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FLORIDA PUBLIC SERVICE COMMISSION

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4	Florida 32301, Telephone No. (904) 224-7595, appearing
5	on behalf of Florida Power & Light Company.
6	JAMES A. MCGEE, Florida Power Corporation,
7	3201 34th Street South, St. Petersburg, Florida 33711,
8	Telephone No. (813) 866-5786, appearing on behalf of
9	Florida Power Corporation.
10	JEFFREY A. STONE, Beggs & Lane, P. O. Box
11	12950, Pensacola, Florida 32576-2950, Telephone No.
12	(904) 432-2451, appearing on behalf of Gulf Power
13	Company.
14	JAMES D. BEASLEY and KENNETH R. HART, Ausley
15	& McMullen, Post Office Box 391, Tallahassee, Florida
16	32302, Telephone No. (904) 224-9115, appearing on
17	behalf of Tampa Electric Company.
18	VICKI GORDON KAUFMAN, McWhirter, Reeves,
19	McGlothlin, Davidson, Rief and Bakas, 117 South
20	Gadsden Street, Tallahassee, Florida 32301, Telephone
21	No. (904) 222-2525, appearing on behalf of Florida
22	Industrial Power Users Group.
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FIORIDA PUBLIC SERVICE COMMISSION

### 1 APPEARANCES CONTINUED:

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2	JOHN ROGER HOWE, Deputy Public Counsel,
3	Office of Public Counsel, 111 West Madison Street,
4	Room 812, Tallahassee, Florida 32399-1400, Telephone
5	No. (904) 488-9330, appearing on behalf of the
6	Citizens of the State of Florida.
7	VICKI JOHNSON, Florida Public Service
8	Commission, Division of Legal Services, 2540 Shumard
9	Oak Boulevard, Tallahassee, Florida 32399-0870,
10	Telephone No. (904) 413-6199, appearing on behalf of
11	the Commission Staff.
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ı	WITNESSES			
2	NAME	PA	GE NO.	
3	ROSEMARY MORLEY			
4	Prefiled Direct Testimony Inserted into the Record by Stipulation		11	
5	WILLIAM REICHEL Prefiled Direct Testimony Inserted		34	
6	into the Record by Stipulation JAMES O. VICK			
7	Prefiled Direct Testimony Inserted into the Record by Stipulation		40	
8	SUSAN D. CRANMER Prefiled Direct Testimony Inserted		57	
9	into the Record by Stipulation			
10	EXHIBITS			
11	NUMBER	ID.	ADMTD.	
12				
13	1 RM-1	76	76	
	2 RM-2	76	76	
14	3 RM-3 4 SDC-1	76 76	76 76	
10		76	76	
15	5 SDC-2 6 Certificate from Records and	76	76	
16	6 Certificate from Records and Reporting	76	76	
17	CERTIFICATE OF REPORTER	78		
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1	PROCEEDINGS
2	(Hearing convened at 9:30 a.m.)
3	COMMISSIONER DEASON: Call the hearing to
4	order. Can we have the notice read, please.
5	MS. JOHNSON: By notice issued July 31st,
6	1996, a hearing was set in Docket No. 960001-EI, Fuel
7	and Purchase Power Cost Recovery Clause and Generating
8	Performace Incentive Factor, and Docket No. 960007-EI,
9	Environmental Cost Recovery Clause.
10	COMMISSIONER DEASON: Thank you. Take
11	appearances.
12	MR. BEASLEY: Commissioners, I'm
13	James D. Beasley, appearing with Lee L. Willis and
14	Kenneth R. Hart, the law firm Ausley & McMullen, P.O.
15	Box 391, Tallahassee, Florida 32302, appearing on
16	behalf of Tampa Electric Company in Docket No. 960007.
17	That's the only docket that we're noticing at this
18	time.
19	MS. JOHNSON: Both dockets were noticed.
20	MR. BEASLEY: Okay. Then 01 as well.
21	COMMISSIONER DEASON: Very well.
22	MR. McGEE: James McGee, Post Office Box
23	14042, St. Petersburg 33733, appearing on behalf of
24	Florida Power Corporation in the 0001 docket.
25	MR. STONE: Jeffrey A. Stone and Russell A.
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Badders of the law firm Beggs & Lane, Pensacola. The
 address is stated correctly on the prehearing order,
 and we're appearing on behalf of Gulf Power company in
 both the 0001 and 007 docket.
 MR. CHILDS: My name is Matthew M. Childs.

6 I'm appearing on behalf of Florida Power & Light7 Company in both dockets.

8 MR. HOWE: I'm Roger Howe of the Office of 9 Public Counsel appearing on behalf of the Citizens of 10 the State of Florida. The address is as shown on the 11 prehearing statements. We're appearing in both 12 dockets, the 01 and the 07.

MS. KAUFMAN: Vicki Gordon Kauman, of the
law firm McWhirter, Reeves, McGlothlin, Davidson, Rief
and Bakas, 117 South Gadsden Street, Tallahassee,
appearing on behalf of the Florida Industrial Power
Users Group in the 01 and 07 dockets.

MS. JOHNSON: Vicki Johnson appearing on
 behalf of the Commission Staff.

20 COMMISSIONER DEASON: Thank you. 21 Ms. Johnson, since the 07 docket has basically been 22 stipulated, would it be appropriate to take it up 23 first?

24 MB. JOHNSON: Yes, Commissioner. However,
 25 there are some preliminary issues that should be

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addressed. I believe Mr. Beasley and Mr. Stone have 1 2 some comments. COMMISSIONER DEASON: Very well. 3 Mr. Beasley. 4 MR. BEASLEY: Commissioners, this Commission 5 6 entered its order No. PSC-96-1048-FOF-EI in Docket No. 96088 approving the initial environmental cost 7 recovery factors for Tampa Electric. The last date to 8 protest that particular order was yesterday. The 9 clerk's office is preparing a certificate to the 10 effect that no protest was filed. We would like to 11 submit that as an exhibit in this docket in support of 12 stipulated Issue 12. 13 14 COMMISSIONER DEASON: Is there any objection? 15 MR. BEASLEY: That's being prepared, and 16 when it is, I'll furnish it to the court reporter. 17 COMMISSIONER DEASON: Mr. Stone. 18 MR. STONE: Commissioner Deason, with regard 19 to the prehearing order that was issued, we recognize 20 that our witnesses were all stipulated and excused. 21 On Page 4 of the prehearing order, the 22 issues for Mr. Vick, they should include Issues 1, 2, 23 and 4. He also provided testimony in support of the 24 Company's position that was stipulated on those 25

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1 issues.

2	In addition, I need to bring to the
3	Commission's attention that since the prehearing
4	conference, Gulf Power has determined that its Crist
5	Unit 7 flow monitors are showing symptoms in failure
6	and they're not performing as needed to, to comply
7	with the Clean Air Act amendments.

8 The result of this determination is that 9 they are in the process of upgrading or changing the 10 plant expenditure item for the Crist 6 flow monitors 11 that was approved in this stipulation to approve an 12 upgrade to the Crist 7 flow monitors.

We have determined that that change does not affect the factors, and that we are comfortable bringing the actual information to the Commission in the true-up for the 07 docket; but we wanted to let everyone know that we are, in fact, changing that plant expenditure item to include an update to the Crist 7 monitors.

The basis for that determination is roughly the same as the Crist 6 monitors. The reason for proceeding with the change at this time is to take advantage of the fact that the contractor making the change is on site.

25

We've also been under a negotiation

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1 arrangement with the contractor that the first payment 2 for the Crist 7 monitors will not occur until after 3 the first of the year. They will also -- it will help 4 us in making sure that there's no impact on the 5 factors. 6 We have prepared revised schedules, if

7 that's the desire of the Commission, that would show 8 that we've included those expenditures in this 9 filing -- in this period, and it has no effect on the 10 factors. Otherwise, we can proceed and just deal with 11 this in the true-up.

12 COMMISSIONER DEASON: Ms. Johnson, is Staff 13 aware of this situation?

14 MS. JOHNSON: Staff is aware of the
15 situation. We have no objections. We would simply
16 ask that they provide the revised -- the projections.
17 They were not included in the original projections.

18 COMMISSIONER DEASON: Have Public Counsel 19 and FIPUG been advised of this situation?

20 MR. HOWE: I was not aware of the situation, 21 but I don't think I see any problem with it if the 22 factor does not change and it will be considered in 23 the true-up filings.

24 COMMISSIONER DEASON: Ms. Kaufman?
 25 MS. KAUFMAN: Same would be true for FIPUG.

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COMMISSIONER DEASON: Very well. Thank you 1 for bringing that to our attention, Mr. Stone. Any 2 other preliminary matters? 3 MS. JOHNSON: Commissioner Deason, there are 4 two corrections to the prehearing order in the 07 5 docket. Page 13, Issue 12, which are the factors, the 6 third line, GSD, GSDT, EVH rate class was omitted; and 7 on the next line, rate class SBFT was omitted. 8 COMMISSIONER DEASON: Same factors apply? 9 MS. JOHNSON: Yes. 10 COMMISSIONER DEASON: Very well. Have you 11 got another correction, or that was it? 12 MS. JOHNSON: That was it. 13 MR. BEASLEY: In agreement with that one. 14 COMMISSIONER DEASON: Any other preliminary 15 matters? We'll proceed then into the 07 docket. All 16 issues, as my understanding, have been stipulated, but 17 it is still necessary to have the prefiled testimony 18 inserted into the record, and that would be for four 19 witnesses, as shown on Page 4 of the prehearing order. 20 That's correct. Staff would MS. JOHNSON: 21 move that the testimony of the witnesses be inserted 22 into the record as though read. 23 COMMISSIONER DEASON: Without objection, 24 that testimony will be inserted into the record. 25

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

#### FLORIDA POWER & LIGHT COMPANY

#### REVISED TESTIMONY OF ROSEMARY MORLEY

#### DOCKET NO. 960007-EI

#### August 14, 1996

1	Q.	Please state your name and address.
2	Α.	My name is Rosemary Morley and my business address is 9250
3		West Flagler Street, Miami, Florida 33174.
4		
5	Q.	By whom are you employed and in what capacity?
6	A.	I am employed by Florida Power & Light Company (FPL) as the
7		Acting Manager of Rates and Tariff Administration.
8		
9	Q.	Have you previously testified in this docket?
10	Α.	Yes, I have.
11		
12	Q.	What is the purpose of your testimony?
13	Α.	The purpose of my testimony is to provide corrections to the
14		Environmental Cost Recovery testimony filed by Barry T. Birkett on
15		June 24, 1996 and adopted as my own on July 30, 1996.
16		
17	Q.	Please describe the corrections.
18	Α.	True-up amounts have been divided into energy and demand

1

components based on actual project expenditures in order to
 comply with Order No. PSC-96-0239-PHO-El. In Mr. Birkett's
 testimony filed on June 24, 1996 which I adopted as my own July
 30, 1996, true-up costs were divided into energy and demand
 components based on the proportion of demand and energy
 amounts for the respective projection period.

