

## Diamond Williams

---

**From:** Milstead, Natalie [NBMILSTE@SOUTHERNCO.COM]  
**Sent:** Friday, October 28, 2011 2:08 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Martha Brown; Caroline Klancke; 'Jeffrey Stone'; Badders, Russell A. (Beggs & Lane); Griffin, Steven R. (Beggs & Lane)  
**Subject:** Gulf Power Company's Stipulation and Agreement  
**Attachments:** Gulf Power Company Stipulation and Agreement.pdf

- A. s/Susan D. Ritenour  
Gulf Power Company  
One Energy Place  
Pensacola FL 32520  
850.444.6231  
[sdriteno@southernco.com](mailto:sdriteno@southernco.com)
- B. Docket No. 110007-EI and 110138-EI
- C. Gulf Power Company
- D. Document consists of 15 pages
- E. The attached document is Gulf Power Company's Stipulation and Agreement

10/28/2011

DOCUMENT NUMBER-DATE  
07947 OCT 28 =  
FPSC-COMMISSION CLERK

**Terry A. Davis**  
Assistant Secretary and  
Assistant Treasurer

One Energy Place  
Pensacola, Florida 32520-0786

Tel 850.444.6664  
Fax 850.444.6026  
TADAVIS@southernco.com



October 28, 2011

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

Dear Ms. Cole:

RE: Docket No. 110007-EI  
Docket No. 110138-EI

Attached is Gulf Power Company's Stipulation and Agreement regarding issues related to Cost Recovery of Plant Crist Turbine upgrades and Joint request for approval in the above referenced dockets.

Regards,

A handwritten signature in cursive script that reads "Terry A. Davis".

nm

Enclosures

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

DOCUMENT NUMBER-DATE  
07947 OCT 28 =  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.

DOCKET NO. 110007-EI

DOCKET NO. 110138-EI

In re: Petition for increase in rates by Gulf Power Company.

**STIPULATION AND AGREEMENT REGARDING ISSUES RELATED TO COST RECOVERY OF PLANT CRIST TURBINE UPGRADES AND JOINT REQUEST FOR APPROVAL**

The Citizens of the State of Florida, through the Office of Public Counsel (“OPC”), the Florida Industrial Power Users Group (“FIPUG”), the Federal Executive Agencies (“FEA”), the Florida Retail Federation (“FRF”) and Gulf Power Company (“Gulf Power”, “Gulf”, or “the Company”), (collectively, the “Parties”), through their respective undersigned counsel, hereby jointly petition the Florida Public Service Commission for entry of an order approving this stipulation regarding the issues of cost recovery associated with turbine upgrades at Gulf’s Plant Crist undertaken or planned by Gulf in connection with the Company’s Flue Gas Desulfurization (“Scrubber”) Project at Plant Crist. The Parties represent that this stipulation fairly and reasonably balances the various positions of the Parties and serves the best interests of the customers they represent and the public interest in general and, therefore, is fully consistent with and supportive of the Commission’s long standing policy of encouraging the settlement of contested proceedings in a manner that benefits the ratepayers of utilities subject to the Commission’s regulatory jurisdiction and thereby avoids the need for costly, time-consuming and inefficient litigation of matters before the Commission.

**BACKGROUND**

The Plant Crist Units 4 through 7 Scrubber Project has been developed by Gulf under its CAIR/CAMR/CAVR Compliance Program which was approved for cost recovery through the Environmental Cost Recovery Clause (“ECRC”) pursuant to a stipulation dated June 22, 2007 (“2007 Stipulation”) between the Parties and the Florida Industrial Power Users Group (“FIPUG”) that was approved by the Commission in Order No. PSC-07-0721-S-EI, issued September 5, 2007, In re: Environmental Cost Recovery.

