

LAW OFFICES
CHANDLER, LANG, HASWELL & COLE, P.A.
POST OFFICE BOX 23879
GAINESVILLE, FLORIDA 32602-3879

ORIGINAL

JAMES F. LANG
JOHN H. HASWELL
C. WHARTON COLE *

June 5, 2001

TELEPHONE 352/376-5226
FAX 352/372-8858
211 N.E. FIRST STREET
GAINESVILLE, FL 32601-5367

*ADMITTED IN FL AND TX

WILLIAM H. CHANDLER
1920 - 1992

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
(850) 413-6770

VIA FEDERAL EXPRESS

RE: In Re: Territorial Dispute Between West Florida Electric Cooperative
Association, Inc. and Gulf Power Company in Washington County,
Florida

Dear Ms. Bayo:

I am enclosing herewith an original and fifteen (15) copies of West Florida Electric Cooperative Association, Inc.'s First Request For Production to Gulf Power Company for filing with the Florida Public Service Commission.

I am also enclosing a copy of this letter as an acknowledgement copy and would appreciate it if you would file stamp it and return it to me in the enclosed self-addressed/stamped envelope as an acknowledgement of the date the Notice of Service was filed. Please call me if you have any questions regarding this matter.

Very truly yours,

John H. Haswell

JHH/daj
Enclosures

APP _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
LEG 1 _____
OPC _____
PAI _____
RGO _____
SEC 1 _____
SER _____
OTH _____

cc: Frank E. Bondurant, Esquire
Attorney for West Florida Electric Cooperative Association, Inc.
Gary Clark, Vice President, Member Services
West Florida Electric Cooperative Association, Inc.
William S. Rimes, Executive Vice President and CEO
West Florida Electric Cooperative Association, Inc.
Jeffrey A. Stone, Esquire
Attorney for Gulf Power Company
Russell A. Badders, Esquire
Attorney for Gulf Power Company
Susan D. Ritenour, Assistant Secretary and Assistant Treasurer
Gulf Power Company

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

07077 JUN-6 5

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Territorial Dispute Between
West Florida Electric Cooperative
Association, Inc. and Gulf Power
Company in Washington County,
Florida.

Docket No.: 010441-EU

Date Filed: June 6, 2001

**FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO GULF POWER COMPANY FROM
WEST FLORIDA ELECTRIC COOPERATIVE ASSOCIATION, INC.**

Pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil procedure, WEST FLORIDA ELECTRIC COOPERATIVE ASSOCIATION, INC. ("WFEC"), by and through its undersigned attorneys, hereby serves the following request for production of documents upon GULF POWER COMPANY ("GPC").

Please produce the following documents at 211 Northeast First Street, Gainesville, Florida, 32601, no later than 30 days after service of this request for the purpose of inspection and copying, or please designate a location where such document will be available for inspection and copying by WFEC no later than 30 days after service of this request.

DEFINITION

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or records including, but not limited to, a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice memorandum, memorandum reflecting an oral communication, hand written or other notes, working paper, draft, application, permit, chart, paper, graph, map, survey, index, tape, disk, data sheet or data processing card, computer print out or any other written recorded transcribed filed or graphic matter however produced or reproduced:

1. All correspondence, emails, memorandums, and documents between GPC, Southern Company Services, and ECS related to Compressor Station 13A. Include all

DOCUMENT NUMBER
07077 JUN-6 2001

FPSC-RECORDS/REPORTING

such documents, correspondence, emails, and memorandums related to Compressor Station 13A between and among any affiliate or subsidiary of ECS and GPC.

2. The contract between GPC and ECS for electric service to Compressor Station 13A.

3. A copy of all studies and/or reports done by GPC, Southern Company Services, Florida Gas Transmission, ECS, or any other entity regarding service to Compressor Station 13A. Include in this request all diagrams showing transformers (including mva capacity ratings, impedance, and high side and low side voltages), switches, circuit breakers, and lines.

4. All documents showing cost by components of all cases studied regarding service to Compressor Station 13A.

5. All documents indicating ownership of or who will own the transmission tap and related facilities to provide service to Compressor Station 13A.

6. All documents showing costs of the construction of transmission lines, distribution sub-stations and associated equipment, transmission sub-stations, if any, relating to providing service by GPC to Compressor Station 13A.

7. All documents discussing or indicating the method chosen by GPC to Compressor Station 13A and the reasons therefor.

8. Unless provided in a previous request, a copy of all internal memorandums, emails, correspondence, and other documentation between GPC, ECS and Southern Company Services related to service to Compressor Station 13A.

9. All documents showing the calculation of a contribution in aid of construction associated with the facilities to be constructed by GPC to serve Compressor Station 13A, including all documents and calculations that would show a reduction in the contribution in aid of construction or its elimination and the basis for such reduction or elimination.

10. A copy of the rate schedule/tariffs used by GPC to provide the electric service to ECS at Compressor Station 13A.

11. A copy of the agreement between ECS and Florida Gas Transmission ("FGT") related to Compressor Station 13A.

12. A copy of any and all agreements between GPC and Enron, and/or ECS, and/or FGT for the supply of gas transportation and gas commodity to GPC's Smith Unit 3.

13. All documents listing the projected demand and energy requirements by month for all years of the contract between GPC and ECS for service to Compressor Station 13A.

14. All documents showing or indicating data on the large motors to be installed at Compressor Station 13A, including the number of motors, horsepower and full load mva ratings, across the line starting mva, and input voltage.

15. All documents providing the same information as the previous question for any future expansions to Compressor Station 13A and the timing thereof.

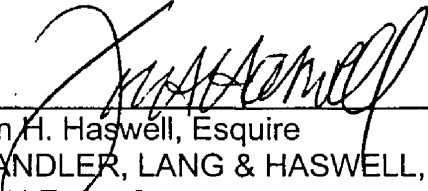
16. All system planning maps, long-range plans, diagrams, drawings, for Washington County, Florida, as of June 1, 2001.

17. All documents, engineering diagrams, system maps, or other drawings that accurately show the location of all GPC distribution and transmission facilities, including sub-stations in Washington County, Florida, as of June 1, 2001.

18. All documents, including all maps, diagrams and drawings depicting GPC's service area, territorial area, or historic service area in Washington County, Florida, as of June 1, 2001.

19. All documents showing cost estimates, invoices, or other writings showing the cost to GPC for the construction of all new facilities necessary to provide service to

ECS' Compressor Station 13A in Washington County, Florida, unless provided pursuant to a previous request.



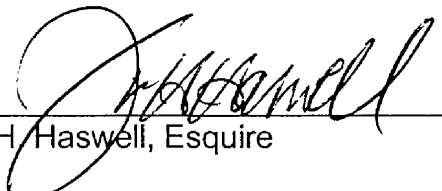
John H. Haswell, Esquire
CHANDLER, LANG & HASWELL, P.A.
211 N.E. 1st Street
Post Office Box 23879
Gainesville, FL 32602
(352) 376-5226 telephone
(352) 372-8858 facsimile
Florida Bar No. 162536

and

Frank E. Bondurant, Esquire
Post Office Box 854
Marianna, Florida 32447
(850) 526-2263 telephone
(850) 526-5947 facsimile

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to Jeffrey A. Stone, Esquire and Russell A. Badders, Esquire, Beggs & Lane, Post Office Box 12950, Pensacola, Florida 32576-2950; Robert Elias, Esquire and Marlene Stern, Esquire, Legal Division, Florida Public Service Commission, Capital Circle Office Center, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by Hand Delivery (Federal Express) this 6th day of June, 2001.



John H. Haswell, Esquire