7

8

Q. Have you prepared any forms that reflect these corrections?

9 A. Yes. I have provided two revised forms. Form 42-1P, Lines 2 and
10 3 and Form 42-7P, Columns (3) and (4) reflect the revised splits
11 between energy and demand based on actual project costs incurred
12 in the respective true-up periods.

13

14 Q. Does this conclude your testimony.

15 A. Yes, it does.

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

#### FLORIDA POWER & LIGHT COMPANY

#### SUPPLEMENTAL TESTIMONY OF ROSEMARY MORLEY

#### DOCKET NO. 960007-EI

#### July 30, 1996

1	Q.	Please state your name and address.
2	Α.	My name is Rosemary Morley and my business address is 9250
3		West Flagler Street, Miami, Florida 33174.
4		
5	Q.	By whom are you employed and in what capacity?
6	Α.	I am employed by Florida Power & Light Company (FPL) as the
7		acting Manager of Rates and Tariff Administration, taking the place
8		of Barry T. Birkett.
9		
10	Q.	Please describe your educational and professional background
11		and experience.
12	Α.	I received a Bachelor of Arts degree with honors in Economics from
13		the University of Maryland in 1979 and a Master of Arts degree in
14		Economics from Northwestern University in 1981. I joined FPL in
15		1983 as an analyst in the Load Forecasting Group. After holding
16		positions of increasing responsibility in various forecasting and
17		planning functions, I joined the Rate Department as a Senior Cost
18		of Service Analyst in 1987. Since that time, I have held various

1		positions in the department including Supervisor of Cost of Service
2		Studies (1990-1993), Principal Rate Analyst (1993-1996) and Rate
3		Development Manager (1996).
4		
5	Q.	What are your responsibilities an duties as acting Manager of
6		Rates and Tariff Administration?
7	Α.	I am responsible for FPL's retail and wholesale rates and cost of
8		service activities. In addition, I will sponsor rate related testimony
9		in dockets before the Florida Public Service Commission and the
10		Federal Energy Regulatory Commission (FERC).
11		
12	Q.	What is the purpose of your testimony?
13	A.	The purpose of my testimony is to adopt Mr. Birkett's testimony and
14		supporting documents found in Docket No. 960007-EI,
15		Environmental Cost Recovery Final True-Up and Projections, which
16		were filed with the Commission on May 20, 1996 and June 24,
17		1996, respectively. I have independently reviewed Mr. Birkett's
18		testimony and supporting documents and adopt them as my own.
19		
20	Q.	Are there any changes to the testimony and documents
21		sponsored by Mr. Birkett in Docket No. 960007-El filed on June
22		24, 1996?
23	A.	Yes, there are. Corrections have been made to the following
24		documents sponsored by Mr. Birkett in the above referenced

docket:

3		Document	Correction
4		Form 42-1P	Line 1b, Line 2
5		Form 42-3P, Page 1 of 2	Line 1.7
6		Form 42-3P, Page 2 of 2	Line 1.7
7		Form 42-4P, Page 9 of 22	Line 6
8		Form 42-4P, Page 10 of 22	Line 6
9		Form 42-7P	Columns 3, 4, 5, and 7
10		Form 42-1E	Lines 1 and 2
11		Form 42-2E	Lines 4a and 4b
12		Form 42-3E	Lines 1 and 2
13		Form 42-6E	Column 1, Lines 1.2 and 1.16
14		Form 42-7E	Lines 1.2 and 1.16
15		Form 42-8E, Page 1 of 10	Line 6
16		Form 42-8E, Page 10 of 10	Lines 1 and 2
17			
18		Corrected documents are attac	hed.
19			
20	Q.	Does this conclude your test	imony.
21	Α.	Yes, it does.	

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION FLORIDA POWER & LIGHT COMPANY TESTIMONY OF BARRY T. BIRKETT DOCKET NO. 960007-EI May 20, 1996

1	Q.	Please state your name and address.
2	A.	My name is Barry T. Birkett and my business address is 9250 West Flagler
3		Street, Miami, Florida, 33174.
4		
5	Q.	By whom are you employed and in what capacity?
6	A.	I am employed by Florida Power & Light Company (FPL) as the Manager
7		of Rates and Tariff Administration.
8		
9	Q.	Have you previously testified in this docket?
10	A.	Yes, I have.
11		
12	Q.	What is the purpose of your testimony?
13	A.	The purpose of my testimony is to present for Commission review and
14		approval the Environmental Compliance Costs associated with our
15		Environmental Compliance activities for the period October 1995 through

March 1996.

2 3 Q. Have you prepared or caused to be prepared under your direction, 4 supervision or control an exhibit in this proceeding? Yes, I have. It consists of eight forms. Form 42-1A reflects the final true-5 A. up to be carried forward to the October 1996 - March 1997 period, Form 6 42-2A consists of the final true-up calculation for the period, Form 42-3A 7 consists of the calculation of the Interest Provision for the period, Form 42-8 4A reflects the calculation of variances between actual and projected costs 9 10 for O & M Activities, Form 42-5A presents a summary of actual monthly costs for the period for O & M Activities. Form 42-6A reflects the 11 calculation of variances between actual and projected costs for Capital 12 Investment Projects, Form 42-7A presents a summary of actual monthly 13 costs for the period for Capital Investment Projects and Form 42-8A 14 consists of the calculation of depreciation expense and return on capital 15 16 investment. 17 What is the source of the data which you will present by way of 18 Q. testimony or exhibits in this proceeding? 19 Unless otherwise indicated, the actual data is taken from the books and 20 A. records of FPL. The books and records are kept in the regular course of 21 our business in accordance with generally accepted accounting principles 22 and practices, and provisions of the Uniform System of Accounts as 23

17

18 prescribed by this Commission. 1 2 What is the actual true-up amount which FPL is requesting for the 3 Q. six-month period October 1995 through March 1996? 4 FPL has calculated and is requesting approval of an underrecovery of 5 A. 6 \$2,087,436 as the actual true-up amount for the six-month period. 7 What is the adjusted net true-up amount which FPL is requesting for 8 Q. the October 1995 through March 1996 period which is to be carried 9 over and refunded in the next projection period? 10 FPL has calculated and is requesting approval of an underrecovery of 11 A. \$65,778 as the adjusted net true-up amount for the six-month period. This 12 adjusted net true-up amount is the difference between the actual 13 underrecovery of \$2,087,436 for the period October 1995 through March 14 1996 and the estimated/actual true-up for the same period of an 15 underrecovery of \$2,021,658, approved in FPSC Order No. PSC-96-0361-16 FOF-EI. This is shown on Form 42-1A. 17 18 Is this true-up calculation consistent with the true-up methodology Q. 19 used for the other cost recovery clauses? 20 Yes, it is. The calculation of the true-up amount follows the procedures 21 A. established by this Commission as set forth on Commission Schedule A-2 22 "Calculation of True-Up and Interest Provisions" for the Fuel Cost 23

1		Recovery Clause.		
2				
3	Q.	Are all costs listed in Forms 42-4A through 42-8A attributable to		
4		Environmental Compliance projects approved by the Commission?		
5	A.	Yes they are.		
6				
7	Q.	How did actual expenditures for October 1995 through March 1996		
8		compare with FPL's estimated/actual projections as presented in		
9		previous testimony and exhibits?		
10	A.	Overall, costs were \$139,884 higher than estimated/actual projections.		
11		O & M Activities were \$183,417 higher and Capital Investment Projects		
12		were \$43,533 lower than estimated/actual projections. Below are variance		
13		explanations for those O & M Activities and Capital Investment Projects		
14		with variances greater than \$30,000. All variances are provided in detail		
15		on Forms 42-2A through 42-8A.		
16				
17		Significant variances by project were as follows:		
18				
19		1. CONTINUOUS EMISSION MONITORING SYSTEMS - O & M		
20		Project expenditures were \$82,157 less than projected. This		
21		variance was due primarily to fewer replacement parts and gases		
22		purchased during the first quarter of 1996 than originally		
23		anticipated.		

1		2.	MAINTENANCE OF STATIONARY ABOVE GROUND FUEL
2			STORAGE TANKS - O & M
3			Project expenditures were \$255,957 less than projected. This
4			variance was due to changes in the timing of the work undertaken.
5			
6		3.	MAINTENANCE OF STATIONARY ABOVE GROUND FUEL
7			STORAGE TANKS - SPILL ABATEMENT
8			Project expenditures were \$225,313 more than projected. This
9			variance was primarily due to more soil being removed at the
10			Sanford Plant metering tanks than originally anticipated.
11			
12		4.	RCRA CORRECTIVE ACTION - O & M
13			Project expenditures were \$342,654 more than projected. This
14			variance was due to unanticipated clean-up required at the Fort
15			Myers and Sanford Plant sites.
16			
17	Q.	Does	s this conclude your testimony?
18	A.	Yes,	it does.

