer-related outages during the period; Western district only dropped below the 1999 level of 2951 in 2004-2005; Eastern district was below the 1999 level of 687 until 2003, but dropped again in 2004-2005; Transmission transformer-related outages were above the 1999 level of 34 in 2000, 2002 and 2003 before decreasing in 2004; 2005 looks to be higher than 1999 at YE (thru 9/05 it was 31). Western has a considerably higher level of transmission transformer-related outages than the other two districts.

Data Request(s) Generated:
No. _____ Description:
No. _____ Description:

Follow-up Required: 1.) determine why Central and Western have a larger number of distribution transformer-related outages 2) determine why Western has a considerably higher level of transmission transformer-related outages. 3) determine whether Gulf has designed or implemented any improvement programs to reduce the number of transformer-related outages during the period

Document #:DR-1.29
Date Requested: 9/15/05
Date Received: 9/28/05
Comments: (i.e., Confidential)

Document Title and Purpose of Review: a. Describe company programs to identify, test and improve distribution, transmission and substation loading deficiencies during the period 1999-2005. b. Provide budgeted and actual dollars, by year and by district, separately for distribution line and substation transformer protection programs during the period 1999-2005.c. Provide separately budgeted and actual dollars, by year and by district, for transmission line and substation protection programs during the period 1999-2005. d. Describe the improvement results realized, by year and by district, from improved company transformer loading programs during the period 1999-2005. e. Describe any modifications or deletions to company transformer loading programs during the period 1999-2005, and the specific reasons for the modifications or deletions to programs. f. Describe any distribution, transmission and substation programs, or portions of programs, outsourced or completed by contractors during the period 1999-2005 not already provided.

Summary of Contents: a.) N/A b.) For the period 1999-2004 there was no distribution or transmission line or substation transformer protection program. In 2005, Gulf Power has implemented a distribution class substation protection and control improvement program. This program will upgrade the protective relaying schemes that affect both distribution line protection and distribution class substation transformer protection. The 2005 budgeted expenditure for this program is $75,000 and it is expected that the actual expenditures will be very close to the budgeted amount c.) see b d.) The program discussed in response to 29b has not been fully implemented as of this date, therefore, there are no measurable results at this time e.) N/A f.) N/A

Conclusions: No distribution and transmission line or substation transformer protection programs prior to 2005. In 2005 Gulf implemented a distribution substation protection and control program; the program for 2005 is budgeted for $75,000

Data Request(s) Generated:
No. _____ Description:
No. _____ Description:

Follow-up Required:1.) determine what Gulf did prior to 2005 to assure substation transformers were protected from lightning, animals, vegetation, etc. 2.) determine what the current program objectives, activities and actions are 3.) review any results or improvements to date **(none at this time see: DR-1.29d)**

Document #:DR-1.30
Date Requested: 9/15/05
Date Received: 10/05/05
Comments: (i.e., Confidential)

Document Title and Purpose of Review: a. List separately the types of distribution, transmission and substation transformers used by the company, if not previously described, and the current load characteristics and assumptions for the use of each. b. Describe any company changes to loading characteristics and assumptions for distribution, transmission, and substation transformers during the period 1999-2005. c. Describe any measurable benefits made to service reliability and quality as a result of changes to company loading characteristics during the period 1999-2005. d. List and describe the types of distribution, transmission, and substation transformer protection devices used by t' ompany during the period 1999-2005. Loading information provided in ' 3-9 is

