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April 7, 2011

110097-EG

RECEIVED
11 APR -8 PM 11:00
COMMISSION
CLERK

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

Dear Ms. Cole:

Enclosed for official filing are an original and seven copies of the Petition for Approval of Modifications to Rate Schedule RSVP- Residential Service Variable Pricing Limited Availability Rate (RSVP) to Gulf Power Company's Tariff Sheet Nos. 6.75, 6.76 and 6.77. A coded copy of the tariff sheets has been provided to show the changes to the existing tariff sheets. Also enclosed is an electronic version of the Petition as prepared in Microsoft Word on a Windows XP System.

Sincerely,

Terry A. Davis

nbm

Enclosures

- COM _____
- APA _____
- ECR _____
- GCL _____
- RAD _____
- SSC _____
- ADM _____
- OPC _____
- CLK _____

cc: Beggs & Lane
Jeffrey A. Stone, Esq.
Florida Public Service Commission
Mark Futrell
Connie Kummer

containing Petition also fwd.

8 files also fwd.

DOCUMENT NUMBER-DATE
02369 APR-8 =
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to approve revisions to)
Tariff Sheet Nos. 6.75, 6.76 and 6.77;)
Rate Schedule RSVP --Residential)
Service Variable Pricing)

Docket No. 110097-EG

Filed: April 7, 2011

**PETITION TO APPROVE REVISIONS TO TARIFF SHEET NOS. 6.75, 6.76
AND 6.77, RATE SCHEDULE RSVP --RESIDENTIAL SERVICE VARIABLE PRICING**

Gulf Power Company ("Gulf Power," "Gulf," or "the Company") hereby petitions this Commission for approval of revisions to Gulf Power's Tariff Sheet Nos. 6.75, 6.76 and 6.77. In support of this petition, Gulf Power states as follows:

1. The name and address of the affected agency is:

Florida Public Service Commission
2540 Shumard Oaks Boulevard
Tallahassee, Florida 32399-0850

2. Gulf Power's corporate headquarters are located at 500 Bayfront Parkway, Pensacola, Florida, 32520. Notices and communications with respect to this petition should be addressed to:

Jeffrey A. Stone
Russell A. Badders
Steven R. Griffin
Beggs & Lane
P.O. Box 12950
Pensacola, Florida 32591

Susan D. Ritenour
Secretary and Treasurer
One Energy Place
Pensacola, Florida 32520-0780

3. Gulf Power is a public utility subject to Commission jurisdiction pursuant to Chapter 366, Florida Statutes.

4. As discussed in more detail below, this filing is intended to facilitate the implementation of Gulf Power's new EnergySelect[®] LITE program which was approved in connection with Gulf Power's Demand-Side Management ("DSM") Plan. Exhibits "A" and "B"

DOCUMENT NUMBER-DATE

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02369 APR-8 =

FPSC-COMMISSION CLERK

to this petition contain Gulf Power's proposed tariff revisions in legislative format and clean copy format, respectively, Section No. VI, Second Revised Sheet No. 6.75, Second Revised Sheet No. 6.76 and First Revised Sheet No. 6.77 of Gulf Power's Retail Tariff Rate Schedule RSVP --Residential Service Variable Pricing ("Rate Schedule RSVP").

5. Rate Schedule RSVP is available as an alternative to Gulf Power's standard residential rate --Rate Schedule RS-- for customers who are enrolled in Gulf Power's EnergySelect[®] program. EnergySelect[®] is an interactive energy management system that allows residential customers to program their central heating and cooling system, electric water heater and pool pump, if they have one, to automatically respond to varying prices of electricity depending upon the time of day, day of week and season. These prices are in relation to the Company's cost of producing or purchasing energy. EnergySelect[®] consists of three elements; a custom-designed programmable thermostat, the RSVP rate featuring four different prices for electricity, and a communications gateway that facilitates two-way communication between the utility and the customer's home.

6. As part of Gulf Power's recently approved DSM Plan,¹ the Company proposed a new program titled EnergySelect[®] LITE. The EnergySelect[®] LITE program was proposed as a separate and complementary program offering to the EnergySelect[®] program. EnergySelect[®] LITE is designed to provide expanded price responsive load management program participation from residential customers who do not meet the participation standards for EnergySelect[®]. The EnergySelect[®] LITE program does not require landline telephone service and will be available to multi-family customers. The program is an interactive energy management system which allows residential customers to program their central heating and cooling system to automatically

¹ The Commission approved Gulf Power's DSM Plan in Order No. PSC-11-0114-PAA-EG dated February 11, 2011.

respond to varying prices of electricity depending upon the time of day, day of week and season, in relation to the Company's cost of producing or purchasing energy.

