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-M-E-M-O-R-A-N-D-U-M-

DATE: May 12, 2017
TO: Office of Commission Clerk
FROM: Lynn M. Deamer, Chief of Auditing, Office of Auditing and Performance Analysis
RE: Docket No.: 170001-EI Company Name: Gulf Power Company Company Code: EI804 Audit Purpose: A3a: Fuel Cost Recovery Clause Audit Control No: 17-023-1-1

Attached is the final audit report for the Utility stated above. I am sending the Utility a copy of this memo and the audit report. If the Utility desires to file a response to the audit report, it should send a response to the Office of Commission Clerk. There are confidential work papers associated with this audit.

LMD/cmm

Attachment: Audit Report

cc: Office of Auditing and Performance Analysis File

State of Florida

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Public Service Commission

Office of Auditing and Performance Analysis Bureau of Auditing Tallahassee District Office

Auditor's Report

Gulf Power Company Fuel and Purchased Power Cost Recovery Clause

Twelve Months Ended December 31, 2016

Docket No. 170001-EI Audit Control No. 17-023-1-1 April 20, 2017 Donna D. Brown Audit Manager

Marisa N. Glover Reviewer

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Purpose

To: Florida Public Service Commission

We have performed the procedures described later in this report to meet the objectives set forth by the Division of Accounting and Finance in its audit service request dated January 20, 2017. We have applied these procedures to the attached summary exhibit and to several related schedules prepared by Gulf Power Company in support of its 2016 filing for the Fuel and Purchased Power Cost Recovery Clause in Docket No. 170001-EI.

This audit was performed following General Standards and Fieldwork Standards found in the AICPA Statements on Standards for Attestation Engagements. The report is intended only for internal Commission use.

Objectives and Procedures

General

Definition

Utility refers to the Gulf Power Company. FAC refers to the Fuel and Purchased Power Cost Recovery Clause.

Revenue

Operating Revenues

Objectives: The objectives were to determine the actual Kilowatt Hours (KWH) sold for the period January 1, 2016, through December 31, 2016, and whether the Utility applied the Commission approved cost recovery factor to actual KWH sales for the FAC.

Procedures: We reconciled the fuel revenues reported in the 2016 filing to the Utility's monthly revenue reports and the general ledger. We selected a random sample of residential and commercial customers' bills and recalculated each to verify the use of the correct tariff rate approved in Order No. PSC-15-0586-FOF-EI, issued December 23, 2015 in Docket No. 150001-EI. No exceptions were noted.

Expense

Operation and Maintenance Expense

Objectives: The objectives were to review the expenses which the Utility has included in the FAC and determine whether those expenses were properly recoverable as required by Order No. 14546, issued July 8, 1985.

Procedures: We recalculated Schedule A-1 from the FAC Filing for each month of 2016. We prepared a schedule of coal, oil, and natural gas consumption for each month of 2016 from the Utility's generation fuel costs journal entries. We compiled charges by month and by account to obtain total fuel costs, which were reconciled to the general ledger and Schedule A-1. We also prepared a schedule of charges by account and by generating plant, including amounts listed as "other generation" for each month for the year ended December 31, 2016, and reconciled total fuel costs to the consumption schedule prepared by audit staff. The fuel expenses included in the FAC Filing compiled with the requirements established in Order No. 14546. No exceptions were noted.

Objectives: The objective was to determine whether the Utility has credited generation-related gains from non-separated wholesale energy sales to the FAC Filing as set forth in Order No. PSC-00-1744-PAA-EI, issued September 26, 2000, in Docket No. 991779-EI.

Procedures: We scheduled the generation-related gains from the Utility's Interchange Analysis Reports for each month of 2016 and reconciled the total to Schedule A-6 and Schedule A-1, Line 15. We traced the gains to the IIC invoices and the imbalance service reports for March, June, September, and December 2016. In addition, we reconciled the Utility's Interchange Analysis Report to Schedule A-6 and Schedule A-1, Line 18 for March, June, September, and December 2016. We determined that the Utility was in compliance with the order noted above. No exceptions were noted.

Objectives: The objective was to determine whether energy payments to the qualified facilities are based on the appropriate standard offer or the negotiated contract price.

Procedures: We schedule total KWHs purchased and energy costs for 2015. We traced amounts on Schedule A-8 to invoices for March, June, September, and November 2016. No exceptions were noted.

Objectives: The objective was to determine whether the amounts of gas storage expense recovered through the FAC Filing by gas storage facility for 2016 were calculated correctly and payments were in accordance with the applicable contract.

Procedures: We reviewed the gas storage contracts in effect for 2016. We recalculated the monthly reservation payment and reconciled the charges to the respective contract. No exceptions were noted.

