

Susan D. Ritenour
Secretary and Treasurer
and Regulatory Manager

One Energy Place
Pensacola, Florida 32520-0781

Tel 850.444.6231
Fax 850.444.6026
SDRITENO@southernco.com



March 14, 2008

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

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COMMISSION
CLERK

Dear Ms. Cole:

RE: Docket No. 080001-EI

Enclosed is the original and five copies of Gulf Power Company's response to Staff's Data Request dated March 4, 2008.

Sincerely,

CMP 1 *Susan D. Ritenour*
bah

COM _____

CTR _____

ECR 1 bh

GCL 2 Enclosures

OPC _____

RCA 1 cc: Beggs & Lane
Jeffrey A. Stone, Esq.

SCR _____

SGA _____

SEC _____

OTH _____

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DOCUMENT NUMBER-DATE

01949 MAR 17 08

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost**)
Recovery Clause with Generating)
Performance Incentive Factor)

Docket No.: **080001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this 14TH day of March, 2008, on the following:

John T. Burnett, Esq.
Progress Energy Service Co.
P. O. Box 14042
St. Petersburg FL 33733-4042

Mehrdad Khojasteh
Florida Public Utilities Company
P. O. Box 3395
West Palm Beach FL 33402-3395

Lisa Bennett, Esq.
FL Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0863

John T. Butler, Esq.
Senior Attorney for Florida
Power & Light Company
700 Universe Boulevard
Juno Beach FL 33408-0420

R. Wade Litchfield, Esq.
Associate General Counsel for
Florida Power & Light Company
700 Universe Boulevard
Juno Beach FL 33408-0420

Jeffrey S. Bartel
Vice President
Florida Power & Light Co.
215 S. Monroe Street, Ste. 810
Tallahassee FL 32301-1859

John W. McWhirter, Jr., Esq.
Attorney for Florida Industrial
Power Users Group
McWhirter Reeves & Davidson
400 N Tampa St., Suite 2450
Tampa FL 33602

Lee L. Willis, Esq.
James D. Beasley, Esq.
Attorneys for Tampa Electric Co.
Ausley & McMullen
P. O. Box 391
Tallahassee FL 32302

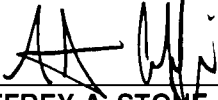
Paula K. Brown, Administrator
Regulatory Coordination
Tampa Electric Company
P. O. Box 111
Tampa FL 33601

Paul Lewis, Jr.
Progress Energy Florida, Inc.
106 E. College Ave., Ste. 800
Tallahassee FL 32301-7740

Patricia Ann Christensen, Esq.
Office of Public Counsel
111 W. Madison St., Room 812
Tallahassee FL 32399-1400

Norman H. Horton, Jr., Esq.
Messer, Caparello & Self, P.A.
P. O. Box 15579
Tallahassee FL 32317

Michael B. Twomey
Attorney for AARP
P. O. Box 5256
Tallahassee FL 32314-5256



JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 007455
STEVEN R. GRIFFIN
Florida Bar No. 0627569
BEGGS & LANE
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power Company

Currently, companies typically file hedging plans for the projected year in September of the current year. Companies also typically file the results of their hedging programs for the true-up year in April of the current year.

1A. What comments does GULF have regarding the timing of reports on hedging activities?

ANSWER:

The Company has no comments on this item.

1B. Should the Commission determine the prudence of utility hedging plans for the projected year?

ANSWER:

The Commission should review and approve the Risk Management Plan for Fuel Procurement filed annually and determine the prudence of actual implementation of the plan.

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FPSC-COMMISSION CLERK

With this next set of questions, staff is seeking to understand the relationship of fuel procurement and hedging activities.

- 2A. Does an electric utility's participation in financial hedging activities for residual oil and natural gas make it a more effective purchaser of residual oil and natural gas? Please explain.

ANSWER:

Currently, Gulf's procurement of physical natural gas and price risk mitigation using financial hedges are completely separate activities. The fact that Gulf engages in financial hedging does not impact how physical natural gas is procured or the terms of that procurement activity. Gulf purchases natural gas utilizing firm supply agreements priced at market.