Subsequent to entering into the 2007 Stipulation, Gulf decided to install turbine upgrades for Crist Units 6 and 7 as part of the Company's implementation of the Plant Crist Scrubber Project to offset increased station service requirements associated with the scrubber installation. Gulf incorporated the costs associated with the upgrades in its planning process for the Scrubber Project and reflected these costs in all of its updates to Gulf's CAIR/CAMR/CAVR Compliance Program filed with the Commission pursuant to the order approving the 2007 stipulation beginning with the update filed in 2008. Gulf referenced these upgrades in its witness testimony in the ongoing ECRC docket beginning with testimony filed in August 2008.

A dispute has arisen among the parties regarding whether the costs associated with the turbine upgrades are properly within the scope of the 2007 Stipulation or otherwise meet the criteria for recovery through the Environmental Cost Recovery Clause. The following issue has been identified in Docket No. 110007-EI for the hearings in that docket scheduled for November 1, 2 and 3, 2011:

Issue 11C: Should Gulf be allowed to recover the costs associated with the Plant Crist Units 6 and 7 turbine upgrades?

The following issue has tentatively been identified as part of Staff's preliminary list of issues in Docket No. 110138-EI scheduled for hearing December 12-16, 2011:

Should the Plant Crist Units 6 and 7 Turbine Upgrade Project be included in rate base and recovered through base rates, rather than through the Environmental Cost Recovery Clause?

### STIPULATION

WHEREAS the Parties agree that a dispute exists regarding the appropriateness of the Crist 6 and 7 turbine upgrades for recovery through the ECRC;

WHEREAS the Parties agree that consideration of the Crist 6 and 7 turbine upgrades for recovery through Gulf's base rates is appropriate if recovery is not provided through the ECRC;

WHEREAS the Parties agree that in order to resolve their differences, recovery of the Crist 6 and 7 turbine upgrades through the ECRC should be discontinued on a prospective basis beginning with the ECRC recovery factors to be applied during 2012, and recovery on a

prospective basis should be provided through the base rates to be established for Gulf Power Company in Docket No. 110138-EI;

WHEREAS the parties agree that as part of the transition from ECRC recovery to base rate recovery, the parties should be allowed an opportunity to address the amount of recovery through base rates through the filing of supplemental testimony in Gulf's rate case, Docket No. 110138-EI;

WHEREAS, in current Docket No. 110138-EI, involving Gulf Power's petition for authority to increase its base rates, Gulf Power removed the investment and expenses associated with the turbine upgrades from test year rate base and expenses in view of Gulf Power's request to recover for these costs through the Environmental Cost Recovery Clause;

WHEREAS, in prefiled testimony submitted in Docket No. 110138-EI, Gulf Power's witness stated that, in the event the Commission denies recovery of costs associated with the Crist turbine upgrades through the Environmental Cost Recovery Clause, Gulf Power would wish to reverse the ratemaking adjustments in the base rate proceeding so as to include the investment and costs in the test year under consideration in that docket;

WHEREAS, in the absence of an agreement of parties and action by the Commission, no procedural mechanism exists that would accommodate the resolution of the dispute which otherwise has the potential to unnecessarily complicate the proceedings pending before the Commission; and,

WHEREAS, to avoid the necessity of, and inefficiency associated with, litigating the issues related to the investment and costs associated with the turbine upgrades in two separate proceedings, while assuring the subject is presented to the Commission in a manner that is fair to all concerned, the undersigned parties have reached an agreement that will facilitate the

Commission's resolution of all remaining potential issues between the parties regarding the turbine upgrades as part of the pending rate case;

WHEREAS the Parties agree that allowing Gulf the opportunity to file supplemental testimony in Docket No. 110138-EI followed by an opportunity for other parties to respond through testimony and an opportunity for Gulf to then file rebuttal testimony is an appropriate means of allowing the parties to address the issues regarding recovery for the turbine upgrades through base rates; and

WHEREAS the Parties agree that the relief requested in this stipulation is a reasonable resolution of the dispute between the parties;

NOW THEREFORE, based on the foregoing background and recitals, and discussions among the Parties, the Parties stipulate and agree to the following:

