October 12, 2016

## VIA ELECTRONIC FILING

Ms. Carlotta Staffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Petition for an increase in rates by Gulf Power Company, Docket No. 160186-El
Re: Petition for approval of 2016 depreciation and dismantlement studies, approval of proposed depreciation rates and annual dismantlement accruals and Plant Smith Units 1 and 2 regulatory asset amortization by Gulf Power Company, Docket No. 160170-EI

Dear Ms. Stuffer:

Attached is Gulf Power Company's Minimum Filing Requirements
Section D - Cost of Capital Schedules.
(Document 24 of 29)

Sincerely,
Robert L. McGee, Jr.


Regulatory \& Pricing Manager

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

## DOCKET NO. 160186-EI



MINIMUM FILING REQUIREMENTS

SECTION D - COST OF CAPITAL SCHEDULES

# GULF POWER COMPANY 

Docket No. 160186-EI
Minimum Filing Requirements
Index
D. Cost of Capital Schedules

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Schedule D-1a
FLORIDA PUBLIC SERVICE COMMISSION

COMPANY: GULF POWER COMPANY

COST OF CAPITAL - 13-MONTH AVERAGE
EXPLANATION: Provide the company's 13month average cost of capital for the test year, the prior year, and historical base year.

Type of Data Shown: Projected Test Year Ended 12/31/17
$\qquad$ _Prior Year Ended 12/31/16 Historical Year Ended 12/31/15 Witness: S. D. Ritenour

| $\begin{gathered} (1) \\ \text { Line } \\ \text { No. } \\ \hline \end{gathered}$ | Class of Capital | $(3)$ Company Total Per Books $(\$ 000 \mathrm{~s})$ | (4) Specific Adjustments (\$000s) | (5) <br> Pro Rata Adjustments (\$000s) | (6) Proration Adjustments (\$000s) | (7) System Adjusted (\$000s) | (8) Jurisdictional Factor \% | (9) <br> Jurisdictional Capital Structure (\$000s) | (10) <br> Ratio \% | (11) <br> Cost <br> Rate <br> \% | (12) <br> Weighted <br> Cost Rate \% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Long-Term Debt | 1,291,440 | $(38,153)$ | $(537,069)$ | - | 716,218 | 0.9809109 | 702,546 | 34.60 | 4.49 | 1.55 |
| 2 | Short-Term Debt | 36,886 | $(1,550)$ | $(15,142)$ | - | 20,194 | 0.9809109 | 19,809 | 0.98 | 1.42 | 0.01 |
| 3 | Preferred Stock | 146,504 | $(4,328)$ | $(60,926)$ | - | 81,250 | 0.9809109 | 79,699 | 3.92 | 6.15 | 0.24 |
| 4 | Common Equity | 1,347,200 | $(26,531)$ | $(565,944)$ | - | 754,725 | 0.9809109 | 740,318 | 36.45 | 11.00 | 4.01 |
| 5 | Customer Deposits | 36,076 | - | $(15,460)$ | - | 20,616 | 1.0000000 | 20,616 | 1.02 | 2.30 | 0.02 |
| 6 | Deferred Income Taxes | 908,834 | $(22,399)$ | $(379,863)$ | - | 506,572 | 0.9809109 | 496,902 | 24.47 | 0.00 | 0.00 |
| 7 | ASC 740 Deferred Taxes | $(54,434)$ | 1,342 | 22,751 | - | $(30,341)$ | 0.9809109 | $(29,762)$ | -1.47 | 0.00 | 0.00 |
| 8 | Investment Credit - Weighted Cost | 1,826 | (563) | (541) | - | 722 | 0.9809109 | 708 | 0.03 | 7.74 | 0.00 |
| 9 | Total | 3,714,332 | $(92,182)$ | $(1,552,194)$ | - | 2,069,956 |  | 2,030,836 | 100.00 |  | 5.83 |


| FLORIDA PUBLIC SERVICE COMMISSION | EXPLANATION: Provide the company's 13- |
| :--- | :--- |
| month average cost of capital for the test year, |  |
| COMPANY: GULF POWER COMPANY | the prior year, and historical base year. |


| Type of Data Shown: |
| :--- |
| $\quad$ Projected Test Year Ended 12/31/17 |
| $\quad$ Prior Year Ended 12/31/16 |
| $\quad$ Historical Year Ended 12/31/15 |
| Witness: S. D. Ritenour |

DOCKET NO.: 160186-EI

| (1) <br> Line <br> No. | Class of Capital | (3) <br> Company Total Per Books (\$000s) | (4) Specific Adjustments (\$000s) | (5) <br> Pro Rata Adjustments (\$000s) | (6) <br> Proration Adjustments (\$000s) | (7) System Adjusted (\$000s) | (8) Jurisdictional Factor \% | (9) <br> Jurisdictional Capital Structure (\$000s) | (10) <br> Ratio \% | (11) <br> Cost <br> Rate <br> \% | (12) <br> Weighted Cost Rate \% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Long-Term Debt | 1,336,513 | $(105,355)$ | $(507,210)$ | - | 723,948 | 0.9810956 | 710,262 | 35.75 | 4.50 | 1.61 |
| 2 | Short-Term Debt | 100,537 | $(33,175)$ | $(27,752)$ | - | 39,610 | 0.9810956 | 38,861 | 1.96 | 0.42 | 0.01 |
| 3 | Preferred Stock | 146,504 | $(11,549)$ | $(55,599)$ | - | 79,356 | 0.9810956 | 77,856 | 3.92 | 6.15 | 0.24 |
| 4 | Common Equity | 1,333,098 | $(96,747)$ | $(509,351)$ | - | 727,000 | 0.9810956 | 713,257 | 35.90 | 11.00 | 3.95 |
| 5 | Customer Deposits | 35,612 | - | $(14,671)$ | - | 20,941 | 1.0000000 | 20,941 | 1.05 | 2.37 | 0.02 |
| 6 | Deferred Income Taxes | 841,601 | $(53,024)$ | $(324,877)$ | - | 463,700 | 0.9810956 | 454,934 | 22.90 | 0.00 | 0.00 |
| 7 | ASC 740 Deferred Taxes | $(55,284)$ | 3,483 | 21,341 | - | $(30,460)$ | 0.9810956 | $(29,884)$ | -1.50 | 0.00 | 0.00 |
| 8 | Investment Credit - Weighted Cost | 2,432 | $(1,660)$ | (318) | - | 454 | 0.9810956 | 445 | 0.02 | 7.67 | 0.00 |
| 9 | Total | $3,741,013$ | $(298,027)$ | $(1,418,437)$ | - | 2,024,549 |  | 1,986,672 | 100.00 |  | 5.83 |