If financial hedging was eliminated as a price risk mitigation tool available to Gulf, Gulf would propose to continue procurement of natural gas in the same manner as it does today.

Gulf believes that physical price hedging through the utilization of fixed price gas procurement agreements would make it a less effective purchaser of natural gas. Physical price hedging introduces unacceptable levels of supply risk into gas supply agreements.

- 2B. Does an electric utility's participation in financial hedging provide it with information that allows it more accurate and timely price discovery and enhanced ability to evaluate specific deals and proposals from suppliers?

ANSWER:

No, that information would be available regardless of participation in a financial hedging program.

NOTE: Please refer to the attached tables and graphs for the remaining questions. Table 1 shows NYMEX Last-Trading-Day Settlement Prices for the month-ahead and the following 17 months, for June 1996 through January 2008. Staff views the month-ahead price as the "current market price." Table 2 shows the differences between the month-ahead settlement price and comparable month's futures prices for from one to 17 months. Graphs 1.1 through 1.4 show the month-ahead prices and the same month's futures prices for contracts purchased six, nine, twelve, and fifteen months earlier. Graphs 2.1 through 2.4 show the differences between the prices graphed in Graphs 1.1 through 1.4, or the difference from Table 2, for the six-month, nine-month, twelve month, and fifteen-month columns.

3. Do the prices in Table 1 agree with the historical market prices used by GULF? If your response is no, please explain what the historical market prices are that are used by GULF.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

4. Does GULF agree that the differences in Table 2 and Graphs 2.1 through 2.4 resemble the hedging gains and losses that would have been realized over the 140-month period, had the Last-Trading-Day Settlement Prices been realized (ignoring transactions costs)? If your response is no, please explain.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

5. Does GULF agree that, on the average, the differences in Table 2 and Graphs 2.1 through 2.4 resemble the hedging gains and losses that would have been realized over the 140-month period, had the Last-Trading-Day Settlement Prices NOT been (exactly) realized? Explain your response.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

6. Does GULF agree that during the natural gas "price spikes" in 2000-2001 (all graphs), 2002-2003 (6- and 9-month graphs), and 2005-2006 (all graphs), large gains would have been realized by anyone purchasing futures contracts several months in advance and selling those contracts during the high-price periods? Explain your response.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

7. Does GULF agree that following the high-price periods, beginning in 2001 and again in 2003, losses would have been realized by anyone purchasing futures contracts several months in advance and selling those contracts during the lower-than-high-price periods (the periods immediately following the high-price periods)? Explain your response.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

8. Does GULF agree that immediately following the 2000-2001 and 2002-2003 price spikes, losses would have been realized for only about twelve months? Explain your response.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

9. Does GULF agree that between the each of the 2000-2001 and 2002-2003 price spikes and the twelve-month periods immediately following each of those periods, gains and losses would have roughly cancelled each other, and price stability would have resulted for anyone purchasing futures contracts several months in advance and selling those contracts during the lower-than-high-price periods, and using the gains and losses to offset "market price volatility"? Explain your response.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

10. Does GULF agree that losses are still occurring roughly 24 months after the 2005-2006 price spike? Explain your response.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

11. Can GULF tell us why, roughly 24 months after the 2005-2006 price spike, futures prices are still one to two dollars above their comparable current market prices?

ANSWER:

The market incorporates risk and uncertainty around gas supply and demand into future prices. At this time the perception of the market is that this risk and uncertainty is higher in the future.

12. Should another price spike occur in the near future, with regard to natural gas market prices and futures prices, does GULF think that the period following the spike would resemble the period following the 2000-2001 and 2002-2003 spikes, or the period following 2005-2006 price spike? Why?

ANSWER:

We simply do not know what gas prices may do in the future in response to changes in market conditions. There are many variables that influence the market price of natural gas and there have been fundamental changes in the market since these prior year events occurred.

13. In carrying out hedging activities to achieve reduced price volatility, does GULF regard "volatility" as 1) unknown prices in future periods, or 2) period-to-period price variability?

