

City of Gainesville  
Office of the City Attorney

ORIGINAL

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City Attorney

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Elizabeth A. Waratuke

July 23, 1999

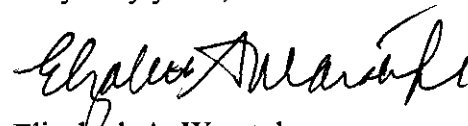
Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service commission  
4750 Esplanade Way, Room 110  
Tallahassee, FL 32399

Re: Docket No. 981890-EU

Dear Ms. Bayó:

Enclosed please find the original Notice of Service of Answers to First Set of Interrogatories Nos. 1- 47, Propounded to Gainesville Regional Utilities by the Florida Public Service Commission.

Very truly yours,



Elizabeth A. Waratuke  
Litigation Attorney

ASB --- W/s  
APC ---  
CAP ---  
CBA --- Enclosures  
CTR ---  
SAC ---  
LEP ---  
MAG ---  
CFC ---  
WHP ---  
WAM ---  
OTM ---

200 E. University Ave., Suite 425, Gainesville, Florida 32601  
P. O. Box 1110, Gainesville, Florida 32602

DOCUMENT NUMBER-DATE

09066 AUG-2 88

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida.

Docket No. 981890EU

NOTICE OF SERVICE OF ANSWERS TO FIRST SET OF INTERROGATORIES NOS. 1 - 47, PROPOUNDED TO GAINESVILLE REGIONAL UTILITIES BY THE FLORIDA PUBLIC SERVICE COMMISSION

TO: Robert V. Elias, Staff Counsel] Leslie J. Paugh, Staff Counsel Florida Public Service Commission Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

GAINESVILLE REGIONAL UTILITIES, by and through its undersigned attorneys and pursuant to Rule 1.340, Florida Rules of Civil Procedure, hereby gives Notice of Service of original and seven copies of Answers to the First Set of Interrogatories, numbered 1 through 47, propounded by the FLORIDA PUBLIC SERVICE COMMISSION under Certificate of Service dated June 23, 1999.

DATED this 30th day of July, 1999.

Raymond O. Manasco, Jr. Utilities Attorney Florida Bar 219861 Gainesville Regional Utilities Post Office Box 147117, Sta. A-138 Gainesville, Florida 32614-7117

DOCUMENT NUMBER-DATE

09066 AUG-28

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

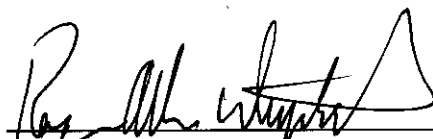
In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida.

Docket No. 981890EU

**AFFIDAVIT**

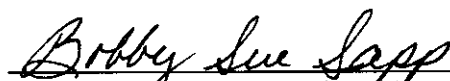
STATE OF FLORIDA  
COUNTY OF ALACHUA

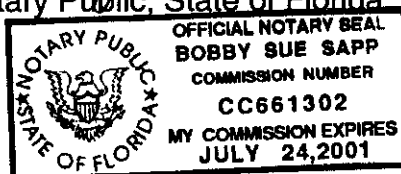
Before me, the undersigned authority, personally appeared this day Roger Allen Westphal, who, first being duly sworn, deposes and says under oath that he provided answers to the Staff's First Set of Interrogatories to Gainesville Regional Utilities (Interrogatory Nos. 1, 3, 4, 5, 6, 7, and 40), and that the response is true and correct to the best of his information and belief.

  
\_\_\_\_\_  
Roger Allen Westphal, Affiant

STATE OF FLORIDA  
COUNTY OF ALACHUA

The foregoing instrument was acknowledged before me this 30<sup>th</sup> day of July, 1999, by Roger Allen Westphal, who is personally known to me and who did swear or affirm that the facts set forth above are true and correct.

  
\_\_\_\_\_  
Notary Public, State of Florida



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida.

