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Ruth Nettles

From: Sent: To: Subject: Rogers, Mallory [MAROGER@SOUTHERNCO.COM] Monday, September 28, 2009 3:53 PM Filings@psc.state.fl.us E-filing

Attachments:

09-28-09 Prelim Issues & Positions.pdf



09-28-09 im Issues & Po:

A. Susan D. Ritenour Gulf Power Company One Energy Place Pensacola FL 32520 850.444.6696 maroger@southernco.com<mailto:maroger@southernco.com>

B. Docket No. 090001-EI

- C. Gulf Power Company
- D. Document consists of 10 pages.

E. The attached document is Gulf's Preliminary Statement Regarding Issues and Positions.

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DOCUMENT NUMBER-DATE

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Susan D. Ritenour Secretary and Treasurer and Regulatory Manager One Energy Place Pensacola, Florida 32520-0781

Tel 850.444.6231 Fax 850.444.6026 SDRITENO@southernco.com



September 28, 2009

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

Dear Ms. Cole:

Re: Docket No. 090001-El

Enclosed is Gulf Power Company's Preliminary Statement Regarding Issues and Positions, to be filed in the above docket.

Sincerely,

Ausan D. Ritenous

mr

Enclosures

cc: Beggs & Lane Jeffrey A. Stone, Esq.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost **Recovery Clause with Generating** Performance Incentive Factor

CERTIFICATE OF SERVICE

Docket No.: 090001-EI

9th I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this _ day of September, 2009, on the following:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power)Cost Recovery Clauses and)Generating Performance Incentive)Factor)

Docket No. 090001-EI Filed: September 28, 2009

PRELIMINARY STATEMENT OF GULF POWER COMPANY REGARDING ISSUES AND POSITIONS

Gulf Power Company, ("Gulf Power", "Gulf", or "the "Company"), by and through its

undersigned attorneys, hereby files this preliminary statement of issues and positions, saying:

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

- **ISSUE 4A:** Should the Commission approve as prudent, GULF's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in GULF's April 2009 and August 2009 hedging reports?
- GULF: Yes. (Ball)
- **ISSUE 4B**: Should the Commission approve Gulf's 2010 Risk Management Plan?
- GULF: Yes. (Ball)
- **<u>ISSUE 4C</u>**: Should the Commission approve GULF's proposal to include the costs associated with construction and operation of the Perdido landfill Gas to Energy Facility in the fuel clause?
- GULF: Yes. (Ball, Dodd)

GENERIC FUEL ADJUSTMENT ISSUES

- **<u>ISSUE 6</u>**: What are the appropriate actual benchmark levels for calendar year 2009 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?
- GULF: \$2,416,709. (Dodd, Ball)

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- **ISSUE 7**: What are the appropriate estimated benchmark levels for calendar year 2010 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?
- <u>GULF</u>: \$1,542,406. (Dodd, Ball)
- **ISSUE 8**: What are the appropriate fuel adjustment true-up amounts for the period January 2008 through December 2008?
- <u>GULF</u>: Under recovery \$48,757,977. (Ball, Dodd)
- **ISSUE 9**: What are the appropriate fuel adjustment true-up amounts for the period January 2009 through December 2009?
- GULF: Over recovery \$36,414,908. (Ball, Dodd)
- **ISSUE 10**: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2010 to December 2010?
- **<u>GULF</u>**: Collection of \$12,343,069. (Dodd)
- **ISSUE 11**: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2010 through December 2010?
- **<u>GULF</u>**: 1.00072. (Dodd)
- **ISSUE 12**: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2010 through December 2010?
- **<u>GULF</u>:** \$601,137,405. (Dodd)
- **ISSUE 13**: What are the appropriate levelized fuel cost recovery factors for the period January 2010 through December 2010?
- GULF: 5.348 cents/kWh. (Dodd)

ISSUE 14: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

GULF: See table below: (Dodd)

Group	Rate Schedules	Line Loss Multipliers			
А	RS, RSVP,GS, GSD, GSDT, GSTOU, OSIII, SBS(1)	1.00526			
В	LP, LPT, SBS(2)	0.98890			
С	PX, PXT, RTP, SBS(3)	0.98063			
D OSI/II		1.00529			
 Includes SBS customers with a contract demand in the range of 100 to 499 KW Includes SBS customers with a contract demand in the range of 500 to 7,499 KW Includes SBS customers with a contract demand over 7,499 KW 					