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION FLORIDA POWER & LIGHT COMPANY TESTIMONY OF BARRY T. BIRKETT DOCKET NO. 960007-EI JUNE 24, 1996

1	Q.	Please state your name and address.
2	Α.	My name is Barry T. Birkett and my business address is 9250 West Flagler
3		Street, Miami, Florida, 33174.
4		
5	Q.	By whom are you employed and in what capacity?
6	Α.	I am employed by Florida Power & Light Company (FPL) as the Manager
7		of Rates and Tariff Administration.
8		
9	Q.	Have you previously testified in this docket?
10	A.	Yes, I have.
11		
12	Q.	What is the purpose of your testimony in this proceeding?
13	Α.	The purpose of my testimony is to present for Commission review and
14		approval proposed Environmental Cost Recovery Clause (ECRC) factors
15		for the October 1996 through September 1997 billing period, including the

1		costs to be recovered through the clause. In addition, I am presenting the
2		estimated/actual costs for the April 1996 through September 1996 period
3		together with an explanation of significant project variances.
4		
5	Q.	Is this filing by FPL in compliance with Order No. PSC-93-1580-FOF-EI,
6		issued in Docket No. 930661-EI?
7	А.	Yes, it is. The costs being submitted for recovery for the projected period
8		are consistent with that order. The costs reflected in the true-up amount
9		are those approved for recovery by the Commission in Order No. PSC-96-
10		0361-FOF-EI dated March 13, 1996.
11		
12	Q.	Have you prepared or caused to be prepared under your direction,
13		supervision or control an exhibit in this proceeding?
14	Α.	Yes, I have. It consists of fifteen forms. Form 42-1P summarizes the costs
15		being presented for recovery at this time, Form 42-2P, reflects the total
16		jurisdictional recoverable costs for O&M activities, Form 42-3P reflects the
17		total jurisdictional recoverable costs for capital investment projects, Form
18		42-4P consists of the calculation of depreciation expense and return on
19		capital investment, Form 42-5P gives the description and progress of
20		environmental compliance activities and projects to be recovered through
21		the clause for the projected period, Form 42-6P reflects the calculation of
22		the energy and demand allocation percentages by rate class and 42-7P
23		reflects the calculation of the ECRC factors. In addition, Forms 42-1E

1		through 42-8 E reflect the true-up and variance calculations for the prior
2		period.
3		
4	Q.	is FPL proposing any changes to the implementation of the Environ-
5		mental Cost Recovery Clause filing?
6	A.	Yes, it is. FPL is proposing that the Environmental Cost Recovery Clause
7		filing be made on an annual basis instead of the current semi-annual basis.
8		
9	Q.	Please explain why FPL is proposing this change?
10	A.	Filing on an annual basis will greatly reduce the amount of paperwork
11		produced, filed and processed by FPL, the Commission, and other parties.
12		In addition, the impact of the clause on our customers' rates will be levelized
13		since seasonal fluctuations in sales will be avoided.
14		
15	Q.	Does FPL have any concerns with an annual filing which it feels need
16		to be addressed?
17	Α.	Yes. Under the current procedures for the clause, a project is to be
18		approved by the Commission prior to the expenditure of costs to be
19		recovered through the clause. If the filing is to be made on an annual basis,
20		this procedure could result in delays in the implementation of environmental
21		projects between filings due to the inability for the utility to recover the
22		project costs. In order to eliminate this problem, FPL is requesting that the
23		Commission allow the recovery of reasonable and prudent project costs

after they are expended, with Commission review and approval.

2

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11

16

Q. Please describe Form 42-1P.

A. Form 42-1P provides a summary of the costs being requested for recovery
through the Environmental Cost Recovery Clause. Total recoverable
environmental costs, adjusted by revenue taxes, amount to \$12,874,283
and include \$12,635,744 of environmental project costs increased by the
estimated/actual overrecovery of \$31,106 for the April 1996 - September
1996 period minus the final underrecovery of \$65,778 for the period
October 1995 - March 1996.

- 12 Q. Please describe Forms 42-2P and 42-3P.
- A. Form 42-2P presents the O&M activities to be recovered in the projected
   period along with the calculation of total jurisdictional recoverable costs for
   these activities, classified by energy and demand.
- Form 42-3P presents the capital investment projects to be recovered in the projected period along with the calculation of total jurisdictional recoverable costs for these projects, classified by energy and demand.
- Forms 42-2P and 42-3P present the method of classifying costs consistent
   with Order No. PSC-94-0393-FOF-EI.
- 23

1	Q.	Are all costs listed in Forms 42-1P through 42-8P attributable to
2		Environmental Compliance projects previously approved by the
3		Commission?
4	A.	Yes they are, with the exception of the Disposal of Noncontainerized Liquid
5		Waste project reflected on Form 42-2P, line 1-17a and Form 42-3P, line 1-
6		17b. This new project is discussed in the testimony of William M. Reichel.
7		
8	Q.	Please describe Form 42-6P.
9	Α.	Form 42-6P calculates the allocation factors for demand and energy at
10		generation. The demand allocation factors are calculated by determining
11		the percentage each rate class contributes to the monthly system peaks.
12		The energy allocators are calculated by determining the percentage each
13		rate contributes to total kWh sales, as adjusted for losses, for each rate
14		class.
15		
16	Q.	Please describe Form 42-7P.
17	A.	Form 42-7P presents the calculation of the proposed ECRC factors by rate
18		class.
19		
20	Q.	How do the estimated/actual project expenditures for April 1996
21		through September 1996 period compare with original projections?
22	A.	Form 42-4E shows that total O&M activities were \$81,454 greater than
23		projected and Form 42-6E shows that total capital investment projects were

1	\$60,003 lower than projected. Below are variance explanations for those
2	O &M Activities and Capital Investment Projects with variances greater than
3	\$30,000. All variances are provided in detail on Forms 42-4E and 42-6E.
4	Return on Capital Investment, Depreciation and Taxes for each project for
5	the estimated/actual period April 1996 through September 1996 are
6	provided as Form 42-8E, pages 1 through 10.
7	
8	1. Continuous Emission Monitoring Systems - O & M
9	Project expenditures are estimated to be \$105,611 greater than previously
10	projected. This variance is due to more spare parts and gasses purchased
11	than anticipated.
12	
13	2. Maintenance of Stationary Above Ground Fuel Storage Tanks -
14	O&M
15	Project expenditures are estimated to be \$82,156 higher than previously
16	projected. This variance is a result of changes in the timing of the work
17	undertaken. The schedule for completing the inspections/repairs and
18	upgrades to FPL's fuel storage tanks is dictated by seasonal fuel throughput
19	considerations at the terminals and plant tank farms. It is also affected by
20	the ability to take tanks out-of-service in conjunction with plant outages.
21	
22	3. RCRA Corrective Action - O&M
23	Project expenditures are estimated to be \$108,499 lower than previously

1		projected. This variance is due to an accelerated work schedule performed
2		earlier than projected.
3		
4		4. Low Nox Burner Technology - Capital
5		Depreciation and Return are estimated to be \$52,449 lower than previously
6		projected. This variance is due to the timing of capital investments.
7		
8	Q.	Does this conclude your testimony?
9	A.	Yes, it does.

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION FLORIDA POWER & LIGHT COMPANY TESTIMONY OF W.M. REICHEL DOCKET NO. 960007-EI

28

June 24, 1996

1	Q.	Please state your name and address.
2	Α.	My name is William M. Reichel and my business address is 700
3		Universe Boulevard, Juno Beach, Florida 33408.
4		
5	Q.	By whom are you employed and in what capacity?
6	Α.	I am employed by Florida Power & Light Company (FPL) as the
7		Manager of Operations Services in the Power Generation
8		Business Unit.
9		
10	Q.	Have you previously testified in this docket?
11	A.	Yes, I have.
12		
13	Q.	What is the purpose of your testimony?
14	Α.	The purpose of my testimony is to submit for Commission review
15		and approval a description of two new environmental compliance

1		activities. One, Power Generation's Disposai of
2		Noncontainerized Liquid Waste Project, will begin shortly. The
3		other activity is one in which FPL is not requesting recovery at
4		this time. This latter submittal is for the purpose of reserving the
5		right to submit these expenditures for the Commission's approval
6		in the future. In addition, I am submitting a project description,
7		progress status, and projected expenditures for each
8		environmental compliance activity.
9		
10		Disposal of Noncontainerized Liquid Waste
11		
12	Q.	Can you describe the law or regulation requiring this process?
13	Α.	Florida Administrative Code 62-701.300, effective January 2,
14		1994, states that noncontainerized liquid waste shall not be
15		placed in solid waste disposal units, such as landfills.
16		Accordingly, FPL's power plants need to dispose of their non-
17		containerized liquid waste in a manner which meets this
18		requirement. See Attachment 1, pp.1-5.
19		
20	Q.	Please generally describe the scope of these compliance
21		activities.

1	Α.	FPL is required to dispose of their noncontainerized liquid waste
2		in a manner which meets Florida Administrative Code 62-
3		701.300 (10). Ash generated during the production of electric
4		power falls into this category. See Attachment 1, pp.1-5.
5		
6	Q.	Can you describe the process FPL uses in preparing their
7		noncontainerized liquid waste for disposal?
8	Α.	FPL currently manages ash from heavy oil fired power plants by
9		using wet ash systems. In general, ash from the economizers
10		and dust collectors (soot hoppers) is sluiced to surface
11		impoundments (basins). In these basins the pH is adjusted to
12		precipitate metals. Sludge that accumulates in these basins are
13		then dewatered by a plate and frame filter press and transported
14		to a Class I landfill in accordance with FL Administrative Code
15		62-701.300. See Attachment 1, pp.1-5.
16		
17		The frequency of basin clean-out is a function of basin capacity
18		of sludge/ash generation. Typically, FPL generates 10,000 tons
19		(@ 50% solids) of sludge per year.
20		
21	Q.	What are the projected expenditures associated with this

#### compliance activity?

2 The cost to have a Vendor dewater the ash to achieve at least Α. 3 a 50% solid component is approximately \$58/ton based on 4 competitive bids from five suppliers. With FPL generating 5 approximately 10,000 tons, the expected per year expenditure 6 will be \$600,000. FPL is evaluating the feasibility of purchasing 7 the equipment necessary to dewater the ash using in-house 8 resources. Current projections reflect that with the purchase of 9 a mobile ash dewatering system for \$270,000, FPL will be able 10 to process the sludge for approximately 50% of contractor costs 11 resulting in an annual saving of about \$300,000. FPL is 12 requesting recovery of \$600,000 for vendor processing of current 13 ash stockpiles and \$270,000 (capital) to purchase the ash 14 dewatering system if it is determined to be cost-effective. If this 15 equipment is purchased, the annual expenditure would change 16 to \$300,000.