| Schedule D-1b |  | COST OF CAPITAL - ADJUSTMENTS |  |  | Page 1 of 4 |
| :---: | :---: | :---: | :---: | :---: | :---: |
| FLORIDA PUBLIC SERVICE COMMISSION |  | EXPLANATION: (1) List and describe the basis for the specific adjustments appearing on Schedule D-1a. <br> (2) List and describe the basis for the pro-rata adjustments appearing on Schedule D-1a. <br> (\$000s) | Type of Data Shown: |  |  |
| COMPANY: GULF POWER COMPANY |  |  | X Prior Y | nded 12/3 |  |
|  |  | X Histori | ar Ended | 1/15 |
| DOCKET NO.: 160186-EI |  |  | Witness: S. D. Ritenour |  |  |
| (1) | (2) |  | (3) | (4) | (5) | (6) |
| Line |  |  | Historic | Prior | Test |
| No. | Class of Capital | Description | Base Year | Year | Year |
| 1 |  | Specific Adjustments: |  |  |  |
| 2 | Long-Term Debt | UPS Portion of Long-Term Debt | $(105,355)$ | $(38,153)$ | $(20,450)$ |
| 3 |  | Equity Ratio Adjustment - LTD Reduction | - | - | $(150,000)$ |
| 4 |  | Subtotal Long-Term Debt | $(105,355)$ | $(38,153)$ | $(170,450)$ |
| 5 | Short-Term Debt | Fuel Under-Recovery Balance | $(27,411)$ | (474) | - |
| 6 |  | UPS Portion of Short-Term Debt | $(5,764)$ | $(1,076)$ | (796) |
| 7 |  | Subtotal Short Term Debt | $(33,175)$ | $(1,550)$ | (796) |
| 8 | Preferred Stock | UPS Portion of Preferred Stock | $(11,549)$ | $(4,328)$ | $(2,642)$ |
| 9 |  | Subtotal Preferred Stock | $(11,549)$ | $(4,328)$ | $(2,642)$ |
| 10 | Common Equity | Common Dividends Declared | 20,025 | 18,472 | 18,554 |
| 11 |  | Non-Utility Property, Net | $(12,560)$ | $(12,437)$ | $(12,374)$ |
| 12 |  | UPS Portion of Common Equity | $(105,801)$ | $(40,204)$ | $(27,069)$ |
| 13 |  | Deferred Earnings Deferred Credit on Transmission Projects | 1,589 | 7,638 | 11,063 |
| 14 |  | Equity Ratio Adjustment - Issuance | - | - | 150,000 |
| 15 |  | Subtotal Common Equity | $(96,747)$ | $(26,531)$ | 140,174 |
| 16 | Deferred Taxes | UPS Portion of Deferred Taxes | $(53,024)$ | $(22,399)$ | $(14,253)$ |
| 17 |  | Subtotal Deferred Taxes | $(53,024)$ | $(22,399)$ | $(14,253)$ |
| 18 | Deferred Taxes (ASC 740) | UPS Portion of Deferred Taxes (ASC 740) | 3,483 | 1,342 | 803 |
| 19 |  | Subtotal Deferred Taxes (ASC 740) | 3,483 | 1,342 | 803 |
| 20 | Investment Credit - Zero Cost | UPS Portion of Investment Tax Credits | $(1,660)$ | (563) | (277) |
| 21 |  | Subtotal Investment Tax Credits - Wtd Cost | $(1,660)$ | (563) | (277) |
| 22 |  | Total Specific Adjustments | $(298,027)$ | $(92,182)$ | $(47,441)$ |


|  | Schedule D-1b | COST OF CAPITAL - ADJUSTMENTS |  |  | Page 2 of 4 |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | FLORIDA PUBLIC SERVICE COMMISSION COMPANY: GULF POWER COMPANY DOCKET NO.: 160186-EI | EXPLANATION: (1) List and describe the basis for the specific adjustments appearing on Schedule D-1a. <br> (2) List and describe the basis for the pro-rata adjustments appearing on Schedule D-1a. <br> (\$000s) | Type of Dat X Project X Prior Y X Histori Witness: S. | hown: <br> Test Year E <br> Ended 12/3 <br> Year Ended <br> Ritenour | $\begin{aligned} & \text { ed } 12 / 31 / 17 \\ & 16 \\ & 1 / 31 / 15 \end{aligned}$ |
|  | (1) Line No. | Description | (4) <br> Historic Base Year | (5) <br> Prior <br> Year | (6) <br> Test <br> Year |
|  | 1 | Pro Rata Adjustments: |  |  |  |
|  | 2 | Environmental Cost Recovery Clause Plant (net) | $(928,802)$ | $(1,302,589)$ | $(1,301,367)$ |
|  | 3 | Energy Conservation Cost Recovery Clause Plant (net) | $(20,112)$ | $(21,883)$ | $(23,505)$ |
|  | 4 | ARO Plant (net) | $(54,228)$ | $(95,838)$ | $(96,348)$ |
|  | 5 | Plant in Service: Generation | - | - | 12,603 |
| Or | 6 | Plant in Service: Power Delivery | - | - | 4,994 |
|  | 7 | Plant in Service: Community Solar | - | - | $(3,000)$ |
|  | 8 | Plant in Service: Customer Service Adjustment | - | - | $(5,452)$ |
|  | 9 | Plant in Service: Power Delivery Settlement Projects | $(122,462)$ | $(177,045)$ | - |
|  | 10 | Plant Smith Net Investment | - | - | $(37,992)$ |
|  | 11 | Accumulated Depreciation: Generation | - | - | (313) |
|  | 12 | Accumulated Depreciation: Power Delivery | - | - | (112) |
|  | 13 | Accumulated Depreciation: COR Regulatory Asset | - | - | 62,500 |
|  | 14 | Accumulated Depreciation: Community Solar | - | - | 183 |
|  | 15 | Accumulated Depreciation: Customer Service | - | - | 3 |
|  | 16 | Accumulated Depreciation: 2016 Depreciation \& Dismantlement Studies | - | - | $(3,642)$ |



