

Susan D. Ritenour
Secretary and Treasurer
and Regulatory Manager

One Energy Place
Pensacola, Florida 32520-0781

Tel 850.444.6231
Fax 850.444.6026
SDRITENO@southernco.com

SCANNED



May 31, 2006

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

Re: Docket No. 060198-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Storm Preparedness Plan.

Sincerely,

Susan D. Ritenour (lw)

bh

Enclosures

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

DOCUMENT NUMBER - DATE

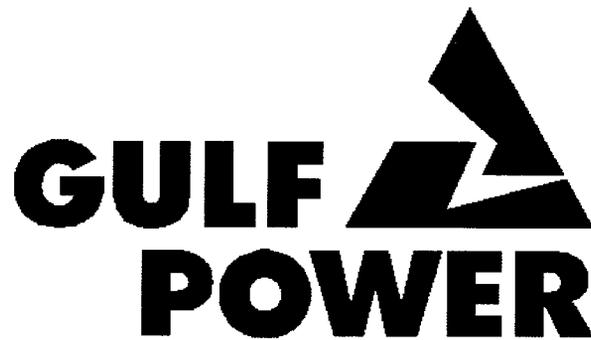
04748 JUN-1 8

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

DOCKET NO. 060198-EI

GULF POWER COMPANY

**Storm Preparedness Plan and
Implementation Cost Estimates**



A SOUTHERN COMPANY

DOCUMENT NUMBER-DATE

04748 JUN-18

FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

DOCKET NO. 060198-EI

GULF POWER COMPANY

**Storm Preparedness Plan and
Implementation Cost Estimates**



DOCUMENT NUMBER-DATE

04748 JUN-18

FPSC-COMMISSION CLERK

Introduction

Gulf Power Company offers the attached Plan in response to the Commission's request for each investor-owned electric utility to file plans and estimated implementation costs for ongoing storm preparedness initiatives as set forth in FPSC Order No. PSC-06-0351-PAA-EI in Docket No. 060198-EI. This Storm Preparedness Plan, containing 10 sections and 1 attachment, is intended to address the 10 plan requirements set forth in the Order.

Gulf Power's proposals in the attached Plan are not intended to address all ongoing storm preparedness initiatives. Gulf Power views this Plan as a starting point of an ongoing process to identify ways to minimize future storm damages and customer outages. Gulf plans to build on what works well and to improve in areas that do not work as well as intended. Gulf is committed to continuous improvement by building on its experiences and is supportive of research to address the potential benefits of initiatives, such as hardening transmission and distribution facilities, which could lead to less-frequent outages and improved continuity of service during major storm-related events.

SECTION 1: A Three-Year Vegetation Management Cycle for Distribution Circuits

Gulf Power's Proposal: Reliability Based Vegetation Management

INTRODUCTION

Since 1987, Gulf Power has utilized a reliability based vegetation management program that has been successful in improving reliability to its customers and mitigating vegetation caused damage during storms. Gulf Power proposes to continue the use of its present reliability based vegetation management philosophy.

RELIABILITY BASED MANAGEMENT METHODOLOGY

Reliability based management targets vegetation based on the following priorities:

- 1) Trouble Ticket Pruning
- 2) Targeted Hot Spot Pruning
- 3) Full Maintenance Pruning

The reactive portion of Gulf's vegetation management program involves trouble ticket pruning.

Trouble Ticket Pruning Each concern involving vegetation that is reported is evaluated in the field and a determination is made as to whether the situation presents a threat to safety and/or reliability. If the inspector feels a threat exists, or that the condition will become a threat before the area is treated on a planned basis, the vegetation will be removed or pruned to obtain a minimum of three years of clearance. Trouble ticket reports are received from a variety of sources, including customers, engineers, line crews, our own utility foresters, and other miscellaneous sources.

The planned portion of the vegetation management program involves the use of targeted hot spot pruning and full maintenance pruning. Each year, the vegetation reliability indices of all distribution circuits are evaluated to determine if any circuits appear to have abnormally high or deteriorating reliability caused by vegetation. Those circuits that are identified are patrolled in the field to determine the actual vegetative condition of the entire circuit. Based on the findings of the field patrol, one of several actions will be taken:

Targeted Hot Spot Pruning - If the field patrol determines that circuit reliability is deteriorating due to vegetative conditions in isolated area(s) of the circuit, then the isolated area(s) will be scheduled for targeted spot pruning. With targeted spot pruning, the isolated area will be systematically pruned to insure adequate clearance

is re-established in the area. Once again, all pruning will insure a minimum of three years of clearance is obtained.

Full Maintenance Pruning - If the field patrol determines that reliability is deteriorating due to the overall condition of vegetation on the entire circuit, then the entire circuit will be scheduled for pruning. In full maintenance pruning, the main feeder as well as all taps and laterals will be pruned to establish a minimum of three years of clearance on the entire circuit. In addition, small trees on the right-of-way that will present future problems will be removed.

Trouble Ticket Pruning – If the field patrol determines that reliability has been compromised by a small number of individual trees, then trouble tickets will be issued for each specific tree. These trees will be removed or pruned to obtain a minimum of three years of clearance.

No Action – Sometimes the field patrol will determine that no action is necessary. A single event will sometimes cause a circuit's vegetation reliability indices to yield an inaccurate representation of the circuit's vegetative condition. An example of this would be a case where an extended outage is caused by a single off right-of-way tree falling across a major three phase line.

RELIABILITY BASED MANAGEMENT VS. CYCLICAL MANAGEMENT

Reliability based management targets funding on vegetative conditions that pose a threat to public safety and system reliability. Vegetative conditions that do not pose a threat are not treated.

Cyclical management of vegetation calls for the treatment of all vegetation on a pre-determined schedule. When cyclical management of an area occurs, all vegetation in the area is treated. Those trees that do not pose a threat to public safety or system reliability are treated by virtue of the fact that the time for treatment has arrived in accordance with the pre-determined schedule. Based on our positive experience with reliability based management, Gulf perceives the following weaknesses exist in a cyclical based approach to vegetation management:

- 1) Cost – Additional cost is incurred in the pruning of vegetation that does not pose a threat to system safety or reliability.
- 2) Diversion of Funding – The expenditure of funding on vegetation that does not pose a threat to system safety or reliability limits funding available to target vegetation that does pose a threat to system integrity.

With respect to its impact on storm hardening, Gulf does not feel a cyclical approach would provide improved system performance over reliability based management during a storm. The vast majority of Gulf's distribution lines are located within road rights-of-way under franchise agreements and Gulf's legal tree pruning rights do not extend beyond the boundaries of the road right-of-way. While there is no empirical evidence to

prove this, there is overwhelming agreement among storm restoration personnel that the vast majority of tree caused outages during storms have historically been caused by off right-of-way trees falling into the road right-of-way. Neither cyclical nor reliability based programs would have a significant impact on these trees. When the next major named storm significantly impacts Gulf's service area, Gulf will obtain forensic data to verify the validity of this assumption.

PROGRAM EFFECTIVENESS MEASURES

The effectiveness of reliability based management is determined by its effect on public safety, reliability, and customer satisfaction.

Public safety is measured by the number of accidents or injuries to the public where vegetation was a cause or contributing factor. There have been no reported injuries or accidents to the public caused by vegetation over the past five years.

Customer satisfaction has remained high for a number of years under reliability based management. For a number of years, Gulf Power's Corporate Communications Department measured public satisfaction of its vegetation management activities through a formal survey. However, the surveys were discontinued in the mid to late 1990's when it was determined Gulf's vegetation management program was a non-factor in overall customer satisfaction.

Reliability is measured in terms of vegetation related SAIDI. While the number of tree caused outages and other reliability indices are considered in the planning and evaluation of work, SAIDI is the primary parameter used to measure program effectiveness because it is the index that considers both the number of outages and the number of customers impacted by these outages. Since going to reliability based management in 1987, Gulf Power has experienced a steady improvement in vegetation related reliability.

It should be noted that Gulf uses a trend line analysis on SAIDI data to verify the index is trending downward. Annual reliability can be heavily influenced by weather fluctuations and program effectiveness can only be measured by looking at long term trends in the annual SAIDI indices.

Implementation Timeline:

N/A

Costs:

Since this is an on-going effort, there are no incremental costs associated with this program.

FPSC Recommendation: Three Year Vegetation Management Cycle

Issues

See above

Methodology

All vegetation with less than three years of clearance will be treated to establish a minimum of three years of clearance. This work will be scheduled and completed on a circuit basis on all main lines, taps, and pull-offs.

Implementation Timeline:

Since this approach requires such a dramatic increase in incremental cost, three to five years will be required to fully implement.

Costs:

An annual budget of \$7.4 million will be required to establish a three-year cycle that prunes all taps, laterals, and main feeders. This represents an annual incremental cost of \$4.2 million.

SECTION 2: An Audit of Joint-Use Attachment Agreements

Gulf Power's Existing Joint Use Audit Agreements:

Gulf Power Company has in its current Joint Use contracts an agreement to conduct a field audit of the joint use poles every five years. These field audits have been in effect since at least 1991. The field audit includes both poles owned by the electric utility to which other utility attachments are made (i.e., telecommunications and cable) and poles not owned by the electric utility to which the electric utility has attached its electrical equipment. Table 1 provides an overview of the scope of items currently being collected in the 2006 Joint Use field audit.

Data Item:	Description:
X,Y Pole Location on Map:	<i>Plot location of poles owned by Gulf Power/BellSouth/Sprint-Florida or poles with Gulf Power/BellSouth/Sprint-Florida attachments on map. The map X,Y will be derived by where the pole is placed relative to the map landbase.</i>
X,Y Pole Location (GPS):	<i>GPS measurements are specified for the location of facilities. Factory-specified 3-10 meter GPS equipment will be utilized to obtain readings (actual accuracy is usually 1-3 meters). The GPS X,Y measurements will be stored as attributes on each pole visited.</i>
Pole Owner:	<i>Verify pole owner from ownership identification matrix to be defined at project start.</i>
County Location:	<i>Assign the county of location for each pole. This will be an automated geospatial operation to ensure accuracy and completeness and will not be an attribute collected in the field.</i>
Gulf Power Map ID:	<i>Assign the Map ID of location for each pole. This will be an automated geospatial operation to ensure accuracy and completeness and will not be an attribute collected in the field.</i>
Pole Type:	<i>Type will be field-determined from a pick list to be defined at project start. Typical values are wood, concrete and steel.</i>
Original Pole Treatment:	<i>Pole Treatment will be field-determined from a picklist to be defined at project start.</i>
Pole Height:	<i>Height of pole as read from brand.</i>
Pole Class:	<i>Class of pole as read from brand.</i>
Pole Manufacture Date:	<i>Date of pole manufacture as read from brand.</i>
Collect attachment types:	<i>Collect the presence of an attachment and the attachment type.</i>
Collect attachment owners:	<i>Determine and collect ownership information for each attachment.</i>
Pole Number	<i>Enter the number from the tag on the pole. Each pole tag attached will be per customer specification.</i>
Comments/Notes	<i>Enter information of interest about the current pole location. For example; customer comments, hazardous conditions, safety concerns (bad dogs), etc.</i>

Table 1: Field Data Collection Items

Any dangerous situations identified in the field during the Joint Use field audit will be immediately reported to the pole owner. Dangerous conditions may include buckling, splitting or broken poles.

Gulf Power's Proposal: Pole Strength Assessments based on Sampling

Upon completion of the 2006 Joint Use field survey currently being conducted and scheduled to be completed September 2006, Gulf Power Company will have the capability to extract joint use attachment data. From this data, a contractor for Gulf Power Company could take a random sampling of each Gulf Power Company owned joint use pole with three (3) or more third party attachments, with a pole having a manufactured date of twenty (20) or more years, to determine whether a pole has sufficient strength to adequately support the attached facilities.

Implementation Timeline:

A Pole Strength/Load Assessment could commence at the beginning of 2007 based on the 2006 Joint Use Field Audit survey currently being conducted by OSMOSE Utility Services, Inc.

Costs:

Gulf Power Company recommends a random sampling for Pole Strength/Load Assessment on 5% of the Gulf Power Company owned joint use poles meeting the following criteria: pole date of at least twenty (20) years and at least three (3) third party attachers.

Based on the result of the 2006 Joint Use field survey, costs could be determined at the conclusion of the survey currently being conducted.

FPSC Recommendation: Audit of Joint-Use Agreements Including Pole Strength Assessments

Assessments of Pole Strength could include the following:

1. **Determining Remaining Pole Strength:** This procedure should include measuring all decay, insect and mechanical damage in the groundline zone. The remaining sound circumference (after removing shell rot) would be measured and entered into a data collection software that would determine the remaining bending strength by calculating the remaining section modulus to report the remaining strength as a percent of the original strength.
2. **Determining Load Assessments:** Completing a pole loading analysis provides additional information for a more accurate determination about serviceability. In some cases, poles may be less than fully loaded. In some of these cases, poles with enough loss of strength to be rejected when full load is assumed can remain safely in

service because they still exceed code requirements. The loading analysis may find a percentage of poles that are overloaded and the assessment will help direct any follow up action.

Implementation Timeline:

A Pole Strength/Load Assessment could commence at the beginning of 2007. This approach would require a dramatic increase in cost and would require a ten (10) year window to fully implement.

Costs:

Several factors go into determining what the actual costing analysis would be. It is estimated that the cost for determining remaining pole strength and determining load assessments, as mentioned above, could be approximately \$5,375,000.

To conduct a complete engineering load study of each joint use pole by completing a structural analysis process including assessing transverse, longitudinal and vertical loads acting on a wood pole structure; analyzing both wire and equipment specifications; and including Pole Strength and Load Assessments as listed above in items one and two, it could cost approximately \$16,125,000.