	considered CONFIDENTIAL.
	Summary of Contents: a.) Gulf Power uses distribution transformers of the following type: Single phase OH (10kVA to 167 kVA), Single phase UG (25kVA to 167 kVA), Three phase padmount (112.5 kVA to 2500 kVA) Transmission and substation transformers of the following types are used: Single phase medium power (60 MVA or less) , Three phase medium power (60 MVA or less), Three phase auto banks (greater than 100 MVA), Three phase station service (60 MVA or less), Three phase generator step up (various- sized to Generator unit) , Single phase Station Service (Distribution Class) b.)
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1) further review data
Document #:DR-1.31 **Date Requested: 9/15/05** **Date Received: 9/28/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Provide company documented procedures for distribution, transmission and substation transformer inventory, replenishment and restocking time frames for the period 1999-2005.b. Describe the organization responsible for distribution, transmission and substation transformer inventory, replenishment and restocking time frames, and equipment reserve levels for normal and emergency conditions, during the period 1999-2005. c. Provide company annual distribution, transmission and substation transformer restock levels and criteria for replenishment of transformers, by type and by district, during the period 1999-2005. d. Provide company distribution, transmission and substation transformer reserve levels for normal and emergency conditions during the period 1999-2005. e. Provide the number of company distribution, transmission and substation transformers in service, by type and by district, for the period 1999-2005. f. Provide the number of spare distribution, transmission and substation transformers, by type and by district, if different from those held for normal and emergency reserve during the period 1999-2005.
	Summary of Contents: a.) Gulf Power has no documented procedures for distribution, transmission, or substation transformer inventory, replenishment and restocking b.) Supply Chain Management (SCM) is responsible for distribution line transformer inventory. Gulf Power Company Transmission is responsible for the transmission and substation transformer inventory. c.) Gulf Power Company uses historical usage data combined with monthly review of the capital budget and planned and unplanned work orders to determine transformer purchase decisions and inventory requirements. SCM is responsible for inventory management at all Gulf Power Company Transmission and Distribution warehouses. SCM has the authority to transfer material, i.e. distribution line transformers, between locations as required. Transmission and substation transformers are ordered as needed d.) for distribution line transformers, Gulf Power Company uses a combination of in-stock as well as consignment stock of transformer inventory for normal and emergency conditions. Additionally, transformer inventory levels are typically higher during the summer months in anticipation of storms. In the event of a catastrophic event such as hurricane damage, suppliers and other Southern Companies will sell to Gulf Power Company available transformer units to ensure adequate inventory to meet requirements. A listing of distribution line transformer inventory balances for 1999-2000 were not available. Transmission does not maintain transformer reserves. e.) Gulf provided an in-service Mass Property Li that shows transformers by type and T&D substation transformers by a location.