| Schedule D-1b | COST OF CAPITAL - ADJUSTMENTS | Page 4 of 4 |  |  |
| :---: | :---: | :---: | :---: | :---: |
| FLORIDA PUBLIC SERVICE COMMISSION | EXPLANATION: (1) List and describe the basis for the specific adjustments appearing on Schedule D-1a. <br> (2) List and describe the basis for the pro-rata adjustments appearing on Schedule D-1a. <br> (\$000s) | Type of Data Shown: <br> X Projected Test Year Ended 12/31/17 $\qquad$ Prior Year Ended 12/31/16 $\qquad$ Historical Year Ended 12/31/15 <br> Witness: S. D. Ritenour |  |  |
| COMPANY: GULF POWER COMPANY |  |  |  |  |
|  |  |  |  |  |
| DOCKET NO.: 160186-EI |  |  |  |  |
| (1) (2) | (3) | (4) | (5) | (6) |
| Line |  | Historic | Prior | Test |
| No. Class of Capital | Description | Base Year | Year | Year |
| 1 | Pro Rata Adjustments Continued: |  |  |  |
| 2 | Deferred Nuclear Charges | (973) | (973) | (973) |
| 3 | Unamortized 2013 Rate Case Expenses | $(3,100)$ | (2) | - |
| 4 | Current Unrealized Gain on Forward Contracts | (4) | - | - |
| 5 | Non-Current Unrealized Gain on Forward Contracts | 3 | - | - |
| 6 | Temporary Cash Investments | - | $(2,455)$ | - |
| 7 | Deferred Earnings on Transmission Settlement Projects | $(3,730)$ | $(18,000)$ | - |
| 8 | Plant Smith Regulatory Asset NBV | - | - | 40,320 |
| 9 | Unamortized Balance Associated with Plant Scholz Inventory | - | - | 533 |
| 10 | COR Regulatory Asset | $(25,468)$ | $(28,500)$ | $(28,500)$ |
| 11 | Environmental Allowance \& Deferred Gain (ECRC) | 63 | 5 | 1 |
| 12 | Additional Pension Funding Required - Current Liability | - | - | 9,500 |
| 13 | Deferred Earnings - Transm Proj 2013 RC Settlement | - | - | $(3,262)$ |
| 14 | Total Pro Rata Adjustments | $(1,418,437)$ | (1,552,194) | (1,212,878) |
| 15 | Total Specific and Pro Rata Adjustments | $(1,716,464)$ | $(1,644,376)$ | $(1,260,319)$ |



Schedule D-2
FLORIDA PUBLIC SERVICE COMMISSION
COMPANY: GULF POWER COMPANY
DOCKET NO.: 160186-EI

COST OF CAPITAL - 5 YEAR HISTORY
EXPLANATION: For the subject Florida utility, all other regulated utility operations combined, all non-regulated operations combined, the parent company, and on a consolidated basis, provide the year-end capital structure for investor capital (i.e. common equity, preferred stock, long-term debt, and short-term debt) for the five years through the end of the

Page 2 of 2
Type of Data Shown:
$\underline{X}$ Projected Test Year Ended 12/31/17
$\underline{X}$ Prior Year Ended 12/31/16
$\underline{X}$ Historical Year Ended 12/31/13-12/31/15
Witness: X. Liu, S. D. Ritenour

| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 2013 |  | 2014 |  | 2015 |  | 2016 |  | 2017 |  |
| Line No. | Class of Capital | Amount (000s) | Percent of Total | Amount (000s) | Percent of Total | Amount (000s) | Percent of Total | Amount (000s) | Percent of Total | Amount (000s) | Percent of Total |
| 1 | Parent Company |  |  |  |  |  |  |  |  |  |  |
| 2 | Common Stock Equity | 19,096,212 | 90.30 | 20,092,225 | 89.13 | 20,739,710 | 83.50 |  |  |  |  |
| 3 | Preference Stock | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 |  |  |  |  |
| 4 | Long-Term Debt | 1,400,000 | 6.62 | 1,749,857 | 7.76 | 3,211,485 | 12.93 |  |  |  |  |
| 5 | Short-Term Debt | 651,131 | 3.08 | 699,933 | 3.11 | 887,416 | 3.57 |  |  |  |  |
| 6 | Total | 21,147,343 | 100.00 | 22,542,015 | 100.00 | 24,838,611 | 100.00 |  |  |  |  |
| 7 | Eliminations |  |  |  |  |  |  |  |  |  |  |
| 8 | Common Stock Equity | $(21,284,221)$ | 96.43 | $(22,640,468)$ | 98.53 | $(24,346,861)$ | 95.75 |  |  |  |  |
| 9 | Preference Stock | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 |  |  |  |  |
| 10 | Long-Term Debt | 0 | 0.00 | 0 | 0.00 | $(722,360)$ | 2.84 |  |  |  |  |
| 11 | Short-Term Debt | $(788,305)$ | 3.57 | $(337,728)$ | 1.47 | $(357,768)$ | 1.41 |  |  |  |  |
| 12 | Total | $(22,072,526)$ | 100.00 | $(22,978,196)$ | 100.00 | (25,426,989) | 100.00 |  |  |  |  |
| 13 | Consolidated Basis |  |  |  |  |  |  |  |  |  |  |
| 14 | Common Stock Equity | 19,007,790 | 43.77 | 19,949,700 | 43.07 | 20,592,194 | 40.47 |  |  |  |  |
| 15 | Preference Stock | 1,130,329 | 2.60 | 1,350,984 | 2.92 | 1,507,473 | 2.96 |  |  |  |  |
| 16 | Noncontrolling Interest | 0 | 0.00 | 39,241 | 0.08 | 42,677 | 0.09 |  |  |  |  |
| 17 | Long-Term Debt | 21,343,752 | 49.14 | 20,841,424 | 45.00 | 24,688,450 | 48.52 |  |  |  |  |
| 18 | Short-Term Debt | 1,950,846 | 4.49 | 4,135,470 | 8.93 | 4,049,988 | 7.96 |  |  |  |  |
| 19 | Total | 43,432,717 | 100.00 | 46,316,819 | 100.00 | 50,880,782 | 100.00 |  |  |  |  |