ISSUE 15: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

<u>GULF</u>: See table below: (Dodd)

		Fuel Cost Factors ¢/KWH			/KWH
	Rate Schedules*	Line Loss Multipliers	Standard	Standard Time of	
Group				On-Peak	Off-Peak
А	RS, RSVP,GS, GSD, GSDT, GSTOU, OSIII, SBS(1)	1.00526	5.376	5.878	4.998
В	LP, LPT, SBS(2)	0.98890	5.289	5.782	4.917
С	PX, PXT, RTP, SBS(3)	0.98063	5.244	5.734	4.876
D	OSI/II	1.00529	5.219	N/A	N/A

*The recovery factor applicable to customers taking service under Rate Schedule SBS is determined as follows: (1) customers with a contract demand in the range of 100 to 499 KW will use the recovery factor applicable to Rate Schedule GSD; (2) customers with a contract demand in the range of 500 to 7,499 KW will use the recovery factor applicable to Rate Schedule LP; and (3) customers with a contract demand over 7,499 KW will use the recovery factor applicable to Rate Schedule PX.

- **ISSUE 16**: What should be the effective date of the fuel adjustment charge and capacity cost recovery charge for billing purposes?
- **<u>GULF</u>:** The new fuel and capacity factors should be effective beginning with the first billing cycle for January 2010 and thereafter through the last billing cycle for December 2010. The first billing cycle may start before January 1, 2010, and the last cycle may be read after December 31, 2010, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

NONE RAISED BY GULF POWER COMPANY

GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

- **ISSUE 21**: What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2008 through December 2008 for each investor-owned electric utility subject to the GPIF?
- **<u>GULF</u>:** \$113,177 reward. (Young)
- **ISSUE 22**: What should the GPIF targets/ranges be for the period January 2010 through December 2010 for each investor-owned electric utility subject to the GPIF?

Unit	EAF	POF	EUOF	Heat Rate	
Crist 4	89.4	8.2	2.4	10,837	
Crist 5	96.3	0.0	3.7	10,777	
Crist 6	92.5	0.0	7.5	10,910	
Crist 7	87.6	0.0	12.4	10,656	
Smith 1	95.8	0.0	4.2	10,300	
Smith 2	89.9	6.3	3.8	10,345	
Daniel 1	77.7	17.2	5.0	10,415 ⁽¹⁾	
Daniel 2	87.8	5.8	6.4	10,231	
 (1) Gulf has revised the target heat rate for Daniel 1 to reflect the appropriate level of rounding precision. Note: the value contained in Gulf's petition was 10,414. EAF = Equivalent Availability Factor (%) 					
POF = Planned Outage Factor (%) EUOF = Equivalent Unplanned Outage Factor (%)					

<u>GULF</u>: See table below: (Young)

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

NONE RAISED BY GULF POWER COMPANY

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

- **ISSUE 27**: What are the appropriate capacity cost recovery true-up amounts for the period January 2008 through December 2008?
- **<u>GULF</u>**: Over recovery of \$680,158. (Ball, Dodd)
- **ISSUE 28**: What are the appropriate capacity cost recovery true-up amounts for the period January 2009 through December 2009?
- **<u>GULF</u>**: Under recovery of \$1,787,568. (Ball, Dodd)
- **<u>ISSUE 30</u>**: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2010 through December 2010?
- GULF: Collection of \$1,107,410. (Dodd)
- **ISSUE 31**: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2010 through December 2010?
- **<u>GULF</u>:** \$48,127,856. (Ball, Dodd)
- **ISSUE 32**: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2010 through December 2010?
- **<u>GULF</u>**: 96.42160%. (Ball, Dodd)

ISSUE 33: What are the appropriate capacity cost recovery factors for the period January 2010 through December 2010?

GULF: See table below: (Dodd)

RATE CLASS	CAPACITY COST RECOVERY FACTORS ¢/KWH		
RS, RSVP	0.502		
GS	0.460		
GSD, GSDT, GSTOU	0.392		
LP, LPT	0.339		
PX, PXT, RTP, SBS	0.284		
OS-I/II	0.118		
OSIII	0.306		

COMPANY-SPECIFIC CAPACITY COST RECOVERY ISSUES

NONE RAISED BY GULF POWER COMPANY

Respectfully submitted this 28th day of September, 2009.

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