

DEPARTMENT OF THE AIR FORCE HIG USAF UTILITY LITIGATION TEAM TYNDALL AIR FORCE BASE FL. 32463

ORIGINAL FILE COPY

\$0 OCT 1990

Mr Steven Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee FL 32399-0870

> Re: Docket No. 891345-EI Gulf Power Company

Dear Mr Tribble

Enclosed are an original and fifteen copies of the Federal Executive Agencies' Cross-Motion for Reconsideration. Copies have been sent to the parties on the attached service list on this date.

Respectfully submitted

TERRIE M. GENT, Capt, USAF HQ USAF/ULT Stop 21 Tyndall AFB FL 32403-6001 (904) 283-6347

APP _____ CAF _____ CMU _____ CTR _____ EAG _____ LEG _____ OPC _____ RCH _____ SEC _____ WAS _____ OTH ____ OTH _____ OTH ____ OTH _____ OTH ____ OTH ____ OTH ____ OTH _____ OTH ____ OTH ____ OTH ____ OTH

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DOCUMENT NUMBER-DATE 09784 OCT 31 1990 FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Gulf Power) Company for an Increase in its) Docket No. 891345-EI Rates and Charges) Filed: October 25, 1990

FEDERAL EXECUTIVE AGENCIES' CROSS-MOTION FOR RECONSIDERATION

THE FEDERAL EXECUTIVE AGENCIES (FEA), pursuant to Rule 25-22.060(1)(b), Florida Administrative Code, join the motion of the Office of Public Counsel and move the Public Service Commission to reconsider: (1) its decision in Order No. 23573 to use a 12.55% return on equity to evaluate the amount of interim revenues subject to refund instead of the 12.05% return actually used to set rates on a going forward basis; and (2) its decision to reduce Gulf Power Company's allowed return on equity by only 50 basis points for management imprudence.

Reconsideration should be granted upon the grounds and for the reasons set out in the motion of the Office of Fublic Counsel.

Respectfully submitted,

TERRIE M. GENT, Capt, USAF HQ USAF/ULT Stop 21 (904) 283-6347

DOCUMENT NUMBER-DATE 2581 09784 OCT 31 1990 PPSC-RECORDS/REPORTING CERTIFICATE OF SERVICE DOCKET NO. 891345-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing FEDERAL EXECUTIVE AGENCIES' CROSS-MOTION FOR RECONSIDERATION has been furnished by U.S. Mail to the following parties on this 30th day of October 1990.

G. Edison Holland, Jr., Esq. Jeffrey A. Stone, Esq. Beggs & Lane P. O. Box 12950 Pensacola FL 32576-2950

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Joseph A. McGlothlin, Esq. Lawson, McWhirter, Grandoff & Reeves 522 E. Park Avenue, Suite 200 Tallahassee FL 32301

Jack Shreve, Esq. John Roger Howe, Esq. Assistant Public Counsel Office of the Public Counsel c/o The Florida Legislature 111 W. Madison St., Rm 801 Tallahassee FL 32399-1400 Mike Palecki, Esq. Division of Legal Services Florida Public Service Commission 101 E. Gaines Street Tallahassee FL 32399-0872

Mr Jack Haskins Gulf Power Company Corporate Headquarters 500 Bayfront Parkway Pensacola FL 32501

Ronald C. LaFace, Esq. Roberts, Baggett, LaFace & Richard P. O. Drawer 1838 Tallahassee FL 32302

TERRIE M. GENT, Capt, USAF

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