**SECTION 3:
A Six-year Transmission Structure Inspection Program**

Gulf Power's Proposal:

Gulf Power's current inspection plans meet or exceed Staff's recommendations. In 2004 Gulf adopted the Southern Company Transmission Line Inspection Standards as its program. The details of the program have been filed with the Commission per FPSC Order No. PSC-06-0144-PAA-EI in Docket No. 060078-EI. In general, Gulf contracts ground line inspections and uses a combination of Company employees and contractors to perform comprehensive walking and aerial inspections. Gulf's transmission structure inspection program is based on two alternating twelve-year cycles which results in a structure being inspected at least every six years.

Historically, Gulf has not inspected a set number of poles each year. Annual inspection rates have varied as the Company responded to its various needs. Gulf plans to utilize the same flexible approach to ensure the Company completes its inspection cycle as required.

Gulf Power currently inspects all its substations at least once annually. These inspections include visual inspection of all structures, buss work, switches and capacitor banks for defects. Current design standards for new substations include 150 mile per hour wind loading for structures inside the substation.

Implementation Timeline:

See above.

Costs:

There are no incremental costs associated with this program.

SECTION 4: Hardening of Existing Transmission Structures

Gulf Power's Proposal:

Gulf believes that existing facilities should be governed by the version of the NESC in effect at the time of initial construction; however, to the extent practical and feasible, consideration should be given to upgrading when capital maintenance is performed on existing transmission facilities.

Regarding Staff's initial recommendation, Gulf estimates that it would require a capital expenditure of approximately \$300 million to replace all wood transmission structures with concrete or steel structures. It is Gulf's position that the adherence to current design and construction standards, using generally accepted engineering practices in conjunction with the recommended 6-year structure inspection program, will maintain adequate hardening of the system in all areas.

In addition, Gulf proposes to:

1. Perform a visual inspection in 2006 of all H-frame structures. Estimated O&M cost is \$200,000.
2. Install storm guys on H-frame transmission structures not currently guyed over five (5) years. Estimated capital cost for total project is \$1.5 million.
3. Complete the replacement of wood cross arms with steel program over ten (10) years. Estimated capital cost for total project is \$3.0 million.
4. Ensure transmission line design standards have "loss of conductor" contingency for all new construction.

Gulf Power currently designs all new transmission construction using extreme wind loading criteria found in the NESC with 1.1 overload factor.

Implementation Timeline:

See above.

Costs:

Total annual increase in capital construction costs is approximately \$600,000. There is a one time, \$200,000 increase in O&M in 2006. There will be increases for any upgrade projects when they occur but specific dollars can not be determined until the project is identified.

SECTION 5: A Transmission and Distribution Geographic Information System

Gulf Power's Proposal:

Gulf Power's Geographic Information System (GIS) is a database for distribution, transmission, and land records across the service area. The distribution side of the system is using **DistGIS** which is the abbreviation for the company's Distribution Geographic Information System. The system is designed to be a complete electronic model of Gulf Power's electrical system overlaid on a representation of the land base. DistGIS is actually a system composed of many parts. The base GIS software is ArcGIS/ArcMap from Environmental Systems Research Institute (ESRI). It also provides consistent, high-quality data to other systems. For example, it feeds data to the outage management systems (TCMS) in place at Gulf Power to ensure optimum response to incidents, such as the recent hurricanes. And the ArcGIS platform serves as an enabling technology for addressing future Gulf Power Company business needs.

Transmission uses the same software as distribution to map the GIS Data. All data that is mapped on the Transmission Mapping tools is pulled from the Common Transmission Database (CTDB). Transmission collects data for the CTDB through various means. The method in which the majority of our data is collected is through inspections on field computers using the Transmission Lines Inspection System (TLIS). This data is transferred into the CTDB and then extracted into various Mapping programs. Transmission uses Transview, TLIS Maps, and individual ESRI Maps. All updates made to the transmission system are captured in the CTDB and are then available in GIS format. At the current rate of data collection and population of the CTDB, Gulf will complete the initial mapping of its transmission system into the GIS within the next six (6) years.

Implementation Timeline:

See above.

Costs:

One additional GIS Technician for Transmission-\$75,000 (80% Capital, 20% O&M)

SECTION 6: Post-Storm Data Collection and Forensic Analysis

Gulf Power's Proposal:

Gulf Power will employ contractors that will be staged out of harms way and will be ready to be mobilized after the threat of the storm has passed. Once on the system, the crews will survey a percentage of the lines in the storm damaged areas. Percentages will vary depending on how many miles of distribution lines are in the area of the company affected by the storm. The crews will be divided to cover both inland and coastal areas. This data will be collected by one of two methods depending on the progression of this program before storm season. The preferred method will be for the contractor to use hand held computers, with stored system maps, to collect the data shown below and store all information gathered. The second method is to collect the same data manually using forms that identify each pole and correlate to a system map that will be supplied by Gulf Power to the contractor. This collection process will be worked concurrently with the storm restoration process.

Implementation Timeline:

This data collection will occur when the next major, named storm significantly impacts Gulf's service area.

Costs:

The cost of this program will vary depending on the severity of the storm damage and the area effected, whether rural or urban. Based on the plan set forth the cost for a storm the size of Dennis would have cost \$100,000 with data collected on twenty percent of the impacted area and the cost for Ivan would have been \$150,000 with ten percent of the impacted area surveyed. Using these two storms an average cost will be \$125,000 to complete a forensic sweep based on the current storm agreement with the contractor. The cost for the next ten years will be incremental and will vary by the storm size and contractor.

SECTION 7: Collection of Detailed Outage Data Differentiating Between the Reliability Performance of Overhead and Underground Systems

Gulf Power's Proposal:

Gulf will record the number of overhead (OH) and underground (UG) customers on its system at the end of each year. This will allow Gulf to calculate the SAIDI and SAIFI indices as experienced by overhead and underground customers.

Gulf will also collect the following data on outages as they occur:

- UG cable is:
 - Direct Buried
 - Direct Buried but Cable Injected
 - In Conduit

- Pole type is:
 - Concrete
 - Wood

The data will be collected as each outage occurs. The Outage Management Software used to collect the outage data and the Outage Management Software database used to store the outage data will be revised to capture this information.

The timeline for implementation is as follows:

- 3rd Q 2006
 - Modify the Outage Management System to allow for the collection of the Pole and UG Cable outage data.
 - Communicate the modification and expectations to DOC personnel, Service Crews & Line Crews
- 4th Q 2006
 - Collect Pole & UG Cable outage data for testing of system changes to be initiated. Communicate with DOC personnel to see if any necessary modifications to the Outage Management System or current work processes are necessary.
- 1st Q 2007
 - Begin collecting Pole & UG Cable outage data for future analysis as recommended by the PSC.

Implementation Timeline:

See above.

Costs:

The costs for this are minimal as it utilizes existing systems and processes.

SECTION 8: Increased Utility Coordination with Local Governments

Gulf Power's Proposal:

Gulf Power Company currently enjoys very positive relationships with the local governments in Northwest Florida. These relationships are based on trust, open communication and demonstrated cooperation in times of emergencies.

Because Gulf Power's service area has been severely impacted by hurricanes in the last two years, the company has had the opportunity to strengthen these relationships as communities work together to prepare for and recover from hurricanes.

In addition to local governments, Gulf Power believes it is important to coordinate with local business leaders and community organizations as well to ensure a comprehensive approach to restoration.

Our plan to continue to further strengthen our coordination with local governments and community leaders is divided into three phases – Year Round Activities, Pre-Hurricane and Post Hurricane.

I. Year Round Activities:

1. Gulf Power will conduct Community Leader Forums where we invite government and civic leaders to meet with us and discuss hurricane-related issues as well as other critical issues related to the well-being of the community. These forums will be moved around the service area in Northwest Florida for broad participation. The president and officers of Gulf Power will participate in these forums to demonstrate commitment from the highest level of the company.
2. Gulf Power will post a web site for city and county building and electrical inspectors. This web site will feature information on our electric system and process improvements as well as information about our hurricane planning and restoration processes.
3. Before hurricane season begins each year, Gulf Power will meet with local government officials to review the company's power restoration process, identify high priority loads, discuss traffic safety and control, and identify possible staging areas and logistics for power crews and other opportunities for coordination.
4. Gulf Power will participate in all local government hurricane preparedness drills, exercises, information fairs and events.

5. Gulf Power will designate specific employees to maintain an active relationship with local governments on an ongoing basis. These employees will explore tree trimming, underground electric service and other utility-related issues and opportunities with the local government officials.
6. Gulf Power has Line Clearing Specialists (LCS) assigned across its service area to maintain contact with the various cities and municipalities we serve. The LCS maintain routine contact with the city or municipality to provide a single point of contact. The LCS routinely communicate with the city or municipality regarding vegetative conditions as they relate to Gulf's distribution facilities, including addressing any concerns the city or municipality may have and coordinating the joint removal of large city-owned trees that threaten Gulf's distribution facilities.

II. Pre-Hurricane

1. When a storm appears to represent a threat to Northwest Florida, Gulf Power will send a news release to all local government officials outlining specific restoration plans and strategies.
2. Gulf Power will identify a single point of contact for local government officials to call with any questions or information. This will help eliminate uncertainty and promote a free flow of information.
3. Gulf Power will assign employees on a rotating basis to man county emergency operation centers (EOCs) as a resource for local emergency and government officials on a 24-hour basis if necessary.

III. Post Hurricane

1. Gulf Power will give local government officials two formal reports a day on restoration progress and estimated completion times, as well as be available for questions or concerns.
2. Gulf Power employees stationed in the local EOCs will relay critical restoration priorities back to the company and participate in EOC information briefings.
3. Where needed, Gulf Power will set up temporary customer service tables in or near local government operations for local citizens to make service related requests in the field.

4. In heavily damaged or flooded areas, Gulf Power will contact local building and electrical inspection offices to coordinate a speedy process to inspect and reconnect repaired structures. This could include Gulf Power crews accompanying inspectors in the field to immediately restore service upon a successful inspection.
5. Gulf Power will participate in all local EOC critiques and post hurricane improvement discussions.

Implementation Timeline:

N/A

Costs:

Since this is an on-going effort, there are no incremental costs associated with this program.

SECTION 9: Proposal for Collaboration on Storm Hardening Research

Gulf Power's Proposal:

Gulf Power is supportive of a collaborative effort to conduct research and development (R&D) on the effects of major hurricanes on the electrical systems throughout the state of Florida. Gulf Power prefers that the R&D effort be managed by an entity within the state that can draw resources from various universities and research organizations that may exist not only in Florida but also from the Southeast Region and other parts of the United States.

The Public Utility Research Center (PURC) located at the University of Florida is qualified to provide the leadership necessary to serve as the R&D coordinator. PURC already has a strong working relationship with Florida's investor-owned utilities, cooperatives and municipals.

Gulf Power plans on participating in a process for the R&D effort that PURC has initiated. This process entails an initial workshop with participants from the utility industry, government and academia. PURC's purpose for the workshop is to provide a forum in which utility managers and hazard research professionals can discuss means to prepare Florida's electrical infrastructure to better withstand and recover from hurricanes.

As stated above, Gulf Power believes that PURC's position allows it to locate the resources necessary and otherwise unknown to the state of Florida utilities. However, Gulf plans on continuing to participate as appropriate within Southern Company and its own R&D efforts in this and other areas of its business. Gulf may choose to also engage in R&D through a local university in Northwest Florida.

Implementation Timeline:

The first meeting, a Workshop for Research in Electricity Infrastructure Hardening, will occur on June 9, 2006. Additional dates and action items are yet to be determined.

Costs:

These costs, yet to be determined, will be an incremental addition to the O&M budget.

SECTION 10: A Natural Disaster Preparedness and Recovery Program

Gulf Power Company's Storm Recovery Plan:

Gulf Power Company uses the plans described in its Storm Recovery Plan to respond to any natural disaster that may occur within its service area. These plans have proven to be very effective during the last 2 years in recovering from the multiple storms that have impacted Gulf Power and its customers. As part of its annual operations, Gulf Power has developed and refined its planning and preparations for the possibility of a natural disaster within the area Gulf serves. This planning is updated annually to build on what works well and to improve in areas that do not work as well as intended. In these updates, Gulf strives for continuous improvement by building on its experiences while working recovery efforts within its own service areas and when serving to assist other utilities that have suffered weather related natural disasters. In the past, Gulf's plan has been encapsulated within a detailed and proprietary Storm Recovery Procedure Manual. Gulf has recently undertaken to pull this information together in a separate document that will form the basis for its Storm Recovery Plan (See Attachment A). Gulf will continue to prepare the more detailed Storm Recovery Procedure manual as an element of its Natural Disaster Preparedness and Recovery program. The Manual will follow the guidelines and philosophy set forth in the Storm Recovery Plan.

Overview of Gulf's Storm Recovery Preparations:

All Gulf Power employees are given a specific storm assignment as a part of the planning process. The Company Emergency Management Center (CEMC) specialist works with Human Resources to ensure that each restoration area is staffed with the appropriate number of employees and that every employee has the proper skill set to perform their storm assignments. In many cases, employees have a storm assignment which may be significantly different from their normal job. Storm training handbooks are updated and distributed as needed. Additionally, training is conducted to ensure that employees are competent to perform the job to which they are assigned. Prior to the storm season, informational meetings are held and internal communications focus on storm preparedness.

Members of the CEMC leadership team attend conferences each year in an effort to benefit from lessons learned by others. In the past, these have included: the Southeastern Electric Exchange (SEE) Mutual Assistance meetings, the National Hurricane Conference, and the Governor's Hurricane Conference. Gulf Power also participates in the yearly statewide storm drill under the direction of the State Emergency Operations Center (SEOC).

In the logistics and support areas, contracts are negotiated and confirmed with vendors for services such as food, lodging, materials, transportation, fuel, and other support functions. Staging sites are secured, and if needed, agreements are negotiated and signed.

