MEMORANDUM

November 4, 1998

TO: DIVISION OF RECORDS AND REPORTING

FROM: DIVISION OF AUDITING AND FINANCIAL ANALYSIS (VANDIVER)

RE: DOCKET NO. 980002-EG -- GULF POWER COMPANY CONSERVATION AUDIT REPORT - PERIOD ENDED MARCH 31, 1998 AUDIT CONTROL NO. 98-173-1-1

The above-referenced audit report is forwarded. Audit exceptions document deviations from the Uniform System of Accounts, Commission rule or order, Staff Accounting Bulletin and generally accepted accounting principles. Audit disclosures show information that may influence the decision process.

The audit was prepared using a micro computer and has been recorded on one diskette. The diskette may be reviewed using IBM compatible equipment and LOTUS 1-2-3 software. There are no confidential working papers associated with this audit.

Please forward a complete copy of this audit report to:

Gulf Power Company Warren E. Tate One Energy Place Pensacola, FL 32520-0780

DNV/sp Attachment cc: Chairman Johnson Commissioner Clark Commissioner Deason Commissioner Garcia Commissioner Jacobs Mary Andrews Bane, Deputy Executive Director/Technical Legal Services Division of Auditing and Financial Analysis (Devlin/Causseaux/ File Folder) Division of Electric and Gas (Colson) Tallahassee District Office (Hicks)

Research and Regulatory Review (Harvey) Office of Public Counsel





FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF AUDITING AND FINANCIAL ANALYSIS BUREAU OF AUDITING

Tallahassee District Office

GULF POWER COMPANY

CONSERVATION AUDIT

SIX MONTHS ENDED MARCH 31, 1998

DOCKET NO. 980002-EG AUDIT CONTROL NO. 98-173-1-1

e Buckley, Audit Manager

Rhonda Hicks, Audit Supervisor

TABLE OF CONTENTS

Ι.	AUDITOR'S REPORT P/ 0	GE
	PURPOSE	1
	DISCLAIM PUBLIC USE	1
	OPINION	1
	SUMMARY OF SIGNIFICANT FINDINGS	2
	SUMMARY OF SIGNIFICANT PROCEDURES	2

II. DISCLOSURES

1. H2O Purification	3
2. MIOX	4
3. ECCR Programs	5
4. Salaries and Benefits	o.
5. Order Number Correction	7
6. Advertising Contract	8
7. Legal Expenses	9

III. EXHIBITS

Company True-up		 23		3.3	 ų.	 		•	1	2	4	- 14	20			- 1	1	1	S.	-		23	a.	2			2	10	0
Interest Calculation	n		 (e)	 			 	•		 		• •	•		 	•										 		1	1

DIVISION OF AUDITING AND FINANCIAL ANALYSIS AUDITOR'S REPORT

October 30, 1998

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have applied the procedures described later in this report to audit the accompanying Energy Conservation Cost Recovery (ECCR) schedules for the historical 6-month period ended March 31, 1998, for Gulf Power Company. These schedules were prepared by the Utility as part of its ECCR filing in Docket No. 980002-EG. There is no confidential information associated with this audit.

This is an internal accounting report prepared after performing a limited scope audit. Accordingly, this report should not be relied upon for any purpose except to assist the Commission staff in the performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use.

In our opinion, the schedules referred to above present fairly, in all material respects, the Utility's books and records, maintained in conformity with the accounting practices prescribed by the Florida Public Service Commission. The attached findings discuss all differences and other matters which were noted during our examination.

SUMMARY OF SIGNIFICANT FINDINGS:

Two programs do not promote energy efficiency or conservation. Three of the programs have little or no activity. \$34,829 of legal expenses were charged to ECCR. Payroll and benefits of \$827,359 make up 72% of the expenses charged to ECCR.

SUMMARY OF SIGNIFICANT PROCEDURES:

Our audit was performed by examining, on a judgmental basis, certain transactions and account balances which we believe are sufficient to base our opinion. Our examination did not entail a complete review of all financial transactions of the company. Our more important audit procedures are summarized below.

CONSERVATION REVENUES: Traced the approved ECCR adjustment factors from the Commission's orders to the Utility's energy (KWH) sales during the six-month period to determine Conservation Revenues for True-up.

CONSERVATION EXPENSES: Traced all account balances for expenses from the Utility's filing to the Company's Monthly ECCR Program Category Expense Distribution Schedules and the Consolidated Register Summary, and then to the General Ledger to determine Conservation Expenses for True-up.

