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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET No. ~~930885~~ EU

GULF POWER COMPANY

REBUTTAL TESTIMONY OF
WILLIAM F. POPE

JUNE 3, 1994

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GULF POWER COMPANY

Before the Florida Public Service Commission
Rebuttal Testimony of
William F. Pope
Docket No. 930885-EU
Date of Filing June 3, 1994

Q. Please state your name and business address.

A. William F. Pope, 500 Bayfront Parkway, Pensacola
Florida 32501.

Q. What is your occupation?

A. I am Coordinator of Bulk Power Planning for Gulf Power
Company in Pensacola, Florida.

Q. Please describe your educational background and experi-
ence.

A. I graduated from the University of Florida in March,
1975 with a Bachelor of Science in Electrical Engineer-
ing, and in May, 1985 I graduated with a Masters in
Business Administration from the University of West
Florida. After graduation in 1975, I was employed with
the Gainesville-Alachua County Regional Utilities,
which is a unit of the City of Gainesville, Florida as
a System Planning Engineer. In this position I was
responsible for performing the necessary studies and
analysis involved with the generation and transmission

1 system plans for future needs, writing and securing the
2 contracts for the system's No. 2 and No. 6 fuel oil
3 supply, and participating on a project team involved
4 with the search for and negotiation of a long-term low
5 sulfur coal contract for the Deerhaven 2 generating
6 unit.

7 In October of 1978, I joined Gulf Power Company as
8 a Plant Engineer at the Plant Smith in Panama City. In
9 this capacity I was responsible for performing various
10 plant engineering functions, coordinating environmental
11 testing activities, coordination of various contractor
12 maintenance activities, plant construction and
13 operations and maintenance expense budget preparation,
14 and acted part-time as an electric maintenance
15 supervisor.

16 In April of 1981, I was promoted to the position
17 of Engineering and Administrative Superintendent at the
18 Plant Crist in Pensacola. In this position I was
19 responsible for the management and supervision of the
20 water and coal laboratory test, instrument and control
21 maintenance and improvement programs, plant engineering
22 functions, unit performance activities, office adminis-
23 tration, plant warehouse and inventory activities, and
24 preparation of the plant's capital and operations and
25 maintenance budgets.

1 In April of 1987 I became Supervisor of System
2 Planning and as of May 1, 1993 I assumed my current
3 position of Coordinator of Bulk Power Planning at the
4 Corporate Office in Pensacola. In these positions, I
5 am responsible for supervising the Company's activities
6 for generation and transmission planning for Gulf
7 Power's long-range needs. The activities of System and
8 Bulk Planning are deeply integrated with the marketing
9 load forecasting, financial, power delivery, and
10 regulatory areas within Gulf Power Company.

11
12 Q. What is the purpose of your testimony in this
13 proceeding?

14 A. I am testifying in rebuttal to portions of the
15 testimony of Jeff Parish, of Alabama Electric
16 Cooperative ("AEC"), who is testifying on behalf of Gulf
17 Coast Electric Cooperative, Inc. ("the Coop"). I will
18 address Mr. Parish's conclusions regarding the effects
19 of the prison load on Gulf Power Company ("Gulf Power").
20 More specifically, I will address and challenge his
21 assumptions with regard to the assumed load profile of
22 the prison and its load at the time of Gulf Power's
23 peak.

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1 Q. Mr. Pope, please comment on Mr. Parish's
2 assertion that only about 65% of the prison's load
3 would occur during the Coop's substation peak.

4 A. Mr. Parish's analysis, using the hourly load shape of a
5 prison served in Alabama, is of questionable relevance
6 when considering what may be assumed as a load
7 characteristic for the Florida corrections facility in
8 Washington County. It is not reasonable to expect that
9 the facility's load would decrease by one-third from
10 the three o'clock time frame to the six o'clock time
11 frame, particularly with the air conditioning load
12 typically experienced during the summer. I would also
13 expect that there would be significant water heating
14 and cooking loads during this late afternoon time frame
15 as well. One correctional facility in our service area
16 for which we have actual data at this time experienced
17 no significant change in load later in the afternoon.
18 Thus, Mr. Parish's comparison of some unidentified
19 prison load in Alabama to the new facility in Florida
20 is significantly flawed.