Objectives: The objective was to determine whether Firm Transportation Service (FTS) charges for natural gas transportation agree with the appropriate FTS rate schedules from utility pipeline tariffs.

Procedures: We reconciled natural gas purchases and FTS charges from the accounts payable analysis for each month of 2016 and reconciled totals to the general ledger. We traced the purchased amounts and the total FTS charges to the paid invoices for July and November 2016. We traced the FTS rates to the appropriate rate schedule and agreement. No exceptions were noted.

Inventory

Objectives: The objective was to determine whether adjustments made to coal inventory due to the semi-annual coal inventory survey had been recorded as set forth in Order No. PSC-97-0359-FOF-EI, issued March 31, 1997, in Docket No. 970001-EI.

Procedures: We recalculated the inventory adjustments on the March and September 2016 aerial survey reports, compared them to the adjusted book balance, and traced them to the supporting journal vouchers. We also verified that the Utility complied with the procedures contained in the applicable order. No exceptions were noted.

Other

Objectives: The objective was to review and verify the payments the Utility made in 2016 under waterborne and rail coal transportation contracts.

Procedures: We scheduled coal, freight, and railcar costs from the Utility's Accounts Payable (AP) analysis for each month of 2016, and reconciled the amounts to the general ledger. We reviewed the waterborne and rail coal transportation contracts. We also traced the general ledger inventory purchases to the AP Analyses to the supporting invoices to the transportation contract rates for the months of January, May, September, and December 2016. No exceptions were noted.

Objectives: The objective was to determine whether vendor credits or rebates are credited to fuel costs.

Procedures: We verified that there were no vendor credits or rebates received during 2016.

Objectives: The objective was to determine whether the service hours, reserve shutdown hours, and unavailable hours filed in Schedule A-4 for the Generating Performance Incentive Factor (GPIF) Filing agree to source documentation.

Procedures: We traced the service hours, reserve shutdown hours, and unavailable hours filed in Schedule A-4 to Schedule 5 in the GPIF Filing and to source documentation for February and November 2016. No exceptions were noted.

Objectives: The objective was to reconcile coal and oil purchases noted on FPSC Form 423 with the monthly Schedule A-5, contractual obligations, and source documentation.

Procedures: We reconciled coal and oil purchases reported on Form 423 with the Schedule A-5 filing for April 2016. We cross-referenced the coal and oil purchases by vendor from the AP analysis to the location cost transaction summaries, to the inventory details and the general ledger. We traced receipts to fuel invoices. No exceptions were noted.

Objectives: The objective was to determine whether the energy costs of other economic purchases (non-broker) included in the FAC Filing reconciled to the books and records of the Utility.

Procedures: We compiled economy energy purchases from the Utility's Interchange Analysis Reports for each month of 2016 and reconciled the total to Schedule A-8, Schedule A-9, and Interchange Contract (IIC) and Purchased Power Agreement (PPA) invoices and contracts for March, June, September, and December 2016. No exceptions were noted.

True-up

Objective: The objective was to determine if the True-Up and Interest Provision as filed on Schedule A-2 was properly calculated.

Procedures: We traced the December 31, 2015, True-Up Provision to the Commission Order. We recalculated the True-Up and Interest Provision amounts as of December 31, 2016, using the Commission approved beginning balance as of December 31, 2015, the Financial Commercial Paper rates, and the 2016 Fuel revenues and costs. No exceptions were noted.

Analytical Review

Objective: The objective was to perform an analytical review of the Utility's FAC Revenues and Expenses to determine if there were any material changes or inconsistencies from the prior year.

Procedures: We compared 2016 to 2015 revenues and expenses. We requested explanations from the Utility for significant variances. Explanations provided were sufficient. Further follow-up was not required.