17

18 St. Johns River Power Park NOx

19

20 Q. Which law or regulation is requiring this project?

21 A. Under Title IV of the Clean Air Act Amendments of 1990, Public

1		Law 101-349, Phase II units must reduce NOx emissions to 0.45
2		lb/mbtu by the year 2000. Pursuant to 40 CFR 76.8, a unit can
3		elect to meet Phase I limits of 0.50 lb/mbtu in 1997 and keep
4		those limits until 2008, thus avoiding the more stringent 0.45
5		lb/mbtu limits in the year 2000. This is know as OPT-IN.
6		
7	Q.	When is the OPT-IN advantageous for the utility?
8	Α.	When a unit is over, but near the 0.50 lb/mbtu limit, it is probably
9		a good option. In this situation a less drastic and therefore less
10		costly countermeasure can be employed to reduce NOx to
11		achieve the more liberal 0.50 lb/mbtu limit. The countermeasure
12		would have to be implemented in 1997 instead of 2000 but the
13		cost could be millions of dollars less than achieving the more
14		stringent 0.45 lb/mbtu limit. St. Johns River Power Park (SJRPP)
15		is a good candidate for OPT-IN since the units are operating in
16		the 0.52 to 0.54 lb/mbtu level.
17		

18 Q. Please describe the NOx reduction project?

A. A pilot project was undertaken at SJRPP Unit No. 1 to determine
 if combustion system modifications could produce the necessary
 NOx reductions. The modifications included movable air hoods

1for the burners, instrumentation, automation of under air ports2and pulverizer internals work. After several months of3adjustments and monitoring, NOx levels between 0.46 and 0.504lb/mbtu were achieved. With these results, there are plans to5modify the second unit. Other options considered were Separate6Overfire Air (SOFA), Selective Catalytic Reduction (SCR) and7Selective Non-Catalytic Reduction.

8

#### 9 Q. What is the cost of the project?

10 Α. The total O&M cost of this project, for both units, is \$645,000. The cost of the alternatives ranged from \$2,000,000 to 11 \$16,000,000, representing FPL's 20% ownership share. The 12 estimated completion date for this project is January 1997. 13 However, it must first be approved by the SJRPP Operating 14 Committee in November 1996. Accordingly, FPL is not 15 requesting recovery at this time. FPL is requesting that the 16 17 Commission recognize this project for potential future recovery 18 after completion.

19

20 Q. Does this conclude your testimony?

21 A. Yes, it does.

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION FLORIDA POWER & LIGHT COMPANY

TESTIMONY OF W.M. REICHEL

#### DOCKET NO. 960007-EI

#### June 24, 1996

1

1	Q.	Please state your name and address.
2	Α.	My name is William M. Reichel and my business address is 700
3		Universe Boulevard, Juno Beach, Florida 33408
4		
5	Q.	By whom are you employed and in what capacity?
6	Α.	I am employed by Florida Power & Light Company (FPL) as the
7		Manager of Operations Services in the Power Generation
8		Business Unit.
9		
10	Q.	Have you previously testified in this docket?
11	A.	Yes, I have.
12		
13	Q.	What is the purpose of your testimony?
14	A.	The purpose of my testimony is to submit for Commission review
15		and approval a description of two new environmental compliance

1 One, Power Generation's Disposal of activities. 2 Noncontainerized Liquid Waste Project, will begin shortly. The 3 other activity is one in which FPL is not requesting recovery at this time. This latter submittal is for the purpose of reserving the 4 right to submit these expenditures for the Commission's approval 5 in the future. In addition, I am submitting a project description, 6 7 progress status, and projected expenditures for each 8 environmental compliance activity. 9 10 Disposal of Noncontainerized Liquid Waste 11 Can you describe the law or regulation requiring this process? 12 Q. Florida Administrative Code 62-701.300, effective January 2. 13 A. 1994, states that noncontainerized liquid waste shall not be 14 placed in solid waste disposal units, such as landfills. 15 Accordingly, FPL's power plants need to dispose of their non-16 containerized liquid waste in a manner which meets this 17 requirement. See Attachment 1, pp.1-5. 18 19 Please generally describe the scope of these compliance 20 Q. activities. 21

35

FPL is required to dispose of their noncontainerized liquid waste 1 Α. in a manner which meets Florida Administrative Code 62-2 701.300 (10). Ash generated during the production of electric 3 power falls into this category. See Attachment 1, pp.1-5. 4 5 Can you describe the process FPL uses in preparing their 6 Q. 7 noncontainerized liquid waste for disposal? FPL currently manages ash from heavy oil fired power plants by 8 Α. using wet ash systems. In general, ash from the economizers . 9 and dust collectors (soot hoppers) is sluiced to surface 10 impoundments (basins). In these basins the pH is adjusted to 11 precipitate metals. Sludge that accumulates in these basins are 12 then dewatered by a plate and frame filter press and transported 13 to a Class I landfill in accordance with FL Administrative Code 14 62-701.300. See Attachment 1, pp.1-5. 15 16 The frequency of basin clean-out is a function of basin capacity 17 of sludge/ash generation. Typically, FPL generates 10,000 tons 18 (@ 50% solids) of sludge per year. 19 20 What are the projected expenditures associated with this 21 Q.

36

1

## compliance activity?

The cost to have a Vendor dewater the ash to achieve at least 2 Α. 3 a 50% solid component is approximately \$58/ton based on competitive bids from five suppliers. With FPL generating 4 approximately 10,000 tons, the expected per year expenditure 5 will be \$600,000. FPL is evaluating the feasibility of purchasing 6 7 the equipment necessary to dewater the ash using in-house resources. Current projections reflect that with the purchase of 8 a mobile ash dewatering system for \$270,000, FPL will be able 9 to process the sludge for approximately 50% of contractor costs 10 resulting in an annual saving of about \$300,000. FPL is 11 requesting recovery of \$600,000 for vendor processing of current 12 ash stockpiles and \$270,000 (capital) to purchase the ash 13 14 dewatering system if it is determined to be cost-effective. If this equipment is purchased, the annual expenditure would change 15 16 to \$300,000.

17

18 St. Johns River Power Park NOx

19

20 Q. Which law or regulation is requiring this project?

21 A. Under Title IV of the Clean Air Act Amendments of 1990, Public

asyustments and monitoring, NOx levels between 0.46 and 0.50 lb/mbtu were achieved. With these results, there are plans to 4 modify the second unit. Other options considered were Separate 5 Overfire Air (SOFA), Selective Catalytic Reduction (SCR) and 6 Selective Non-Catalytic Reduction. 7 8 What is the cost of the project? Q. 9 The total O&M cost of this project, for both units, is \$645,000. A. 10 The cost of the alternatives ranged from \$2,000,000 to 11 \$10,000,000, representing FPL's 20% ownership share. The 12 estimated completion date for this project is January 1997. 13 However, it must first be approved by the SJRPP Operating 14 Committee in November 1996. Accordingly, FPL is not 15 requesting recovery at this time. FPL is requesting that the 16 Commission recognize this project for potential future recovery 17 after completion. 18 19 Does this conclude your testimony? Q. 20

21 A. Yes, it does.

6

I		GULF POWER COMPANY
2	Y	Before the Florida Public Service Commission
	1	Prepared Direct Testimony of
3		James O. Vick
		Docket No. 960007-EI
4		Date of Filing: May 20, 1996
5	Q.	Please state your name and business address.
6	Α.	My name is James O. Vick and my business address is 500 Bayfront Parkway,
7		Pensacola, Florida, 32501-0328.
8		
9	Q.	By whom are you employed and in what capacity?
10	Α.	I am employed by Gulf Power Company as the Supervisor of Environmental Affairs.
11		
12	Q.	Mr. Vick, will you please describe your education and experience?
13	A.	I graduated from Florida State University, Tallahassee, Florida in 1975 with a
14		Bachelor of Science Degree in Marine Biology. I also hold a Bachelor's Degree in
15		Civil Engineering from the University of South Florida in Tampa, Florida. In addition,
16		I have a Masters of Science Degree in Management from Troy State University,
17		Pensacola, Florida. I joined Gulf Power Company in August 1978 as an Associate
18		Engineer. I have since held various engineering positions such as Air Quality
19		Engineer and Senior Environmental Licensing Engineer. In 1989, I assumed my
20		present position as Supervisor of Environmental Affairs.
21		
22	Q.	What are your responsibilities with Gulf Power Company?
23	A.	As Supervisor of Environmental Affairs, my primary responsibility is overseeing the
24		activities of the Environmental Affairs section to ensure the Company is, and
25		remains, in compliance with environmental laws and regulations, i.e., both existing

1		laws and such laws and regulations that may be enacted or amended in the future.
2		In performing this function, I have the responsibility for numerous environmental
3		programs and projects.
4		
5	Q.	Are you the same James O. Vick who has previously testified before this
6		Commission on various environmental matters?
7	A.	Yes.
8		
9	Q.	What is the purpose of your testimony in this proceeding?
10	A.	The purpose of my testimony is to support Gulf Power Company's true-up period
11		ending March 31, 1996. In her testimony and schedules, Ms. Cranmer has
12		identified the carrying costs (including depreciation expense and dismantlement
13		costs) associated with environmental investment and the O&M expenses included in
14		the true-up period. I will discuss the primary reasons for variances between the
15		projected and actual costs.
16		
17	Q.	Please compare Gulf's recoverable environmental capital costs included in the true-
18		up calculation for the period October through March 1996 with the approved project
19		amounts.
20	Α.	As reflected in Ms. Cranmer's Schedule 6A, the recoverable capital costs included in
21		the true-up calculation total \$4,536,342 as compared to the estimated true-up
22		amount of \$4,543,346. This resulted in a variance of (\$7,004). With the exception
23		of Line Item 1.16, SO2 Allowances, the variances in these projects/programs were
24		not significant and do not require further detailed explanation.
25		