1. Gulf's final environmental cost recovery true-up amount for the period ending December 31, 2010 of \$861,325 over-recovery as filed in Docket No. 110007-EI will not be opposed by any party to this stipulation.
2. Gulf's estimated environmental cost recovery true-up amount for the period January 2011 through December 2011 of \$14,380,513 over-recovery as filed in Docket No. 110007-EI will not be opposed by any party to this stipulation.
3. Gulf's projected environmental cost recovery amount for the period January 2012 through December 2012 previously filed as \$169,103,827 shall be revised to \$165,075,432 which reflects the removal of all prospective revenue requirements from the ECRC for any of the Crist turbine upgrades and this revised amount will not be opposed by any party to this stipulation.
4. Gulf's total environmental cost recovery amount, including true-up amounts, for the period January 2012 through December 2012 previously filed as \$153,861,989 (excluding revenue taxes) shall be revised to \$149,833,594 (excluding revenue taxes) which reflects the

removal of all prospective revenue requirements from the ECRC for any of the Crist turbine upgrades and this revised amount will not be opposed by any party to this stipulation.

5. Based on the foregoing changes, Gulf's proposed environmental cost recovery factors for the period January 2012 through December 2012 for each rate group shall be revised to match the values in the following table and these revised amounts will not be opposed by any party to this stipulation:

<b>RATE CLASS</b>	<b>ENVIRONMENTAL COST RECOVERY FACTORS ¢/KWH</b>
RS, RSVP	1.294
GS	1.286
GSD, GSDT, GSTOU	1.273
LP, LPT	1.245
PX, PXT, RTP, SBS	1.227
OS-I/II	1.233
OSIII	1.255

6. As a result of the foregoing removal of the turbine upgrades from the ECRC recovery mechanism on a going forward basis, the only remaining dispute between the Parties is related to the revenue requirement amount that should be included in base rates thereof which shall be addressed by the Commission in Docket No. 110138-EI

7. Gulf Power shall be permitted an opportunity to submit supplemental pre-filed direct testimony and exhibits for the purpose of and limited to addressing the amount and timing of Gulf's investment in the turbine upgrades, the reasonableness of the associated investment and costs, and the extent to which the related investment and costs should be reflected in the revenue requirements the Commission will determine (and the base rates the Commission will prescribe) for Gulf Power in Docket No. 110138-EI. Such supplemental pre-filed direct testimony shall be

filed by Gulf and electronically served on all parties to Docket 110138-EI and Staff no later than November 8, 2011.

8. In response to any supplemental direct testimony and exhibits filed by Gulf Power pursuant to this stipulation, intervenors and Staff shall likewise be permitted an opportunity to submit supplemental pre-filed direct testimony and exhibits subject to the same limitations and scope outlined in paragraph 6 above. Such intervenor testimony shall be filed and electronically served on all parties to Docket 110138-EI and Staff no later than November 15, 2011. Such Staff testimony shall be filed and electronically served on all parties to Docket 110138-EI no later than November 22, 2011.

9. Gulf Power shall be permitted an opportunity to submit rebuttal testimony and exhibits to any supplemental testimony and exhibits submitted by intervenors or staff pursuant to this stipulation. Such supplemental rebuttal testimony shall be filed and electronically served on all parties to Docket 110138-EI and Staff no later than November 29, 2011.

10. All witnesses who prefile testimony and/or exhibits related to the turbine upgrades shall include with the filing any calculations, work papers, or underlying source documents that the sponsoring parties can reasonably foresee would be needed by other parties or Commission Staff to evaluate the testimony or exhibits. The undersigned parties agree to use best efforts to cooperate with respect to the prompt service of and expedited responses to discovery requests associated with prefiled testimony and exhibits submitted pursuant to this Stipulation and Agreement, to include, upon request, making the witness(es) available for deposition on an expedited basis, with the view of ensuring that all parties and Commission Staff have an adequate opportunity to prepare for the hearing on the matters that are the subject of this Stipulation and Agreement.