Gulf Power's Supply Chain Management department ensures that materials on hand, along with available supplies from the material vendors, are sufficient to meet the anticipated demands of the storm season.

Overview of Gulf Power's Company Emergency Management Center (CEMC):

The objective of the CEMC is to provide overall direction in the restoration of electric service to Gulf's customers as quickly as possible, while protecting the safety of everyone involved. In order to provide a coordinated response and to maximize the restoration effectiveness, the Company organizes into three major restoration areas headquartered in Pensacola, Fort Walton Beach, and Panama City. The CEMC consists of functional teams which provide support to Power Generation, Transmission and Distribution as they restore their respective systems. The three primary leaders working in the CEMC are the CEMC Manager, the Resource Director, and the Logistics Director, who report directly to the Power Delivery General Manager. On a daily basis, these three leaders work with each other to insure the CEMC is providing the proper administration and support necessary for the restoration efforts in the field. The functional teams that are represented in the CEMC and that report to the CEMC manager are as follows: CEMC Staff; Distribution; Distribution Operations Center; Transmission, System Control, and System Protection; Power Generation; Contractor Coordination; Logistics; Aircraft Operations; Supply Chain Management; Customer Service; EOC Coordination; Corporate Security and Risk Management; Safety and Health; Public Affairs; Human Resources; Fleet Services; Information Technology; Corporate Real Estate and Quality (Facilities); Accounting and Treasury; and Environmental.

When the National Weather Service announces a tropical storm or hurricane has entered the Gulf of Mexico, the System Operator will notify the CEMC leadership, appropriate management and the Company's executives. Private weather services used by Gulf Power also issue notifications to selected Company officials. The storm is monitored as it develops, and if there is a possibility Gulf Power's service area will be affected, the CEMC at the Company's Pace Boulevard building is set up and readied for activation. The hurricane is closely monitored when it may threaten Gulf Power's service area within 36 hours.

After evaluation of wind profiles and consultation with private weather services, a decision is made as to when it will be unsafe for employees to travel. At that time, and after consultation with senior Company management, the Project Services Manager (CEMC Manager), the Power Delivery Services Manager, or the CEMC specialist will determine when the CEMC will be formally activated. Once activated, the CEMC, which is located at the Pace Boulevard Building, is staffed by a core group that will remain for the duration of the storm.

CEMC leaders are notified of the activation plan and are responsible for ensuring their respective areas are in a state of readiness and are properly staffed. The CEMC remains operational 24 hours a day, 7 days a week, until such time the power is substantially

restored to all customers who are able to receive service. Depending on the severity of the storm, repair work on the system may continue after the CEMC is deactivated.

Implementation Timeline:

N/A

Costs:

Since this is an on-going effort, there are no incremental costs associated with this program.

ATTACHMENT A

**Gulf Power Company
Storm Recovery Plan
Including Natural Disaster Preparedness and Recovery
Effective Date: 06/01/06**

Gulf Power Company uses the plans described in its Storm Recovery Plan to respond to any natural disaster that may occur within its service area. These plans have proven to be very effective during the last 2 years in recovering from the multiple storms that have impacted Gulf Power and its customers. As part of its annual operations Gulf Power has developed and refined its planning and preparations for the possibility of a natural disaster within the area Gulf serves. This planning is updated annually to build on what works well and to improve in areas that do not work as well as intended. In these updates, Gulf strives for continuous improvement by building on its experiences while working recovery efforts within its own service areas and when serving to assist other utilities that have suffered weather related natural disasters. In the past, Gulf's plan has been encapsulated within a detailed and proprietary Storm Recovery Procedure Manual. Gulf has recently undertaken to pull this information together in a separate document that will form the basis for its Storm Recovery Plan. Gulf will continue to prepare the more detailed Storm Recovery Procedure manual as an element of its Natural Disaster Preparedness and Recovery program. The Manual will follow the guidelines and philosophy set forth in the Storm Recovery Plan.

Executive Overview of Gulf's Storm Recovery Preparations:

As a part of the planning process, all Gulf Power employees are given a specific storm assignment. The Company Emergency Management Center (CEMC) specialist works with Human Resources to ensure that each restoration area is staffed with the appropriate number of employees and that every employee has the proper skill set to perform their storm assignments. In many cases, employees have a storm assignment which may be significantly different from their normal job. Storm training handbooks are updated and distributed as needed. Additionally, training is conducted to ensure that employees are competent to perform the job to which they are assigned. Prior to the storm season, informational meetings are held and internal communications focus on storm preparedness.

Members of the CEMC leadership team attend conferences each year in an effort to benefit from lessons learned by others. In the past, these have included: the Southeastern Electric Exchange (SEE) Mutual Assistance meetings, the National Hurricane Conference, and the Governor's Hurricane

Conference. Gulf Power also participates in the yearly statewide storm drill under the direction of the State Emergency Operations Center (SEOC).

In the logistics and support areas, contracts are negotiated and confirmed with vendors for services such as food, lodging, materials, transportation, fuel, and other support functions. Staging sites are secured, and if needed, agreements are negotiated and signed. Gulf Power's Supply Chain Management department ensures that materials on hand, along with available supplies from the material vendors, are sufficient to meet the anticipated demands of the storm season.

Overview of Gulf Power's Company Emergency Management Center (CEMC):

The objective of the CEMC is to provide overall direction in the restoration of electric service to Gulf's customers as quickly as possible, while protecting the safety of everyone involved. In order to provide a coordinated response and to maximize the restoration effectiveness, the Company organizes into three major restoration areas headquartered in Pensacola, Fort Walton Beach, and Panama City. The CEMC consists of functional teams which provide support to Power Generation, Transmission and Distribution as they restore their respective systems. The three primary leaders working in the CEMC are the CEMC Manager, the Resource Director, and the Logistics Director, who report directly to the Power Delivery General Manager. On a daily basis, these three leaders work with each other to insure the CEMC is providing the proper administration and support necessary for the restoration efforts in the field. The functional teams that are represented in the CEMC and that report to the CEMC manager are as follows: CEMC Staff; Distribution; Distribution Operations Center; Transmission, System Control, and System Protection; Power Generation; Contractor Coordination; Logistics; Aircraft Operations; Supply Chain Management; Customer Service; EOC Coordination; Corporate Security and Risk Management; Safety and Health; Public Affairs; Human Resources; Fleet Services; Information Technology; Corporate Real Estate and Quality (Facilities); Accounting and Treasury; and Environmental.

When the National Weather Service announces a tropical storm or hurricane has entered the Gulf of Mexico, the System Operator will notify the CEMC leadership, appropriate management and the Company's executives. Private weather services used by Gulf Power also issue notifications to selected Company officials. The storm is monitored as it develops, and if there is a possibility Gulf Power's service area will be affected, the CEMC at the Company's Pace Boulevard building is set up and readied for activation. The

hurricane is closely monitored when it may threaten Gulf Power's service area within 36 hours.

After evaluation of wind profiles and consultation with private weather services, a decision is made as to when it will be unsafe for employees to travel. At that time, and after consultation with senior Company management, the Project Services Manager (CEMC Manager), the Power Delivery Services Manager, or the CEMC specialist will determine when the CEMC will be formally activated. Once activated, the CEMC, which is located at the Pace Boulevard Building, is staffed by a core group that will remain for the duration of the storm.

CEMC leaders are notified of the activation plan and are responsible for ensuring their respective areas are in a state of readiness and are properly staffed. The CEMC remains operational 24 hours a day, 7 days a week, until such time the power is substantially restored to all customers who are able to receive service. Depending on the severity of the storm, repair work on the system may continue after the CEMC is deactivated.

Summary of Gulf's Storm Team Leaders' Roles and Responsibilities:

CEMC Staff:

Led by the CEMC Manager, this department is responsible for the overall coordination of storm restoration efforts. Before, during and after the storm, the staff is responsible for monitoring the weather associated with the hurricane and communicating this information to other CEMC leaders and Company management and executives. It is responsible for the acquisition of line resources through the SEE, from other Southern Company subsidiaries, and from other utilities, and for coordinating the acquisition of those resources through the Resource Director. The staff assigns work locations to the incoming tree trimming and distribution line resources. The CEMC Manager is responsible for providing customer outage numbers and estimated times of restoration (ETRs) to the SEOC. The CEMC Manager also represents Gulf Power Company on all conference calls associated with the Southern Company Disaster Managers committee and the SEE Mutual Assistance committee.

Distribution:

This department is responsible for damage assessment and restoration of the distribution system after the storm. The damage assessment provides the information necessary to determine what additional outside labor resources and material will be necessary to complete the restoration. This department works

with the CEMC staff and Supply Chain Management in allocating labor and material resources to the affected areas as necessary.

Distribution Operations Center (DOC):

This department reports to the DOC supervisor and monitors the distribution system's status to help expedite the restoration process. The DOC also ensures the outage management system is current and provides accurate information which the CEMC uses in communications with customers, governmental officials and employees. The DOC issues switching orders to ensure the safety of workers repairing damage to the electrical system.

Transmission, System Control, and System Protection:

This team is responsible for the overall transmission and substation restoration efforts. Under the direction of the Transmission manager, this department assesses damage to the transmission system by prioritizing the transmission lines to be aeri ally evaluated and formulating a restoration plan; performs evaluations of substations; performs switching as needed; and identifies protection and control schemes that need repair after the storm event. This team is also responsible for monitoring the transmission system load and operational status, and for taking corrective action when necessary during the restoration effort.

Power Generation:

This department provides guidance and accountability to mitigate the risk of storm related damage to Gulf's generation assets, and ensures these assets are properly maintained and operational following a storm event.

Contractor Coordination:

This department is responsible for the acquisition of contract distribution line and tree trimming resources. It ensures contractors are pre-identified and qualified to work on Gulf Power's system and negotiates the necessary contracts. This department is also responsible for monitoring the costs of these resources and approving the invoices. The CEMC Manager and the Resource Director work together in determining the number of contract distribution line and tree trimming resources to acquire and where they will be assigned to work. The

CEMC Manager has the responsibility for releasing the contractors as work is completed.

Logistics:

The logistics team, under the direction of the Logistics Director, is responsible for coordinating food and lodging requirements for the restoration effort; setting up and managing staging sites; and coordinating mass transportation.

Aircraft Operations:

Aircraft Operations is responsible for providing and coordinating flights necessary to assess damage to the electrical system, flying with the contractor pilots as airborne evaluators to assess damage to the electrical system, and communicating the damage findings to the appropriate CEMC area to facilitate timely restoration of electrical service.

Supply Chain Management:

This department produces purchase orders and acquires materials, equipment and supplies needed for the restoration effort. It maintains a centralized material distribution network and disposes of scrap and damaged materials. The Supply Chain Management manager ensures preparations have been made to provide effective procurement and materials management services.

Customer Service:

This department is responsible for the continuing operation of the Customer Call Center that serves as the primary interface for Gulf Power's customers to report trouble. The Customer Service representatives handle the customers' calls in a timely and professional manner. Through the Customer Service System and the Trouble Call Management System the department enables the CEMC to assign adequate resources to respond to storm trouble.

EOC Coordination:

The County EOC Team Leader is the coordinator of the County EOC representatives who provide timely and accurate information to those local

governmental representatives. The Company also has a representative who works at the SEOC. The Company's EOC representatives provide a direct contact point between Gulf Power and governmental officials at the county and state EOCs, provide the EOCs with accurate and timely information concerning the ongoing restoration effort, and work with the EOCs to address any specialized service needs or concerns.

Corporate Security and Risk Management:

Under the direction of the manager, this department protects the Company's assets; investigates any claims; and provides security at any staging area or facility.

Safety and Health:

This team provides orientation to outside resources; provides any additional training necessary; and works to ensure the safety of employees. The manager also works to address and prevent any health issues through acquiring and providing nursing resources.

Public Affairs:

This department provides timely and accurate information to internal and external audiences; provides media releases; responds to media inquiries; posts news on the Company's web site; and communicates with contacts at county EOCs. The Public Affairs Manager is the designated Company spokesperson in response to any media inquiry.

Human Resources:

This department assists in accounting for all employees after the storm event; making storm assignments; coordinating the acquisition of additional support personnel from other Southern Company subsidiaries; and coordinating Family Services for employees whose personal property has been damaged or who have had personal emergencies. The Human Resources Director is responsible for handling all personnel issues associated with employees working storm duty.

Fleet Services:

This department secures fleet equipment for deployment; coordinates all automotive and water craft rentals; provides maintenance support for automotive equipment; and works to acquire and distribute fuel. The Fleet Services Team Leader ensures that all garages are operational and that all company vehicles are maintained.

Information Technology (IT):

Under the leadership of the Team Leader, the IT Team ensures Company wide communication tools are operational and technical support is provided as needed. This team coordinates the shutdown and protection of all computer equipment; sets up the computer and communication tools in the CEMC; repairs or restores the telecommunications infrastructure, which provides communications for the Company; replaces computers, fax machines and telephones that may have been damaged; establishes temporary communications networks; and provides IT support as needed.

Corporate Real Estate and Quality (Facilities):

This department ensures all Company facilities are secured and safe before and after any major weather event. It is also responsible for overseeing repairs to facilities damaged during a storm. The manager ensures adequate manpower and materials are available for emergency preparedness and recovery.

Accounting and Treasury:

This department ensures the Company properly accounts for all expenditures associated with the restoration; ensures funds are available to support the restoration effort; and provides accounting support in the field restoration areas. Accounting and Treasury management ensures that proper accounting practices and procedures are followed.

Environmental:

The Environmental Department coordinates the overall prevention, assessment, and subsequent remediation of environmental damage associated with company facilities after a natural disaster and serves as the liaison with the local, state, and federal environmental agencies.