Audit Findings

None

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<u>Exhibit</u>

Exhibit 1: True-Up

SCHEDULE A-2 PAGE 1 OF 3

CALCULATION OF TRUE-UP AND INTEREST PROVISION GULF POWER COMPANY FOR THE MONTH OF: DECEMBER 2016

| | | | CURRENT M | ONTH | | | PERIOD - TO - | DATE | |
|----|--|----------------|----------------|----------------|----------|-----------------|----------------|-----------------|---------|
| | | \$ | | DIFFEREN | ICE | \$ | | DIFFERENCE | |
| | | ACTUAL | ESTIMATED % | AMOUNT (\$) | % | ACTUAL | ESTIMATED | AMOUNT (\$) | |
| Α. | Fuel Cost & Net Power Transactions | | | | | | | | |
| 1 | Fuel Cost of System Net Generation | 20,168,147.33 | 14,987,697 | 5,180,450,33 | 34.56 | 232,906,885.96 | 253,010,293 | (20,103,407.04) | (7.95) |
| 1a | Other Generation | 177,777.36 | 176,634 | 1,143.36 | 0.65 | 2,076,183.59 | 2,682,058 | (605,874.41) | (22.59) |
| 2 | Fuel Cost of Power Sold | (9,868,066.88) | (2,915,000) | (6,953,066.88) | (238.53) | (67,647,977.33) | (68,552,000) | 904,022.67 | 1.32 |
| 3 | Fuel Cost - Purchased Power | 17,695,006.50 | 14,046,000 | 3,649,006.50 | 25.98 | 187,389,167.06 | 202,884,000 | (15,494,832.94) | (7.64) |
| 3a | Demand & Non-Fuel Cost Purchased Power | 0.00 | 0 | 0.00 | 0.00 | 0.00 | 0 | 0.00 | 0.00 |
| - | Energy Payments to Qualifying Facilities | 704,975.34 | 355,000 | 349,975.34 | 98.58 | 6,187,431.77 | 5,026,000 | 1,161,431.77 | 23.11 |
| 4 | Energy Cost - Economy Purchases | 0.00 | . 0 | 0.00 | 0.00 | 0.00 | 0 | 0.00 | 0.00 |
| 5 | Hedging Settlement Cost | 1,750,470.00 | 2,287,103 | (536,633.00) | (23.46) | 54,060,780.00 | 21,046,602 | 33,014,178.00 | 156.86 |
| | Total Fuel & Net Power Transactions | 30,628,309.65 | 28,937,434 | 1,690,875.65 | 5.84 | 414,972,471.05 | 416,096,953 | (1,124,481.95) | (0.27) |
| 7 | AdjustmentsTo Fuel Cost* | 1,273.28 | 0 | 1,273.28 | 100.00 | 13,114.48 | 0 | 13,114.48 | 100.00 |
| 8 | Adj. Total Fuel & Net Power Transactions | 30,629,582.93 | 28,937,434 | 1,692,148.93 | 5.85 | 414,985,585.53 | 416,096,953 | (1,111,367.47) | (0.27) |
| в | KWH Sales | | | | | | | | |
| 1 | Jurisdictional Sales | 771,019,819 | 826,023,000 | (55,003,181) | (6.66) | 11,081,505,276 | 10,961,737,000 | 119,768,276 | 1.09 |
| 2 | Non-Jurisdictional Sales | 24,087,902 | 28,101,000 | (4,013,098) | (14.28) | 315,581,966 | 330,925,000 | (15,343,034) | (4.64) |
| 3 | Total Territorial Sales | 795,107,721 | 854,124,000 | (59,016,279) | (6.91) | 11,397,087,242 | 11,292,662,000 | 104,425,242 | 0.92 |
| 4 | Juris. Sales as % of Total Terr. Sales | 96.9705 | 96.7100 | 0.2605 | 0.27 | 97.2310 | 97.0696 | 0.1614 | 0.17 |

*(Gain)/Loss on sales of natural gas and costs of contract dispute litigation.