7. In the DSM Plan program description of EnergySelect[®] LITE, Gulf indicated that it would submit a new rate schedule for EnergySelect[®] LITE following approval of the program.² In order to facilitate introduction of EnergySelect[®] LITE, while avoiding the potential customer confusion from two different rate schedules for EnergySelect[®] LITE and EnergySelect[®], Gulf proposes to use a modified version of its existing Rate Schedule RSVP for both programs.

8. The first modification removes the Equipment Requirements from the Rate Schedule. Since the equipment requirements are different for the EnergySelect[®] and EnergySelect[®] LITE programs, they have been addressed in the programs' respective DSM program participation standards which were filed with the Commission on April 1, 2011. (Document No. 02152-11, Docket No. 100154-EG) The second modification eliminates the \$4.95 monthly customer participation charge. Gulf proposes to eliminate the monthly participation charge for multiple reasons. First, the EnergySelect[®] LITE program does not presently facilitate the same level of bill savings opportunities as EnergySelect[®] given that it only provides thermostat (temperature) control. In addition, elimination of the monthly participation charge will increase the availability of both programs to low-income customers and others whose bill savings do not outweigh this monthly fee. Removal of the fee will also help prevent potential migration of participants away from the legacy EnergySelect[®] program and reduce program turnover due to bill savings concerns. A final modification to Rate Schedule RSVP eliminates the reinstallation charge. Elimination of this reinstallation charge is expected

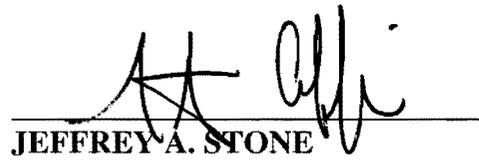
² Gulf Power's proposed program participation standards for EnergySelect[®] LITE provide that "[p]articipation is contingent on the availability of an applicable rate schedule." See, Page 22.

to remove a barrier to former EnergySelect[®] customers who no longer have a landline --but who do have broadband internet capabilities-- from participating in EnergySelect[®] LITE.

9. The evolution of Gulf's EnergySelect[®] program further supports the modifications described above. At the time of the Company's DSM Plan filing, the Company expected to operate its EnergySelect[®] and EnergySelect[®] LITE programs independently. In the program description, Gulf Power explained that EnergySelect[®] LITE differs from EnergySelect[®] in two respects: (1) it utilizes equipment that does not require a landline telephone for communication; and (2) it only allows control of the customer's heating and cooling equipment. Subsequent to the filing of Gulf Power's DSM Plan, the Company's vendor, Comverge, announced the planned availability of additional load control equipment in late 2011. This additional equipment will effectively allow EnergySelect[®] LITE to duplicate the functionality of Gulf's current EnergySelect[®] program. Specifically, Comverge's new load control equipment will allow control of electric water heating and one additional large appliance like a pool pump. The availability of this new generation of equipment also resolves the main barrier to qualification for EnergySelect[®] - a landline telephone. Once the functionality of the EnergySelect[®] LITE technology duplicates the legacy program, there will be no need to operate two independent programs thereby obviating the need for two separate rate schedules.

WHEREFORE Gulf Power respectfully requests that the Commission approve this petition and the modifications as set forth in Exhibits "A" and "B" attached hereto.

Respectfully submitted this 7th day of April, 2011.

A handwritten signature in black ink, appearing to read "Jeffrey A. Stone", is written over a horizontal line.

JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

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Attorneys for Gulf Power Company

EXHIBIT A

Tariff Sheet

DOCUMENT NUMBER-DATE

02369 APR-8 =

FPSC-COMMISSION CLERK

**RATE SCHEDULE RSVP
RESIDENTIAL SERVICE VARIABLE PRICING
LIMITED AVAILABILITY RATE
(Optional Schedule)**

URSC: RS1

PAGE	EFFECTIVE DATE
1 of 4	

AVAILABILITY:

Available, subject to equipment availability, to customers eligible for Rate Schedule RS (Residential Service). Availability is limited to those customers enrolled in the EnergySelect® programs.

APPLICABILITY:

Applicable as an alternative to Rate Schedule RS for service used for domestic purposes at an individually metered dwelling unit suitable for year-round family occupancy containing full kitchen facilities. Service provided hereunder shall not be shared with or resold to others. Service is provided only with the owner's permission.