OTHER: Reconciled Company filed CT schedules to the Company's books and records. Obtained employee salaries charged to ECCR. Obtained a schedule calculating employee benefits. Determined advertising costs charged to ECCR. Researched selected invoices from Accounts Payable Detail Distribution Register.

DISCLOSURES

Disclosure No. 1

Subject: H2O Purification

Statement of Fact: The Company, under its research and development program, has a project to test the reliability of ozone as an alternative to chlorine as a disinfectant. A \$5,000 payment to Ozone Technology was charged to Account 908-1671.

Recommendation: This program does not promote energy efficiency or conservation. The \$5,000 charged to this program in October 1997 should be removed from ECCR.

Subject: Mixed Oxidant (MIOX)

Statement of Fact: The Company, under its research and development program, has a project to test the MIOX process to disinfect the water system for Panama City Beach. MIOX is a mixed oxidant technology which electrolytically produces a combination of oxidants for disinfection. \$2,000 was charged to Account 908-1671 for rental of an automated mixed oxidant generator, twin tower water softener and oxidant tank.

Recommendation: This program does not promote energy efficiency or conservation. The \$2,000 charged to this project in March 1998 should be removed from ECCR.

Subject: ECCR Programs

Statement of Fact: Little or no activity was performed in the following programs even though charges were made.

ECCR PROGRAM	ACTIVITY *	CHARGES T	O ECCR
		Payroll & Benefits	Other
1. In Concert With The Environment	0	\$12,034	\$15,199
2. Good Cents Environmental Home	0	\$8,743	
3. Duct Leakage Repair	3	\$17,586	\$6
4. Gulf Express Loan	Discontinued second quarter 199	\$10,357	\$17,275

Activity

1. No presentations made

2. No Good Cents Environmental Homes constructed

3. 3 duct leakage repair units completed compared to a goal of 50. October 1996 through September 1997 had 10 repair units completed compared to a goal of 107 with expenses of \$68,763.

Recommendation: These programs should be reviewed for elimination.

Subject: Salaries and Benefits

Statement of Fact: Salaries and Benefits comprise 72% of the total ECCR expenses. Total ECCR expenses were \$1,154,830 including salaries and benefits of \$827,359.

Recommendation: This fact combined with Disclosure 3 shows that salaries are being charged to ECCR even though no activity is taking place.

Subject: Order Number Correction

Statement of Fact: The Company cites FPSC Order No. 23461 in its direct testimony of January 13, 1998, direct testimony of July 14, 1998 and its final True-up, dated November 19, 1997. Order Number 23461 refers to Quincy Telephone.

Recommendation: This Number is incorrect. The Company apparently is referring to Order Number 23561. The Order Number should be corrected.

The Public Service Commission in Order PSC-93-0361-FOF-EG also cites Order Number 23461. It also should be Order Number 23561.

Subject: Advertising Contract

Statement of Fact: Gulf Power signed a contract with Lewis Advertising/Mobile on October 11, 1996 providing for monthly payment of fees of \$17,300. The company paid \$20,100 to Lewis Advertising each month in 1997. Gulf Power could not provide a contract authorizing the \$20,100 payments.

Recommendation: Signed contracts with approvals are a necessary control. Payments should not be made without a signed contract. If authorization can not be found, the difference between these amounts, \$18,600 for six months or \$37,200 for 12 months, should be taken out of ECCR and charged to a nonregulated account.

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Subject: Legal Expenses

Statement of Fact: Beggs & Lane, a private practice acting as General Counsel for Gulf, charged \$9,411.50 to Advanced Energy Management and \$25,418.00 to Commercial/Industrial Energy Audits/TAA.

Recommendation: This information is included for the analyst's review. Specific information was not provided.

GULF POWER COMPANY

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ENERGY CONSERVATION ADJUSTMENT For the Period October, 1997 through March, 1998