11. All parties to Docket No. 110138-EI shall endeavor to include statements of their positions on the issue or issues related to the turbine upgrades as part of their prehearing statements which shall remain due on the date set forth in the Order Establishing Procedure. The parties shall be allowed a reasonable opportunity to modify their position(s) to conform to their testimony filed after the due date for their testimony by communicating such modifications to the Commission Staff for inclusion in the Prehearing Order as quickly as possible, but no later than the Prehearing Conference scheduled for November 21, 2011.

12. This Stipulation and Agreement shall become effective immediately upon approval by the Commission. By entering this Stipulation and Agreement, no party waives or concedes any position on the merits of the matters that are the subject of the Stipulation and Agreement, and each party reserves the right to present and support any position regarding the substance of the issues that it determines is consistent with its interests. Each of the undersigned parties agrees to support the approval of the Stipulation and Agreement as serving the objectives of enhancing the efficiency of Commission proceedings and avoiding unnecessary litigation, and as consistent with the public interest.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

WHEREFORE, the undersigned parties agree and stipulate to the above terms and provisions, and together request the Commission to approve this Stipulation and Agreement at its earliest opportunity.

Respectfully Submitted,

**Office of Public Counsel**

By \_\_\_\_\_  
**Joseph A. McGlothlin, Esquire**  
Florida Bar No. \_\_\_\_\_  
Associate Public Counsel

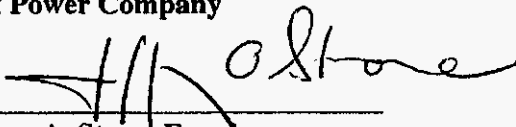
**Patricia A. Christensen, Esquire**  
Florida Bar No. 0989789  
Associate Public Counsel

111 W. Madison Street, Room 812  
Tallahassee, Florida 32399  
(850) 488-9330

**Florida Industrial Power Users Group**

By \_\_\_\_\_  
**John C. Moyle, Jr. Esquire**  
Florida Bar No. \_\_\_\_\_  
**Vicki Gordon Kaufman, Esquire**  
Florida Bar No. \_\_\_\_\_  
Keefe, Anchors, Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, Florida 32301  
(850) 681-3828

**Gulf Power Company**

By  \_\_\_\_\_  
**Jeffrey A. Stone, Esquire**  
Florida Bar No. 325953  
Beggs & Lane  
Post Office Box 12950  
Pensacola, FL 32576-2950  
(850) 432-2451

**Federal Executive Agencies**

By \_\_\_\_\_  
**Karen White, Esquire**  
**Major Christopher C. Thompson**  
AFCEA  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
AFLONJACL-ULT  
Ph: (850) 283-6348

**Florida Retail Federation**

By \_\_\_\_\_  
**Robert Scheffel Wright, Esquire**  
Florida Bar No. \_\_\_\_\_  
**John T. Lavia, Esquire**  
Florida Bar No. \_\_\_\_\_  
225 South Adams Street, Suite 200  
Tallahassee, Florida 32301  
(850) 222-7206

WHEREFORE, the undersigned parties agree and stipulate to the above terms and provisions, and together request the Commission to approve this Stipulation and Agreement at its earliest opportunity.

Respectfully Submitted,

**Office of Public Counsel**

By Joseph A. McGlothlin  
**Joseph A. McGlothlin, Esquire**  
Florida Bar No. \_\_\_\_\_  
Associate Public Counsel

**Patricia A. Christensen, Esquire**  
Florida Bar No. 0989789  
Associate Public Counsel

111 W. Madison Street, Room 812  
Tallahassee, Florida 32399  
(850) 488-9330

**Florida Industrial Power Users Group**

By \_\_\_\_\_  
**John C. Moyle, Jr., Esquire**  
Florida Bar No. \_\_\_\_\_  
**Vicki Gordon Kaufman, Esquire**  
Florida Bar No. \_\_\_\_\_  
Keefe, Anchors, Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, Florida 32301  
(850) 681-3828