Excerpts from Gulf's Storm Recovery Procedures by Section:



STORM RECOVERY PROCEDURES

		Page No.
II	Executive Overview	1-5
III	Company Emergency Management Center (CEMC)	3 – 8 29-35 44
V	Fleet Services	2 5
VI	Logistics	2 3
VII	Human Resources	2 3
VIII	Supply Chain Management	2-6 10 11 13 15
IX	Corporate Real Estate & Quality	2
X	Public Affairs	2-3 17-18 21-23
XI	Customer Service	2-3
XII	Corporate Security & Risk Management/ Safety & Health	2-4
XIII	Accounting & Treasury	2-3
XIV	Power Generation	2-3
XV	Environmental	2
XVI	Power Delivery	2-6

II EXECUTIVE OVERVIEW

(1) Executive Overview of Storm Recovery Procedure Plan

This restoration procedure establishes a plan of action to be utilized for the operation and restoration of generation, transmission, and distribution facilities during major disasters. Such disasters are hurricanes, tornadoes, and storms that could cause widespread outages to our customers.

The overall objective is to restore electric service to our customers as quickly as possible consistent with protecting the safety of everyone involved.

In order to provide a coordinated response to maximize our restoration effectiveness, the company will organize into 3 major Restoration Areas headquartered in Pensacola, Ft. Walton and Panama City. The Project Services Manager of Power Delivery will direct the Company Emergency Management Center (CEMC). The CEMC consists of functional teams to provide support to power generation, transmission and three distribution restoration areas.

The three major distribution restoration areas, under the direction of the respective Power Delivery Managers (PDM) / Restoration Area Managers (RAM), are subdivided into smaller operating areas to coordinate local restoration efforts. These local area headquarters are staffed with area coordinators, switchmen, line/service crews, tree crews and the nucleus of support personnel to form the basic unit for local restoration. Movement of personnel and equipment between local area headquarters is directed by the RAM for each of the three distribution restoration areas. Movement of personnel and equipment into and out of Gulf Power's service area and between distribution restoration areas is directed by the Project Services Manager or his designee. The Project Services Manager or his designee will consult with the RAM's regarding the movement of crew's into and out of their respective areas.

The responsibilities of the functional support teams and restoration areas are outlined in the CEMC Section III and described in detail in the remaining sections of this manual.

Safety

Safety is each person's first responsibility. The standards set forth in the Company's Safety Manual, Safe Work Policy and Safe Work Practices remain in effect at all times. "Non-Gulf Power crews will work under their safe work practices, provided a specific site or system hazard has not been identified

requiring additional safe work methods." Maximum use of daylight hours will be made in restoring service. Crews will not be required to work around energized conductors while exposed to sustained gale force (39 mph) or greater winds.

Employees will generally be evacuated from company buildings that are expected to experience hurricane force winds. Exceptions to this will be essential functions where our facilities are designed to withstand the expected wind and water conditions with the approval of that Area's Management. Building evacuations will be the responsibility of Corporate Real Estate & Quality and Safety & Health team leaders.

Notifications

When the National Weather Service (NWS) announces that a tropical storm (winds of 39 to 73 mph) or hurricane has entered the Gulf of Mexico, the on duty System Control Operator will notify the following personnel:

If the tropical storm or hurricane enters the Gulf of Mexico on a weekend or holiday, the on duty System Control Coordinator will make these notifications unless prevented by work conditions. During normal office hours (or when the on duty System Control Coordinator can not make these notifications) the Project Services Manager, CEMC Specialist or the Power Delivery Services Manager will arrange for these notifications to be made.

A Hurricane Watch is declared when a hurricane may threaten Gulf Power's service area within 36 hours. At that time, the Project Services Manager, Power Delivery Services Manager or the CEMC Specialist will determine when the CEMC will be activated. Contact will also be established with Southern Company Operating Companies Disaster Managers, and with Gulf Power Company's representative at the State of Florida's Emergency Operations Center (FEOC).

The Saffir-Simpson Hurricane Scale is a 1-5 rating based on the hurricane's present intensity. This is used to give an estimate of the potential property damage and flooding expected along the coast from a hurricane landfall. Wind speed is the determining factor in the scale, as storm surge values are highly dependent on the slope of the continental shelf in the landfall region. Note that all winds are using the U.S. 1-minute average.

The remainder of this manual provides greater detail into the operation of each of the functional support areas during storm conditions. Suggestions for improvements to this manual should be made to the Project Services Manager or the CEMC Specialist.

(II) Company Emergency Management Center - CEMC

In order to provide support for each restoration area and direct the Company's overall storm response, functional teams have been established as shown on Exhibit A. The CEMC will be directed by the Project Services Manager of Power Delivery with the Power Delivery Services Manager as the first alternate and the CEMC Specialist as the second alternate. The CEMC Staff will be directed by the CEMC Specialist. Each of the functional teams will have a team leader and an alternate (Exhibit B1-B16).

As a part of Gulf Power Company's conditions of employment, all Southern Company employees working at a Gulf Power Company facility must be available for storm duty. In the event of a storm situation, Gulf Power **must** be a priority. As long as there are customers out of service, teams of Southern Company employees work shifts around the clock until service is restored. Failure to comply with storm restoration duties without extraordinary circumstances will result in termination.

While many employees have specific duties assigned throughout the hurricane season, all Southern Company employees are subject to assignment and re-assignment during and after a hurricane. ***It is the responsibility of each employee to know what their storm assignment is and to be available as necessary.***

Before, during, and after a storm, employees should call 1-888-Gulf-Hur (1-888-485-3487) for instructions and additional information. All updates, including phone numbers employees are to call regarding assignments, will be communicated there. As in the past, employees will be given a reasonable amount of time to take care of family, homes, cars, boats, etc., before reporting for storm duty. It is suggested that during storm season, all employees make alternate housing arrangements (if necessary) ***IN ADVANCE*** for families and other personal preparations so that if an employee is called in for storm duty, things can be put in order quickly.

During storm conditions each CEMC Team Leader and Power Delivery RAM will arrange for the notification of their team members. Employees will be given reasonable time to secure their personal belongings. Where possible, employees will be allowed to report after storm conditions allow for safe travel.

Human Resources will contact employees not covered in the above paragraph and advise them when, where and to whom to report. Employees should monitor 1-888-Gulf-Hur (1-888-485-3487) for current information and instructions.

After being contacted by Human Resources the employee is not required to make contact with their normal work location supervisor/manager before reporting for storm duty. Upon completion of District Storm Information Center (DSIC) storm duty, the DSIC shall provide the employee's storm duty status information to the CEMC Human Resources team. Human Resources will re-assign or **officially release the employee to return to their normal work location**. This procedure will provide for better coordination of resources to meet the Company's restoration effort. CEMC Human Resources and the applicable DSIC shall maintain personnel records on all employees contacted by them to report for storm duty.

Each employee will be given a storm assignment prior to June 1 on an annual basis. Power Generation employees will retain their normal work assignment unless directed otherwise by this procedure or Power Generation Management.

All Non-Gulf Power personnel requests ***must be*** coordinated with the CEMC Project Services Manager and/or approved designee. This will prevent duplications and allow for better coordination of lodging and other support requirements. The RAM or his designee will make all the requests for Non-Gulf Power Company personnel. All contractors (utility /tree /construction /catering, etc.) must have a copy of the Florida Out of State Contractor Emergency Response Certificate (Exhibit L). The Contract Administration member of the CEMC Supply Chain Management team will furnish this certificate to all approved contractors. All Non-Gulf Power Company personnel working on Gulf Power Company system must provide to the appropriate CEMC team (Distribution, Transmission, Substation, etc.) a team record (Exhibit C-C3). This record will be used by staff members for input into the Personnel Tracking Summary (Exhibit M). This summary will be utilized by other CEMC teams (Food & Lodging, Security, Fleet Services, etc.) to help determine the type and amount of support required for each storm team. The Personnel Tracking Summary records will also be used for validation of contractor invoicing. Request for relocation of Gulf and Non-Gulf personnel between major District Restoration Areas must be coordinated with the CEMC Project Services Manager or his designee.

The CEMC staff will display the storm's progress and intensity on a standard hurricane-tracking chart (Exhibit D), from the time the CEMC is activated until the storm has made landfall. Status of the storm restoration effort will be communicated to the appropriate DSIC as needed.

Three DSIC's will be activated when a hurricane Warning is declared which occurs when a hurricane is expected to strike within 24 hours. The DSIC's located in Pensacola, Ft. Walton and Panama City will have responsibilities for the Milton, Crestview and Chipley Districts respectively. The CEMC Staff will

follow the pre-established Procedure for Calculating Customers Out of Service and will produce the Customer Outage Summaries, (Exhibit F). These reports will be published at 7 AM, 11 AM, 3 PM and 7 PM or until the CEMC Project Services Manager or his designee discontinues the reports. Transmission trouble will be documented on Exhibit J by the CEMC Transmission Team. This information will be provided to and reviewed by the Project Services Manager or his alternate. The CEMC Staff will also post customer outage information in the CEMC status board area. In conjunction with the above communications the RAM's should assess their restoration area's personnel and equipment needs and surpluses. Although these needs and surpluses should be communicated directly to the CEMC Project Service's Manager by the RAM's when possible, specific requests can be made to the Power Delivery Services Manager as the first alternate, the CEMC Specialist as the second alternate or appropriate team leader in the CEMC to expedite response.

Public Affairs is responsible for disseminating information to the Customer Service Center (CSC), Gulf Power Company's representative in each County Emergency Operations Center (CEOC), the media and other appropriate concerns. The Project Services Manager or his designee will communicate information to Gulf Power Company's representative at the FEOC.

"In the event of a storm, and if the restoration effort is a multi-day event, morning update/status meetings will be held. It will be the responsibility of the General Manager of Power Delivery (or his/her designee) to schedule and lead the daily meetings. The purpose of these meetings will be to update storm restoration progress and to discuss any issues and/or problems CEMC areas have encountered. In an effort to keep these meetings to a manageable number, attendance will be limited to Executives, CEMC Team Leaders and Power Delivery Managers."

A Distribution System Order (DSO) or a General Work Order (GWO) will be used to charge expenses and labor directly attributable to the emergency restoration efforts on Gulf Power Company's system. All storm work orders must be charged to Plant Expenditure (PE) 3649. For distribution line repair, DSO's will be issued by the DSIC for their specific area. The DSO number will be provided to the CEMC Staff who will in turn provide it to Property Accounting and to others as necessary.

For transmission line, substation, generating plant, and building repair, a GWO for each affected location will be assigned by the affected department. All GWO's should be completed by field personnel in accordance with normal operations and forwarded to Property Accounting

The primary responsibility of Gulf Power Company representative(s) in the CEOC's is to direct information and requests from that CEOC to Gulf Power Company's Dispatch Center and/or to the CEMC. Likewise, information and specific requests from Gulf Power Company's CEMC shall be directed to Gulf's representative at the CEOC.

Examples of information and/or specific requests include:

- * Evacuation orders
- * Life or limb threatening emergencies
- * Reports of identified critical customer outages
- * Roadway accessibility
- * Damage assessment of county infrastructure

II EXHIBITS

- A. CEMC Organizational Chart
- B. Hurricane Tracking Chart
- C. Storm Phase Conditions
- D. Customer Outage Summaries
- E. County Restoration Area Status Report
- F. District Storm Information Center (DSIC) Organizational Chart

