

Dorothy Menasco

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Subject: FEA Third Set of Interrogatories to Gulf Power-110138
Signed By: There are problems with the signature. Click the signature button for details.
Attachments: Third set of Inter to Gulf Power.pdf



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- a. Person responsible for this electronic filing:

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- b. Docket 110138-EI

In re: Petition for increase in rates by Gulf Power Company

- c. Document being filed on behalf of FEA
- d. There are 5 pages to FEA's Notice of Service
- e. The document attached for electronic filing is FEA's Notice of Service of Third Set of Interrogatories #62-65 to Gulf Power.

//Signed//

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for increase in rates by)
Gulf Power Company)
_____)

Docket No. 110138-EI

**Federal Executive Agencies' Third Set
of Interrogatories to Gulf Power Company (Nos. 62-65)**

Pursuant to § 350.0611(1), Florida Statutes, Rule 28-106.206, Florida Administrative Code and Rule 1.340, Florida Rules of Civil Procedure, the Federal Executive Agencies ("FEA") through their undersigned attorney hereby propound the following interrogatories to Gulf Power Company ("Gulf Power" or "Utility" or "Company"), to be answered on or before 30 days from the date of service, or at such other time and place as may be mutually agreed upon by counsel. Each interrogatory should be answered under oath by the most qualified and informed person to provide the most complete and accurate answer to each question, who is also included within the definition of Gulf Power Company.

DEFINITIONS

As used herein, the following words shall have the meanings indicated:

- (i) "Gulf Power Company" shall mean the company, including but not limited to any of its directors, employees, consultants, agents, representatives, attorneys (concerning nonprivileged matters, which privilege must be expressly identified and justified) and any other person or entity acting or purporting to act on behalf of the Company.
- (ii) "You" or "Your" means Gulf Power Company as defined above.
- (iii) "Affiliate" means any entity that directly or indirectly through one or more intermediaries, controls, is controlled by or is under common control with Gulf Power Company, or shares a 5% or greater common ownership.

- (iv) "Identify" shall mean, with respect to any document or report; set forth the title, if any, describe the relevant page or pages and line or lines thereof (or annex a copy to the answer to these interrogatories, with appropriate designations of such page or pages and line or lines), and state the present location and custodian of the original and all copies of the documents, who prepared the document, and when it was prepared.

INSTRUCTIONS

- A. Documents or reports to be identified shall include all documents in your possession, custody and control and all other documents of which you have knowledge.
- B. Each interrogatory is to be answered based upon the knowledge, information or belief of the Company, and any answer based upon information and belief is to state that it is given on such basis. If the complete answer to an interrogatory is not known, so state and answer as fully as possible the part of the interrogatory to which an answer is known. For each answer, or part thereof, please identify the individual or individuals who provided the information or helped in providing the information contained in the responses, specifying the individual's business address, telephone number and the individual's relationship to the Company, and please identify the witness who will be sponsoring the responses and will be able to answer cross-examination questions concerning the response.
- C. If the requested information is not applicable, that response should be reported as well as the reason. If the requested information is not available, that response should be reported as well as the reason.
- D. If an interrogatory contained herein asks for information that has already been provided, please so state, indicating the date provided and, if applicable, the interrogatory number, the request of production number or staff data request that requested the information.
- E. To the extent an interrogatory calls for information which cannot now be precisely and completely furnished, such information as can be furnished should be included in the answer,

together with a statement that further information cannot be furnished, and a statement as to the reasons therefore. If you expect to obtain further information between the time answers are served and the time of hearing, you are requested to state this fact in each answer, and provide such further information as soon as it is available. If the information which cannot now be furnished is believed to be available to another person, identify such other person and the reasons for believing such person has the described information.

- F. In the event any interrogatory herein calls for information or for the identification of a document which you deem to be privileged, in whole or in part, the information should be given or the document identified to the fullest extent possible consistent with such claim of privilege and specify the grounds relied upon for the claim of privilege.
- G. If the respondent intends to seek clarification of any portion of the discovery request, the respondent shall request such clarification within 10 days of service of the discovery request. Further, any specific objection to a discovery request shall be made within 10 days of service of the discovery request.
- H. Separate answers shall be furnished for each interrogatory, although where the context permits, an interrogatory may be answered by reference to the answer furnished to another interrogatory.

INTERROGATORIES

62. In reference to Gulf Power Company's Minimum Filing Requirement, Section C – Net Operating Income Schedules, pages 29-30, please provide a copy of the workpapers (in electronic format with all formulas intact) and a list of all assumptions relied on to breakdown Account No. 447 Sales for Resale into the different adjustments. Provide for both 2011 and 2012.

63. Please provide the breakdown of Sales for Resale totals for the years 2006 - 2010 in the same format as that presented in Gulf Power Company's Minimum Filing

Requirement, Section C – Net Operating Income Schedules, page 29, line 10. In addition, please provide the same data for the 12 months ended March 31, 2011 and June 30, 2011, respectively.

64. In reference to Gulf Power Company's Minimum Filing Requirements, Section C – Net Operating Income Schedules, page 29, please provide a copy of the workpapers (in electronic format with all formulas intact) and a list of all assumptions relied on to breakdown Residential, Commercial and Industrial revenues (lines 2-4). Please provide the breakdown of these same revenue classes for the years 2006 - 2009 separately by year.

65. In reference to Operating Revenues (Residential, Commercial and Industrial) listed on pages 32-33 of Gulf Power Company's Minimum Filing Requirements, Section C – Net Operating Income Schedules, pages 32-33, please indicate for each year what the weather was for that year. For example, warmer than normal, normal or cooler than normal, etc. Please provide the cooling degree days which Gulf claims reflects normal weather. Also, please provide the actual cooling degree days for the years 2006 - 2010.



CHRIS C. THOMPSON, Maj, USAF
Staff Attorney
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CERTIFICATE OF SERVICE

Docket No. 110138-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Third Set of Interrogatories to Gulf Power Company (Nos. 48-61) has been furnished by electronic mail and/or U.S. Mail this 4th day of October, 2011, to the following:

Florida Public Service Commission

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**Gardner, Bist, Wiener, Wadsworth,
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//signed//cct

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