7 In determining the appropriate level of short-term debt to include in its capital structure, Gulf attempts to achieve the most cost-effective balance between interest rates and
8 liquidity. During the test year, Gulf's short-term debt as a percent of total capitalization (debt, preferred and common equity) is $1.6 \%$. Most of the short-term borrowing is in the
9 form of commercial paper. Gulf has bank lines of credit totaling $\$ 280$ million to support its commercial paper program, daily rate pollution control bonds and other borrowing
10 needs. Short-term debt is used for the ongoing operating needs of the Company, rather than being related to a specific project. Gulf's policy reflects the inclusion of some
11 short-term debt. The amount varies due to a number of factors including seasonality. The timing of long-term financing is dependent on several factors, including market conditions,
12 projected levels of short-term debt and projected capital needs.
,

| Schedule D-4a |  |  |  |  | LONG-TERM DEBT OUTSTANDING |  |  |  |  |  |  | Page 1 of 3 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| FLORIDA PUBLIC SERVICE COMMISSION |  |  |  |  | EXPLANATION: Provide the specified data on long-term |  |  |  |  |  |  | Type of Data Shown: |  |  |
| COMPANY: GULF POWER COMPANY |  |  |  |  | debt issues on a 13 -month average basis for the test year, prior year, |  |  |  |  |  |  | X Projected Test Year Ended 12/31/17 |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| DOCKET NO.: 160186-EI |  |  |  | (\$000s) |  |  |  |  |  |  |  | Witness: S. D. Ritenour |  |  |
| Thirteen Month Average Long-Term Debt for the Prior Year Ended 12/31/17 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| (1) |  | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) | (13) | (14) |
|  |  |  |  |  |  | 13-Month | Discount | Issuing |  |  |  |  |  |  |
|  |  |  |  |  | Principal | Average | (Premium) | Expense |  |  | Interest | Total | Unamortized | Unamort. Issuing |
|  |  |  |  |  | Amount | Principal | on | on |  | Annual | Expense | Annual | Discount | Expense \& Loss on |
| Line |  | Description, |  | Maturity | Sold- (Face | Amount | Principal | Principal | Life | Amortization | (Coupon Rate) | Cost | (Premium) | Reacquired Debt |
| No |  | Coupon Rate | Issue Date | Date | Value) | Outstanding | Amt. Sold | Amt Sold | (Years) | ( $7+8$ )/9 | (2) $\times(6)$ | $(10)+(11)$ | Assoc. with (6) | Assoc. with (6) |
| Senior Notes and Other Long Term Debt |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1 | 5.90\% | Senior Note Series 2007A | 6/12/2007 | 6/15/2017 | 85,000 | 39,231 | 39 | $(2,273)$ | 10 | (108) | 2,315 | 2,207 | 7 | (30) |
| 2 | 4.75\% | Senior Note Series 2010A | 4/13/2010 | 4/15/2020 | 175,000 | 175,000 | 28 | (196) | 10 | (20) | 8,313 | 8,293 | 323 | (377) |
| 3 | 5.10\% | Senior Note Series 2010B | 9/17/2010 | 10/1/2040 | 125,000 | 125,000 | 80 | 1,278 | 30 | 43 | 6,375 | 6,418 | 909 | 80 |
| 4 | 5.75\% | Senior Note Series 2011A | 5/18/2011 | 6/1/2051 | 125,000 | 125,000 | 0 | 4,129 | 40 | 103 | 7,188 | 7,291 | 3,336 | 172 |
| 5 | 3.10\% | Senior Note Series 2012A | 5/18/2012 | 5/15/2022 | 100,000 | 100,000 | 187 | 743 | 10 | 93 | 3,100 | 3,193 | 409 | 50 |
| 6 | 5.00\% | Senior Note Series 2013A | 6/18/2013 | 6/15/2043 | 90,000 | 90,000 | 139 | 970 | 30 | 37 | 4,500 | 4,537 | 801 | 161 |
| 7 | 4.55\% | Senior Note Series 2014A | 9/23/2014 | 10/1/2044 | 200,000 | 200,000 | 392 | 1,949 | 30 | 78 | 9,100 | 9,178 | 1,944 | 187 |
| 8 | 5.14\% | Senior Note Series 2016 | 12/1/2016 | 11/30/2046 | 150,000 | 150,000 | 0 | 1,200 | 30 | 40 | 7,710 | 7,750 | - | 1,180 |
| Pollution Control Bonds |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 9 | 2.10\% | Escambia County Series 1997 | 7/1/1997 | 7/1/2022 | 37,000 | 37,000 | 0 | 1,456 | 14 | 104 | 777 | 881 | - | 520 |
| 10 | Variable | Jackson County Series 1997 | 7/1/1997 | 7/1/2022 | 3,930 | 3,930 | 57 | 0 | 25 | 2 | 81 | 83 | 2 | 9 |
| 11 | 2.00\% | Monroe County Series 2002 | 9/26/2002 | 9/1/2037 | 42,000 | 42,000 | 0 | 2,175 | 29 | 75 | 840 | 915 | - | 1,512 |
| 12 | 2.00\% | Escambia County Series 2003 | 4/15/2003 | 6/1/2023 | 32,550 | 32,550 | 0 | 1,125 | 15 | 75 | 651 | 726 | - | 445 |
| 13 | Variable | Escambia County 1st Series 2009 | 3/31/2009 | 4/1/2039 | 65,400 | 65,400 | 0 | 1,770 | 30 | 59 | 1,350 | 1,409 | - | 1,276 |
| 14 | 1.60\% | Escambia County 2nd Series 2009 (a) | 3/31/2009 | 4/1/2039 | 65,000 | 65,000 | 0 | 630 | 30 | 21 | 1,040 | 1,061 | - | 456 |
| 15 | 2.53\% | Monroe County Series 2010 PCB (b) | 6/3/2010 | 6/1/2049 | 21,000 | 21,000 | 11 | 619 | 30 | 21 | 531 | 552 | 59 | 475 |
| 16 | Variable | Jackson County MBFC Series 2012 | 11/20/2012 | 11/1/2042 | 13,000 | 13,000 | 0 | 690 | 30 | 23 | 275 | 298 | - | 576 |
| 17 | 4.45\% | Jackson County MBFC Series 2014 | 4/15/2014 | 4/1/2044 | 29,075 | 29,075 | 0 | 900 | 30 | 30 | 1,294 | 1,324 | - | 810 |
| 18 | Unamortiz | tized Loss on Reacq. Debt |  |  |  |  |  |  |  | 1,633 | 0 | 1,633 | - | 13,945 |
| 19 | Total L | ong-Term Debt |  |  |  | 1,313,186 | 933 | 17,165 |  | 2,309 | 55,440 | 57,749 | 7,790 | 21,447 |
| 20 Less: Adjustment to Long-Term Debt |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 21 | 5.14\% | enior Note Series 2016 |  |  |  | 150,000 | 0 | 1,200 | 30 | 40 | 7,710 | 7,750 | 0 | 1,180 |
| 22 | Adjusted | Total Long-Term Debt |  |  |  | 1,163,186 | 933 | 15,965 |  | 2,269 | 47,730 | 49,999 | 7,790 | 20,267 |
| 23 | Issuance | Expense (13+14) |  |  |  | 28,057 |  |  |  |  |  |  |  |  |
| 24 | Net |  |  |  |  | 1,135,129 |  |  |  |  |  |  |  |  |
| 25 | Embedd | Cost of Long-Term Debt (Colmun 12 |  |  |  | 4.40\% |  |  |  |  |  |  |  |  |