EXHIBIT A

Company Emergency Management Center

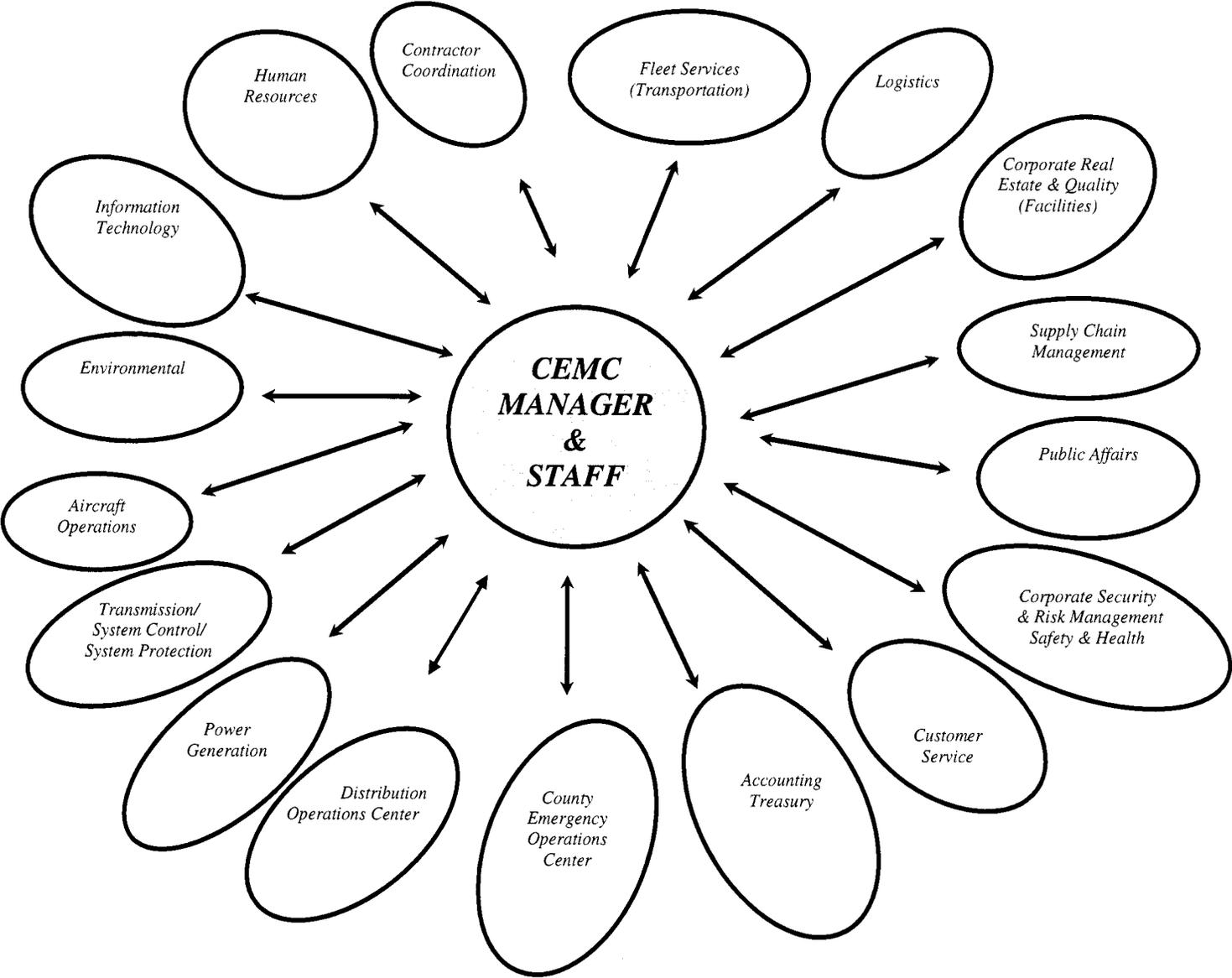


EXHIBIT C

STORM PHASE CONDITIONS

PHASE	STORM CONDITION	CONDITION DESCRIPTION	COMPANY EMERGENCY MANAGEMENT CENTER CEMC	MAJOR RESTORATION AREAS STORM INFORMATION CENTERS DSIC
I	TROPICAL STORM	WIND SPEED 39-73 MPH	SYSTEM CONTROL OR CEMC BEGINS NOTIFICATION PROCESS	
II	HURRICANE WATCH	HURRICANE HAS BECOME A THREAT TO COASTAL AREAS USUALLY ISSUED 24-36 HOURS BEFORE EXPECTED LANDFALL	CEMC FACILITY PREPARED FOR POSSIBLE OCCUPANCY	RESTORATION AREA MANAGERS PREPARE FOR POSSIBLE ACTIVATION OF THEIR DSIC'S
III	HURRICANE WARNING	INDICATES HURRICANE WINDS 74 MPH OR GREATER, AND HIGH ROUGH SEAS ARE EXPECTED IN A SPECIFIC COASTAL AREA WITHIN 24 HOURS	CEMC OPERATIONAL ON A 24 HOUR BASIS IN ACCORDANCE WITH STORM RECOVERY PROCEDURES	DSIC OPERATIONAL COORDINATING RESTORATION EFFORTS WITH THE CEMC
IV	HURRICANE HAS PASSED RESTORATION IS IN PROCESS	HURRICANE HAS MADE LANDFALL WINDS ARE BELOW 50 MPH	CONTINUES TO STAFF ON 24 HOUR BASIS CONTINUES TO RECEIVE DAMAGE ASSESSMENT STATUS REPORTS FROM DSIC'S AND CONTINUES TO PROVIDE COMPANY LEVEL STATUS REPORTS	RESTORATION AREA MANAGERS CONTINUE TO OPERATE WITH THEIR DSIC'S AND COORDINATING RESTORATION EFFORTS WITH THE CEMC
V	RESTORATION OF SYSTEM NEARING COMPLETION	GULF'S SYSTEM IS RETURNING TO NORMAL OPERATIONS	CONTINUES TO STAFF ACCORDING TO RESTORATION NEEDS CONTINUES TO PROVIDE COMPANY LEVEL STATUS REPORTS	CONTINUES TO PROVIDE CEMC WITH RESTORATION STATUS REPORTS

EXHIBIT D
1 of 4

GULF POWER COMPANY
RESTORATION SUMMARY

DISASTER NAME:

LOCATION	PENSACOLA RESTORATION AREA	FT. WALTON RESTORATION AREA	PANAMA CITY RESTORATION AREA	GULF POWER COMPANY TOTALS
NUMBER OF CUSTOMERS	195,974	105,046	100,247	401,267

7 A.M.				
NUMBER OUT				
PERCENT OUT				

11 A.M.				
NUMBER OUT				
PERCENT OUT				

3 P.M.				
NUMBER OUT				
PERCENT OUT				
7 P.M.				
NUMBER OUT				
PERCENT OUT				

NOTE: Customer numbers as of April - 2006

EXHIBIT D
2 of 4

PENSACOLA - RESTORATION AREA STATUS REPORT

DISASTER NAME:

LOCATION	AREA 1 PENSACOLA NORTH	AREA 2 PENSACOLA CENTRAL	AREA 3 PENSACOLA SOUTH	AREA 4 GULF BREEZE	AREA 5 MILTON	PENSACOLA AREA TOTALS
NUMBER OF CUSTOMERS	50,147	46,032	38,237	28,730	32,828	195,974

7 A.M.						
NUMBER OUT						
PERCENT OUT						

11 A.M.						
NUMBER OUT						
PERCENT OUT						

3 P.M.						
NUMBER OUT						
PERCENT OUT						

7 P.M.						
NUMBER OUT						
PERCENT OUT						

NOTE: Customer numbers as of April - 2006

EXHIBIT D
3 of 4

FT. WALTON – RESTORATION AREA STATUS REPORT

DISASTER NAME:

LOCATION	AREA 1 FT. WALTON (SOUTH)	AREA 2 FT. WALTON (NORTH)	AREA 3 DESTIN	AREA 4 NICEVILLE- VALPARAISO	AREA 5 CRESTVIEW	AREA 6 DEFUNIAK	FT. WALTON AREA TOTALS
NUMBER OF CUSTOMERS	23,743	20,933	29,638	10,469	15,659	4,604	105,046

7 A.M.							
NUMBER OUT							
PERCENT OUT							

11 A.M.							
NUMBER OUT							
PERCENT OUT							

3 P.M.							
NUMBER OUT							
PERCENT OUT							

7 P.M.							
NUMBER OUT							
PERCENT OUT							

NOTE: Customer numbers as of April - 2006

EXHIBIT D
 4 of 4

PANAMA CITY – RESTORATION AREA STATUS REPORT

DISASTER NAME:

LOCATION	<u>AREA 1</u> PANAMA CITY BEACH	<u>AREA 2</u> PANAMA CITY WEST	<u>AREA 3</u> PANAMA CITY EAST	<u>AREA 4</u> CHIPLEY NORTH	PANAMA CITY AREA TOTALS
NUMBER OF CUSTOMERS	38,424	22,719	29,137	9,967	100,247

7 A.M.					
NUMBER OUT					
PERCENT OUT					

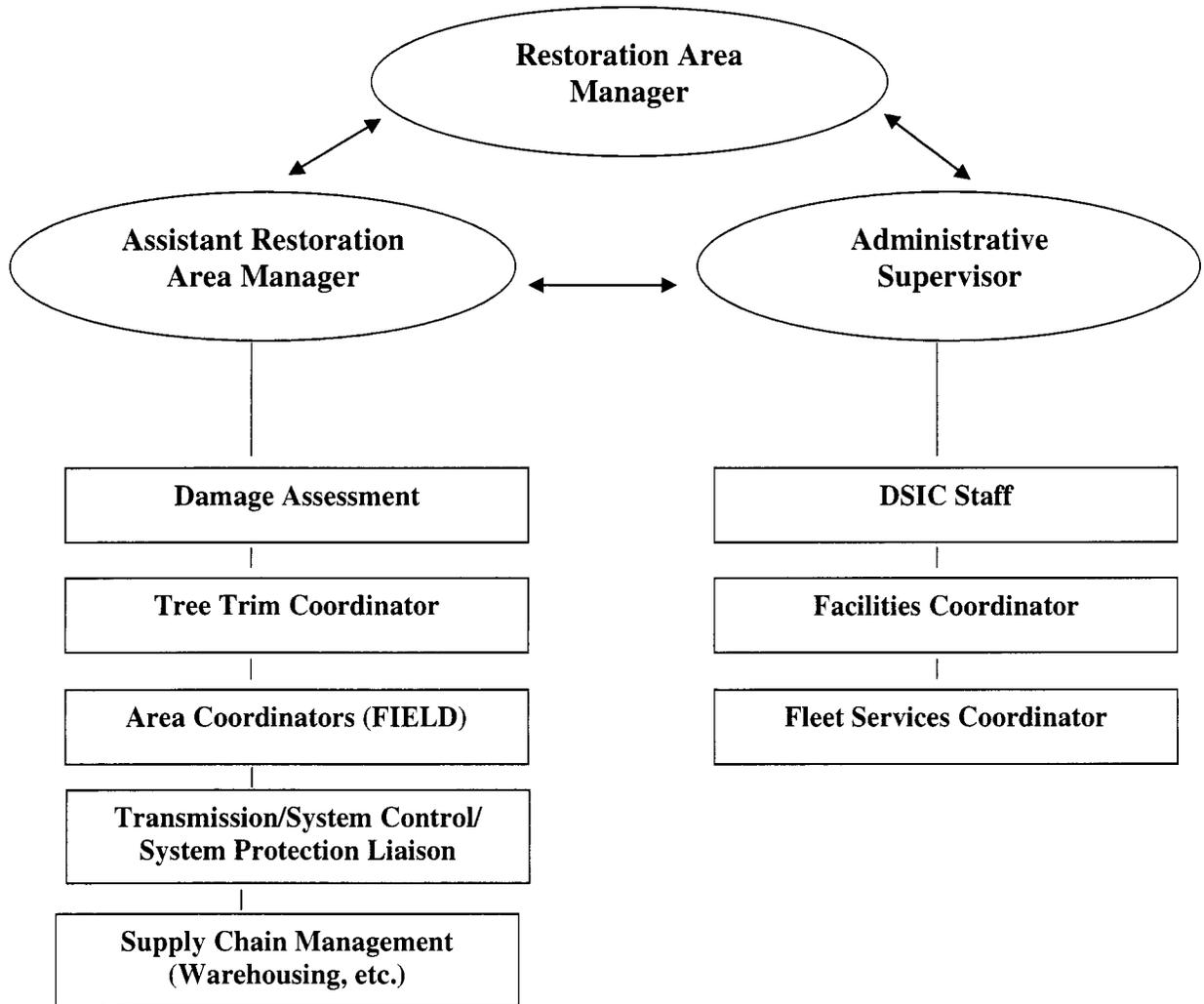
11 A.M.					
NUMBER OUT					
PERCENT OUT					

3 P.M.					
NUMBER OUT					
PERCENT OUT					

7 P.M.					
NUMBER OUT					
PERCENT OUT					

NOTE: Customer numbers as of April - 2006

EXHIBIT F



III STORM PROCEDUES

Fleet Services – Section V

The Fleet Services CEMC Team leader assigned to the CEMC is the Sr. Fleet Specialist. The Fleet Services Supervisor is the Fleet Services Support Team Leader.

The Fleet Services CEMC Team Leader is responsible for staying abreast of data from the CEMC coordinating fleet activities during storm preparation and restoration activities.

The Fleet Services Support Team Leader is responsible for ensuring all garages are operational and providing maintenance support.

Purpose and Scope

This emergency procedure is intended to provide a plan of action for Gulf's Fleet Services company-wide in the event a hurricane or major disaster strikes our service area. This procedure is designed to complement the overall company effort, yet be flexible enough to handle a variety of situations.

Objectives

The primary objectives of Fleet Services during a major disaster are securing of unassigned company equipment for redeployment, coordinating all automotive and water craft rentals and providing maintenance support for all company automotive equipment and "other" equipment when requested.

Fleet Services Personnel Assignments

Present Fleet Services employees assigned to maintenance garages will be assigned to their respective garage locations. Mechanics assigned to the Pine Forest Garage will be subject to reassignment either to another garage or a mobile service truck. The Fleet Services Support Team Leader will be located in the area requiring the most support. Relocation will occur after the storm has passed, as storm personnel are being dispatched. Assignment and relocation of all fleet personnel will be at the discretion of the Fleet Services Support Team Leader.

As during normal non-emergency operations the Single Point of Contact for fleet maintenance activities will remain Extension 5115 throughout all phases of storm preparation and restoration.

Fleet Services will coordinate with Supply Chain Management all automotive equipment rentals and watercraft support for the company. The CEMC Fleet Services Team Leader will maintain a listing of all vendors including rental cars, and mechanized equipment. Prior arrangements will be in place to facilitate reserving equipment prior to storm landfall and expedite delivery during restoration efforts for cars, pickups, trucks, vans and flatbed trailers, aerial lifts, derricks and barges. Vendor listings will include work, home, cellular phone numbers, and beepers with service areas and capabilities identified.

Fleet Services will be responsible for coordinating all fleet maintenance for the company. When a Hurricane Watch is issued all normal preventive maintenance (PM) will cease and storm preparation will begin. Support vendors will be notified and their support status verified. The Pine Forest Garage will review work in progress and begin completing those units that can be ready if a Hurricane Warning is issued. Mechanics will be located in the maintenance garages and traveling mechanics will support all staging areas. The Fleet Services Support Team Leader will determine load demands and shift manpower resources in order to meet necessary service levels. If outside manpower support is necessary the request will be coordinated through the CEMC. Fleet repair request should be made through normal channels (Single Point of Contact, Extension 5115), if possible, and not through the CEMC Fleet Services Team.

Fleet Services Plans for A Fuel Crisis

Fleet Services has been in constant contact with our fuel supplier and we have an action plan in place in the event of a Natural Disaster.

In 2005 we had a plan in which Johnson and Johnson, Inc. would supply equipment and fuel for eight staging areas and would supply manpower to operate the equipment. The equipment Johnson and Johnson, Inc provided could operate self contained with it own generators to supply power for the stationary tankers and the Mobile Fuel trucks could pump fuel in the trucks at night. The plan worked flawlessly during Hurricane Dennis and Hurricane Katrina.

