Gulf Power Company 500 Bayfront Farkway Post Office Box 1151 Pensacola FL 32520-0770 Telephone 904 444-6365



Jack L. Haskins
Manager of Rates and Regulatory Matters
and Assistant Secretary

the southern electric system.

January 3, 1994

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

Dear Mr. Tribble:

Re: Docket No. 930855-EU

Enclosed are an original and fifteen copies of the Preliminary Issue Statement of Gulf Power Company to be filed in the above

docket.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Statement in WordPerfect 5.1 format as prepared on a MS-DOS based computer.

Sincerely,

Tw

Enclosures

DOCUMENT HUMBER-DATE

00097 JAN-4 #

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:	Petition of Gulf Power)	
Company	to Resolve a Territorial)	Docket No.: 930855-EU
Dispute	with Gulf Coast Electric)	Filed: January 4, 1994
Cooperative, Inc.)	
_)	

PRELIMINARY ISSUE STATEMENT OF GULF POWER COMPANY

Gulf Power Company ["Gulf Power", "Gulf", or "the Company"], by and through its undersigned counsel, files this preliminary issue statement and identifies the following issues as relevant to the Florida Public Service Commission's determination in this docket:

- ISSUE 1: Would the provision of electric service to the correctional facility site by Gulf Coast Electric Cooperative, Inc. ["the Coop"] result in uneconomic duplication of facilities?
- ISSUE 2: Which party is more capable of providing adequate facilities to serve the correctional facility site at lowest initial cost?
- ISSUE 3: Which party is more capable of providing reliable electric service to the correctional facility site?
- ISSUE 4: Which party is capable of providing electric service to the correctional facility site at the lowest cost to the Department of Corrections?
- ISSUE 5: Should Gulf Power be awarded the authority to serve the correctional facility site?

DOCUMENT NUMBER - DATE

Respectfully submitted this day of January, 1994.

G. EDISON HOLLAND, JR.
Florida Bar No. 261599
JEFFREY A. STONE
Florida Bar No. 325953
TERESA E. LILES
Florida Bar No. 510998
Beggs & Lane
P.O. Box 12950
Pensacola, Florida 32576-2950
(904) 432-2451
Attorneys for Gulf Power
Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 3d day of January 1994 by U.S. Mail or hand delivery to the following:

Mary Anne Helton Staff Counsel FL Public Service Commission 101 East Gaines Street Tallahassee FL 32399-0863

John Haswell, Esquire Chandler, Lang & Haswell P. O. Box 23879 Gainesville FL 32602

Patrick Floyd, Esquire Gulf Coast Electric Coop. 408 Long Avenue Port St. Joe FL 32456

G. EDISON HOLLAND, JR.
Florida Bar No. 261599
JEFFREY A. STONE
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Attorneys for Gulf Power Company

LAW OFFICES

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CHANDLER, LANG & HASWELL, P.A.

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JAMES F. LANG
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TELEPHONE 904/376-5226
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211 N.E. FIRST STREET
GAINESVILLE, FL 32601-5367

WILLIAM H. CHANDLER 1920-1992

January 4, 1994

Steve Tribble, Clerk Florida Public Service Commission 101 E. Gaines Street Tallahassee, FL 32399-0854

In Re:

Petition of Gulf Power Company to Resolve a Territoria Dispute with Gulf

Coast Electric Cooperative, Inc. Docket No: Cooperative Unit Cooperative Coop

Dear Mr. Tribble:

I am enclosing herewith the original Certificate of Service to be attached to the Preliminary Issues sent to you on January 3, 1994 which I would appreciate your filing in the appropriate file.

Very truly yours,

John H. Haswell

JHH/gz Enclosure

DOCUMENT NO.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Gulf Power Company to Resolve a Territorial Dispute with Gulf Coast Electric Cooperative, Inc. Docket No. 930885-EU

I HEREBY CERTIFY that a copy of the Preliminary Issues has been furnished this 4th day of January, 1994 by facsimilie transmission to G. Edison Holland, Jr., Jeffrey A. Stone and Teresa E. Liles at (904) 469-3331.

John H. Haswell, Esquire

CHANDLER, LANG & HASWELL, P.A.

211 N.E. 1st Street

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Gainesville, FL 32602

(904) 376-5226

Florida Bar No. 162536