Conservation Revenues	OCTOBER	NOVEMBER	NOVEMBER DECEMBER	Audit	TANUARY	Residential Mail In Adjust	FEBRUARY	MARCH	101/1
1 a Residential Conservation Audit Fees b (Other Fees) c	808	888	888	888	888	888	888	888	888
2. Conservation Adjustment Revenues	235,022 23	215,381 88	245,631.74		229,559 17		205,490.41	182,757 56	1,314,042.99
3. Total Revenues	235.022 23	215,381 88	245,631 74	80	229,559.17	80	205.490 41	182,757 56	1.314.042.99
4 Adjustment not Applicable to Period - Prior True Up	27,962 42	27,962 42	27,962 42		27,962 42		21,962.42	27,962 38	167,774 48
5 Conservation Revenues Applicable to Period	262,984 65	243,344 30	273,794 16	000	257,521.59	80	233,452 83	210,719 94	1.461.817.47
6. Conservation Expenses (Form CT-3 Page 8)	29 01 0, 902	195,095.25	1E-999'0CZ	(1,706.85)	150,675 03	4,210.81	163,002 92	176.378 56	1.154.830.87
7 True Up this Period (Line 5 minus Line 6)	26,673.63	48,249 05	43,127.85	1,706.85	106,646 56	(4,210 81)	70,449 91	36.140.46	326 966 60
8 Interest Provesion thes Period (Page 10, Live 10)	3,054 68	18 807.0	3.914 22	57 48	4,126 32	(25 50)		4,475 93	24,265.51
9 True Up & Interest Provision Beginning of Month	793,702 34	796.068 43	78 080,028	53 0173 52	840,939.85	10 057,626	919,514 00	966, 325 06	AC 207.087
10 Prior True Up Collected or Retunded	(27,962 42)	(23,962.42)	(27.962 42)	80	(27,962 42)	000	(27,962 42)	(27,962 38)	(167.774 48)
End of Period-Net True Up	796.068 43	18 0 000 87	10,057,058 43 620,093 87 639,173 52 640,939 65 620,058 10,057	840,939 85	10 057,028	919,514 00	906.325 06	977.179.97	977 179 97

- 10 -

Florida Public Service Commission Docket No. 980002-EG GULF POWER COMPANY July 14, 1998 CT-3 Page 4 of 5

GULF POWER COMPANY

ENERGY CONSERVATION ADJUSTMENT For the Period October, 1997 through March, 1998

Interest Provision	OCTOBER	NOVEMBER	DECEMBER	Audit Adjustment	JANUARY	Residential Mail In Adjust	FEBRUARY	MARCH	TOTAL
1. Beginning True up Amount	793,702 34	796,058 43	820,093 87		840,939 85		919,514 00	966,325.06	
2 Ending True up before interest	792,413 75	816,355.06	835,259.30		919,623 99		962,001 49	972,704 04	
3 Total beginning & ending	1,588,116 09	1,612,423.49	1,655,353 17	0.00	1,780,563 84	0.00	1,681,515 49	1,939,029.10	
4 Average True up Amount	793.058 05	806,211 75	827,676 59	0 00	880,281 92	0 00	940,757 75	969,514 55	
5 Interest Rate First Day Reporting Business Month	5 5300	5 5300	5 6000	0 0000	5 7500	0 0000	5 5000	5 5300	
6 Interest Rate First Day Subsequent Business Month	5 5300	5 6000	5 7500	0 0000	5 5000	0 0000	5 5300	5 5500	
7 Total of Lines 5 and 6	11 0600	11 1300	11 3500	0 0000	11 2500	0 0000	11 0300	11 0800	
8. Average Interest rate (50% of Line 7)	5 5300	5 5650	5 6750	C 0000	5 6250	0 0000	5 5150	5 5400	
9 Monthly Average Interest Rate Line 8 \ 12	0.004608	0 004638	0 004729	000000	0 004688	6 000000	0 004595	0 004617	
10 Interest Provision (line 4 X 9)	3,654 68	3.738.81	3.914 22	57.48	4,126 32	(25.50)	4,323 57	4,475 93	24,265 51

- 11 -

Sorida Public Service Commission Corket No. 980002-EG CLY POWER COMPANY Liy 14. 1998 T-1 age 5 of 5

STATE OF FLORIDA

Commissioners: Julia L. Johnson, Chairman J. Terry Deason Susan F. Clark Joe Garcia E. Leon Jacobs, Jr.



DIVISION OF RECORDS & REPORTING BLANCA S. BAYÓ DIRECTOR (850) 413-6770

Public Service Commission

November 6, 1998

Warren E. Tate Gulf Power Company One Energy Place Pensacola, Florida 32520-0780

> Re: Docket No. 980002 - EG - Gulf Power Company Audit Report - Conservation - Period Ended March 31, 1998 Audit Control # 98-173-1-1

Dear Mr. Tate:

The enclosed audit report is forwarded for your review. Any company response filed with this office within ten (10) work days of the above case will be forwarded for consideration by the staff analyst in the preparation of a recommendation for this case.

Thank you for your cooperation.

Sincerely,

Blanca S. Bavó

BSB/abf Enclosure cc: Division of Audit and Financial Analysis