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December 7, 2006

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

Re: Docket No. 060198-EI

Pursuant to Staff's request at the October 10, 2006, Workshop, attached is additional comments by Gulf Power Company to Staff's proposed storm initiative metrics to be filed in the above referenced docket.

Sincerely,

Susan D. Ritenour (lw)

lw

cc: Beggs and Lane
Russell A. Badders, Esquire

GULF POWER COMPANY'S

ADDITIONAL COMMENTS ON STAFF'S PROPOSED STORM INITIATIVE METRICS

Docket No. 060198

December 7, 2006

As requested in the October 30, 2006, FPSC Workshop, Gulf Power provides the following additional comments in regards to the annual performance metric requirements related to the Storm Preparedness Plans in Order No. PSC-06-0781-PAA-EI. These comments revise the previous Initiative 8 comments filed on October 17, 2006.

Initiative 8 – Increase Coordination with Local Governments

Gulf's Comments:

Gulf Power proposes to satisfy the annual reporting requirements of Initiative 8 (Coordination with Local Governments) through a combination of survey questions and quantitative metrics.

The following are suggested Survey Questions to include in a survey of County EOC Directors at the end of each year to gauge utility cooperation with local governments. It would be the responsibility of the utility to have the surveys completed and submitted to the FPSC by March 1 of each year.

1. Did the utility participate in all county hurricane drills during the year? How many were held?
2. Is the utility responsive to emergency operation requests for critical facility restorations?
3. Does the utility have an ongoing presence in the Emergency Operation Center when a hurricane threatens?
4. Has the utility identified specific personnel as contacts for the county EOC?
5. Does the utility participate in public information releases and press briefings with the county during hurricane operations?
6. How do you rate the utility's storm and restoration coordination efforts -- poor, adequate or outstanding?
7. In what areas do you think the utility can improve its coordination with local government?

The following are suggested Quantitative Metrics to be submitted by each electric utility.

1. How many emergency operations drills were conducted by local government in the previous year? How many did Gulf Power actively participate in?
2. How many Community Leader Forums did Gulf Power participate in the past year?