	Conclusions: a.) Gulf Power has no documented procedures for distribution, transmission, or substation transformer inventory, replenishment and restocking b.) Supply Chain Management (SCM) is responsible for distribution line transformer inventory; Transmission is responsible for the transmission and substation transformer inventory c.) SCM is responsible for inventory management at all Gulf Power Company Transmission and Distribution warehouses d.) for distribution line transformers, Gulf Power Company uses a combination of in-stock as well as consignment stock; In the event of a catastrophic event such as hurricane damage, suppliers and other Southern Companies will sell to Gulf Power Company available transformer units. e.) The totals for each year are: 1999- Substation 476, Distribution OH 109,035, UG/UV/Pad 18,612 = 128,123 2000-Substation 645, Distribution OH 109,726, UG/UV/Pad 19,743 = 130,114 2001- Substation 649, Distribution OH 107,401, UG/UV/Pad 19,428 = 127,428 2002- Substation 645, Distribution OH 110,727, UG/UV/Pad 21,349 = 131,721 2003- Substation 635, Distribution OH 110,244, UG/UV/Pad 22,208 = 133,087 2004- Substation 640, Distribution OH 115,116, UG/UV/Pad 23,787 = 139,543 2005- Substation 640, Distribution OH 115,240, UG/UV/Pad 24,821 = 140,701 f.) spare substation transformers by type and district are: 1999- Substation 40, 2000-Substation 42, 2001- Substation 37, 2002- Substation 40, 2003-Substation 28, 2004-Substation 27, 2005-Substation 29
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1.) determine what method transmission uses to assure levels of transformers are available to reduce any outage time frames 2.) determine whether Gulf maintains a ready supply of transmission transformers based on a ratio of in-service to mean failure times (i.e. do they anticipate failure timeframes and project forward) 3.) determine whether spares are substation only and why levels dropped in 2003-2005 even though the system is growing.
Document #:DR-1.32 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Provide a copy of current company documented procedures relative to distribution, transmission and substation facility inspections and artificial grounding. b. List and describe company inspection programs used to identify, repair and replace distribution, transmission and substation equipment and facilities, and to inspect artificial grounds, during the period 1999-2005.c. Provide separately the budgeted and actual dollars, by year and by district, for distribution, transmission and substation inspection programs for the period 1999- 2004. d. Describe the improvement results realized, by year and by district, from company distribution, transmission and substation inspection programs during the period 1999-2004. e. Describe any updates, changes, modifications or deletions to company inspection programs for distribution, transmission or substations, during the period 1999-2005, and the specific reasons for the action. f. Describe any distribution, transmission or substation inspection program or work outsourced or completed by contractors during 1999-2005.
	Summary of Contents: a.) includes Gulf Power plate for Distribution System Inspection and Maintenance Program; exhibit 1 Company Procedures relative to Substation Inspection Programs is considered CONFIDENTIAL by the company; b.) Distribution Inspection Programs- (see answer to question 33 for pole inspection program) As part of the distribution ground-line pole inspection program, a visual inspection is performed for visual damage or rot on crossarms, broken or frayed down guys, broken or disconnected ground wires (from the ground rod), abandoned anchors, broken glassware (including luminaries) or porcelain, damaged or missing guy markers (up to 8 ft.) any oil leaking equipment, any obvious signs of burned or flashed areas, blown lightning arrestors and remarks made of any special conditions. Also as part of the pole inspection program, broken ground wires are repaired and missing or damaged guy guards are replaced; Transmission and Substation Facility Inspection Programs- Substation: batteries are inspected every 6 mos. Capacity integrity and resistance test performed as indicated from inspections; Breakers :oil breaker preventative diagnostics are performed every two years; SF6 breakers have diagnostics performed every 3 yrs; 12 kV vacuum breakers have diagnostics performed every 4 yrs.; Regulators- preventive diagnostics are performed annually; power factor testing is performed every 6 years. Transformers- Dissolved gas analysis is performed annually; power factor testing is performed every 6 yrs. c.) Distribution: see answer to Ques. 33 pole inspection information; Transmission- N/A d.) Distribution: see answer to ques. 33 pole inspection information; Transmission: N/A e.) Distribution- see ques. 33 for pole inspection info.; Trans.- N/A f.) Distribution- see ques. 33; Trans.- Gulf Power has used contractors to paint re-gasket and reclaim oil for large power transformers. Gulf has also used contrac[illegible] to identify leaks in FS6 breakers on the system; Regulators- preventive d[illegible]nostics are

performed annually; power factor testing is performed every 6 years. Transformers; Dissolved gas analysis is performed annually; power factor testing is performed every 6 yrs.

Conclusions: a.) Gulf has procedures for inspection programs distribution, transmission and substation equipment. b.) As part of the distribution ground-line pole inspection program, a visual inspection is performed for visual damage; Also as part of the pole inspection program, broken ground wires are repaired and missing or damaged guy guards are replaced; Substation: batteries are inspected every 6 mos. ; SF6 breakers have diagnostics performed every 3 yrs; 12 kV vacuum breakers have diagnostics performed every 4 yrs f.) Trans.- Gulf Power has used contractors to paint re-gasket and reclaim oil for large power transformers. Gulf has also used contractors to identify leaks in FS6 breakers on the system

Data Request(s) Generated:
No. _____ Description:
No. _____ Description:

Follow-up Required: 1) what are the distribution system inspection intervals for each district? 2) how often are distribution inspections conducted and are contractors used for any part? 3) get a sample of distribution inspections from each district for the period 4.) get a sample of substation inspections completed in each district during the period [see DR-2]

Document #:DR-1.33
Date Requested: 9/15/05
Date Received:10/05/05
Comments: (i.e., Confidential)

Document Title and Purpose of Review: a. Provide a copy of current documented company procedures relative to distribution and transmission pole inspection programs and describe any changes made to procedures, during 1999-2005. b. Provide the number of company distribution and transmission pole inspections completed annually, by district, for the period 1999-2005. c. Describe all company distribution and transmission pole inspection programs completed during the period 1999-2005. d. Describe company transmission tower inspection programs during the period 1999-2004, if different or not included in the response to transmission pole inspection programs. e. Provide pole-related SAIDI, CAIDI and SAIFI results for the period 1999-2005.f. Provide company budgeted and actual dollars, by year and by district, for distribution and transmission pole inspection programs during the period 1999-2005. g. Describe improvement results realized, by year and by district, from company pole inspection programs during the period 1999-2005. h. Describe any portions of company pole inspection programs, outsourced or completed by contractors during the period 1999-2005.