(a) Rate effective beginning December 2017 is projected to be $3.8 \%$. Previous rate was $1.4 \%$
(b) Rate effective beginning June 2017 is projected to be $3.35 \%$. Previous rate was $1.7 \%$

Schedule D-4a
FLORIDA PUBLIC SERVICE COMMISSIO
COMPANY: GULF POWER COMPANY

DOCKET NO: 160186-El
DOCKET NO.: 160186-EI

LONG-TERM DEBT OUTSTANDING
EXPLANATION: Provide the specified data on long-term
debt issues on a 13 -month average basis for the test year, prior year,
and historical base year. Arrange by type of issue (i.e., first mortgage bonds).
(\$000s)
Thirteen Month Average Long-Term Debt for the Prior Year Ended 12/31/16

Type of Data Shown:
Page 2 of 3
_ Projected Test Year Ended 12/31/17 X Prior Year Ended 12/31/16 _ Historical Year Ended 12/31/15 Historical Year Ended $12 / 2$

| (1) | (2) | (3) | (4) | (5) | (6) 13-Month | (7) <br> Discount | (8) | (9) | (10) | (11) | (12) | (13) | (14) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Line <br> No. | Description, Coupon Rate | Issue Date | Maturity Date | Principal Amount Sold- (Face Value) | Average <br> Principal Amount Outstanding | (Premium) on Principal Amt. Sold | Expense on <br> Principal <br> Amt Sold | Life (Years) | Annual Amortization $(7+8) / 9$ | Interest Expense (Coupon Rate) (2) $\times(6)$ | Total Annual Cost $(10)+(11)$ | Unamortized Discount (Premium) Assoc. with (6) | Unamort. Issuing Expense \& Loss on Reacquired Debt Assoc. with (6) |

Senior Notes and Other Long Term Debt

| 1 | $5.30 \%$ | Senior Note Series M |
| :--- | :--- | :--- |
| 2 | $5.90 \%$ | Senior Note Series 2007A |
| 3 | $4.75 \%$ | Senior Note Series 2010A |
| 4 | $5.10 \%$ | Senior Note Series 2010B |
| 5 | $5.75 \%$ | Senior Note Series 2011A |
| 6 | $3.10 \%$ | Senior Note Series 2012A |
| 7 | $5.00 \%$ | Senior Note Series 2013A |
| 8 | $4.55 \%$ | Senior Note Series 2014A |
| 9 | $5.14 \%$ | Senior Note Series 2016 |


| 12/6/2006 | 12/1/2016 | 110,000 | 101,539 | 24 | 6,294 | 10 | 579 | 5,382 | 5,961 | 31 | 246 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 6/12/2007 | 6/15/2017 | 85,000 | 85,000 | 39 | $(2,273)$ | 10 | (223) | 5,015 | 4,792 | 58 | (264) |
| 4/13/2010 | 4/15/2020 | 175,000 | 175,000 | 28 | (196) | 10 | (20) | 8,313 | 8,293 | 439 | (513) |
| 9/17/2010 | 10/1/2040 | 125,000 | 125,000 | 80 | 1,278 | 30 | 43 | 6,375 | 6,418 | 948 | 84 |
| 5/18/2011 | 6/1/2051 | 125,000 | 125,000 | 0 | 4,129 | 40 | 103 | 7,188 | 7,291 | 3,434 | 177 |
| 5/18/2012 | 5/15/2022 | 100,000 | 100,000 | 187 | 743 | 10 | 93 | 3,100 | 3,193 | 492 | 60 |
| 6/18/2013 | 6/15/2043 | 90,000 | 90,000 | 139 | 970 | 30 | 37 | 4,500 | 4,537 | 832 | 167 |
| 9/23/2014 | 10/1/2044 | 200,000 | 200,000 | 392 | 1,949 | 30 | 78 | 9,100 | 9,178 | 2,016 | 194 |
| 12/1/2016 | 11/30/2046 | 150,000 | 11,538 | 0 | 1,200 | 30 | 40 | 593 | 633 | 0 | 92 |
| 7/1/1997 | 7/1/2022 | 37,000 | 37,000 | 0 | 1,420 | 14 | 104 | 777 | 881 | 0 | 623 |
| 7/1/1997 | 7/1/2022 | 3,930 | 3,930 | 57 | 0 | 25 | 2 | 46 | 48 | 2 | 11 |
| 9/26/2002 | 9/1/2037 | 42,000 | 42,000 | 0 | 2,206 | 29 | 75 | 840 | 915 | 0 | 1,588 |
| 4/15/2003 | 6/1/2023 | 32,550 | 32,550 | 0 | 1,141 | 15 | 75 | 583 | 658 | 0 | 520 |
| 3/31/2009 | 4/1/2039 | 65,400 | 65,400 | 0 | 1,764 | 30 | 59 | 761 | 820 | 0 | 1,335 |
| 3/31/2009 | 4/1/2039 | 65,000 | 65,000 | 0 | 631 | 30 | 21 | 910 | 931 | 0 | 477 |
| 6/3/2010 | 6/1/2049 | 21,000 | 21,000 | 11 | 687 | 30 | 23 | 357 | 380 | 62 | 496 |
| 11/20/2012 | 11/1/2042 | 13,000 | 13,000 | 0 | 682 | 30 | 22 | 158 | 180 | 0 | 598 |
| 4/15/2014 | 4/1/2044 | 29,075 | 29,075 | 0 | 909 | 30 | 30 | 1,294 | 1,324 | 0 | 840 |
|  |  |  |  |  |  |  | 1,685 | 0 | 1,685 | 0 | 15,547 |
|  |  |  | 1,322,032 | 957 | 23,534 |  | 2,826 | 55,292 | 58,118 | 8,314 | 22,278 |
|  |  |  | 11,538 | 0 | 1,200 | 30 | 40 | 593 | 633 | 0 | 92 |
|  |  |  | 1,310,494 | 957 | 22,334 |  | 2,786 | 54,699 | 57,485 | 8,314 | 22,186 |