**Gulf Power Company**

By Jeffroy A. Stone  
**Jeffroy A. Stone, Esquire**  
Florida Bar No. 325953  
Beggs & Lane  
Post Office Box 12950  
Pensacola, FL 32576-2950  
(850) 432-2451

**Federal Executive Agencies**

By \_\_\_\_\_  
**Karen White, Esquire**  
**Major Christopher C. Thompson**  
AFCEA  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
AFLONJACL-ULT  
Ph: (850) 283-6348

**Florida Retail Federation**

By \_\_\_\_\_  
**Robert Scheffel Wright, Esquire**  
Florida Bar No. \_\_\_\_\_  
**John T. Lavia, Esquire**  
Florida Bar No. \_\_\_\_\_  
225 South Adams Street, Suite 200  
Tallahassee, Florida 32301  
(850) 222-7206

WHEREFORE, the undersigned parties agree and stipulate to the above terms and provisions, and together request the Commission to approve this Stipulation and Agreement at its earliest opportunity.

Respectfully Submitted,

**Office of Public Counsel**

By \_\_\_\_\_  
**Joseph A. McGlothlin, Esquire**  
Florida Bar No. \_\_\_\_\_  
Associate Public Counsel

**Patricia A. Christensen, Esquire**  
Florida Bar No. 0989789  
Associate Public Counsel

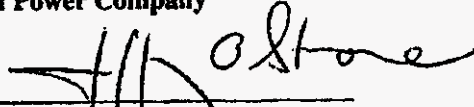
111 W. Madison Street, Room 812  
Tallahassee, Florida 32399  
(850) 488-9330

**Florida Industrial Power Users Group**

By \_\_\_\_\_  
**John C. Moyle, Jr. Esquire**  
Florida Bar No. \_\_\_\_\_

**Vicki Gordon Kaufman, Esquire**  
Florida Bar No. \_\_\_\_\_  
Keefe, Anchors, Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, Florida 32301  
(850) 681-3828


**Gulf Power Company**

By  \_\_\_\_\_  
**Jeffrey A. Stone, Esquire**  
Florida Bar No. 325953  
Beggs & Lane  
Post Office Box 12950  
Pensacola, FL 32576-2950  
(850) 432-2451

**Federal Executive Agencies**

By \_\_\_\_\_  
**Karen White, Esquire**  
**Major Christopher C. Thompson**  
AFCEA  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
AFLONJACL-ULT  
Ph: (850) 283-6348

**Florida Retail Federation**

By  \_\_\_\_\_  
**Robert Scheffel Wright, Esquire**  
Florida Bar No. 0986721  
**John T. Lavia, Esquire**  
Florida Bar No. \_\_\_\_\_  
225 South Adams Street, Suite 200  
Tallahassee, Florida 32301  
(850) 222-7206

WHEREFORE, the undersigned parties agree and stipulate to the above terms and conditions, and request the Commission to approve this Stipulation and Agreement at its earliest opportunity.

Respectfully Submitted,

**Office of Public Counsel**

By \_\_\_\_\_  
Joseph A. MacQuinn, Esquire  
Florida Bar No. \_\_\_\_\_  
Associate Public Counsel

Patricia A. Christensen, Esquire  
Florida Bar No. 000000  
Associate Public Counsel

111 W. Madison Street, Room 812  
Tallahassee, Florida 32399  
(850) 488-9330

**Florida Industrial Power Users Group**

By \_\_\_\_\_  
John C. Moyle, Jr. Esquire  
Florida Bar No. \_\_\_\_\_  
Vicki Gordon Kaufman, Esquire  
Florida Bar No. \_\_\_\_\_  
Keefe, Anchors, Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, Florida 32301  
(850) 681-3828

**Gulf Power Company**

By \_\_\_\_\_  
Jeffrey A. Eichel Esquire  
Florida Bar No. 226053  
Pegga & Lane  
Post Office Box 12950  
Tallahassee, FL 32302-0950  
(904) 490-0461