Summary of Contents: a.) Distribution- Gulf's specifications for 1999-2002 required a full excavate (18-24 inches) and external treatment of non-CCA 9chromated copper arsenic) treated poles. Starting in 2003, after completing Gulf's first cycle of pole inspections, Gulf changed its specifications to include the inspection and treatment of CCA poles; Transmission- Prior to 2004 Gulf did not have documented procedures relative to transmission pole inspections. In 2004, Gulf adopted the Southern Company Ground Line Inspection program. b.) The number of pole inspections completed during the period 1999-2005 is:
1999-2001 (poles originally scheduled for 1999 were inspected during the last quarter of 1998 (Western 7,585, Central 3,682 and Eastern 3,704) there were no pole inspections completed; In 2002-2005 annual totals were: 2002- 24,684, 2003- 19,887 and 2004- 20,864; 2005 inspections began on October 1, 2005; Transmission- 2004- Gulf Power inspected 1,000 wood and concrete poles, and towers. c.) Distribution- see answers 33a &b; Transmission- see answer 33a, exhibit 2 d.) see answer 33a, exhibit 1 e.) N/A f.) Distribution budget dollars for 1999-2005 are: 1999-2000 had no budgeted distribution dollars for inspection, but spent $454,000 in 1999 and 350,000 in 2000;

Distribution:

Year	Actual	Budget
2001	$202,781	$345,000
2002	$848,692	$670,000
2003	$353,917	$500,000
2004	$307,267	$500,000
2005	$ 70,696	$197,367 (YTD 8/05)

Transmission:

Year	Actual	Budget
2004	$102,266	$211,000
2005	$114,778	$

g.) Improvement results by district were:
Distribution: (Percent Rejected Poles)

Year	Western	Central	Eastern
1999	16.2	19.6	14.4
2000	n/a	n/a	n/a
2001	n/a	n/a	n/a
2002	18.7	15.1	10.7
2003	3.9	6.6	2.8
2004	5.2	6.3	2.9
2005	n/a	n/a	n/a

Transmission- N/A
h) Gulf Power has contracted all of its ground-line pole inspections during 1999-2005

Conclusions: a.) Gulf Distribution did not conduct any wood pole inspections during 1999-2001, although 1999 scheduled inspections were completed in 1998; Transmission only inspected 1,000 wood and concrete poles and towers during 2004.b.) Distribution had no inspections 2000-2001 and 1999 scheduled inspections were completed in 1998; Transmission appears only to have inspected in 2004, and may be related to post hurricane inspection c & d) see previous answers e.) N/A ? f.) No budgeted dollars for distribution during 1999-2000

Data Request(s) Generated:
No. _____ Description:
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Follow-up Required: 1) find out why Gulf did not complete any inspections in 2000-2001 2) get the inspection cycle time and dates for distribution and transmission pole inspections 3) determine what Gulf did in transmission inspections prior to 2004 4.) determine whether any distribution and transmission inspections in 2004 were hurricane related 5) determine how many inspections are scheduled for distribution and transmission during 2005 and how many are complete to date. 6) determine whether the company can provide pole-related outage SAIDI,CAIDI and SAIFI 7) determine why actual 2004 transmission inspection dollars were lower than budgeted (hurricane?) 8) determine why the number of rejected poles has gone down substantially since 2002 (standards change in 2003?)

Document #:DR-1.34
Date Requested: 9/15/05
Date Received: 10/05/05
Comments: (i.e., Confidential)

Document Title and Purpose of Review: a. Provide current company documented procedures for distribution and transmission vegetation management programs, and describe any changes to the procedures during the period 1999-2005. b. Describe the organizations responsible for distribution and transmission vegetation management, including total management and non-management personnel, number of crews, crew size, number of company vs. contractor crews, overall responsibilities and performance measurements during the period 1999-2005. c. Describe current company philosophy and methods for distribution and transmission vegetation management and any changes in philosophy or methods during the period 1999-2005.d. Provide a description of company distribution and transmission vegetation management programs, objectives, measurements and results, by year and by district, for the period 1999-2005. e. Provide vegetation-related SAIDI, CAIDI and SAIFI results for the period 1999-2005. f. Provide budgeted and actual dollars for distribution and transmission vegetation management programs, by year and by district, during the period 1999-2005. g. Describe company reliability improvements realized from vegetation management programs, by year and by district, during the period 1999-2005. h. Describe any portions of the distribution and transmission vegetation management programs, outsourced or completed by contractors during the period 1999-2005.