INSTALLATION AND REMOVAL:

Energy management equipment will be installed at the Customer's residence upon the Customer's request for service under Rate Schedule RSVP at no charge to the Customer. Gulf Power will provide the necessary energy management equipment for use on the Customer's premises. Customer will provide Gulf Power and its agents with reasonable access to the premises for installing, maintaining, inspecting, testing, and/or removing Company-owned equipment.



Section No. VI
Third Revised Sheet No. 6.76
Canceling Second Revised Sheet No. 6.76

PAGE	EFFECTIVE DATE
2 of 4	

(Continued from Rate Schedule RSVP, Sheet No. 6.75)

If a Customer moves into a residence with existing Company-owned energy management equipment, the Customer will receive service under Rate Schedule RSVP. The Customer will be given the option of remaining on Rate Schedule RSVP or moving to Rate Schedule RS. If the Customer chooses Rate Schedule RS at that time, Company-owned energy management equipment will be removed free of charge.

CHARACTER OF SERVICE:

Available for single-phase service from local distribution lines of the Company's system at nominal secondary voltage of 120/240 volts. Service shall be metered through one metering device capable of measuring electrical energy consumption during the various times each energy demand charge is in effect.

MONTHLY RATES:

Customer Charge: \$10.00

Energy Demand Charge:

Low Cost Hours (P ₁):	1.785¢ per KWH
Medium Cost Hours (P ₂):	3.021¢ per KWH
High Cost Hours (P ₃):	7.598¢ per KWH
Critical Cost Hours (P ₄):	28.500¢ per KWH

Fuel Charge: Fuel charges are normally adjusted by the Florida Public Service Commission annually in January. For current fuel costs included in this tariff, see Sheet No. 6.34.

PAGE	EFFECTIVE DATE
3 of 4	

(Continued from Rate Schedule RSVP, Sheet No. 6.76)

DETERMINATION OF PRICING PERIODS:

Pricing periods are established by season for weekdays and weekends. The pricing periods for price levels P₁, P₂, and P₃ are as follows:

May through October

	<u>P₁</u>	<u>P₂</u>	<u>P₃</u>
Weekdays	11 P.M. - 6 A.M.	6 A.M. - 1 P.M. 6 P.M. - 11 P.M.	1 P.M. - 6 P.M.
Weekends	11 P.M. - 6 A.M.	6 A.M. - 11 P.M.	-----

November through April

	<u>P₁</u>	<u>P₂</u>	<u>P₃</u>
Weekdays	11 P.M. - 5 A.M.	5 A.M. - 6 A.M. 10 A.M. - 11 P.M.	6 A.M. - 10 A.M.
Weekends	11 P.M. - 6 A.M.	6 A.M. - 11 P.M.	-----

The pricing periods for price level P₄ shall be determined at the sole discretion of the Company. Each customer will be notified by electronic signal at least one half hour prior to the start of price level P₄.

The pricing periods for the following observed holidays will be the same as the weekend hour price levels for the month in which the holiday occurs:

- | | |
|------------------|---------------|
| New Year's Day | Memorial Day |
| Independence Day | Labor Day |
| Thanksgiving Day | Christmas Day |

MINIMUM BILL:

In consideration of the readiness of the Company to furnish such service, a monthly charge will be made of not less than the Customer charge.

DEPOSIT:

A deposit amounting to twice the estimated average monthly bill may be required before service is connected at designated premises. The deposit may be applied to any final bills against the Customer for service.

Legislative Format

**RATE SCHEDULE RSVP
RESIDENTIAL SERVICE VARIABLE PRICING
LIMITED AVAILABILITY RATE
(Optional Schedule)
URSC: RS1**

PAGE 1 of 4	EFFECTIVE DATE June 7, 2002
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AVAILABILITY:

Available, subject to equipment availability, to customers eligible for Rate Schedule RS (Residential Service). Availability is limited to those customers ~~who meet certain equipment requirements described below~~ enrolled in the EnergySelect® programs.

APPLICABILITY:

Applicable as an alternative to Rate Schedule RS for service used for domestic purposes at an individually metered dwelling unit suitable for year-round family occupancy containing full kitchen facilities. Service provided hereunder shall not be shared with or resold to others. Service is provided only with the owner's permission.

