State of Florida		ORIGINAL	()
		Public Service Commission -M-E-M-O-R-A-N-D-U-M-	X
DATE: TO:	AUGUST 25, 1999	AND GAS (BREMAN)	-
FROM:	DIVISION OF ELECTRIC AND GAS (BREMAN) DENISE N. VANDIVER; DIVISION OF AUDITING AND FINANCIAL ANALYSIS ()		
RE:	DOCKET NO. 990007-EI; GULF POWER COMPANY RESPONSE TO ENVIRONMENTAL AUDIT REPORT; 15 MONTHS ENDED DECEMBER 31, 1998 - AUDIT CONTROL NO. 99-042-1-1		
(Gulf Power Company submit	ted the attached comments regarding the recent	

environmental audit completed by the Bureau of Auditing. These comments are forwarded for your review.

Attachment

cc: Division of Records and Reporting Division of Auditing and Financial Analysis (Devlin/Causseaux/Harvey/File Folder) Tallahassee District Office (Hicks) Division of Legal Services

Office of Public Counsel

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August 17, 1999

Ms. Denise Vandiver Bureau Chief – Auditing Services Division of Auditing and Financial Analysis Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee FL 32399-0865

Dear Ms. Vandiver:

RE: Docket No.- 2000 II. Report Environmental – 15 Months Ended December 31, 1998 Audit Control No.

Attached is Gulf Power Company response to the above mentioned audit report.

Sincerely,

Swan D Ritenow

Susan D. Ritenour Assistant Secretary and Assistant Treasurer

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Attachment

cc: Beggs and Lane J. A. Stone, Esquire Gulf Power Company Linda C. Davis

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Gulf Power Company Docket No. 990007-El Environmental Clause Audit Control No. 99-042-1-1 Audit Response to Exception No. 1

Gulf Power Company's Response to Audit Opinion for Exception No.1

Commission Order No. PSC-94-0044-FOF-EI states that Gulf Power Company is not precluded from using a work order system to capture environmental cost. Currently, capital costs and plant balances are charged to separate work orders in Gulf's plant accounting system. These work orders are accumulated under plant expenditure projects designated for environmental charges only.

The plant accounting system provides a complete and accurate audit trail and easy access to reports and detail information which support the ECRC capital costs. Current year and some prior year data are maintained in the plant system database. Other prior year data is available on microfiche. The audit request to reconcile three ECRC plant balances involved multiple projects and work orders from prior years. The request also asked that Gulf Power provide the auditor with complete documentation of the amounts involved and that we cross-reference those amounts so the auditors could understand with minimal assistance how the plant-in-service amounts reconciled to the general ledger. A large part of the time Gulf spent complying with this audit request involved making copies of applicable plant accounting reports, Company operating reports and the Company's consolidated general ledger for periods from 1991-1998, which supported the reconciliation process. A substantial amount of time was also spent cross-referencing and documenting the reconciliation process for the auditors, as requested, so they could follow the process with minimal assistance.