Summary of Contents: a.) Distribution and Transmission vegetation management is governed by:
NESC 9 Part 2-Sec. 21 Par. 218), OSHA 29 CFR Part 1910, Gulf Power Distribution Bulletin 35, ANSI A300 (part 1)-2001 Pruning and ANSI Z133.1-2000; Gulf Power stopped using spec plates and tree trim policies since they were redundant compilation of the above mentioned documents. Distribution Bulletin 35 covers customer relations since that topic is not addressed in any of the national standards; copies of standards, etc. are provided. b.) The Forestry Service Section is responsible for all transmission and distribution vegetation management. Forestry Services is a section of Power Delivery Contract Services. The Forestry Service Team Leader reports directly to the Con[illegible] Services Supervisor and is responsible for managing the day-to-day ope[illegible]ns of

Forestry Services. Three Line Clearance Specialists are responsible for developing work-plans, overseeing contractor activities, and serving as the local Gulf Power contact for cities, towns, and customers regarding vegetation management activities. Two Forestry Services Technicians are responsible for supporting Line Clearance Specialists activities, patrolling and evaluating vegetative conditions, and providing customer service support.; Average annual contractor crew counts for the period 1999-2005 included 30 distribution crews containing 63 people, and 7 transmission crews containing 21 people. Gulf Power does not have any company tree crews.; Performance of the Forestry Services Organization is evaluated in terms of safety, customer satisfaction, reliability trends, and budget management. c.) The philosophy toward distribution vegetation management remains largely unchanged since 1999. Areas with vegetation problems are reported to Forestry Services from a variety of sources (customer call center, engineering, Power Delivery Technical Services, visual observations from Forestry Services field patrols, etc.). Each report is evaluated in the field and corrective spot pruning is scheduled if necessary.; In addition to spot pruning, full maintenance pruning is scheduled on selected feeders. Feeders are prioritized based on the various sources listed above as well as data from the TCMS. In recent years, more emphasis has been placed on increasing the number of miles receiving full maintenance pruning.; Distribution methods have not changed since 1999. Two or three man lift crews are used to perform distribution pruning. Transmission: Transmission rights-of-way conditions are analyzed yearly through the use of ground and aerial patrols. Hazard trees and areas with less than one year's clearance are corrected as they are identified throughout the year. Data from field patrols is used to develop work plans for areas that will receive full scale herbicide treatment, side trimming, or mowing.; Since 1999, Gulf Power has made two significant changes to transmission vegetation management methods. Prior to 2002, danger trees and tall vegetation were identified using aerial patrols. In 2002 and 2003, an annual ground patrol was added to the aerial patrols to closely evaluate the vegetative condition of each line. All vegetative conditions that could threaten the line within growing season are identified and corrected; The second change was to implement the large scale use of herbicides on transmission rights-of-way to reduce the need for mowing. d.) Full maintenance trimming completed each year 1999-2005 were:

Distribution

Year	Central	Eastern	Western	Total
1999	317	149	326	792
2000	111	53	77	241
2001	100	74	35	209
2002	203	138	1000	1341
2003	169	232	574	975
2004	123	192	324	639
2005	75	87	96	258 (thru 09/05)

Transmission (Herbicide)

Year	Acres Treated
1999	6,273
2000	4,781
2001	2,350
2002	265
2003	12,580
2004	5,456
2005	0 (thru 09/05)

Transmission (Side Trimming)

Year	Miles Trimmed
2002	0
2003	243
2004	197
2005	0 (thru 09/05)

Transmission (Mowing)

Year	Acres
2002	613
2003	3,220
2004	1,125
2005	836 (thru 09/05)