Gulf did purchase 12 skid tanks for gasoline to supply fuel for small gas vehicles and place them at the fuel facilities at Gulf Power. Johnson and Johnson, Inc fueled these tanks on a regular basis and kept the gas needs met during the entire restoration period and Gulf experienced no fuel shortages.

In 2006 the same plan will be in effect and Johnson and Johnson, Inc. will supply fuel, equipment and manpower to Gulf Power in the event of a natural disaster or fuel shortage.

Gulf Power has requested and contracted Johnson and Johnson, Inc. to have the same plan in effect but has agreed to pay a retainer to Johnson and Johnson, Inc for six tankers with pumps and three Mobile fuel trucks. Gulf Power will have the availability of the units should we need them for company restoration efforts or there is a need to assist another company with a restoration. This equipment would also be available should there be a supply disruption caused by a storm in other parts of the state or in the Southeast.

Johnson and Johnson, Inc will be able to purchase fuel from many terminals across the Gulf Coast and in Georgia. They have a bulk plant that is maintained in Madison, Florida with a spare capacity of 85,000 gallons in the event of a terminal supply disruption.

Supply chain has agreed to keep at least 75% capacity in all fuel bulk tanks and all sites will have generator backup to keep the sites operating. Johnson and Johnson, Inc. will keep all fuel sites supplied including generating plants until normal operations and local fuel suppliers can get supply back to a normal status.

Logistics – Section VI

The Logistics support team will work together to assure successful operation in an emergency situation. Listed below are the job responsibilities of the coordinators and field personnel.

CEMC Team Leaders

Provides for the overall coordination of the logistics storm restoration procedure, including staging site procurement, mass transportation, secure SouthernLINC phones, major account liaison, administrative support, food vendor procurement, initiate hotel room obtainment from vendor, and other on-site requirements.

Area Logistics Managers

1. Manage overall logistics in assigned restoration areas.
2. Partner with Area Restoration Manager.
3. Brief logistic managers of emergency situation and the goals that must be achieved and maintained throughout the emergency situation.
4. Organize coordinators and assign personnel.
5. Ensure adequate security is available at staging sites and other locations.

6. Respond to needs communicated by other logistic managers.

Logistics Managers

1. Partner with the E&C Supervisor.
2. Brief coordinators and field personnel of emergency situation and the goals that must be achieved and maintained throughout the emergency situation.
3. Notify fleet services about fuel needs.
4. Organize coordinators and field personnel.
5. Secure local contracts and agreements with food and beverage vendors.
6. Assess needs of site and crews.
7. Coordinate food sites in emergency staging areas.
8. Organize meal delivery to emergency personnel and remote crews.
9. Respond to needs communicated by other logistics managers and team members.

Lodging Coordinators

1. Determine lodging locations from vendor prior to emergency situation.
2. Assess needs of sites and crews.
3. Maintain and update the Manpower Tracking System.
4. Arrange lodging for emergency personnel and crews.
5. Communicate lodging arrangements to appropriate personnel.

Staging Site Managers

1. Assess needs of site and crews.
2. Notify fleet services about fuel needs.
3. Organize Logistics field personnel.
4. Ensure the vendors for food, food service, tents, bedding, showers, laundry, etc. are secured, on site and operational.
5. Develop staging site plan for parking and fueling vehicles as well as feeding and housing crews.
6. Ensure adequate security is available at staging site.
7. Provide other necessary support for emergency personnel and crews as required.

Major Accounts Liaison

1. Determine resources available through major accounts.
2. Communicate the resources available to appropriate coordinator.
3. Communicate restoration expectations to major accounts.
4. Ensure availability of on-site National Account's representative.

Mass Transportation Coordinators

1. Ensure mass transportation secured and available prior to emergency situation.
2. Assess transportation needs of crews.
3. Arrange transportation for crews as coordinated with area logistics managers and/or logistics managers.
4. Communicate transportation arrangements to appropriate personnel.

Site Manager training will be conducted as needed. The Logistics Managers will brief team members and coordinators on the scope of the job and the goals that must be achieved and maintained throughout the emergency situation to ensure safe and timely restoration.

Human Resources – Section VII

This procedure outlines responsibilities of the Human Resources Team during hurricanes or major storms affecting the Company's service area or other Non-Gulf System areas where Southern Company employees provide manpower support.

The scope of this procedure provides support company-wide by utilizing Southern Company personnel working at a Gulf Power facility. This supplemental support staff will be assigned and trained in accordance with this procedure.

The CEMC will provide the official notifications to the Human Resources Director in the event Storm Recovery Procedures are implemented. The Human Resources Director will be responsible for carrying out the Human Resources Team responsibilities during a storm. The personnel function will be performed at Pace Blvd. Building.

- a. Power Delivery, CEMC Specialist will seek input from all locations to assess the manpower needs by storm skills, as defined by the storm manual or by task activities needed. This information will be completed prior to June 1, each year and will be summarized and provided to the Human Resources Director.
- b. The CEMC Specialist and the Human Resources Director are responsible for making storm assignments for all Gulf Power Corporate Office employees and all Southern Company employees working at a Gulf Power facility.

- c. Employees will be assigned based on skill sets required for the assignment.
- d. Department Managers will be notified regarding their employee's assignment and location, when circumstances permit.
- e. Employees will be contacted directly by the CEMC, Team Leaders, DSIC, Human Resources and/or Plant Management and advised when and where to report for storm duties.
- f. When assigned employees are released from their initial storm or emergency assignment, they are responsible for notifying Human Resources. Human Resources will reassign or **officially release** the employee to return to their normal work location.
- g. Transportation for employees assigned to storm duty will be a coordinated effort between the employee and the CEMC and/or DSIC Fleet Services Team.
- h. Human Resources and the DSIC and/or CEMC team leaders will monitor and maintain records for employees contacted by them to report for storm duty.

The Family Services Team is responsible for coordinating Search & Rescue efforts to locate missing employees and for providing assistance to employees whose personal property has been damaged, or who have medical/personal emergencies.

Human Resources will initially staff the Family Services Team. If damage is extensive and requires additional resources, HR will coordinate the assignment of additional employees or request personnel from other Southern Company subsidiaries.

The CEMC will receive all requests for storm restoration assistance outside Gulf Power Company's service area. They will notify the Human Resources Team for additional support personnel. Human Resources or the CEMC will make contact with the employee(s) who have been selected to work as a team member for storm teams working outside Gulf Power Company's service area.

Supply Chain Management - Section VIII

A. Purpose

These guidelines describe those measures that Supply Chain Management (SCM) (Procurement, Materials Management, Warehouse Operations, Investment Recovery, and Contracts) has established to expedite the recovery process. It is not intended that these guidelines provide answers to all questions, which might arise, but rather to identify many of the questions that ultimately will have to be answered.

B. Applicability

These guidelines cover activities performed by the following functions:

- Procurement (SCM)
- Materials Management (SCM)
- Warehouse Operations (SCM)
- Investment Recovery (SCM)
- Contracts (SCM)

C. Responsibilities

The **Vice-President of Power Generation** and the **Customer Operations Vice-President** will ensure that subordinate functions comply with the intent of Gulf Power Company Policies and Procedures.

The **Supply Chain Management Manager**, will ensure that these guidelines are updated as needed, communicated to all subordinate employees, and coordinated with other departments within the company.

The **Supply Chain Management Manager** will ensure that reasonable preparations have been made to provide effective procurement and materials management services in the event of a natural disaster.

The **Supply Chain Management Materials Supervisor** will ensure that reasonable preparations have been made to re-establish a centralized material distribution network in the event of a natural disaster.

Each employee in **Supply Chain Management** will ensure the availability of restoration materials and services by effectively and efficiently providing procurement and materials management services. Employees will protect information entrusted to their care from unauthorized disclosure, alteration, or unplanned destruction.

Supply Chain Management Warehouse Operations will ensure the availability of restoration materials by operating an effective material distribution network.

D. References

The Southern Company Business Continuity Planning Policy	
Management Procedure 310-001	Purchasing Material, Equipment and Supplies
Management Procedure 310-002	Purchase Requisition Approvals
Management Procedure 310-004	Sealed Bids on Written Quotations
Management Procedure 310-007	Business Travel
Management Procedure 310-009	Approved Vendors List
Management Procedure 100-005	Employee Expense Accounts

The function of **Supply Chain Management** is to produce approved purchase orders for materials, equipment, and supplies used in the production and distribution of electricity. The purchase orders may take the form of a regular purchase order, an emergency or confirming purchase order, or a blanket purchase order. Blanket order releases are considered regular purchase orders. Failure to produce a properly executed purchase order could result in the inability of the Company to produce and/or deliver electricity to the customer. Improper documentation of purchase orders could result in the disallowance of expenses in the rate base and/or fines for failing to follow regulatory agency dictates.

The function of **Supply Chain Management** is to provide systems, analysis tools, and analytical skills in support of the company's materials operations. Failure to properly manage the company's material assets could result in higher material expenses, reduced material availability, and lost productivity. Improper documentation of inventory transactions could result in the disallowance of expenses in the rate base and/or fines for failing to follow regulatory agency directives.

The function of **Supply Chain Management Warehouse Operations** is to provide an effective and efficient network of transmission and distribution material warehouses. Failure to properly manage the company's warehouse operations could result in higher material expenses, reduced material availability, and lost productivity. Improper documentation of inventory transactions could

result in the disallowance of expenses in the rate base and/or fines for failing to follow regulatory agency dictates.

The function of **Supply Chain Management Investment Recovery** is to dispose of scrap and obsolete materials in a manner that adheres to applicable laws and regulations for the disposal of environmentally sensitive materials. Failure to properly manage the company's investment operations could result in the disallowance of expenses in the rate base and/or fines for failing to follow regulatory agency dictates.

The function of **Supply Chain Management Contracts** is to produce approved purchase orders for services used in the production and distribution of electricity. Failure to provide contractual protection could expose the company to excess liability during especially heightened high-risk situations.

The table below associates a primary warehouse location to each restoration area defined in the company's Storm Recovery Procedures manual:

Restoration Area	Area #	Warehouse Location
Pensacola	1	Pine Forest
	2	Pine Forest
	3	Chase Street
	4	Gulf Breeze
	5	Milton
Ft Walton	1	Ft Walton
	2	Ft Walton
	3	Destin
	4	Fort Walton
	5	Crestview
	6	Crestview
Panama City	1	Panama City Beach
	2	Panama City
	3	Panama City
	4	Panama City
	5	Chipley

Annually, by the first of May, Supply Chain Management, Power Delivery and the applicable CEMC Team Leaders will review and revise as needed the company's Storm Material List (SML) and Storm Service List (SSL). Supply Chain Management will submit the SML to the Power Delivery Service Manager

or designee (LPE) for approval. Once approved, Supply Chain Management will make arrangements with the other Southern system operating companies and the company's alliance/partnership suppliers to have SML quantities available on June 1st. Certain storm stock items in excess of normal requirements will be acquired and maintained for the duration of storm season.

Supply Chain Management Projected Facilities and Equipment Requirements By Work Location

	G.W.	P.C.	F.W.	P.F.	P.C.B.	Desti	G.B.	Chas	Chipl	Crest	Milton	Total
Facilities												
Tent (20' x 40)*	2	1	1	1	1	1	1	1	1	1	1	12
Folding Tables*	6	3	3	3	3	3	3	3	3	3	3	36
Folding Chairs*	36	18	18	18	18	18	18	18	18	18	18	216
Pedestal Fans (30")*	4	2	2	2	2	2	2	2	2	2	2	24
Portable Lighting*	2	1	1	1	1	1	1	1	1	1	1	12
Portable Toilets*	2	1	1	1	1	1	1	1	1	1	1	12
Portable Ramps*	2	1	1	1	1	1	1	1	1	1	1	12
Transportation												
Full Size Pick-Up Trucks	5	4	4	4	3	3	3	3	2	3	3	37
20-ft U-Haul Trucks	4	0	0	0	0	0	0	0	0	0	0	4
16-ft Flatbed Trailers	0	2	2	2	1	1	1	1	1	1	1	13
Tractor w/Flatbed, Spider	3	0	0	0	0	0	0	0	0	0	0	3
Tractor w/Flatbed	1	0	0	0	0	0	0	0	0	0	0	1
Communications/Information												
Southern Linc Radio/Phones	8	4	4	4	2	2	2	2	1	2	2	33
Personal Computers	3	0	0	0	0	0	0	0	0	0	0	3
Laser Printer	1	0	0	0	0	0	0	0	0	0	0	1
Fax Machine	1	0	0	0	0	0	0	0	0	0	0	1
Material Handling Equipment												
5,000 Lb Tow Motors	2	2	2	2	1	1	1	1	1	1	1	15
10,000 Lb Tow Motors	1	1	1	1	1	1	1	1	1	1	1	11
20,000 LB Tow Motors	1	0	0	0	0	0	0	0	0	0	0	1
Manual Pallet Jacks	2	2	2	2	2	2	2	2	2	2	2	22
Trash/Scrap Receptacles												
2-1/2 Yard Dumpsters	6	6	6	6	6	6	6	6	6	6	6	66
20 Yard Dumpsters	3	3	3	3	3	3	3	3	3	3	3	33
40 Yard Dumpsters	3	1	1	4	1	1	1	1	1	1	1	11

* Required only if existing warehouse space is uninhabitable.

The immediate priority would be to re-establish a centralized material distribution network to support the company's restoration efforts. If post disaster damage assessments confirm catastrophic damage, Warehouse Operations would make preparations to get the Central Receiving Location and manned storerooms operational at non-company sites. The priority relocation site for the Central Receiving function is the Pensacola Fair Grounds. The company's Staging Area Manager will determine the location and number of construction staging sites. Initially, the sites would stock items from the approved Storm Material List (SML). Throughout the restoration period, Materials Management would monitor and revise as needed the materials and quantities stocked. As material and service needs are identified, orders would be issued.

