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Sent:	Wednesday, September 18, 2013 12:11 PM	
To:	Filings@psc.state.fl.us	
Subject:	Gulf Power Company's Preliminary List of Issues and Positions - Docket No. 130007-EI	
Attachments:	Gulf Power 130007-EI Preliminary List of Issues and Positions filed 9-18-13.pdf	

A. s/Robert L. McGee

Gulf Power Company

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- B. Docket No. 130007-EI
- C. Gulf Power Company
- D. Document consists of 5 pages.
- E. The attached document is Gulf Power Company's Preliminary List of Issues and Positions.

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Stay connected with Gulf Power



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September 18, 2013

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

Re: Docket No. 130007-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Preliminary List of Issues and Positions, to be filed in the above referenced Environmental Cost Recovery Clause docket.

Sincerely,

Robert J. All forf.

Robert L. McGee, Jr. Regulatory and Pricing Manager

md

Enclosures

Beggs & Lane cc w/encl.: Jeffrey A. Stone, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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IN RE: Environmental Cost Recovery Clause. Docket No. 130007-EI Filed: September 18, 2013

PRELIMINARY STATEMENT OF GULF POWER COMPANY REGARDING ISSUES AND POSITIONS

Gulf Power Company, ("Gulf Power", "Gulf", or "the "Company"), by and through its

undersigned attorneys, hereby files this preliminary statement of issues and positions, saying:

Generic Environmental Cost Recovery Issues

- **ISSUE 1:** What are the final environmental cost recovery true-up amounts for the period January 2012 through December 2012?
- GULF: Under recovery of \$3,704,002. (Vick, Dodd)
- **ISSUE 2:** What are the estimated/actual environmental cost recovery true-up amounts for the period January 2013 through December 2013?
- GULF: Under recovery of \$4,084,856. (Vick, Dodd)
- **ISSUE 3:** What are the projected environmental cost recovery amounts for the period January 2014 through December 2014?
- **<u>GULF</u>**: \$142,486,731. (Vick, Dodd)
- **ISSUE 4:** What are the environmental cost recovery amounts, including true-up amounts, for the period January 2014 through December 2014?
- **<u>GULF</u>**: Recovery of \$150,383,807. (Dodd)
- **ISSUE 5:** What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2014 through December 2014?
- <u>GULF</u>: The depreciation rates used to calculate the depreciation expense should be the rates that are in effect during the period the allowed capital investment is in service. (Dodd)

- **ISSUE 6:** What are the appropriate jurisdictional separation factors for the projected period January 2014 through December 2014?
- **<u>GULF</u>:** The demand jurisdictional separation factor is 97.07146%. Energy jurisdictional separation factors are calculated each month based on retail KWH sales as a percentage of projected total territorial KWH sales. (Dodd)
- **ISSUE 7:** What are the appropriate environmental cost recovery factors for the period January 2014 through December 2014 for each rate group?
- GULF: See table below: (Dodd)

RATE CLASS	ENVIRONMENTAL COST RECOVERY FACTORS ¢/KWH 1.554
RS, RSVP	
GS	1.402
GSD, GSDT, GSTOU	1.249
LP, LPT	1.114
PX, PXT, RTP, SBS	1.062
OS-I/II	0.419
OSIII	1.020

- **<u>ISSUE 8</u>**: What should be the effective date of the new environmental cost recovery factors for billing purposes?
- **GULF:** The new environmental cost recovery factors should be effective beginning with the first billing cycle for January 2014 and thereafter through the last billing cycle for December 2014. The first billing cycle may start before January 1, 2013, and the last cycle may be read after December 31, 2013, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. (Dodd)
- **ISSUE 16:** Should the Commission approve Gulf's Environmental Compliance Program Update as reasonable?
- GULF: Yes. (Vick)

ISSUE 17: Should Gulf's proposal to allocate costs associated with the Clean Air Act Amendments of 1990 (CAAA) and other air quality capital costs to the rate classes on a 12 Coincident Peak (CP) and 1/13 energy basis be approved?

GULF: Yes. (Vick, O'Sheasy, Dodd)

Respectfully submitted this 18th day of September, 2013.

mana JEFFREY A. STONE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost Recovery Clause

Docket No.: 130007-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 18th day of September, 2013 to the following:

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