Transmission (Urban Tree Pruning)

Year	Miles
2002	340
2003	124
2004	7
2005	0 (thru 09/05)

e.) Distribution vegetation-related SAIDI, CAIDI and SAIFI for 1999-2005 are:

Year	SAIDI	CAIDI	SAIFI
1999	11.3	78.1	0.1446
2000	17.8	80.4	0.2208
2001	14.0	80.8	0.1736
2002	17.0	86.4	0.1965
2003	10.1	83.7	0.1205
2004	17.8	84.9	0.2093
2005	10.0	88.2	0.1133 (thru 09/05)

Transmission vegetation-related SAIDI and SAIFI

Year	SAIDI	SAIFI
1999	1.80	0.014
2000	0.93	0.019
2001	0.01	0.003
2002	0.55	0.011
2003	0.27	0.015
2004	0.18	0.008
2005	0.00	0.000 (thru 09/05)

f.) Budgeted and actual dollars for distribution vegetation management 1999-2005

Distribution

Year	Actual	Budget
1999	$2,231,662	$3,035,000
2000	$1,634.914	$3,010,997
2001	$2,246,475	$1,639,694
2002	$4,155,922	$4.234.995
2003	$3,537,527	$3,291,216
2004	$2,821,245	$3,211,072
2005	$ 997,968	$2,341,994 (thru 08/05)

Transmission

Year	Actual	Budget
1999	$1,052,921	$ 600,000
2000	$ 561.623	$ 600.000

	2001 $1,584,971 $ 960,000 2002 $1,078,538 $ 895,430 2003 $1,726,965 $ 800,000 2004 $1,648,792 $ 900,000 2005 $ 500,207 $1,245,843 (thru 08/05) g.) Charts are provided for distribution and transmission vegetation SAIDI and SAIFI trends during the period; chart shows distribution trend was downward prior to Ivan but is up afterward; Transmission SAIDI and SAIFI trends are both downward. h.) During the period 1999-2005 all scheduled vegetation maintenance herbicide, trimming, mowing, and other field vegetation maintenance activities were completed by contractors.
	Conclusions: a.) Gulf Power subscribes to NESC and ANSI standards for tree trimming b.) The Forestry Service Section is responsible for all transmission and distribution vegetation management. Forestry Services is a section of Power Delivery Contract Services. The Forestry Service Team Leader reports directly to the Contract Services Supervisor and is responsible for managing the day-to-day operations of Forestry Services.; Three Line Clearance Specialists are responsible for developing work-plans, overseeing contractor activities; Average annual contractor crew counts for the period 1999-2005 included 30 distribution crews containing 63 people, and 7 transmission crews containing 21 people. Gulf Power does not have any company tree crews c.) The philosophy toward distribution vegetation management remains largely unchanged since 1999; In addition to spot pruning, full maintenance pruning is scheduled on selected feeders. Feeders are prioritized based on the various sources listed above as well as data from the TCMS. In recent years, more emphasis has been placed on increasing the number of miles receiving full maintenance pruning.; Transmission rights-of-way conditions are analyzed yearly through the use of ground and aerial patrols. Hazard trees and areas with less than one year's clearance are corrected as they are identified throughout the year. Data from field patrols is used to develop work plans for areas that will receive full scale herbicide treatment, side trimming, or mowing.; Prior to 2002, danger trees and tall vegetation were identified using aerial patrols. In 2002 and 2003, an annual ground patrol was added to the aerial patrols to closely evaluate the vegetative condition of each line ; large scale use of herbicides on transmission rights-of-way to reduce the need for mowing. d,e,&f) See charts g.) see charts h.) During the period 1999-2005 all scheduled vegetation maintenance herbicide, trimming, mowing, and other field vegetation maintenance activities were completed by contractors.
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1) organizational reporting 2) budget and actual trends 3) vegetation trimming trends 4) vegetation contracts 5) vegetation contractor crews 6) contractor performance evaluations and measurements 7) quality assurance for vegetation management 8) feeder and lateral tree trimming miles and trends 9) T&D performance measurements for vegetation management
Document #:DR-1.35 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Describe how often the Company bids the distribution and transmission vegetation management contracts, the terms for contract extension without re-bidding, and how vendor performance is measured. b. Describe any changes in company vegetation management programs, or in vegetation management contracting methods, during the period 1999-2005.
	Summary of Contents: a.) Hourly contracts are competitively bid and generally established for a three year period. The vendor is eligible for an extension at the end of the contract if their work quality, response, and overall performance is satisfactory. If a market analysis determines the contractor's rates are below market, then a contract can be extended for one to three years, depending on the vendors willingness to maintain a below market rate structure. Unit pricing and lump sum bids are established for specific projects and are competitively bid. The length of these contracts ranges from a few months to three years depending on the specific project. These contracts are generally not extended without competitive bidding. Vendor performance is measured in terms of work quality, response, and cost per unit. The cost per unit of work completed on an hourly contract is monitored and compared to fixed cost bids of similar work to ensure unit costs of hourly contracts are in line with market pricing. b.) In summary, Increased emphasis on completing full maintenance pruning on distribution feeders, increased use of unit pricing and lump sum contracts, increased usage of herbicide on transmission rights-of-way and annual field patrols of transmission rights-of-way. Additionally, the company has continued to hire and train personnel with the arboricultural skills needed to effectively implement and manage its vegetation management program. Prior to 1999, there was one Certified Arborist on staff. Today there are six.
	Conclusions: a.) hourly bids are competi[illegible]ly bid for a 3 yr. period w/1-3 yr. extension if satisfactory work, quality [illegible] cost