1	Q.	Please explain the variance in SO2 Allowances during the recovery period.
2	Α.	Gulf did not project gains from the sale of withheld allowances from the EPA auction
3		held in March when preparing the projection filing. In March, Gulf sold vintage 1996
4		withheld allowances in the amount of \$91,239.46. This gain will be amortized over
5		the remaining ten months (\$9,124 per month from March-December) of fiscal 1996
6		which equates to the variance.
7		
8	Q.	How do Gulf's actual O&M expenses compare to the amounts included in the
9		estimated true-up?
10	A.	Ms. Cranmer's Schedule 4A reflects that Gulf incurred a total of \$1,720,285 in
11		recoverable O&M expenses for the period as compared to the amount included in
12		the estimated true-up of \$2,230,178. This results in a variance of (\$509,893). I will
13		address the variances for the O&M projects/programs.
14		
15	Q.	Please explain the variance in the Sulfur category (Line Item 1.1).
16	A.	Expenses during the period totaled \$2,927 resulting in a variance of (\$21,073). This
17		variance was due to limited use of sulfur in the flue gas injection system during the
18		period. Crist Unit 7 being offline for a maintenance outage for almost two months of
19		the period contributed to the variance.
20		
21	Q.	Please explain the variances in the Air Emission Fees category (Line Item 1.2).
22	Α.	Air Emission Fees were projected at \$350,700 for the period as compared to actual
23		expenses of \$161,650 which resulted in a variance of (\$189,050). In February
24		1995, Gulf instituted an SO2 substitution plan which changed the status of Crist
25		Units 4 and 5 and Scholz Units 1 and 2 to Phase I substitution units. All of Gulf

Witness: James O. Vick

Power's electric generating units except Crist Units 6 and 7 were initially designated 1 as Phase II units under the Clean Air Act Amendments of 1990. Air emission fees 2 were required by the State for all Phase II units. In early 1996 the Florida 3 Department of Environmental Protection (FDEP) agreed that substitution units were 4 not subject to air emission fees. The only units for which 1995 air emission fees 5 were due were for Crist Units 1-3 and Smith Units 1 and 2. The fees were paid in 6 February 1996 in the amount of \$161,500. The variance was a result of not having 7 to pay fees for the units that were redesignated at substitution units. 8

- Q. Please explain the (\$26,687) variance in the Title V category (Line Item 1.3).
   A. The Title V permitting is on-going. Expenses incurred during the period for the
   permitting process were less than anticipated due to delays in the Title V program
- implementation by FDEP.
- 14

9

Q. Please explain the (\$2,294) variance in the Asbestos Fees category (Line Item 1.4).
 A. The projected amount included Asbestos Fee Notifications which were expected to
 be incurred during the scheduled Crist Unit 7 outage. Less Asbestos Containing
 Materials (ACM) were encountered during Crist Unit 7 outage than was anticipated
 which resulted in the variance.

20

Q. Please explain the (\$29,472) variance in the Emission Monitoring category (Line
 Item 1.5).

A. The projected amount included expenses for Relative Accuracy Test Audits
 (RATA's), FPSC approved program. The projections were calculated using previous
 year expense information which included several scheduled and unscheduled

additional tests. The required frequency for these Continuous Emission Monitoring Ĩ. RATA tests is six months, or one year, depending upon the quality of the results of 2 the RATA. There are also requirements to perform "emergency" maintenance 3 activities. RATA quality results have been exceptional and qualify Gulf for testing on 4 an annual basis. This resulted in fewer RATA's being required during the period. 5 There were no incidences during the period which resulted in an emergency RATA. 6 The fewer RATA's during the period resulted in a decrease in expenses. 7 8 Please explain the variance of (\$179,074) in the General Water Quality category 9 Q. (Line Item 1.6). 10 Three projects within this category contributed to this variance. First, the A. 11 Groundwater Monitoring Plan for Plant Smith has not yet been approved by the 12 FDEP. This accounts for delays in projected expenses. Secondly, the Plant Smith 13 Soil Contamination Study is on-going, but expenses were less than anticipated 14 during the period. Lastly, the Surface Water Studies which are currently being 15 conducted at Plants Crist, Smith and Scholz are behind schedule. Activities and 16 expenses for each of these projects are expected to increase in the near future, and 17 expenses will level over time. 18 19 Please explain the (47,015) variance in the Groundwater Monitoring Investigation 20 Q. category (Line Item 1.7). 21 The FDEP has delayed approval of project activities in this category which A. 22 subsequently has delayed projected expenditures. Upon FDEP approval, these 23 activities and related expenses will commence. 24 25

Page 5

Witness: James O. Vick

1	Q.	Please explain the variance of (19,404) in the Lead and Copper category (Line Item
2		1.9)
3	Α.	Delays in implementation of the Lead and Copper program at Plant Smith resulted
4		in expenses being less than projected. Implementation of the program is underway
5		at Plant Smith, and these expenses should be incurred in the future.
6		
7	Q.	Please explain the (\$2,564) variance in the Environmental Auditing/Assessment
8		Program (Line Item 1.10).
9	Α.	There was minimal activity in this program during the recovery period. Gulf
10		anticipates environmental assessment activities to increase later in the year.
11		
12	Q.	Please explain the \$6,740 variance in the General Solid and Hazardous Waste
13		category (Line Item 1.11)
14	А.	This program historically encounters fluctuations in approved program activities
15		which are directly related to the quantities of solid and hazardous waste generated
16		through Gulf's operations which require proper disposal within regulatory guidelines.
17		During this recovery period, those quantities of waste requiring disposal exceeded
18		our projection.
19		
20	Q.	Does this conclude your testimony?
21	Α.	Yes.
22		
23		
24		
25		

Witness: James O. Vick

I.		GULF POWER COMPANY
2		Before the Florida Public Service Commission Prepared Direct Testimony of
3		James O. Vick
4		Docket No. 960007-EI Date of Filing: June 24, 1996
5	Q.	Please state your name and business address.
6	Α.	My name is James O. Vick and my business address is 500 Bayfront
7		Parkway, Pensacola, Florida, 32501-0328.
8	Q.	By whom are you employed and in what capacity?
10	Α.	I am employed by Gulf Power Company as the Supervisor of Environmental
11		Affairs.
12		
13	Q.	Mr. Vick, will you please describe your education and experience?
14	Α.	I graduated from Florida State University, Tallahassee, Florida, in 1975 with
15		a Bachelor of Science Degree in Marine Biology. I also hold a Bachelor's
16		Degree in Civil Engineering from the University of South Florida in Tampa,
17		Florida. In addition, I have a Masters of Science Degree in Management
18		from Troy State University, Pensacola, Florida. I joined Gulf Power Company
19		in August 1978 as an Associate Engineer. I have since held various
20		engineering positions such as Air Quality Engineer and Senior Environmental
21		Licensing Engineer. In 1990, I assumed my present position as Supervisor
22		of Environmental Affairs.
23		
24	Q.	What are your responsibilities with Gulf Power Company?
25	Α.	As Supervisor of Environmental Affairs, my primary responsibility is

overseeing the activities of the Environmental Affairs section to ensure the
 Company is, and remains, in compliance with environmental laws and
 regulations, i.e., both existing laws and such laws and regulations that may
 be enacted or amended in the future. In performing this function, I have the
 responsibility for numerous environmental activities.

- Q. Are you the same James O. Vick who has previously testified before this
   Commission on various environmental matters?
  - 9 A. Yes.
  - 10

- 11 Q. What is the purpose of your testimony in this proceeding?
- A. The purpose of my testimony is to support Gulf Power Company's projection
   of environmental compliance amounts recoverable through the
   Environmental Cost Recovery Clause (ECRC) for the period October 1996
   through September 1997. I will discuss the amounts included in the
- 16 projection period for those compliance activities previously approved by the
- 17 Commission and one new project requested for inclusion in ECRC.
- 18 Additionally, I will provide testimony to support Gulf Power Company's
- 19 projection of Clean Air Act Amendments (CAAA) emission allowances
- 20 expended during the period October 1996 through September 1997 and will
- be available to answer any questions concerning the Company's CAAA
   allowance administration.
- 23
- Q. Mr. Vick, please identify the capital projects included in Gulf's ECRC
   calculations.

A A listing of the environmental capital projects which have been included in 1 Gulf's ECRC calculations has been provided to Ms. Cranmer and includes 2 expenditures, clearings, retirements, and cost of removal currently projected 3 for each of these projects. These amounts were provided to Ms. Cranmer, 4 who has compiled Schedules 42-3P, 42-3PA, 42-4P, and 42-4PA of her 5 testimony. Schedules 42-4P and 42-4PA reflect the expenditures, clearings, 6 retirements, and cost of removal currently projected for each of these 7 projects. These amounts were provided to Ms. Cranmer, who calculated the 8 associated revenue requirements for our requested recovery. All the listed 9 projects are associated with environmental compliance activities which have 10 been previously approved for recovery through the ECRC by this 11 Commission in Docket No. 930613-EI and past proceedings in this ongoing 12 13 recovery docket.

14

Q. Are there any new capital projects included in the Company's projection for
 which Gulf seeks recovery through the Environmental Cost Recovery
 Clause?

Yes. One item, Upgrade Crist 6 CEMS Flow Monitors (PE 1164), is A 18 requested for recovery through ECRC. The existing Crist 6 flow system, a 19 Clean Air Act Amendment requirement, is becoming more expensive to 20 maintain as it approaches the end of its life expectancy. The maintenance 21 costs of the existing system are anticipated to increase over the next four 22 years. Further, the accuracy and reliability of the existing system is 23 predicted to continue decreasing over the same time period. The upgraded 24 flow system will provide Gulf with the accuracy and reliability necessary to 25

Page 3

maintain compliance with CAAA requirements. From an economic
 standpoint, it is prudent for Gulf to upgrade the system at this time. The
 expected savings from upgrading the system outweigh the expected
 maintenance costs that would be incurred through maintenance of the
 existing system over the next four years.

- 6
- Q. Please compare the Environmental Operation and Maintenance (O & M)
   activities listed on Schedules 42-2P and 42-2PA of Exhibit SDC-2 to the
   Q & M activities approved for cost recovery in past ECRC dockets.
- A. The O & M activities listed on Schedules 42-2P and 42-PA have all been approved for recovery through the ECRC in past proceedings. These O & M activities are all on-going compliance activities and are grouped into four major categories--Air Quality, Water Quality, Environmental Programs Administration, and Solid and Hazardous Waste. I will discuss each O & M activity within each of these major categories and the projected expenses later in my testimony.
- 17

18 Q. What O & M activities are included in the Air Quality category?

19 A. There are five O & M activities included in this category:

The first, Sulfur (Line Item 1.1), refers to the flue gas sulfur injection system needed to improve the collection efficiency of the Crist Unit 7 electrostatic precipitator when burning low sulfur coal. As stated in previous testimony, the injection of raw sulfur into the flue gas enhances the collection efficiency of the electrostatic precipitator when burning low sulfur coal. Presently, the coal supply at Crist is of such quality in sulfur content 1that sulfur injection is not necessary to meet the sulfur dioxide emission2requirements of the CAAA. Consequently, Gulf has not projected any3expenditures for this line item for the period since the availability of the4present fuel supply, is expected to continue. However, sulfur injection is5dependent upon the quality of fuel, and might once again be required6depending upon the quality of a particular coal supply.

