

12:10 pm

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September 1, 1994

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FILE COPY

HAND DELIVERED

Blanca S. Bayo, Director  
Division of Records and Reporting  
101 East Gaines Street  
Tallahassee, Florida 32399

Re: Docket No. 931044-EI; Petition for Authority to Implement  
a Replacement Rate Schedule for Stand-by Electric Service  
by Gulf Power Company.

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- LEG
- LIN
- OPC
- RCM
- SEC
- WAS
- OTH

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and 15  
copies of the Brief of the Industrial Intervenors, an original and  
15 copies of the Industrial Intervenors' Proposed Findings of Fact  
and Conclusions of Law, and the original and 15 copies of the  
Industrial Intervenors' Post-hearing Statement of Issues and  
Positions, in the above docket. Also enclosed is a double-sided  
high density 5.25 inch floppy disk containing the above listed  
pleadings (titled BRIEF.; FACT.; P-H.STA) in WordPerfect 5.1 format  
as prepared on a MS-DOS 3.30 based computer.

Please acknowledge receipt of the above on the extra copies  
enclosed herein and return them to me. Thank you for your  
assistance.

Yours truly,  
*Joe McGlothlin*  
Joseph A. McGlothlin

JAM/bam  
Enclosures

*Finding* DOCUMENT NUMBER-DATE *Brief*

09078 SEP-1 1994

09077 SEP-1 1994

FPSC-RECORDS/REPORTING

*P/H statement*

DOCUMENT NUMBER-DATE

09076 SEP-1 1994

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Authority to ) DOCKET NO. 931044-EI  
Implement a Replacement Rate )  
Schedule for Stand-by Electric ) FILED: September 1, 1994  
Service by Gulf Power Company. )  
\_\_\_\_\_ )

THE INDUSTRIAL INTERVENORS' POST-HEARING  
STATEMENT OF ISSUES AND POSITIONS

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Pursuant to Rule 25-056(3), Florida Administrative Code, and Order No. PSC-94-0727-PCO-EI, Monsanto Company, Stone Container Corporation, and Champion International Corporation ("Industrial Intervenors") files its Post-Hearing Statement of Issues and Positions. Industrial Intervenors is simultaneously filing its brief and also its Proposed Findings of Fact and Conclusions of Law in which Industrial Intervenors' positions are explained in more detail.

INDUSTRIAL INTERVENORS' BASIC POSITION

The Replacement standby rate developed by Gulf Power and standby customers remedies the complexity and burdens of the old rate while providing cost-based incentives to customers to help Gulf avoid the necessity of adding generating capacity. Staff's concerns about revenue impact are speculative and de minimis; other customers won't be affected.

Statement of Issues and Positions

1. ISSUE: Is the Coordinated Maintenance Month (CMM) provision on the Standby and supplemental rate schedule appropriate?

\*Industrial Intervenors:

Yes. The replacement standby tariff recovers all costs of providing standby capacity through continuation of the reservation charge while the CMM encourages customers to maintain units during off peak months. Staff's fear that customers will artificially extend maintenance outages are unfounded; it is as

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inherently more efficient and more economical to self-generate.

2. ISSUE: Is the annual review of the Option A daily demand charge found on the Standby and Supplemental rate schedule appropriate?

\*Industrial Intervenors:

Yes. Staff's concern that Gulf's Option A may result in underbilling looks to the past. In the future, Southern will build only gas turbines. As Southern's load grows, supplemental energy from existing base-loaded units will be less available. Gulf's design limiting non-Se days to seven is appropriate.

3. ISSUE: ISSUE DELETED.

4. ISSUE: Should the Commission approve the Gulf Power's Standby and Supplemental rate schedule?

\*Industrial Intervenors:

Yes. The new rate is a product of two years of cooperative effort and negotiations resulting in a rate that reduces complexity in making operational decisions for the affected customers and helps the utility avoid the cost of adding generating capacity, all without negatively affecting other customers.

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Attorneys for the Industrial  
Intervenors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Industrial Intervenors' Post-hearing Statement of Issues and Positions has been furnished by U.S. Mail or by hand delivery\* to the following parties of record, this 1st day of September, 1994.

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