	performance; unit and lump sum contracts are established for specific projects and are competitively bid; length of these contracts ranges from a few months to three years; vendor performance measured on work quality, response, and cost per unit. b.) Increased emphasis on completing full maintenance pruning on distribution feeders, increased use of unit pricing and lump sum contracts, increased usage of herbicide on transmission rights-of-way and annual field patrols of transmission rights-of-way; Prior to 1999, there was one Certified Arborist on staff. Today there are six..
	Data Request(s) Generated: No. _____ Description: No. _____ Description:
	Follow-up Required: 1) examine vegetation and pole inspection contracts during the period 2) review for terms, extensions and work performed 3) get contractor evaluation performance documents during the period vegetation and pole inspections 4) identify how Gulf has improved tree trimming on feeders and laterals 5) has Gulf completed any studies identifying additional vegetation management improvement needs?
Document #:DR-1.36 **Date Requested: 9/15/05** **Date Received: 10/05/05** **Comments: (i.e., Confidential)**	**Document Title and Purpose of Review:** a. Provide a current copy of company procedures for receiving, reporting and resolving customer complaints and inquiries, and explain any changes to procedures during the period 1999-2005. b. Describe company processes and systems used for handling customer complaints and inquiries, separate from FPSC received complaints, during the period 1999-2005 and describe any system or process changes and modifications during the period. c. Explain whether customer complaint data is reported, how often management reviews and evaluates complaint data, and how management uses the data for planning and remediation efforts. d. Explain whether company management evaluates complaint and inquiry patterns by specific type or geographical location. e. Describe any management incentives, objectives or performance measurements, associated with reduced customer complaints and inquiries, used by the company during the period 1999-2005. f. Provide the annual total number of customer complaints and inquiries received by the company, separate from FPSC complaints, by cause type and by district, during the period 1999-2005.
	Summary of Contents: a.) company response is directed toward the handling of FPSC complaints and responding prior to 72 hrs. so the complaints are not counted as FPSC complaints; b.) customer complaints can be received through the Customer Service Center (CSC) on-line customer care system and an Interactive Voice Response Unit (IVRU); In 1999 Gulf completed an interface between the Automated Resource Management System (ARMS) and the Customer Service System (CSS) to assign orders to the field through a mobile computer; when work is completed it is reported to CSS and billing is automatically updated, providing customer service representatives in the Customer Service Center (CSC) with real-time order status capability; In 2003 Gulf began using a third-party vendor for overflow calls from the CSC during large outages; emergency situations are immediately routed to a customer service representative; Gulf has also implemented an application to allow customers to make payment arrangements through the IVRU. c.) Gulf uses several methods to evaluate customer complaint data. Our customer service representatives are heavily monitored for quality assurance. Our monitoring system, (Witness) provides the ability to record and listen to customer calls. Emphasis is placed on quality and first call resolution, ensuring that customers are handled effectively and are satisfied. This year, Gulf power has also implemented an after call survey which provides customers an opportunity to provide immediate feedback on the service that they received. The results have been favorable.; Gulf Power management reviews a monthly report which supplies data on FPSC complaints and inquiries. Gulf power has avoided any apparent infractions for well over six years, and the complaint activity as reflected in the FPSC Consumer Activity Report has remained at very low levels. Management reviews complaints and determines if there are any deficiencies, if so, takes action to correct them..; d.) A report providing data on FPSC complaints and inquiries is sent to management monthly for review and evaluation. The report lists the nature of the complaint and the geographic location; e.) One of Gulf Power's primary goals is to lead the industry in customer service satisfaction. A number of indicators are used to gauge performance against this goal, including comprehensive customer surveys designed to benchmark the performance of Gulf Power Company relative to other major utilities in the region and nation; In addition, to service quality goals based on these survey results, Gulf Power Company also has a goal to maintain the lowest level of complaint activity (measured in complaints logged per million customers) among investor-owned electric utilities in the state of Florida. This data is derived from FPSC Consumer Activity reports, which are published monthly.; f.) The Customer Service Center is the primary source for receiving customer inquiries. This operation is centralized; therefore customer inquiries for the entire company are handled through the CSC; Gulf Power does not group calls by district. Gulf uses codes to identify the type of calls received. Graphs which show the total calls received and the call types are attached. Call type information is only available from 2002 forward; Total Customer Inquiries are captured by the CSC and pr[illegible]ed 1999-2005 (thru 08/05).; The type of calls are also profiled by numbe[illegible] calls in