Planned hours of operation at the Central Receiving Location would be from 6:00 a.m. through 12:00 a.m.

Road conditions, special delivery needs and other factors will likely require hours for Tractor/Trailer Operators to vary from those of the others based at the Central Receiving Location. Manned Construction Staging Areas will be operational around the clock. Every attempt will be made to limit daily shifts to a maximum of 12-hours. Daily employee start times will be staggered accordingly to cover each location's hours of operation. Exact hours of operation, staff requirements, and responsibilities for each location will be adjusted as necessary to accommodate the needs of each location.

For the duration of any restoration effort, the Company will contract with fuel suppliers to provide on-site refueling services. Each night, fuel suppliers will stop at all operational construction staging areas to re-fuel restoration vehicles. Any plans to park vehicles at sites other than the construction staging areas must be communicated to the CEMC SCM representatives if all vehicles are to be refueled each night. Material runners will accompany each delivery truck to capture per vehicle fuel charges.

Corporate Real Estate & Quality – Section IX

The purpose of these guidelines is to describe the plan of action that Corporate Real Estate & Quality's teams will use to minimize damage to company facilities through planning and preparation, and how we plan to expedite the recovery from major damage to company facilities. It is not possible to provide a definite plan or answer to all of the many possibilities that we may face during an emergency; it is our mission to identify roles, responsibilities, and authority.

These guidelines cover activities performed by Corporate Real Estate and Quality's teams when the management of our company activates the CEMC.

Management

The Corporate Real Estate & Quality emergency response teams will be set-up with employees working independently and/or as a group to handle emergencies. Teams shall:

1. Report as directed to assigned area to gather information concerning the extent of damage and the needs for the restoration process, estimate needed manpower, length of outage, etc.

2. Act as a channel of communication between area of damage and the Corporate Real Estate & Quality Team Leader to provide information to and from the CEMC and other functions and organizations.
3. Utilization of existing personnel and general direction of facilities restoration work forces.

Corporate Real Estate & Quality's immediate priority in any type of emergency is employee safety and the re-establishment of critical company functions and services.

Public Affairs – Section X

Provide timely and accurate information to internal and external audiences on a daily basis and chronicle the events and efforts of Gulf Power Company's restoration of electrical service in a manner that will inhibit customer criticism through an understanding of the restoration process. Foster pride in employees while ensuring that all due recognition is given Gulf Power Company by the general public for restoring a valuable commodity in the most efficient manner possible.

Achieving the Procedure's objective depends upon Public Affairs staff members doing their jobs effectively. Consequently, this plan is designed so that employees can easily determine their storm assignments and specific duties at each stage of the storm – pre-storm, storm and post-storm.

A. **Three Point Strategy**

1. Define the problem.
2. Explain how we are working to resolve the problem.
3. Tell how well we did solving the problem.

B. **Be Flexible.** The organization of personnel into teams is designed to create efficiency. If you have met your primary responsibility under the team organization, you may be called on to do any job that needs doing.

C. **Single Source of Information.** The Company Emergency Management Center (CEMC) will be established on the fourth floor of the Pace Boulevard building to receive restoration information from the entire service area. The Storm Restoration Coordinator or designated representative will be the only official source for information on restoration efforts. All rumors concerning injuries, progress of restoration

or anything hurricane related are to be ignored unless verified through the CEMC.

- D. **Be Patient.** The External Team will gather restoration reports on a twice-daily basis, and will make this information available to everyone in the department. Please don't call the CEMC for an update. If members of the general public call give them the latest information from the External Team's update and tell them that we are working as quickly and safely as possible to restore their electricity. If they persist and want additional information, direct them to the telephone bank set up in the Customer Response Center.
- E. **Don't Get Lost.** It will be very important for your team captain to know where you are at all times. If possible, always leave a telephone number where you can be reached.
- F. **Don't Panic.** We have the people and resources to accomplish our tasks. If you see you are pressed and a project is in danger of not getting out on time, ask for help. Don't panic.
- G. **Long Hours.** Be prepared to work overtime. Because of the size of the task, normal 8-5 working hours will not be followed for at least the first few days following the hurricane. Every effort will be made to keep overtime work to a minimum.
- H. **Be Honest.** Tell the truth in all external and internal communications.

The department is designed to function as five separate teams. Teams will be activated at the direction of the department manager, who will act as the Communications Manager and who will be in charge of all five teams to ensure that the department's hurricane procedure objective is met. Each team will have a team leader who reports to the Communications Manager.

Staff members are assigned to specific teams and, once assigned, no longer report to their supervisor. They will instead report to that team's leader until released from storm duty.

Therefore, employees should direct any questions about reporting times or duty assignments to their team leader and not to their regular supervisor. Supervisors, conversely, should not make non-storm duty work assignments or requests of their regular staff without first checking with the team leader, or, in the team leader's absence, the Communications Manager.

Employee Department & Company Policy: Each staff member has responsibilities in every phase of the storm; those specific duties will be assigned by the Team Leader. It is important to note that Gulf Power's Storm Procedure calls for, where duty assignments allow, having employees stay at home or in a shelter during the storm. Employees also are given ample time to make preparations for the safety and care of their families and homes.

A. If a Category 3 or higher hurricane is expected to strike Pensacola, secondary work locations will have to be established for all Corporate Office personnel. The first floor office facilities currently occupied by Public Affairs functions most likely will be inoperable or inaccessible because of storm damage and/or local area flooding.

1. **Communications Services**

If a secondary work location can be established at Gulf Power facilities or a printing vendor within Northwest Florida, that option should take precedence over a move out of the service area. However, if storm damage is severe and widespread it may be necessary for Publication and Postal Services to maintain limited operations out of facilities owned and operated by a sister utility of the Southern Company. In that case, a regular shuttle schedule will be established between that facility and Pensacola to ensure uninterrupted emergency postal and publication operations.

2. **All Other Public Affairs Functions**

The primary site of the CEMC at the Pace Boulevard office will serve as a secondary base of operations for all other Public Affairs functions during contingency conditions. Public Affairs will require the usual CEMC team office space as well as one additional office or work space for other teams. The following actions will be taken following activation of the contingency plan:

- a) Notify news media of contingency plan and give them CEMC telephone numbers – BellSouth and cellular -- dedicated to Public Affairs.
- b) Distribute press releases to all media detailing the potential impact of the storm to Gulf Power facilities, how much help would be expected from our sister companies and other utilities, and that many people should expect not to have electricity for at least a month, or until their homes could receive it.

- c) Notify county Emergency Operations Center liaisons and give them the CEMC telephone numbers dedicated to Public Affairs.
- d) Establish shift/staffing schedule for contingency plan.
- e) Update media from County EMC.
 - Radio initially will be primary media for communication. Regional stations will need to be identified since local stations may not be on-the-air. Consider stations in Mobile, Evergreen, Dothan, etc., as well as "clear channel stations" such as WSB in Atlanta and WWL in New Orleans for evening updates. (Both are 50,000 watts.). Update contacts with AP, UPI, Reuters, etc., as vehicle to disseminate news to media.
- f) Ensure that high quality copiers are available at contingency locations for internal restoration publications and other messages to employees

This is an inventory of the emergency management centers and contacts within Gulf Power's service area. The company will coordinate communications and restoration efforts with appropriate emergency management organizations.

This packet of Public Service Messages will be distributed to the news media of our service area. We are hopeful that they will cooperate with us in disseminating the information included in these messages at the appropriate times. The messages are divided into four categories:

1. Pre-hurricane
2. Hurricane Landfall
3. Post-hurricane
4. Wrap-Up

Each PSA category contains messages for each particular period of time and will not be suitable once the next phase of the hurricane progression has been reached.

PRE-HURRICANE

INDEX

1. Gulf Power's Plan of Action - :36
2. Storm Information Center - :39
3. What to do if your power goes out - :33
4. Precautions - :25
5. Freezer Care - :49
6. Reports of power outages - :34

1. GULF POWER'S PLAN OF ACTION

With the approach of the hurricane, Gulf Power advises that interruptions of electric service are likely to occur. However, you can be assured that every effort will be made to restore service. All Gulf Power crews and equipment are prepared for immediate action throughout our service area. In addition, crews from sister companies within the Southern electric system are on call. An emergency priority system for restoring power to vital community services such as hospitals and sewer lift stations has been set up. This has been a Public Service Message from Gulf Power and this station.

2. – 6. Numbers 2 through 6 are similar in nature, and include a short message for printing or announcing.

Customer Service – Section XI

The Customer Service Center (CSC) in Pensacola will serve as the primary emergency operations center for all trouble reporting. Additional personnel from the Corporate Office will be assigned to the Pensacola Center to help support 24 hour operations.

Depending on the call volume, the Southern System Mutual Assistance Plan may be activated. The Mutual Assistance Plan will provide support from the other five Customer Service Centers in the Southern System.

In the event of major damage to the facility and/or equipment in Pensacola, all calls will be rerouted to other Southern Company Customer Service Centers.

Once it is determined that trouble tickets are needed, all trouble tickets, regardless of origin, will be dispatched to the appropriate restoration location. The Distribution Operations Center in Pensacola will determine when to begin issuing trouble tickets and will also determine the destination for the tickets. If the CSS system should become inoperable, trouble tickets will be taken by hand on traditional trouble ticket forms. They will be sent to the appropriate restoration location by the most efficient means available. (i.e.: couriers, faxes, etc.)

The CSC will be responsible for all customer trouble reporting and the CSC Manager will determine when to implement the Southern System Mutual Assistance Plan.

If the Southern Company Customer Service centers are activated, the CSC Manager will provide a schedule indicating when assistance will be needed. The

Customer Service Supervisors in Pensacola will be responsible for assigning personnel to the schedule.

The CSC Manager will determine when to discontinue the Southern System Mutual Assistance Plan.

Customer Service Representatives and additional Corporate Office personnel assigned to the CSC will be responsible for answering customer trouble calls. Personnel will issue trouble tickets on-line to operations. These tickets will print at the appropriate distribution control location as determined by the Distribution Operations Center.

Properly handled telephone inquiries can create an immeasurable amount of good will. Instructions outlining customer service skills, accessing the CSS system, issuing trouble tickets and answering frequently asked questions are included in the storm training package. This package will be made available to all personnel assigned to the CSC.

CSR's will issue a trouble report by way of CSS or TCMS web call entry tool. Outage information from trouble report goes directly to TCMS (tickets do not print) for DOC operators to dispatch. In the event CSS or TCMS web call entry is unavailable, CSR's will use paper copy trouble tickets.

Corporate Security & Risk Management – Safety & Health – Section XII

General

The Corporate Security & Risk Management Manager will be the overall primary coordinator of the Security Team with the Security Manager's identified designee as the alternate coordinator.

The Safety and Health Team Leader will be the primary coordinator of the Safety and Health Team with a Senior Safety & Health Representative as the alternate coordinator, if the need arises.

Purpose and Scope

This section of emergency procedures is intended to provide a plan of action for the Corporate Security and Risk Management Department in the event a hurricane or major disaster strikes our service area. These procedures are designed to complement the overall Company effort and to be flexible enough to handle a variety of situations.

Objectives

The primary objective of the Corporate Security and Risk Management Department during a hurricane or major disaster is the protection of all employees, guest employees and their assets, and Company assets. This department will also investigate accidents involving injury to the public if Gulf Power personnel, guest employees, or Company facilities are involved to mitigate potential litigation.

Security Personnel Assignments

The Corporate Security & Risk Management Manager and/or the designee will provide coordination and coverage for all Security and Risk activities. The designee will maintain constant liaison with the Corporate Security and Risk Management Team Leaders and appropriate law enforcement agencies and other local, state or federal agencies as required. The Corporate Security & Risk Management Manager and/or the designee will be available to top management to insure that communications about all Corporate Security and Risk Management activities exist. The Investigators will provide in field support to storm crews in their assigned service area. Administrative support will be provided by Corporate Security & Risk Management.

Protection of Employees

The Corporate Security and Risk Management Department will be responsible for the placement of Security or contract personnel or other Gulf Power personnel to aid in the handling of disruptive or irate customers in the Corporate or District offices or other staging areas. Investigators will lead the investigations of all threats to the Company or its personnel.

Placement of Guard Services

The Corporate Security and Risk Management Department will be responsible for the placement of guards, and will also be responsible for providing impromptu inspections of all guards to ensure that they are providing adequate service. All security guard manpower requests should be directed to the Corporate Security and Risk Management desk in the CEMC.

Investigations of Accidents

The management of the Company will be kept abreast of all Claims investigations. The Corporate Security & Risk Management Manager and/or the designee will assist Safety & Health personnel, upon request, on any investigation involving an employee accident in which the employee is injured or major property damage occurs.

Claims

All claims should be handled in accordance with the Claims Procedure Manual of Gulf Power Company. The management of the Company will be kept abreast of all Claims investigations. The Standard Property Damage Claim form will be provided by each Area Coordinator or Team Leader. All questions should be directed to the Risk Management Supervisor or Gulf Power Company's Security and Risk Management Department.

Insurance Claim Coordination on Behalf of Gulf Power

Any damage to property of the Company suffered during a storm must be tracked in order to file for insurance proceeds with our excess insurers. Risk Management will coordinate the SCS Risk Management to track storm damages and start the insurance recovery process, then working in conjunction with Property Plant Accounting and Corporate Real Estate & Quality to fully document the Company insurance claim.

Crew Work Area/Patrols

Investigators in the Districts will assist in patrols of employee work areas to assist with any problems such as irate customers or theft from vehicles. After hour patrols will also be provided by these investigators and/or uniformed security officers under the contract with Gulf Power Company.

Use of Personnel from Other Companies

Assistance of non-Gulf Power Company security personnel will be requested as appropriate through the Corporate Security and Risk Management Team Leaders and/or the designee. All additional personnel requests will be coordinated with the CEMC.