SCHEDULE A-2 PAGE 2 OF 3

CALCULATION OF TRUE-UP AND INTEREST PROVISION GULF POWER COMPANY FOR THE MONTH OF: DECEMBER 2016

| | | CURRENT M | ONTH | | | PERIOD - TO - | DATE | |
|---|----------------|--------------|----------------|---------|-----------------|---------------|----------------|---------|
| | \$ | | DIFFERENCI | E | \$ | | DIFFERENCI | : |
| | ACTUAL | ESTIMATED | AMOUNT (\$) | % | ACTUAL | ESTIMATED | AMOUNT (\$) | % |
| C. True-up Calculation | | | | | | | | |
| 1 Jurisdictional Fuel Revenue | 26,088,715.42 | 30,125,671 | (4,036,955.53) | (13.40) | 404,136,512.90 | 399,782,672 | 4,353,841.22 | 1.09 |
| 2 Fuel Adj. Revs. Not Applicable to Period: | | | | | | | | |
| 2a True-Up Provision | 1,614,174.00 | 1,614,174 | 0.00 | 0.00 | 19,370,087.00 | 19,370,087 | 0.00 | 0.00 |
| 2b Incentive Provision | (220,534.00) | (220,534) | 0.00 | 0.00 | (2,646,407.00) | (2,646,407) | 0.00 | 0.00 |
| 3 Juris. Fuel Revenue Applicable to Period | 27,482,355.42 | 31,519,311 | (4,036,955.58) | (12.81) | 420,860,192.90 | 416,506,352 | 4,353,840.90 | 1.05 |
| Adjusted Total Fuel & Net Power | | | | | | | | |
| 4 Transactions (Line A8) | 30,629,582.93 | 28,937,434 | 1,692,148.93 | 5.85 | 414,985,584.76 | 416,096,953 | (1,111,368.24) | (0.27) |
| 5 Juris. Sales % of Total KWH Sales (Line B4) | 96.9705 | 96.7100 | 0.2605 | 0.27 | 97.2310 | 97.0696 | 0.1614 | 0.17 |
| Juns. Total Fuel & Net Power Transactions | | | | | | | | |
| 6 Adj. for Line Losses (C4*C5*1.0015) | 29,746,212.20 | 28,027,371 | 1,718,841.20 | 6.13 | 404,100,706.82 | 404,501,081 | (400,374.18) | (0.10) |
| True-Up Provision for the Month | (0.000.050.70) | o 404 040 | (5 755 700 70) | 464.92 | 40 750 400 00 | 40.005.070 | 4 754 014 08 | (20.60) |
| 7 Over/(Under) Collection (C3-C6) | (2,263,856.78) | 3,491,940 | (5,755,796.78) | 164.83 | 16,759,486.08 | 12,005,272 | 4,754,214.08 | (39.60) |
| 8 Interest Provision for the Month | 8,685.23 | 5,552 | 3,133.23 | (56.43) | 80,520.86 | 43,379 | 37,141.86 | (85.62) |
| 9 Beginning True-Up & Interest Provision | 19,309,482.87 | 10,165,333 | 9,144,149.87 | (89.95) | 18,046,021.07 | 19,370,087 | (1,324,065.93) | 6.84 |
| 10 True-Up Collected / (Refunded) | (1,614,174.00) | (1,614,174) | 0.00 | 0.00 | (19,370,087.00) | (19,370,087) | 0.00 | 0.00 |
| End of Period - Total Net True-Up, Before | | | | | | | | |
| 11 Adjustment (C7+C8+C9+C10) | 15,440,137.32 | 12,048,651 | 3,391,486.32 | (28.15) | 15,515,941.01 | 12,048,651 | 3,467,290.01 | (28.78) |
| 12 Adjustment (1) | (177,882.72) | (866,563.19) | 688,680.47 | (79.47) | (253,686.41) | (866,563) | 612,876.78 | (70.72) |
| 13 End of Period - Total Net True-Up | 15,262,254.60 | 11,182,088 | 4,080,166.79 | (36.49) | 15,262,254.60 | 11,182,088 | 4,080,166.79 | (36.49) |
| Adjustment for Scherer Unit 3 to retail | | | · · · · · | | • | | | |
| (177,882.72) | | | | | | | | |

SCHEDULE A-2 PAGE 3 OF 3

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CALCULATION OF TRUE-UP AND INTEREST PROVISION GULF POWER COMPANY FOR THE MONTH OF: DECEMBER 2016

| | | CURRENT MONTH | | | | |
|----|---|---------------|------------|---------------|-------|--|
| | - | \$ | | DIFFERENCE | | |
| | | ACTUAL | ESTIMATED | AMOUNT (\$) | % | |
| D. | Interest Provision | | | | | |
| 1 | BeginningTrue-Up Amount (C9) Ending True-Up Amount | 19,309,482.87 | 10,165,333 | 9,144,149.87 | 89.95 | |
| 2 | Before Interest (C7+C9+C10) | 15,431,452.09 | 12,043,099 | 3,388,353.09 | 28.14 | |
| 3 | Total of Beginning & Ending True-Up Amts. | 34,740,934.96 | 22,208,432 | 12,532,502.96 | 56.43 | |
| 4 | Average True-Up Amount | 17,370,467.48 | 11,104,216 | 6,266,251.48 | 56.43 | |
| 5 | Interest Rate 1st Day of Reporting Business Month Interest Rate | 0.48 | 0.48 | 0.0000 | | |
| 6 | 1st Day of Subsequent Business Month | 0.72 | 0.72 | 0.0000 | | |
| 7 | Total (D5+D6) | 1.20 | 1.20 | 0.0000 | | |
| 8 | Annual Average Interest Rate | 0.60 | 0.60 | 0.0000 | | |
| 9 | Monthly Average Interest Rate (D8/12) | 0.0500 | 0.0500 | 0.0000 | | |
| 10 | Interest Provision (D4*D9) | 8,685.23 | 5,552 | 3,133.23 | 56.43 | |
| | Jurisdictional Loss Multiplier (From Schedule A-1) | 1.0015 | 1.0015 | | | |