Docket No. 981890EU

**AFFIDAVIT**

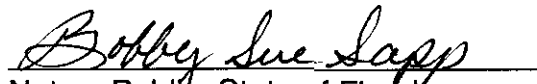
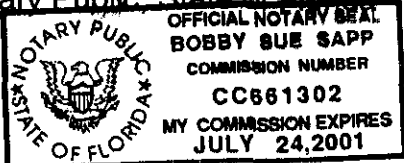
STATE OF FLORIDA  
COUNTY OF ALACHUA

Before me, the undersigned authority, personally appeared this day Darrell R. DuBose, who, first being duly sworn, deposes and says under oath that he provided answers to the Staff's First Set of Interrogatories to Gainesville Regional Utilities (Interrogatory Nos. 8, 9, 32, 33, 34, 35, 36, 37, 38, 39, 42, 43, 44, 45, 46, and 47), and that the response is true and correct to the best of his information and belief.

  
Darrell R. DuBose, Affiant

STATE OF FLORIDA  
COUNTY OF ALACHUA

The foregoing instrument was acknowledged before me this 30<sup>th</sup> day of July, 1999, by Darrell R. DuBose, who is personally known to me and who did swear or affirm that the facts set forth above are true and correct.

  
Notary Public, State of Florida  


BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into the  
aggregate electric utility reserve  
margins planned for Peninsular  
Florida.

Docket No. 981890EU

**AFFIDAVIT**

STATE OF FLORIDA  
COUNTY OF ALACHUA

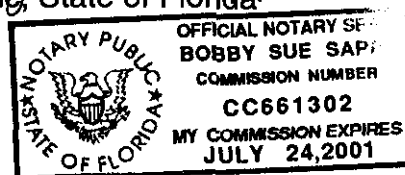
Before me, the undersigned authority, personally appeared this day Todd Kamhoot, who, first being duly sworn, deposes and says under oath that he provided answers to the Staff's First Set of Interrogatories to Gainesville Regional Utilities (Interrogatory Nos.10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, and 21), and that the response is true and correct to the best of his information and belief.

  
\_\_\_\_\_  
Todd Kamhoot, Affiant

STATE OF FLORIDA  
COUNTY OF ALACHUA

The foregoing instrument was acknowledged before me this 30<sup>th</sup> day of July, 1999, by Todd Kamhoot, who is personally known to me and who did swear or affirm that the facts set forth above are true and correct.

  
\_\_\_\_\_  
Notary Public, State of Florida



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida.

Docket No. 981890EU

**AFFIDAVIT**

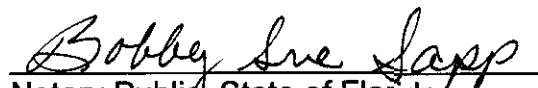
STATE OF FLORIDA  
COUNTY OF ALACHUA

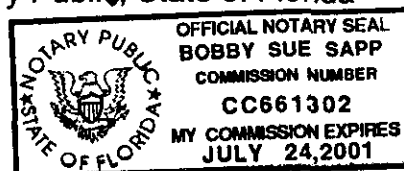
Before me, the undersigned authority, personally appeared this day Berdell Knowles, who, first being duly sworn, deposes and says under oath that he provided answers to the Staff's First Set of Interrogatories to Gainesville Regional Utilities (Interrogatory Nos. 2, 22,23,24,25,26,27,28,29,30,31, and 41), and that the response is true and correct to the best of his information and belief.

  
Berdell Knowles, Affiant

STATE OF FLORIDA  
COUNTY OF ALACHUA

The foregoing instrument was acknowledged before me this 22<sup>nd</sup> day of July, 1999, by Berdell Knowles, who is personally known to me and who did swear or affirm that the facts set forth above are true and correct.

  
Notary Public, State of Florida



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida.