each type for 2002-2005; The Total Customer Inquiries for the period 1999-2005 are:

Year	Agents	IVR	Total	
1999	759,641	212,611	972,252	
2000	796,274	163,621	959,895	
2001	830,791	172,999	1,003,790	
2002	917,656	178,401	1,096,088	
2003	952,143	188,217	1,140,360	
2004	984,317	450,700	1,438,580	
2005	658,851	384,089	1,042,940	(thru 08/05)

Conclusions: a) response is directed at handling FPSC complaints b.) customer complaints can be received through the Customer Service Center (CSC) on-line customer care system and an Interactive Voice Response Unit (IVRU); Gulf has interfaced its customer service system and customer service center system to automate the ordering, restoration and billing processes; and provide customer reps real-time order status; Gulf dispatches field work orders and updates records through mobile computers; c) Our monitoring system, (Witness) provides the ability to record and listen to customer calls. Emphasis is placed on quality and first call resolution, ensuring that customers are handled effectively and are satisfied. This year, Gulf Power has also implemented an after call survey which provides customers an opportunity to provide immediate feedback on the service that they received. d) A report providing data on FPSC complaints and inquiries is sent to management monthly for review and evaluation. The report lists the nature of the complaint and the geographic location; e.) A number of indicators are used to gauge performance against this goal, including comprehensive customer surveys designed to benchmark the performance of Gulf Power Company relative to other major utilities in the region and nation; Gulf Power Company also has a goal to maintain the lowest level of complaint activity among investor-owned electric utilities in the state of Florida; f.) the Customer Service Center is the primary source for receiving customer inquiries. This operation is centralized; therefore customer inquiries for the entire company are handled through the CSC; Gulf Power does not group calls by district. Gulf uses codes to identify the type of calls received;

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Follow-up Required: 1) determine whether all complaints are totaled, reported and reviewed by management or just FPSC complaints; 2) why doesn't Gulf evaluate complaints by district? 3) how many complaints are handled by the over-flow vendor annually, and how are they accounted for? 4) does Gulf use the overflow vendor only for large outages, or are there other uses? 5) is Gulf meeting its goal to maintain the lowest level of complaint activity (complaints logged per million customers) among investor owned utilities in Florida? 6) what future plans does Gulf have to reduce overall customer complaint levels? 7) what future plans does Gulf Power have to improve the complaint handling and reporting process? 8) what future plans does Gulf have to improve customer satisfaction?