Federal Executive Agencies

By \_\_\_\_\_  
Karen White, Esquire  
Major Christopher C. Thompson  
AFCEA  
139 Barrés Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
AFLON:ACL-ULT  
Ph: (850) 283-6348

**Florida Retail Federation**

By \_\_\_\_\_  
Robert Scheffel Wright, Esquire  
Florida Bar No. \_\_\_\_\_  
John T. Lavia, Esquire  
Florida Bar No. \_\_\_\_\_  
225 South Adams Street, Suite 200  
Tallahassee, Florida 32301  
(850) 222-7206

WHEREFORE, the undersigned parties agree and stipulate to the above terms and provisions, and together request the Commission to approve this Stipulation and Agreement at its earliest opportunity.

Respectfully Submitted,

**Office of Public Counsel**

By \_\_\_\_\_  
**Joseph A. McGlothlin, Esquire**  
Florida Bar No. \_\_\_\_\_  
Associate Public Counsel

**Patricia A. Christensen, Esquire**  
Florida Bar No. 0989789  
Associate Public Counsel

111 W. Madison Street, Room 812  
Tallahassee, Florida 32399  
(850) 488-9330

**Florida Industrial Power Users Group**

By *Vicki Gordon Kaufman*  
**John C. Moyle, Jr., Esquire**  
Florida Bar No. 727016  
**Vicki Gordon Kaufman, Esquire**  
Florida Bar No. 296672  
Keefe, Anchors, Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, Florida 32301  
(850) 681-3828

**Gulf Power Company**

By *J.A. Stone*  
**Jeffrey A. Stone, Esquire**  
Florida Bar No. 325953  
Beggs & Lane  
Post Office Box 12950  
Pensacola, FL 32576-2950  
(850) 432-2451

**Federal Executive Agencies**

By \_\_\_\_\_  
**Karen White, Esquire**  
**Major Christopher C. Thompson**  
AFCESA  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
AFLONJACL-ULT  
Ph: (850) 283-6348

**Florida Retail Federation**

By \_\_\_\_\_  
**Robert Scheffel Wright, Esquire**  
Florida Bar No. \_\_\_\_\_  
**John T. Lavia, Esquire**  
Florida Bar No. \_\_\_\_\_  
225 South Adams Street, Suite 200  
Tallahassee, Florida 32301  
(850) 222-7206

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: **Environmental Cost  
Recovery Clause** )  
 )  
 )

Docket No. **110007-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by electronic mail this 28<sup>th</sup> day of October, 2011 to the following:

Martha Carter Brown, Esq.  
Senior Counsel  
FL Public Service Comm.  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[mbrown@psc.state.fl.us](mailto:mbrown@psc.state.fl.us)

Vicki Gordan Kaufman  
John C. Moyle  
FIPUG  
118 N. Gadsden Street  
Tallahassee, FL 32301  
[vkaufman@kagmlaw.com](mailto:vkaufman@kagmlaw.com)  
[jmoyle@kagmlaw.com](mailto:jmoyle@kagmlaw.com)

Paula K. Brown  
Tampa Electric Company  
P. O. Box 111  
Tampa, FL 33601  
[Regdept@tecoenergy.com](mailto:Regdept@tecoenergy.com)

John T. Butler, Esq.  
Attorney for Florida Power & Light  
Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
[John.Butler@fpl.com](mailto:John.Butler@fpl.com)

James D. Beasley, Esq.  
J. Jeffrey Wahlen  
Attorneys for Tampa Electric Co.  
Ausley & McMullen  
P. O. Box 391  
Tallahassee, FL 32302  
[jbeasley@ausley.com](mailto:jbeasley@ausley.com)

Paul Lewis, Jr.  
Progress Energy Florida, Inc.  
106 E. College Ave., Ste. 800  
Tallahassee, FL 32301  
[paul.lewisjr@pgnmail.com](mailto:paul.lewisjr@pgnmail.com)