The second activity listed on Schedules 42-2P and 42-2PA, Air Emission Fees (Line Item 1.2), represents the expenses projected for the annual fees required by the CAAA. The expenses projected for the six-month recovery period total \$162,093 and for the annual recovery period total \$229,593.

The third activity listed on Schedules 42-2P and 42-2PA, Title V Permits (Line Item 1.3), represents projected expenses associated with the implementation of the Title V permits. The total estimated expenses for the Title V Program during the recovery period are \$48,853 and \$97,989 for the six-month and 12-month periods, respectively.

The fourth activity listed on Schedules 42-2P and 42-2PA, Asbestos Notification Fees (Line Item 1.4), are required to be paid to the Florida Department of Environmental Protection (FDEP) for the purpose of allowing planned and emergency asbestos abatement activities at Gulf's facilities. The expenses projected for the recovery periods total \$3,246 for six- months and \$5,000 for 12-months.

The fifth activity listed on Schedules 42-2P and 42-2PA, Emission
 Monitoring (Line Item 1.5), reflects an ongoing O & M expense associated
 with the new Continuous Emission Monitoring equipment (CEM) as required

Page 5

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Witness: James O. Vick

by the CAAA. These expenses are incurred in response to the federal Environmental Protection Agency's (EPA) requirements that the Company perform Quality Assurance/Quality Control (QA/QC) testing for the CEMs, including Relative Accuracy Test Audits (RATA) and Linearity Tests. The expenses projected to occur during the recovery period for these activities total \$152,485 for six-months and \$305,773 for 12-months.

7

8 Q. What O & M activities are included in Water Quality?

A. General Water Quality (Line Item 1.6), identified in Schedules 42-2P and
 42-2PA, includes Soil Contamination Studies, Dechlorination, Groundwater
 Monitoring Plan Revisions, Surface Water Studies, and Daniel Groundwater
 Monitoring. All the programs included in Line Item 1.6, General Water
 Quality, have been approved in past proceedings. The expenses projected
 to occur during the recovery period for these activities total \$299,532 and
 \$543,340 for the six-month and 12-month periods, respectively.

The second activity listed in the Water Quality Category, Groundwater Contamination Investigation (Line Item 1.7), was previously approved for environmental cost recovery in Docket No. 930613-EI. This activity is projected to incur incremental expenses totaling \$530,212 and \$979,551 during the six-month and 12-month recovery periods.

Line Item 1.8, State NPDES Administration, was previously approved for recovery in the ECRC and reflects expenses associated with the filing of two permit applications. These expenses are expected to incur \$49,500 during the recovery period.

1		Finally, Line Item 1.9, Lead and Copper Rule, was also previously
2		approved for ECRC recovery and reflects sampling and analytical costs for
3		lead and copper in drinking water. These expenses are expected to total
4		\$4,133 and \$8,127 during the six-month and 12-month recovery periods.
5		
6	Q.	What activities are included in the Environmental Affairs Administration
7		Category?
8	A.	Only one O & M activity is included in this category on Schedules 42-2P and
9		42-2PA (Line Item 1.10). This Line Item refers to the Company's
10		Environmental Audit/Assessment function. This program is an on-going
11		compliance activity previously approved and is projected to incur expenses
12		totaling \$5,076 and \$7,230 during the six-month and 12-month recovery
13		periods, respectively.
14		
15	Q.	What O & M activities are included in the Solid and Hazardous Waste
16		category?
17	A.	Only one program, General Solid and Hazardous Waste (Line Item 1.11), is
18		included in the Solid and Hazardous Waste category on Schedules 42-2P
19		and 42-2PA. This activity involves the proper identification, handling,
20		storage, transportation and disposal of solid and hazardous wastes as
21		required by Federal and State regulations. This program is an on-going
22		compliance activity previously approved and is projected to incur incremental
23		expenses totaling \$89,537 for the six-month period and \$180,509 during the
24		12-month recovery period.

25

Witness: James O. Vick

- Q. How did you derive the O & M expenses the Company identified in
- Ms. Cranmer's exhibits for consideration in the Environmental Cost Recovery
   Clause?

A. We have based this information on projected 1996-1997 environmental
expenses for the time frame of October 1996 through September 1997.
O & M expenses resulting from environmental compliance activities for the
period October 1996 through March 1997 are listed on Schedule 42-2P and
for the period October 1996 through September 1997 are listed on Schedule
42-2PA. This information was provided to Ms. Cranmer for her to include in
the calculation of the total revenue requirements.

11

For the period April 1996 through September 1996, do you expect significant 0 12 variances in O & M expenses, and if so, please explain these variances. 13 Yes. Gulf's best estimate is that nine categories are expected to have 14 A. variances during this period. These expected variances are based on two 15 months of actual and four months of projected data. However, these 16 variances are subject to change depending on the level of activity during the 17 remainder of the period. 18

The first category Sulfur, reflects an expected variance of (\$11,496). This variance is the result of the current fuel supply at Plant Crist being of such quality that sulfur injection is not necessary to meet emission requirements of the CAAA.

The second category, Air Emission Fees, reflects a variance of
 (\$86,500). The projected emission fees for Plant Daniel were significantly
 less than originally expected, which resulted in the variance.

1 Line item 1.4, Asbestos Fees, reflects a variance of (\$832). This variance resulted from a smaller quantity of asbestos-containing material 2 (ACM) being encountered during the planned spring outage at Plant Crist. 3 Line item 1.5, Emission Monitoring, reflects a variance of 4 (\$16,349). The variance is the result of fewer Relative Accuracy Test Audits 5 (RATA's) being performed at Plant Crist due to the performance of the 6 continuous emission monitoring system (CEMS). When a RATA indicates an 7 accuracy of 95 percent or greater for a CEM system, only one RATA per year 8 is required instead of the normal two. 9 Line item 1.7, Groundwater Contamination Investigation, reflects a 10 variance of (\$124,326). This variance is simply the result of scheduling. 11 Planned activities within this category have yet to commence pending FDEP 12 approval of proposed action plans. Once FDEP has approved these plans, 13 activities in this project will resume as anticipated. 14 Line item 1.8. NPDES Administration, reflects a variance of (\$15,000). 15 This variance is the result of the submittal of the NPDES application fees for 16 Plant Crist and Scholz being moved to March 1997. 17 Line item 1.9, Lead and Copper Rule, reflects a variance of (\$5,242). 18 The variance is the result of actual program costs at Plant Smith being less 19 than projected. The quantity of chemicals anticipated for use at Plant Smith 20 are less than originally expected. 21 Line item 1.10, Environmental Auditing/Assessment, reflects a 22 variance of (\$846). The variance is the result of no environmental 23 assessment activities being performed during the period. 24

Witness: James O. Vick

1		Line item 1.11, General Solid and Hazardous Waste, reflects a
2		variance of (\$18,282). The variance is the result of projected quantities of
3		waste generated being less than projected.
4		
5	Q.	Has the Company included expenditures for emission allowances in its
6		projection for this filing?
7	A.	Yes. Phase I of the CAA became effective January 1, 1995; therefore, this
8		projection includes an estimate of the cost of allowances to be expended
9		during the period October 1996 through September 1997.
10		
11	Q.	How is the number of allowances expected to be used projected?
12	A.	The same fuel budget model that predicts the coal burn in units affected by
13		CAA Phase I also forecasts the number of tons of sulfur in the coal burned,
14		which is readily converted to tons of SO2.
15		
16	Q.	How was the cost of allowances to be expended determined for the forecast?
17	Α.	The projected cost of allowances was determined by a method very similar to
18		fuel inventory as specified by FERC procedures. In other words, allowances
19		are held "in stock" at cost and are "issued" at the projected cost of
20		allowances which is based on anticipated allowances granted net of
21		allowance sales, purchases, and transfers.
22		
23	Q.	Did the Company project the purchase or sale of allowances during the
24		forecast period?

A.	No. The only transactions projected are the inventory adjustments for
	allowances surrendered to the EPA for 1996 emissions and the 1996
	allowances allocated from the EPA.
Q.	Does this conclude your testimony?
A.	Yes.
	Q.

1		GULF POWER COMPANY
2		Before the Florida Public Service Commission
3		Direct Testimony of Susan D. Cranmer
4		Docket No. 960007-EI Date of Filing: May 20, 1996
5		
б	Q.	Please state your name, business address and
7		occupation.
8	A.	My name is Susan Cranmer. My business address is 500
9		Bayfront Parkway, Pensacola, Florida 32501. I hold
10		the position of Assistant Secretary and Assistant
11		Treasurer for Gulf Power Company. In this position, I
12		am responsible for supervising the Rates and
13		Regulatory Matters Department.
14		
15	Q.	Please briefly describe your educational background
16		and business experience.
17	Α.	I graduated from Wake Forest University in
18		Winston-Salem, North Carolina in 1981 with a Bachelor
19		of Science Degree in Business and from the University
20		of West Florida in 1982 with a Bachelor of Arts Degree
21		in Accounting. I am also a Certified Public
22		Accountant licensed in the State of Florida. I joined
23		Gulf Power Company in 1983 as a Financial Analyst.
24		Prior to assuming my current position, I have held
25		various positions with Gulf including Computer

Modeling Analyst, Senior Financial Analyst, and 1 Supervisor of Rate Services. 2 My responsibilities include supervision of: 3 tariff administration, cost of service activities, 4 calculation of cost recovery factors, the regulatory filing function of the Rates and Regulatory Matters 6 Department and various treasury activities. 7 8 Have you prepared an exhibit that contains information 9 0. to which you will refer in your testimony? 10 11 A. Yes, I have. Counsel: We ask that Ms. Cranmer's Exhibit 12 consisting of eight schedules be marked as 13 Exhibit No. 4 (SDC-1). 14 15. Are you familiar with the Environmental Cost Recovery 16 0. Clause (ECRC) True-up Calculation for the period of 17 October 1995 through March 1996 set forth in your 18 exhibit? 19 Yes. These documents were prepared under my 20 Α. supervision. 21 22 Q. Have you verified that to the best of your knowledge 23 and belief the information contained in these 24