21
22 Q. Mr. Pope, how do you respond to Mr. Parish's
23 estimate of the impact of the prison load on Gulf
24 Power's system?

25

1 A. Mr. Parish has attempted to draw an "apples versus
2 oranges" comparison between Gulf Power and the Coop.
3 His statement that "We believe the prison peak loads
4 are at the same time as Gulf Power's peaks" shows the
5 fatal error of his beliefs.
6 In fact, the unidentified prison does not peak at the
7 same time as Gulf Power. Whereas the prison used in
8 his analysis allegedly will peak as early as 1:30 PM,
9 Gulf Power typically peaks in the summer at 5:00 PM,
10 about the same time as the Coop substation. Thus, the
11 54% capacity advantage Mr. Parish attempts to create
12 for the Coop will be closer to zero in the summer,
13 especially since the electrical load characteristics
14 for the new Florida facility with its air conditioning
15 load could likely bear little resemblance to the
16 unidentified facility in Alabama.
17 Mr. Parish's peak comparison really only deals with
18 the situation in the summer months with the mystery
19 prison. He states that the diversity in the winter and
20 other months is "estimated" to be "approximately" 70%,
21 but doesn't volunteer any data or facts. He also
22 neglected to make any KW capacity comparisons with Gulf
23 Power in these months, so we do not know what his
24 assumptions are.
25

1 Q. What is the situation in the winter months?

2 A. Mr. Parish states that AEC substations usually peak at
3 7:00 AM.

4
5 Q. When does Gulf Power usually peak in the winter months?

6 A. Gulf Power also peaks at 7:00 AM.

7
8 Q. Then there is really no difference between the
9 facility's impact on Gulf Power's system and the Coop's
10 system during these months?

11 A. That is correct. There is no difference. In addition,
12 as I've already demonstrated, there is little if any
13 difference in the summer months. Assuming no
14 differences, then the 54% capacity advantage Mr. Parish
15 imputed to the Coop should be adjusted. This would
16 adjust Mr. Parish's own calculations of the Coop's
17 capacity cost for 1995 to be \$27,146, compared to a
18 capacity cost to Gulf Power of only \$18,962. This
19 adjustment assumes that it is appropriate to use the
20 type of analysis Mr. Parish utilized.

21
22 Q. Please elaborate.

23 A. Gulf Power witness M. W. Howell will testify that it is
24 incorrect to attempt to use pool interchange

25

1 transactions as a proxy for capacity cost. Thus, both
2 Mr. Parish's method and his calculations are flawed.

3

4 Q. Does this conclude your testimony?

5 A. Yes. However, Gulf Power has not yet received
6 responses to discovery requests previously submitted to
7 the Coop. Additionally, other discovery requests will
8 likely follow as a result of Mr. Parish's direct
9 testimony. I will have to supplement my testimony
10 following receipt of all discovery items.

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AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF ESCAMBIA)

Docket No. 930885-EU

Before me the undersigned authority, personally appeared William F. Pope, who being first duly sworn, deposes, and says that he is the Coordinator of Bulk Power Planning of Gulf Power Company, a Maine corporation, that the foregoing is true and correct to the best of his knowledge, information, and belief. He is personally known to me.

William F. Pope
William F. Pope
Coordinator of Bulk Power Planning

Sworn to and subscribed before me this 1st day of June, 1994.

Linda C. Webb
Notary Public, State of Florida at Large



LINDA C. WEBB
Notary Public-State of FL
Comm. Exp: May 31, 1998
Comm. No: CC 362703