Docket No. 981890EU

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the original of the foregoing Notice was filed with Ms. Blanca S. Bayó, Director of the Division of Records and Reporting, THE PUBLIC SERVICE COMMISSION, 110 Betty Easley Conference Center, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399. The original and seven copies of the Answers to the First Set of Interrogatories to Gainesville regional Utilities (Nos. 1 – 47), propounded by the FLORIDA PUBLIC SERVICE COMMISSION, together with seven copies of the foregoing Notice, were served on Robert V. Elias, Staff Counsel and Leslie J. Paugh, Staff Counsel, Florida Public Service Commission, Gerald L. Gunter Building 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, on behalf of Gainesville Regional Utilities. A copy each of this Notice and the Answers to Interrogatories 1 – 47 have been furnished by U. S. Mail this 30<sup>th</sup> day of July, 1999, to the following:

Reedy Creek Improvement District  
Willard Smith / Fran Winchester  
Post Office Box 10175  
Lake Buena Vista, FL 32830

City of Tallahassee  
Richard G. Feldman  
300 South Adams Street  
Tallahassee, Florida 32301

McWhirter Reeves McGlothlin  
Vickie Gordon Kaufman  
117 South Gadsden Street  
Tallahassee, Florida 32301

Utilities Commission, City of New Smyrna  
Beach  
Ronald L. Vaden  
Post Office Box 100  
New Smyrna Beach, FL 32170

Office of Public Counsel  
John Roger Howe  
111 W. Madison Street, Rm. 812  
Tallahassee, FL 32399

Beggs & Lane  
Jeffrey Stone  
Post Office Box 12950  
Pensacola, FL 32576

Ausley & McMullen  
James Beasley  
Post Office Box 391  
Tallahassee, FL 32301

FL Electric Cooperative Association  
Michelle Hershel  
Post Office Box 590  
Tallahassee, FL 32302

Legal Environmental Assistance Foundation  
Deb Swim  
1114 Thomasville Road, Suite E  
Tallahassee, FL 32303

Florida Reliability Coordinating Council  
Ken Wiley  
405 Reo Street, Suite 100  
Tampa, FL 33609

Landers & Parsons  
Scheff Wright  
Post Office Box 271  
Tallahassee, Florida 32303

Moyle Flanigan  
Jon Moyle, Jr.  
210 South Monroe Street  
Tallahassee, FL 32301

Steel Hector and Davis  
Matthew M. Childs  
215 South Monroe Street  
Suite 601  
Tallahassee, FL 32301

City of Homestead  
James Swartz  
675 N. Flagler Street  
Homestead, FL 33030

City of Lake Worth Utilities  
Harvey Wildschuetz  
1900 Second Avenue, North  
Lake Worth, FL 33461

Seminole Electric Cooperative  
Timothy Woodbury  
Post Office Box 272000  
Tampa, Florida 33688

Florida Power Corporation  
Jim McGee  
Post Office Box 14042  
St. Petersburg, FL 33733

City of Lakeland  
Gary Lawrence  
501 East Lemon Street  
Lakeland, FL 33801

Young VanAssenderp & Varnadoe  
Roy Young  
Post Office Box 1833  
Tallahassee, FL 32302

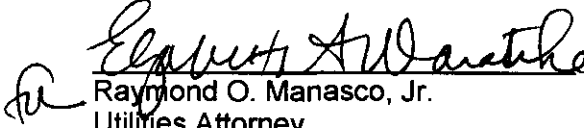
Jacksonville Electric Authority  
Tracey E. Danese  
21 West Church Street  
Tower 16  
Jacksonville, Florida 32202

Kissimmee Utility Authority  
A. K. (Ben) Sharma  
Post Office Box 423219  
Kissimmee, FL 34742

Thornton Williams & Association  
Paul Sexton  
Post Office Box 10109  
Tallahassee, FL 32302

Florida Municipal Power Agency  
Frederick Bryant  
Post Office Box 3209  
Tallahassee, Florida 32315

Orlando Utilities Commission  
Thomas B. Tart  
Post Office Box 3193  
Orlando, FL 32802

  
Raymond O. Manasco, Jr.  
Utilities Attorney  
Florida Bar 219861  
Gainesville Regional Utilities  
Post Office Box 147117, Sta. A-138  
Gainesville, Florida 32614-7117