Karen S. White, Staff Attorney  
c/o AFCESA-ULFSC  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
Phone: 850-283-6348  
FAX: 850-283-6219  
[karen.white@tyndall.af.mil](mailto:karen.white@tyndall.af.mil)

Kenneth Hoffman  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1858  
[Ken.Hoffman@fpl.com](mailto:Ken.Hoffman@fpl.com)

Gary V. Perko, Esq.  
Hopping Green & Sams  
P. O. Box 6526  
Tallahassee, FL 32314  
[gperko@hgslaw.com](mailto:gperko@hgslaw.com)

J.R. Kelly  
P. Christensen  
C. Rehwinkel  
Associate Public Counsel  
Office of Public Counsel  
111 W. Madison St., Rm. 812  
Tallahassee, FL 32399-1400  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[kelly.jr@leg.state.fl.us](mailto:kelly.jr@leg.state.fl.us)

John T. Burnett, Esq.  
Dianne M. Triplett  
Progress Energy Service Co.  
P. O. Box 14042  
St. Petersburg, FL 33733-4042  
[john.burnett@pgnmail.com](mailto:john.burnett@pgnmail.com)



**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

**STEVEN GRIFFIN**

Florida Bar No. 0627569

**BEGGS & LANE**

P. O. Box 12950

Pensacola FL 32591-2950

(850) 432-2451

**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates  
by Gulf Power Company

)  
)  
)  
)  
Docket No. 110138-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail the 28<sup>th</sup> day of October, 2011, on the following:

Office of Public Counsel  
J. R. Kelly/Joseph A. McGlothlin/Erik Sayler  
c/o The Florida Legislature  
111 W. Madison Street,  
Room 812  
Tallahassee, FL 32393-1400  
[mcglothlin.joseph@leg.state.fl.us](mailto:mcglothlin.joseph@leg.state.fl.us)  
[merchant.tricia@leg.state.fl.us](mailto:merchant.tricia@leg.state.fl.us)  
[Kelly.jr@leg.state.fl.us](mailto:Kelly.jr@leg.state.fl.us)  
[Sayler.erik@leg.state.fl.us](mailto:Sayler.erik@leg.state.fl.us)

Gunster Law Firm  
Charles A. Guyton  
215 S. Monroe St.,  
Suite 618  
Tallahassee, FL 32301  
[cguyton@gunster.com](mailto:cguyton@gunster.com)

Florida Industrial Power  
Users Group  
Vicki G. Kaufman/  
Jon C. Moyle, Jr.  
c/o Keefe Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301  
[vkaufman@kagmlaw.com](mailto:vkaufman@kagmlaw.com)

Caroline Klancke  
Keino Young  
Martha Barrera  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[mbarrera@psc.state.fl.us](mailto:mbarrera@psc.state.fl.us)  
[cklancke@psc.state.fl.us](mailto:cklancke@psc.state.fl.us)  
[kyoung@psc.state.fl.us](mailto:kyoung@psc.state.fl.us)

Richard Melson  
705 Piedmont Drive  
Tallahassee, FL 32312  
[rick@rmelsonlaw.com](mailto:rick@rmelsonlaw.com)

Gardner Law Firm  
Robert Scheffel Wright  
John T. La Via,  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)

Federal Executive Agencies  
c/o Major Christopher C.  
Thompson  
Ms. Karen White  
AFLOA/JACL-JLFSC  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base,  
Florida 32403  
[chris.thompson.2@tyndall.af.mil](mailto:chris.thompson.2@tyndall.af.mil)  
[karen.white@tyndall.af.mil](mailto:karen.white@tyndall.af.mil)

Florida Retail Federation  
227 South Adams Street  
Tallahassee, FL 32301



\_\_\_\_\_  
**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

**STEVEN R. GRIFFIN**

Florida Bar No. 0627569

BEGGS & LANE

P. O. Box 12950

Pensacola FL 32591-2950

(850) 432-2451

**Attorneys for Gulf Power Company**