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Page 2

Witness: Susan D. Cranmer

1		documents is correct?
2	Α.	Yes, I have.
3		
4	Q.	What is the amount to be refunded or collected in the
5		recovery period beginning October 1996?
6	A.	An amount to be refunded of 3686,617 was calculated as
7		shown on Schedule 1A of my exhibit.
8		
9	Q.	How was this amount calculated?
10	Α.	The \$686,617 was calculated by taking the difference
11		in the estimated October 1995 through March 1996
12		under-recovery of \$669,968 as approved in Order No.
13		PSC-96-0361-FOF-EI, dated March 13, 1996 and the
14		actual over-recovery of \$16,649, which is the sum of
15		lines 5, 6, and 10 on Schedule 2A.
16		
17	Q.	Please describe Schedules 2A and 3A of your exhibit.
18	Α.	Schedule 2A shows the calculation of the actual over-
19		recovery of environmental costs for the period October
20		1995 through March 1996. Schedule 3A of my exhibit is
21		the calculation of the interest provision on the over-
22		recovery. This is the same method of calculating
23		interest that is used in the Fuel Cost Recovery (FCR)
24		and Purchased Power Capacity Cost (PPCC) Recovery
25		clauses.

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Page 3 Witness: Susan D. Cranmer

Please describe Schedules 4A and 5A of your exhibit. 1 0. Schedule 4A compares the actual O & M expenses for the A. period with the estimated/actual O & M expenses 3 included in the estimated true-up filed January 22, 4 1996. Schedule 5A shows the monthly O & M expenses by 5 activity, along with the calculation of jurisdictional 6 O & M expenses. Mr. Vick describes the main reasons 7 for the variances in O & M expenses in his true-up 8 testimony. 9

10

Please describe Schedules 6A and 7A of your exhibit. 11 0. Schedule 6A compares the actual carrying costs related 12 Α. to investment with the estimated/actual amount 13 included in the estimated true-up filed January 22, 14 1996. The recoverable costs include the return on 15 investment, depreciation expense, dismantlement 16 accrual, property tax, and cost of emission allowances 17 associated with each environmental capital project for 18 the period October 1995 through March 1996. Schedule 19 7A provides the monthly carrying costs associated with 20 each project, along with the calculation of the 21 jurisdictional carrying costs. In his testimony, 22 Mr. Vick describes the reason for the major variance 23 in recoverable costs related to environmental 24 investment. 25

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Page 4 Witness: Susan D. Cranmer

Q. Please describe Schedule 8A of your exhibit. Schedule 8A provides the monthly calculation of the Α. recoverable costs associated with each capital project. As I stated earlier, these costs include return on investment, depreciation expense, dismantlement accrual, property tax, and the cost of emission allowances. Pages 1 through 15 of Schedule 8A show the investment and associated costs related to capital projects, while page 16 shows the investment and costs related to emission allowances. Ms. Cranmer, does this conclude your testimony? 0. A. Yes, it does. 

Page 5 Witness: Susan D. Cranmer

1		GULF POWER COMPANY
2		Before the Florida Public Service Commission Direct Testimony of
3		Susan D. Cranmer
4		Docket No. 960007-EI Date of Filing: June 24, 1996
5		
6	Q.	Please state your name, business address and
7		occupation.
8	A.	My name is Susan Cranmer. My business address is 500
9		Bayfront Parkway, Pensacola, Florida 32501. I hold
1.0		the position of Assistant Secretary and Assistant
11		Treasurer for Gulf Power Company.
12		
13	Q.	Please briefly describe your educational background
14		and business experience.
15	Α.	I graduated from Wake Forest University in
16		Winston-Salem, North Carolina in 1981 with a Bachelor
17		of Science Degree in Business and from the University
18		of West Florida in 1982 with a Bachelor of Arts Degree
19		in Accounting. I am also a Certified Public
2.0		Accountant licensed in the State of Florida. I joined
21		Gulf Power Company in 1983 as a Financial Analyst.
22		Prior to assuming my current position, I have held
23		various positions with Gulf including Computer
24		Modeling Analyst, Senior Financial Analyst, and
25		Supervisor of Rate Services.

My responsibilities include supervision of: 1 tariff administration, cost of service activities, calculation of cost recovery factors, the regulatory 3 filing function of the Rates and Regulatory Matters 4 5 Department, and various treasury activities. 6 Have you previously filed testimony before this 7 0. Commission in connection with Gulf's Environmental 8 9 Cost Recovery Clause (ECRC)? 10 Α. Yes, I have. 11 12 What is the purpose of your testimony? Q. A. The purpose of my testimony is to present both the 13 calculation of the revenue requirements and the 14 development of the environmental cost recovery factors 15 for the six month period of October 1996 through March 16 1997. I will also discuss Gulf's proposal to change 17 its ECRC factors from semi-annual to annual factors. 18 To support this proposed change, I have also 19 calculated the revenue requirements and developed the 20 ECRC factors for the 12-month period of October 1996 21 through September 1997. 22 23 Have you prepared an exhibit that contains information 24 0. 25 to which you will refer in your testimony?

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Page 2

Witness: Susan D. Cranmer

Yes, I have. My exhibit consists of 22 schedules, 1 Α. 2 each of which were prepared under my direction, supervision, or review. 3 Counsel: We ask that Ms. Cranmer's Exhibit consisting 4 of 22 schedules be marked as Exhibit 5 No. 5 (SDC-2). 6 7 Why is Gulf proposing to change its ECRC factors from 8 0. a six-month to a one-year cycle? 9 First, changing to a one-year cycle would levelize the 10 Α. ECRC factor, which increases customer satisfaction. 11 Currently, using a six-month factor, Gulf's ECRC 12 factor goes down in the summer by 10-12 percent and 13 back up in the winter by 10-12 percent simply because 14 the summer kilowatt-hours used to calculate the factor 15 are higher than the winter kilowatt-hours. Also, Gulf 16 projects its operating and maintenance (0 & M) 17 expenses on an annual basis. From one 12-month period 18 to the next, expenses related to many of Gulf's O & M 19 activities do not vary widely. However, from month to 20 month there may be variances due to the timing of 21 payments for such things as annual permit fees or 22 licenses. Using a 12-month projection period would 23 even out the possible factor fluctuation caused by 24 incurring such annual expenses in one six-month period 25

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Page 3 Witness: Susan D. Cranmer

and not the next. Finally, by changing to a one-year 1 cycle, administrative costs associated with the filing 2 - legal fees, regulatory review, hearings, etc. - are 3 decreased for both the Company and the Commission 4 Staff. Schedules 42-1PA through 42-7PA provide annual 5 data for the period October 1996 through September 6 1997, corresponding to Schedules 42-1P through 42-7P 7 for the semi-annual period. In the remainder of my 8 testimony, I will refer to both the semi-annual (P) 9 and annual (PA) projection schedules when discussing 10 Gulf's requested amounts and factors. 11 12 What environmental costs is Gulf requesting for 13 0. 1.4 recovery through the Environmental Cost Recovery Clause? 15 As discussed in the testimony of J. O. Vick, Gulf is 16 Α. requesting recovery for certain environmental 17 compliance operating expenses and capital costs that 1.8are consistent with both the decision of the 19 Commission in Docket No. 930613-EI and with past 20 proceedings in this ongoing recovery docket. The 21 costs we have identified for recovery through the ECRC 22 are not currently being recovered through base rates 23 24 or any other recovery mechanism.

25

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Witness: Susan D. Cranmer

What has Gulf calculated as the total true-up to be 1 0. applied in the period October 1996 through March 1997? The total true-up for this period is a decrease of 3 Α. \$1,085,683. This includes a final true-up over-4 recovery of \$686,617 for the period October 1995 5 through March 1996 as shown on line 3 of Schedules б 42-1P and 42-1PA. It also includes an estimated over-7 8 recovery of \$399,066 for the period April 1996 through September 1996, as shown on line 2 of Schedules 42-1F 9 and 42-1PA. The detailed calculations supporting the 10 estimated true-up are contained in Schedules 42-1E 11 through 42-8E. The calculation of the total true-up 12 is the same for the annual recovery factors, if 13 14 approved.

15

16 Q. How was the amount of O & M expenses to be recovered 17 through the ECRC calculated?

Mr. Vick has provided me with projected recoverable 18 Α. O & M expenses for October 1996 through September 1.9 1997. Schedules 42-2P and 42-2PA of my exhibit show 20 the calculation of the recoverable 0 & M expenses 21 broken down between the demand-related and energy-22 related expenses. Also, Schedules 42-2P and 42-2PA 23 24 provide the appropriate jurisdictional factors and 25 amounts related to these expenses. All 0 & M expenses

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associated with compliance with the Clean Air Act
 Amendments of 1990 were considered to be energy related, consistent with Commission Order No.
 PSC-94-0044-FOF-EI. The remaining expenses were
 broken down between demand and energy consistent with
 Gulf's last approved cost-of-service methodology in
 Docket No. 891345-EI.

8

9 Q. Please describe Schedules 42-3P, 42-3PA, 42-4P, and
10 42-4PA of your exhibit.

Schedules 42-3P and 42-3PA summarize the monthly 11 Α. recoverable revenue requirements associated with each 12 capital investment for the semi-annual and annual 13 recovery periods. Schedules 42-4P and 42-4PA show the 14 detailed calculation of the revenue requirements 15 associated with each investment. These schedules also 16 include the calculation of the jurisdictional amount 17 18 of recoverable revenue requirements. Mr. Vick has provided me with the expenditures, clearings, 19 retirements, and cost of removal related to each 20 capital project and the monthly costs of emission 21 allowances. From that information, I calculated 22 plant-in-service and Construction Work In Progress-Non 23 Interest Bearing (CWIP-NIB). Depreciation and 24 dismantlement expense and the associated accumulated 25

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depreciation balances were calculated based on Gulf's latest approved depreciation rates and dismantlement accruals. The capital projects identified for recovery through the ECRC are those environmental projects which are not included in the approved projected 1990 test year on which present base rates were set.