EQUIPMENT REQUIREMENTS:

- ~~(1) Touch-tone phone service.~~
- ~~(2) Service entrance panel or house power panel rated at 200 amps or less.~~
- ~~(3) Central heating and air conditioning that is compatible with Company installed energy management equipment.~~
- ~~(4) Electric water heaters, pool pumps, or other devices controlled by equipment provided through the program must be no larger than 30 amps and 240 volts each and compatible with Company installed energy management equipment.~~
- ~~(5) Electric wiring must be conducive to power line carrier messaging.~~
- ~~(6) Residence must be located in an area capable of meeting a paging strength standard.~~
- ~~(7) Existing meter configuration must be capable of incorporating the energy management equipment.~~

INSTALLATION AND REMOVAL:

Energy management equipment will be installed at the Customer's residence upon the Customer's initial request for service under Rate Schedule RSVP at no charge to the Customer. ~~If this same Customer requests service at the same residence under Rate Schedule RSVP after returning to Rate Schedule RS, the Customer will be billed \$179.00 for installation costs and, thereafter, billed under Rate Schedule RSVP.~~ Gulf Power will provide the necessary energy management equipment for use on the Customer's premises. Customer will provide Gulf Power and its agents with reasonable access to the premises for installing, maintaining, inspecting, testing, and/or removing Company-owned equipment.



Section No. VI
Third~~Second~~ Revised Sheet No. 6.76
Canceling ~~Second~~First Revised Sheet No. 6.76

PAGE 2 of 4	EFFECTIVE DATE June 7, 2002
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(Continued from Rate Schedule RSVP, Sheet No. 6.75)

~~If a Customer has taken service under Rate Schedule RSVP two separate times at the same residence then requests to be moved back to Rate Schedule RS, the Customer will be billed \$109.00 for removal costs and thereafter billed under Rate Schedule RS.~~

If a Customer moves into a residence with existing Company-owned energy management equipment, the Customer will receive service under Rate Schedule RSVP with no participation charge for a period of three months. At the end of three months, the Customer will be given the option of remaining on Rate Schedule RSVP (and thereafter paying the monthly participation charge) or moving to Rate Schedule RS. If the Customer chooses Rate Schedule RS at that time, Company-owned energy management equipment will be removed free of charge.

CHARACTER OF SERVICE:

Available for single-phase service from local distribution lines of the Company's system at nominal secondary voltage of 120/240 volts. Service shall be metered through one metering device capable of measuring electrical energy consumption during the various times each energy demand charge is in effect.

MONTHLY RATES:

Customer Charge: \$10.00

~~Program Participation Charge: \$4.95~~

Energy Demand Charge:

Low Cost Hours (P₁): 1.785¢ per KWH

Medium Cost Hours (P₂): 3.021¢ per KWH

High Cost Hours (P₃): 7.598¢ per KWH

Critical Cost Hours (P₄): 28.500¢ per KWH

Fuel Charge:

Fuel charges are normally adjusted by the Florida Public Service Commission annually in January. As of June 7, 2002, the amount for fuel was 2.206¢/KWH. For current fuel costs included in this tariff, see Sheet No. page 6.34.

ISSUED BY: ~~Travis Bowden~~ Mark Crosswhite



Section No. VI
~~Second First Revised Sheet No. 6.77~~
 Canceling ~~First Revised~~ Original Sheet No. 6.77

PAGE 3 of 4	EFFECTIVE DATE June 7, 2002
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(Continued from Rate Schedule RSVP, Sheet No. 6.76)

DETERMINATION OF PRICING PERIODS:

Pricing periods are established by season for weekdays and weekends. The pricing periods for price levels P₁, P₂, and P₃ are as follows:

May through October

	<u>P₁</u>	<u>P₂</u>	<u>P₃</u>
Weekdays	11 P.M. - 6 A.M.	6 A.M. - 1 P.M. 6 P.M. - 11 P.M.	1 P.M. - 6 P.M.
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November through April

	<u>P₁</u>	<u>P₂</u>	<u>P₃</u>
Weekdays	11 P.M. - 5 A.M.	5 A.M. - 6 A.M. 10 A.M. - 11 P.M.	6 A.M. - 10 A.M.
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The pricing periods for price level P₄ shall be determined at the sole discretion of the Company. Each customer will be notified by electronic signal at least one half hour prior to the start of price level P₄.

The pricing periods for the following observed holidays will be the same as the weekend hour price levels for the month in which the holiday occurs:

- | | |
|------------------|---------------|
| New Year's Day | Memorial Day |
| Independence Day | Labor Day |
| Thanksgiving Day | Christmas Day |

MINIMUM BILL:

In consideration of the readiness of the Company to furnish such service, a monthly charge will be made of not less than the ~~sum of the Customer charge and the program participation charge.~~

DEPOSIT:

A deposit amounting to twice the estimated average monthly bill may be required before service is connected at designated premises. The deposit may be applied to any final bills against the Customer for service.

ISSUED BY: ~~Travis Bowden~~ Mark Crosswhite