10 2.10\% Escambia County Series 1997
11 Variable Jackson County Series 1997
12 2.00\% Monroe County Series 2002
13 1.79\% Escambia County Series 2003 (a)
14 Variable Escambia County 1st Series 2009
16 1.70\% Escambia Coun 2 Series 2009
17 Variable Monroe County Series 2010 PCB
17 Variable Jackson County MBFC Series 2012
19 Unamortized Loss on Reacq. Debt
20 Total Long-Term Debt
21 Less: Adjustment to Long-Term Debt
22 5.14\% Senior Note Series 2016
23 Adjusted Total Long-Term Debt
26 Issuance Expense (13+14)
27 Net
28 Embedded Cost of Long-Term Debt (Colmun 12 / Net)

30,500
$\begin{array}{r}1,279,994 \\ \hline 4.49 \%\end{array}$
(a) Rate effective beginning June 2016 is projected to be $2.0 \%$. Previous rate was $1.55 \%$


EXPLANATION: Supply a statement of the company's policy on treatment of profit or loss from reacquired bonds. Detail any profit or loss on reacquired bonds for the test year and prior year.

Page 1 of 1
Type of Data Shown:
X Projected Test Year Ended 12/31/17
X
X
Projected Test Year Ended
Historical Year Ended 12/31/15
Witness: S. D. Ritenour
(1) (2)
(ine
No.

1
2
3

Gulf Power Company treats profits or losses on reacquired bonds in accordance with the Code of Federal Requlations: Title 18; Conservation of Power and Water Resources, Part 101; General Instructions, paragraph 17. The test year and prior year do not include any projected reacquired bonds

| FLORIDA PUBLIC SERVICE COMMISSION | EXPLANATION: Provide the data as specified for preferred <br> stock on a 13-month average basis for the test year, prior year <br> and historical base year. | Type of Data Shown: <br> COMPANY: GULF POWER COMPANY |
| :--- | :--- | :--- |
|  |  | (\$000s) Projected Test Year Ended 12/31/17 |

Thirteen-Month Average Preference Stock for the Test Year Ended 12/31/14

| (1) <br> Line <br> No. | (2) <br> Description, Coupon Rate | (3) <br> Issue <br> Date | (4) <br> Call <br> Provisions or Special <br> Restrictions | (5) <br> Principal <br> Amount <br> Sold | (6) <br> 13-Month Avg. <br> Principal <br> Amount <br> Outstanding | (7) <br> (Discount) <br> Premium on <br> Principal <br> Amount Sold | (8) <br> (Discount) <br> Premium <br> Associated <br> with $(6)$ | (9) <br> Issuing <br> Expense on <br> Principal <br> Amount Sold | (10) Issuing Expense Associated with (6) | (11) <br> Net <br> Proceeds $(6)+(8)-(10)$ | (12) <br> Dollar <br> Dividend on Face Value $\text { (2) } \times(6)$ | (13) <br> Effective <br> Cost <br> Rate $(12) /(11)$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 6.00\% | 11-15-05 | Note 1 | 55,000 | 55,000 | 0 | 0 | 1,114 | 1,114 | 53,886 | 3,300 | 6.12\% |
| 2 | 6.45\% | 10-19-07 | Note 2 | 45,000 | 45,000 | 0 | 0 | 888 | 888 | 44,112 | 2,903 | 6.58\% |
| 3 | 5.60\% | 06-18-13 | Note 3 | 50,000 | 50,000 | 0 | 0 | 1,494 | 1,494 | 48,506 | 2,800 | 5.77\% |
| 4 | Total |  |  | 150,000 | 150,000 | 0 | 0 | 3,496 | 3,496 | 146,504 | 9,003 | 6.15\% |

5 Weighted Average Cost of Preferred Stock

6 Note 1: The Company shall have the right to redeem Preference Stock, without premium, from time to time, on or after November 15, 2010, upon
7 notice, at a redemption price equal to $\$ 100.00$ per share plus accrued and unpaid dividends.

8 Note 2: The Company shall have the right to redeem the Preference Stock, from time to time, per the calculation outlined in the Prospectus
$9 \quad$ Supplement dated October 16, 2007.

10 Note 3: The Company shall have the right to redeem the Preference Stock, from time to time, per the calculation outlined in the Prospectus
11 Supplement dated June 12, 2013.

12 Totals may not add due to rounding.
FLORIDA PUBLIC SERVICE COMMISSION

COMPANY: GULF POWER COMPANY
DOCKET NO.: 160186-EI

EXPLANATION: Provide the data as specified for preferred stock on a 13-month average basis for the test year, prior year and historical base year.