ANSWER:

Gulf does not regard volatility as unknown prices in future periods. Since the price Gulf pays for the gas it purchases is indexed to a daily FGT Zone 3 price, price volatility would be measured most effectively by determining the standard deviation of this daily gas price over as long a period as reasonable.

14. Generally, the longer the refund/recovery period for refunding over recoveries or recovering under recoveries, the smoother will be the period-to-period recovery factors. Agree? Explain your response.

ANSWER:

All else remaining constant, Gulf agrees that spreading an over or under-recovery amount over a longer period of time will result in a smoothing effect. However, Gulf does not agree with the statement in its entirety due to other factors affecting period-to-period recovery factors, such as changes in the Company's over or under-recovery position and changes in projected fuel costs in future periods.

15. Is this truer for under recoveries than it is for over recoveries?

ANSWER:

No. See response to item no. 14.

16. If an under recovery is extraordinarily small (negative sign, large number of dollars) or an over recovery is extraordinarily large (positive sign, large number of dollars), what benefit is there to ratepayers deferring part of the amount beyond the next immediate recovery period?

ANSWER:

With respect to under-recoveries, deferring large under-recovery amounts into multiple subsequent years will result in lower fuel rates for the immediate projection period. However, the long-term cumulative effects of compounding under-recovery balances could negate any short-term benefit to the ratepayer by carrying large under-recovery balances into years where rates otherwise may have decreased.

With respect to over-recoveries, deferring large over-recovery amounts into multiple subsequent years will result in higher fuel rates for the immediate projection period, and although customers would receive interest on the unrefunded balance, they would not receive the immediate benefit of the refund.

17. As future months draw nearer, if you realize that your natural gas (heavy oil) needs are going to be lower than anticipated when swaps were initiated, do you reverse your short positions to maintain your percentage of hedged MMBtu's (barrels)?

ANSWER:

Not necessarily, we evaluate the economics of the options available and make adjustments to the hedge positions that we believe provide the most benefit to the customer.

Table 3 shows the estimated End-of-Period Total Net True-ups [Column (c)], estimated Total Fuel Revenue [Column(d)], and estimated Fuel Revenue Applicable to Period [Column (f)] for the last five years' reprojected estimates. The table also shows over-recovery percentages based on total revenue [Column (e)] and over-recovery percentages based on applicable revenue [Column (g)]. The percents are also based on reprojected estimates.

18. Do you agree that the amounts in Table 3 are correct for GULF? If not, please provide corrected dollar amounts.

ANSWER:

The Company agrees that the amounts in Table 3 are correct for Gulf.

19. Do you agree that the percents in Column (g) are calculated according to the mid-course percent method adopted in 2007 (Order No. PSC-07-0333-PAA-EI)? If not, please provide corrected percents.

ANSWER:

Gulf agrees, recognizing that the current mid-course methodology adopted in 2007 is applied to periods prior to issuance of the order referenced above.

20. Although none of the four large IOU's have petitioned for mid-course corrections since early 2003, do you agree that during the previous five years, your mid-course percents have been greater than 10 percent, at least at the times that some of the estimated revenues and expenses were "reprojected." If you disagree, please explain.

ANSWER:

Gulf agrees that on two occasions in the identified period, pursuant to the Commission's "mid-course correction" policy, Gulf determined that its estimated end-of-period net true-up amount for fuel and purchased power (energy) costs for the period crossed the applicable 10% threshold and provided the required notice to the Commission regarding this determination. In both instances, Gulf reported to the Commission that it was not seeking a mid-course adjustment to its fuel cost recovery factors.

21. Please indicate the years from 2003 through 2007 in which hedging gains or losses prevented the percents in columns (e) and (g) from being less than -10% or greater than +10% at the time that the estimates were reprojected.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.

22. Please indicate the years from 2003 through 2007 in which hedging gains or losses caused the percents in columns (e) and (g) to be greater than -10% or greater than +10% at the time that the estimates were reprojected.

ANSWER:

The Company will respond to this item no later than Friday, March 21, 2008.