- 8
- 9 Q. How was the amount of Property Taxes to be recovered10 through the ECRC derived?

Property taxes were calculated by applying the 11 Α. applicable tax rate to taxable investment. In 12 Florida, pollution control facilities are taxed based 13 14 only on their salvage value. For the recoverable environmental investment located in Florida, the 15 amount of property taxes is estimated to be \$0. In 16 Mississippi, there is no such reduction in property 17 taxes for pollution control facilities. Therefore, 18 property taxes related to recoverable environmental 19 investment at Plant Daniel are calculated by applying 2.0 the applicable millage rate to the assessed value of 21 22 the property.

23

24

25

Page 7

Q. What capital structure and return on equity were used
 to develop the rate of return used to calculate the
 revenue requirements?

The rate of return used is based on Gulf's capital 4 Α. structure as approved in Gulf's last rate case, Docket 5 No. 891345-EI, Order No. 23573, dated October 3, 1990. 6 This rate of return incorporates a return on equity of 7 12.0% as approved by Commission Order No. PSC-93-0771-8 FOF-EI, dated May 20, 1993. The use of this rate of 9 return for the calculation of revenue requirements for 10 the ECRC was approved by the Commission in Order No. 11 PSC-94-0044-FOF-EI dated January 12, 1994 in Docket 12 No. 930613-EI. 13

14

How was the breakdown between demand-related and 15 0. energy-related investment costs determined? 16 The investment-related costs associated with 17 Α. compliance with the Clean Air Act Amendments of 1990 18 (CAAA) were considered to be energy-related, consis-19 tent with Commission Order No. PSC-94-0044-FOF-EI, 20 dated January 12, 1994 in Docket No. 930613-EI. The 21 remaining investment-related costs of environmental compliance not associated with the CAAA were allocated 23 12/13th based on demand and 1/13th based on energy, 24 consistent with Gulf's last cost-of-service study. 25

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The calculation of this breakdown is shown on 1 Schedules 42-4P and 42-4PA and summarized on 2 Schedules 42-3P and 42-3PA. 3 4 What is the total amount of projected recoverable 5 Ο. 6 costs related to the semi-annual period October 1996 through March 1997 and the annual period October 1996 7 8 through September 1997? The total projected jurisdictional recoverable costs 9 Α. for the six-month period October 1996 through March 10 1997 are \$5,592,988 as shown on line 1c of Schedule 11 12 42-1P. This includes costs related to 0 & M activities of \$1,295,262 and costs related to capital 13 projects of \$4,297,726 as shown on lines la and lb of 14 Schedule 42-1P. The total projected jurisdictional 15 recoverable costs for the 12-month period October 1996 1.6 through September 1997 are \$10,901,818 as shown on 17 line 1c of Schedule 42-1PA. This includes costs 18 related to 0 & M activities of \$2,318,813 and costs 19 related to capital projects of \$8,583,005 as shown on lines la and 1b of Schedule 42-1PA. 21 22 What is the total recoverable revenue requirement and 23 0. how was it allocated to each rate class? 24

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Page 9

Witness: Susan D. Cranmer

The total recoverable revenue requirement including 1 Α. revenue taxes is \$4,579,828 for the period October 2 1996 through March 1997 as shown on line 5 of Schedule 3 42-1P. The total recoverable revenue requirement 4 including revenue taxes is \$9,974,077 for the 12-month 5 period October 1996 through September 1997 as shown on 6 line 5 of Schedule 42-1PA. These amounts include the 7 recoverable costs related to the projection period and 8 the total true-up cost to be refunded. Schedules 42-9 1P and 42-1PA also summarize the energy and demand 10 components of the requested revenue requirement. I 11 allocated these amounts to rate class using the 12 appropriate energy and demand allocators as shown on 13 Schedules 42-6P, 42-6PA, 42-7P, and 42-7PA. 14 15 How were the allocation factors calculated for use in 16 0. the Environmental Cost Recovery Clause? 17 The demand allocation factors used in the 18 A . Environmental Cost Recovery Clause were calculated 19 using the 1995 load data filed with the Commission in 20 accordance with FPSC Rule 25-6.0437. The energy 21 allocation factors were calculated based on projected 22 KWH sales for the period adjusted for losses. The 23 calculation of the allocation factors for the six-24 month period is shown in columns 1 through 9 on 25

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Page 10

Witness: Susan D. Cranmer

Schedule 42-6P and for the 12-month period in columns 1 1 through 9 of Schedule 42-6PA. 2 3 How were these factors applied to allocate the 4 0. requested recovery amount properly to the rate 5 6 classes? As I described earlier in my testimony, Schedules 7 Α. 42-1P and 42-1PA summarize the energy and demand 8 portions of the total requested revenue requirement. 9 The energy-related recoverable revenue requirement of 10 \$2,824,770 for the period October 1996 through March 11 1997 and \$6,195,324 for the period October 1996 12 13 through September 1997 was allocated using the energy allocator, as shown in column 3 on Schedules 42-7P and 14 42-7PA, respectively. The demand-related recoverable 15 revenue requirement of \$1,755,058 for the period 16 October 1996 through March 1997 and \$3,778,843 for the 17 period October 1996 through September 1997 was 18 allocated using the demand allocator, as shown in 19 column 4 on Schedules 42-7P and 42-7PA. The energy-20 related and demand-related recoverable revenue 21 requirements are added together to derive the total 22 23 amount assigned to each rate class, as shown in 24 column 5.

What is the monthly amount related to environmental 1 0. costs recovered through this factor that will be 2 included on a residential customer's bill for 1,000 3 kwh? 4 The environmental costs recovered through the clause 5 A. from the residential customer who uses 1,000 kwh will 6 be \$1.28 monthly for the six-month period October 1996 7 through March 1997. If Gulf's request for annual ECRC 8 factors is approved, the amount recovered would be 9 \$1.24 monthly for the period October 1996 through 10 September 1997. 11 12 13 When does Gulf propose to collect these new Ο. environmental cost recovery charges? 14 The six-month factors would apply to October 1996 15 Α. through March 1997 billings beginning with Cycle 1 16 meter readings scheduled on September 27, 1996 and 17 ending with meter readings scheduled on March 28, 18 1997. If the Commission approves an annual recovery 19 period for the environmental costs, the annual ECRC factors shown on Schedule 42-7PA would apply to 21 October 1996 through September 1997 billings beginning 22 with Cycle 1 meter readings schedule on September 27, 23 1996 and ending with Cycle 21 meter readings scheduled 24 on September 26, 1997. 25

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Witness: Susan D. Cranmer

1	Q.	Ms.	Cran	nmer,	does	this	conclu	de you	r testimony?
2	Α.	Yes,	it	does	•				
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Page 13 Witness: Susan D. Cranmer

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COMMISSIONER DEASON: Likewise, we need to 1 identify the exhibits, and those are contained on 2 Page 14 of the prehearing order. 3 MS. JOHNSON: That's correct. 4 COMMISSIONER DEASON: And those exhibits 5 will be numbered 1, 2, 3, 4, and 5 as shown on Page 6 14. And does Staff move the admission of those 7 exhibits? 8 MS. JOHNSON: That's correct, but I 9 understand that Mr. Beasley will be providing copies 10 of Exhibit 6 to all the parties. 11 MR. BEASLEY: And that would be a 12 certificate, Commissioner Deason. So you could either 13 take official notice of it or mark it as an exhibit, 14 whichever your preference. 15 COMMISSIONER DEASON: Well, we'll go ahead 16 and mark it as Exhibit 6. And you will be providing 17 copies to all the parties? 18 MR. BEASLEY: Yes, sir. 19 COMMISSIONER JOHNSON: What did you say it 20 was, Mr. Beasley? 21 MR. BEASLEY: That's a certificate from the 22 Division of Records and Reporting to the effect that 23 no protest was filed. 24 (Exhibits 1-6 marked for identification and 25

FLORIDA PUBLIC SERVICE COMMISSION

received in evidence.) 1 COMMISSIONER JOHNSON: Okay. 2 COMMISSIONER DEASON: So as of this point, 3 the prefiled testimony and the exhibits have been 4 admitted into the record and all cross-examination has 5 been waived; is that correct? 6 MS. JOHNSON: That's correct. 7 COMMISSIONER DEASON: Commissioners, the 8 issues are as identified in the prehearing order. 9 They have all been stipulated by the parties, but it's 10 still necessary for the Commission to take action on 11 these issues, and we can discuss them at this time or 12 if you feel a motion is in order, that would be fine, 13 too. 14 MS. JOHNSON: I don't have any questions on 15 any of the issues, so I'm prepared to move them all 16 unless someone else has questions. 17 COMMISSIONER DEASON: So there's a motion, 18 then, to approve the stipulations on all issues 19 contained in the 07 docket. Is there a second? 20 COMMISSIONER GARCIA: I second. 21 COMMISSIONER DEASON: Without objection, 22 then, show that those stipulations have been approved 23 unanimously. Any other business in the 07 docket? 24 MS. JOHNSON: Staff is not aware of any. 25

FLORIDA PUBLIC SERVICE COMMISSION

	1				
1	COMMISSIONER DEASON:	Very	well.	That	would
2	conclude the 07 docket.				
3	(Hearing concluded at	10.00	a.m.)		
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## FLORIDA PUBLIC SERVICE COMMISSION

11 STATE OF FLORIDA) CERTIFICATE OF REPORTER 2 COUNTY OF LEON ) I, RUTHE POTAMI, CSR, RPR Official 3 Commission Reporter, 4 DO HEREBY CERTIFY that the Hearing in Docket No. 960007-EI was heard by the Florida Public Service 5 Commission at the time and place herein stated; it is 6 further CERTIFIED that I stenographically reported 7 the said proceedings; that the same has been transcribed under my direct supervision; and that this 8 transcript, consisting of 92 pages, constitutes a true transcription of my notes of said proceedings and the 9 included prefiled testimony. 10 DATED this 3rd day of September, 1996. 11 12 13 H. RUTHE POTAMI, CSR, RPR Official Commission Reporter 14 (904) 413-6734 15 16 17 18 19 20 21 22 23 24 25

## FLORIDA PUBLIC SERVICE COMMISSION