## Type of Data Shown: Projected Test Year Ended 12/31/17

$\square$ Prior Year Ended 12/31/16 Historical Year Ended 12/31/15
Witness: S. D. Ritenour

Thirteen-Month Average Preference Stock for the Prior Year Ended 12/31/13

\begin{tabular}{|c|c|c|c|c|c|c|c|c|c|c|c|c|}
\hline (1)

Line

No. \& \begin{tabular}{l}
(2) <br>
Description, Coupon
$\qquad$

 \& 

(3) <br>
Issue <br>
Date

 \& 

(4) <br>
Call <br>
Provisions or Special <br>
Restrictions

 \& 

(5) <br>
Principal <br>
Amount <br>
Sold

 \& 

(6) <br>
13-Month Avg. <br>
Principal <br>
Amount <br>
Outstanding

 \& 

(7) <br>
(Discount) <br>
Premium on <br>
Principal <br>
Amount Sold
\end{tabular} \& (8)

(Discount)
Premium
Associated

with $(6)$ \& \begin{tabular}{l}
(9) <br>
Issuing <br>
Expense on <br>
Principal <br>
Amount Sold

 \& (10) Issuing Expense Associated with (6) \& 

(11) <br>
Net <br>
Proceeds

$$
(6)+(8)-(10)
$$

 \& 

(12) <br>
Dollar Dividend on Face Value (2) $\times(6)$

 \& 

(13) Effective <br>
Cost <br>
Rate

$$
(12) /(11)
$$

\end{tabular} <br>

\hline 1
2
3 \& $6.00 \%$
$6.45 \%$
$5.60 \%$ \& $11-15-05$
$10-19-07$
$06-18-13$ \& Note 1
Note 2
Note 3 \& 55,000
45,000
50,000 \& 55,000
45,000
50,000 \& 0
0
0 \& 0
0
0 \& 1,114
888
1,494 \& 1,114
888
1,494 \& 53,886
44,112
48,506 \& 3,300
2,903
2,800 \& $6.12 \%$
$6.58 \%$
$5.77 \%$ <br>
\hline 4 \& Total \& \& \& 150,000 \& 150,000 \& 0 \& 0 \& 3,496 \& 3,496 \& 146,504 \& 9,003 \& 6.15\% <br>
\hline 5 \& Weight \& Average Cos \& of Preferred \& \& \& \& \& \& \& \& \& 6.15\% <br>
\hline
\end{tabular}

6 Note 1: The Company shall have the right to redeem Preference Stock, without premium, from time to time, on or after November 15, 2010, upon
7 notice, at a redemption price equal to $\$ 100.00$ per share plus accrued and unpaid dividends.

8 Note 2: The Company shall have the right to redeem the Preference Stock, from time to time, per the calculation outlined in the Prospectus
9 Supplement dated October 16, 2007.
10 Note 3: The Company shall have the right to redeem the Preference Stock, from time to time, per the calculation outlined in the Prospectus
11 Supplement dated June 12, 2013.

12 Totals may not add due to rounding.

Schedule D-5
FLORIDA PUBLIC SERVICE COMMISSION

COMPANY: GULF POWER COMPANY
DOCKET NO.: 160186-EI

PREFERRED STOCK OUTSTANDING
for preferred EXPLANATION: Provide the data as specified for preferred
stock on a 13-month average basis for the test year, prior year and historical base year.

Type of Data Shown:
___ Projected Test Year Ended 12/31/17
Prior Year Ended 12/31/16
X Historical Year Ended 12/31/15
Witness: S. D. Ritenour

Thiteen-Month Average Preference Stock for the Prior Year Ended 12/31/12


5 Weighted Average Cost of Preferred Stock

6 Note 1: The Company shall have the right to redeem Preference Stock, without premium, from time to time, on or after November 15, 2010, upon
7 notice, at a redemption price equal to $\$ 100.00$ per share plus accrued and unpaid dividends.

8 Note 2: The Company shall have the right to redeem the Preference Stock, from time to time, per the calculation outlined in the Prospectus
$9 \quad$ Supplement dated October 16, 2007.
10 Note 3: The Company shall have the right to redeem the Preference Stock, from time to time, per the calculation outlined in the Prospectus Supplement dated June 12, 2013.

12 Totals may not add due to rounding.


Column (4) Note: Gulf does not maintain deposits on inactive accounts.


Column (4) Note: Gulf does not maintain deposits on inactive accounts.

| Schedule | D-6 | CUSTOMER DEPOSITS |  |  |  |  | age 3 of 3 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| FLORIDA | PUBLIC SERVICE |  | EXPLANATION: Provide monthly balances, interest rates, and interest payments on customer deposits for the test year, the prior year and historical base year. |  |  |  |  | Type of Data Shown: <br> Projected Test Year Ended 12/31/17 <br> Prior Year Ended 12/31/16 |
| DOCKET NO.: 160186-EI |  |  |  |  |  |  |  | X Historical Year Ended 12/31/15 Witness: S. D. Ritenour |
| (1) | (2) | (3) | (4) |  | (5) | (6) | (7) |  |
|  |  |  |  |  |  |  | Actual |  |
|  |  | Active | Inactive |  | Total | Total | Payments \& |  |
|  | Month | Customer | Customer |  | Deposits | Interest | Credits |  |
| Line | and | Deposits* | Deposits |  | (3)+(4) | Payments* | on Bills |  |
| No. | Year |  |  |  |  |  |  |  |
|  |  | (\$000s) | (\$000s) |  | (\$000s) | (\$000s) | (\$000s) |  |
| 1 | December-14 | 35,094 |  | 0 | 35,094 | 66 | 654 |  |
| 2 | January-15 | 35,079 |  | 0 | 35,079 | 68 | 635 |  |
| 3 | February-15 | 35,311 |  | 0 | 35,311 | 72 | 627 |  |
| 4 | March-15 | 35,437 |  | 0 | 35,437 | 66 | 650 |  |
| 5 | April-15 | 35,688 |  | 0 | 35,688 | 69 | 616 |  |
| 6 | May-15 | 35,883 |  | 0 | 35,883 | 72 | 726 |  |
| 7 | June-15 | 35,617 |  | 0 | 35,617 | 85 | 3,214 |  |
| 8 | July-15 | 35,722 |  | 0 | 35,722 | 63 | 649 |  |
| 9 | August-15 | 35,800 |  | 0 | 35,800 | 69 | 690 |  |
| 10 | September-15 | 35,783 |  | 0 | 35,783 | 65 | 772 |  |
| 11 | October-15 | 35,828 |  | 0 | 35,828 | 64 | 672 |  |
| 12 | November-15 | 35,859 |  | 0 | 35,859 | 72 | 697 |  |
| 13 | December-15 | 35,860 |  | $\bigcirc$ | 35,860 | 79 | 618 |  |
| 14 | 13 Month Average | 35,612 |  | $\underline{0}$ | 35,612 |  |  |  |
| 15 | 12 Month Total |  |  |  |  | 844 |  |  |
| 16 | Effective Interest R |  |  |  |  |  |  |  |
| 17 | 12 Month Interest |  |  |  |  |  |  |  |
| 18 | Expense (6) divide |  |  |  |  |  |  |  |
| 19 | Total Deposits (5) |  |  |  |  |  |  |  |

* Note: Pursuant to FPSC Order No. PSC-12-0266-NOR-PU the current rates are $2 \%$ and $3 \%$.

Column (4) Note: Gulf does not maintain deposits on inactive accounts.

| FLORIDA PUBLIC SERVICE COMMISSION | EXPLANATION: Provide the most recent five year data for the | Type of Data Shown: |
| :--- | :--- | :--- |
|  | company, or consolidated parent if the company is not <br> publicly traded as indicated. To the extent the requested data <br> is available from other sources, the Company can reference and <br> attach the information to comply with the requirements of this MFR. | Projected Test Year Ended 12/31/17 |
| COMPANY: GULF POWER COMPANY | Prior Year Ended 12/31/16 |  |


| (1) | (2) | (3) | (4) | (5) | (6) | (7) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Line |  |  |  |  |  |  |
|  | Description | 2011 | 2012 | 2013 | 2014 | 2015 |
| 1 | Pre-tax Interest Coverage Ratio (X) | 3.22 | 3.72 | 3.93 | 3.98 | 3.94 |
| 2 | Earned Returns on Average Book Equity (\%) | 9.55 | 10.92 | 10.30 | 11.02 | 11.11 |
| 3 | Book Value/Share (\$) | 20.32 | 21.09 | 21.43 | 21.98 | 22.59 |
| 4 | Dividends/Share (\$) | 1.87 | 1.94 | 2.01 | 2.08 | 2.15 |
| 5 | Earnings/Share (\$) | 2.57 | 2.70 | 1.88 | 2.19 | 2.60 |
| 6 | Market Value/Share (\$) | 46.29 | 42.81 | 41.11 | 49.11 | 46.79 |
| 7 | Market/Book Ratio (\%) | 227.80 | 203.00 | 191.80 | 223.40 | 207.20 |
| 8 | Price/Earning Ratio (6) / (5) | 18.00 | 15.90 | 21.90 | 22.40 | 18.00 |

FINANCIAL PLANS - STOCKS AND BOND ISSUES
1.) If the test year is projected, provide a summary of financing plans and assumptions.
COMPANY: GULF POWER COMPANY
DOCKET NO.: 160186-EI
2.) Provide the company's capital structure objectives, the basis for assumptions (such as those for issue cost and interest rates), and any other significant assumptions. Provide a statement of the Company's policy on the timing of the entrance into capital markets.

| Financing Plans for the Year Ended 12/31/17 |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| (1) | (2) (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
|  |  | For Bonds |  |  | For Stock |  |  |  |
| Line No. |  Date of <br> Issue/  <br> Type of Issue Retirement | Capitalization (\$000s) | Interest Rate | Life in <br> Years | No. of Shares | Market Price | Issue Costs (\$000s) | Principal <br> Amount $(\$ 000 \mathrm{~s})$ |
| 1 | Senior Unsecured Notes | NONE PROJECTED FOR PERIOD |  |  |  |  |  |  |
| 2 | Pollution Control Bonds | NONE PROJECTED FOR PERIOD |  |  |  |  |  |  |
| 3 | Preference Stock | NONE PROJECTED FOR PERIOD |  |  |  |  |  |  |
| 4 | Common Stock Issuance | NONE PROJECTED FOR PERIOD |  |  |  |  |  | 150,000 |
| 5 | Capital Structure Objectives: |  |  |  |  |  |  |  |
| 6 7 8 | Gulf's objective is to maintain a balanced capital structure that will provide the utility with the financial flexibility and strength to attract the capital necessary to provide reliable electric service to its customers. Gulf's long-term financing plans, which include equity issuances to and/or capital contributions from Southern Company, are designed to support a strong credit profile to meet the heavy capital requirements that are needed. |  |  |  |  |  |  |  |
| 9 | Basis for Assumptions: |  |  |  |  |  |  |  |
| 10 | When new debt financings are projected, interest rate assumptions are provided by Southern Company Services, Inc. based upon a U.S. Treasury rates forecast by Moody's Analytics, adjusted for the respective risk premiums which are reflective of Gulf's debt rating. Short-term rates are based on the Moody's Analytics forecast for 3-month LIBOR (London InterBank Offered Rate). The interest rates assumption also consider the effect of the debt related costs over the life of the underlying debt. All debt issues are assumed to be sold at face value. |  |  |  |  |  |  |  |
| 12 |  |  |  |  |  |  |  |  |
| 13 | Company's Policy on the Timing of Entrance into Capital Markets: |  |  |  |  |  |  |  |
| 14 15 16 17 | The Company continuously monitors capital market conditions for opportunities to minimize its overall cost of capital. Each year a financing plan is developed based on current year debt maturities, captial expenditure projections and forecasted internally generated funds. Gulf's participation in the commercial paper program through Southern Company Funding Corp. and its existing committed credit facilities provide sufficient liquidity and flexibility in determining the amount and timing of long-term debt issuances. With a goal of maintaining financial flexibility and liquidity, the timing of the Company's entrance into the capital markets is based on actual and projected short-term debt balances and capital market conditions. |  |  |  |  |  |  |  |