Issuance of Keys

The Corporate Security Department will assist with the issuance of keys needed during a storm situation. To obtain a key, contact Security at the CEMC. Storm team leaders in the Districts are responsible for recovery of all keys issued upon completion of restoration.

General Assistance

A representative of the Corporate Security and Risk Management Department will be on duty or available 24 hours a day to provide assistance as needed.

Safety and Health Personnel Assignments – (Unless Otherwise Assigned)

The Safety and Health Team Leader will be responsible for the placement of Safety and Health personnel and will coordinate additional personnel needs with the CEMC, Human Resources Team or with the appropriate RAM. These requests will be for Gulf Power Company personnel to aid in identifying safety and health risks, facilitating accident investigations, identifying local medical facilities/providers, training, and other safety and health services as needed.

The Safety and Health Team Leader will provide coordination and coverage for all safety and health activities. The Safety and Health Administrative Assistant will maintain constant liaison with the Safety and Health Team Leader, safety and health team members and management to ensure communications about all safety and health activities and issues. Safety and Health Representatives will provide field support in their assigned service area to storm crews and leadership.

Accounting and Treasury – Section XIII

ACCOUNTING PERSONNEL

Accounting personnel will be available during an emergency condition as needed. Certain employees may best use their training and skills to assist in stores accounting operations, timekeeping, agents' activities, certain line work, or telephone operators in the Customer Response Center.

SPECIAL ACCOUNTING INSTRUCTIONS

Normal accounting procedures will be followed, where possible, during the duration of the emergency except as follows:

A. **Account Distribution for Charges Applicable to the Emergency Operation Not Covered By Insurance**

Storm job order numbers (DSO for distribution line repair, GWO for location property, or job order number for off-system assistance) will be used to charge expenses and labor directly attributable to the emergency. All DSO's and GWO's for named storms must be charged to PE 3649. For distribution line repair, DSO numbers will be issued by the Power Delivery Manager for each district restoration area and relayed to the CEMC who will, in turn, relay the number to Property Accounting and to others as necessary. For transmission repair, a GWO number for each affected location will be assigned by the affected Department and forwarded to Property Accounting. The GWO's should be completed by field personnel in accordance with normal operations and forwarded to Property Accounting.

For non-Gulf Power Company system restoration assistance, Power Delivery will obtain a job order number from Corporate Accounting and relay the number to Property Accounting.

Property Accounting will review the storm DSO's and transfer plant additions, COR's, and retirements to an adjustment work order based on the normal cost of the retirement units charged to the storm work orders. The remaining charges on the DSO's will be closed to the proper non-plant accounts. The Power Delivery Manager(s) are responsible for signing-off job order. The Power Delivery Manager(s) will forward the approved job order to Property Accounting for processing.

B. **Special Accounting for Damages Covered by Insurance**

Insurable property includes substation fences, electric generating plants, and office buildings, subject to applicable deductibles.

The affected area will create a GWO number on request for each plant location during the emergency to account for costs directly attributable to damage of insurable property (i.e., substations, generating plants, office buildings).

With assistance from Transmission and Distribution engineers, and/or plant engineers, and/or Corporate Real Estate and Quality, charges to the GWO set up to handle property damage for insurable property will be reconciled, itemized and submitted to the insurance adjuster for the insurance claim, if applicable.

C. **Aid to Another Company**

In the event Gulf Power Company furnishes personnel or materials to another company to aid their storm restoration recovery, the CEMC is responsible for obtaining a job order number from Corporate Accounting for capturing costs. Each event requires a separate job order number and each company to which Gulf Power Company furnishes personnel or materials requires a separate job order number. Property Accounting will use the charges to this job order number as the basis for billing the other company as provided for in Gulf's procedures on intercompany billings. Property Accounting will be notified of the number of personnel and departure date(s) and return date(s) for billings to other companies.

D. **Storm Accountants**

Upon request for mutual assistance the Project Services Manager or the CEMC Specialist and/or, Human Resources will contact the employees who have been designated to serve as Accountants on storm teams providing mutual assistance to another company. The employee's management shall be contacted, if available, prior to contacting the employee. Treasury will also be contacted so that distribution of funds is made to the proper personnel.

E. **Storm Damage Agency Accounts**

In order to better control expenses incurred by Company personnel while performing their duties during storm or emergency conditions, special Agency Accounts will be established and maintained by the storm accountants to ensure prompt and accurate payment and documentation of expenditures.

Power Generation – Section XIV

The purpose of this Power Generation Storm Procedure is to provide high-level guidance and accountability to mitigate the risk of storm related damage to our generation assets and injury to our employees. Individual plant procedures, maintained by the plants, provide detailed guidance and accountabilities for equipment specific preparations, restoration, and etc.

COMMUNICATION

Plant Manager's are responsible for reporting to the CEMC any significant damage to Gulf Power's generating assets as soon as possible. Requests for additional personnel to recover from storm damage and mitigate further damage will be made through the CEMC.

PLANNING AHEAD

Plant Managers are responsible for maintaining an updated, plant-specific storm procedure. This procedure should be reviewed annually prior to June 1st and approved by the Plant Manager. Plant Storm Recovery Procedures should include at a minimum:

- Checklists for Storm preparation showing for each action item
- Action to be performed
- Group manager is responsible for completion
- Timeframe for completion (72, 48, 24 Hours prior to storm's predicted arrival).
- Method of ensuring checklist completion
- Any special operational considerations required during the hurricane
- Post hurricane damage assessment, repairs and accounting responsibilities
- Appendix addressing personnel issues (family, on-site, recall, etc.)

Plant Managers, Group Managers and Team Leaders are responsible for communicating plant Storm Recovery Procedures to all employees annually prior to June 1st.

The Power Generation Services Supervisor is responsible for updating the Power Generation Procedure annually prior to May 1st.

TAKING STOCK

Immediately after the storm passes, plant personnel will assess any damage incurred. Plants will send a report to the Power Generation Services Supervisor describing in detail any damage and estimating costs to repair the damage. Plants should also determine the status and availability of all personnel after the hurricane passes.

Plant Manager's requiring additional personnel to recover from storm damage shall make a request through the CEMC Human Resources team.

Additionally, after the storm passes and if the plants have personnel available to assist in other company-wide storm restoration efforts, Plant Managers shall notify the CEMC Human Resources Team of the additional available personnel.

Environmental – Section XV

This document is intended to provide a plan of action for Environmental Affairs Section in the event of a hurricane or other major disaster striking Gulf's service area.

The prime objective of Environmental Affairs is to coordinate the overall assessment and subsequent remediation of environmental damage caused by a hurricane or other major disaster and to serve as Gulf's liaison with all environmental agencies.

In order to accomplish this objective, all storm restoration personnel are responsible for reporting any and all potential situations that could pose a threat to the environment. They are to report the situation to their Area Coordinator or Team Leader and the CEMC. The CEMC will contact the Manager of Environmental Affairs. If the disaster warrants, a representative of Environmental Affairs will be assigned to the CEMC.

Power Delivery Operations – Section XVI-A

Purpose and Scope

This part of the Storm Recovery Procedures is intended to provide a plan of action for Power Delivery, in the event a hurricane or major disaster strikes Gulf Power Company's Service Area.

These procedures are designed to complement the overall company restoration efforts and to be flexible enough to handle a variety of situations.

Objective

The primary objective of this information is to provide a guide, during hurricanes and other major disasters, for the safe and rapid restoration of Gulf Power Company's Distribution System.

Three Major Restoration Areas

During storm conditions, the Power Delivery System will be divided into three (3) major Restoration Areas under the direction of three RAM's.

District Storm Information Center (DSIC)

Each of the three (3) Restoration Areas will have a DSIC. The purpose of the DSIC is to provide staff support to the RAM and to facilitate the flow of information and requests received from the CEMC and from each of the field area operating headquarters. The DSIC field operations staff will receive damage and restoration status reports from field Area Coordinators and/or Team Leaders. The DSIC Administrative Supervisors will receive all requests for personnel from the Field Area. STORM2000 System will be used to track Company personnel working storm duty, the Personnel Tracking Summary (Exhibit M) and the Transmission Line Status Report (Exhibit J) will be used to determine manpower allocations to specific restoration area work sites. This information will be provided to the Project Services Manager or his designee prior to being released for publication. These reports are required until such time the CEMC requests they be discontinued.

DSIC Field Operations Storm Duty Descriptions

Area Coordinator

Area Coordinator is responsible for the overall restoration effort for designated DSIC field area. Reports directly to and communicates the status of the restoration progress to the RAM and/or his designee. Area Coordinator is responsible for the safe and efficient restoration of service to customers and safety of all personnel assigned to their designed restoration area. Area Coordinator is also responsible for evaluating system conditions, identifying potential conditions that might cause outage problems and reporting these conditions to the RAM and/or his designee. The area coordinator continuously monitors the restoration activities by looking at such items as the number of transformers off, blown fuses, reclosers off, priority orders, and customers affected. Based on his/her continuous assessment of the distribution system, plan restoration activities, determines manpower needs and requests manpower from the DSIC. The area coordinator directs the activities of the DSIC field area team leader(s).

Team Leader

The Team Leader reports directly to the area coordinator. Is in charge or in command of restoration activities specifically for the restoration area to which he/she is assigned. The team leader directs the activities and restoration efforts for all personnel assigned to his/her specific restoration area. He/she is responsible for constantly evaluating field conditions, personnel safety, work assignments, providing guidance and promoting harmonious interactions between storm team members to ensure teamwork and the restoration of service to customers in a safe and timely manner. The team leader will coordinate restoration efforts with the area coordinator.

Team Member

The Team Member reports to and follows direction provided by the team leader. A Team Member is an individual who has the skills to perform assigned storm duty in an efficient and safe manner and promotes teamwork by his/her action(s).

Administrative Assistant

Reports directly to the team leader and is typically located in the field operating headquarters or pre-determined location and is primarily responsible for providing support function. This could include answering the telephone, providing supplies (paper, pencils, markers, stapler, staples & etc.), and requesting additional personnel and/or tree trim support for the team leader to the area coordinator. Duties may also include marking storm restoration feeder maps whenever a feeder is energized and providing support to the team leader as directed by him/her. Administrative assistant must be multi-task oriented.

Accountant

The Accountant reports directly to the person in charge of the area(s) and/or team to which he/she is assigned. The Accountants main function is to provide support for everyone assigned to the same area(s) and/or team. To accomplish this, the accountant must take ownership for providing food, lodging, laundry service, fuel and etc. He/she must maintain records for all expenses associated with providing this support and has a wide scope of duties. These range from serving as liaison between the person in charge, team leaders, team members, DSIC, CEMC to dealing directly with business establishments.

Evaluator

An evaluator is a trained team member whose primary job is to assess damage on the distribution system. Each evaluator will have a driver assigned to them. The driver is to focus on the safe operation of the vehicle while the evaluator is focusing his/her attention to the condition of the distribution system. He/she may be reviewing an entire feeder from the substation to its final customer(s), or may be responding to a single customer outage. In either case, knowing how to spot trouble is critical in determining the best way to return to normal operations. As an evaluator, you are to mark the storm restoration maps in accordance with the Southern System Standardized Map Marking Symbology, record the causes of damage ("forensic" data) and reports back to the team leader in accordance with established reporting times.

The evaluator's report(s) to the team leader will help him/her to:

- (1) Determine how widespread the problems are,
- (2) Properly schedule restoration efforts according to priority,
- (3) Determine how many and what types of crews to dispatch, and
- (4) Correct safety problems
- (5) Document the causes of damage in accordance with the Florida Public Service Commission rules.

Driver

Reports directly to the team leader and is a trained team member whose role is to ensure the safe operation of the vehicle and compliance with the DOT Traffic Control Zone Diagram. This individual must possess a valid state driver's license and follow the direction provided by the evaluator and/or team leader. Prior to reporting to assigned duty location, the driver is responsible for making vehicle arrangements per Fleet Services Guidelines, Section V.

Contractor(s) Coordination

The RAM's or their designee is responsible for providing the Project Services Manager with damage reports for Gulf Power Company's system. They are also responsible for requesting additional manpower or advising the CEMC of manpower that is available for re-assignment to other areas. The Project Services Manager and/or his designee are responsible for matching manpower with needs. The Contractor Coordinator is responsible for contacting and coordinating contract crew(s) entering and exiting Gulf Power Company's system as directed by the Project Services Manager and/or his designee and for making the appropriate contact(s). In order to help reduce duplications all requests for contractor(s) should be directed to the CEMC Contractor

Coordinator. This will allow for better coordination of lodging, transportation, and other contractor support. Request for relocation of Gulf and Non-Gulf Power Company system personnel between major Restoration Areas must be coordinated by the Project Services Manager and/or his designee. The Project Services Manager and/or his designee are responsible for releasing all contractor(s) from working for Gulf Power Company.

All movement of manpower, once assigned to a Restoration Area, is the respective RAM's responsibility.

All Non-Gulf Power personnel working on Gulf Power Companies System must provide to the CEMC a team record Section III. These records will be used by staff members for input into the Personnel Tracking Summary (Exhibit M). The STORM2000 System and Personnel Tracking Summary will also be utilized by other CEMC teams (Food & Lodging, Security, Transportation & etc.) to help determine the type and amount of support required for each storm team. The Personnel Tracking Summary and supporting documentation will be used for validation of invoicing received from companies providing assistance after a disaster.

Post Storm Forensic Data Collections

Gulf Power will employ contractors that will be staged out of harms way and will be ready to be mobilized after the threat of the storm has passed. Once on the system, the crews will survey a percentage of the lines in the storm damaged areas. Percentages will vary depending on how many miles of distribution lines are in the area of the company affected by the storm. The crews will be divided to cover both inland and coastal areas. This data will be collected by one of the two methods depending on the progression of this program before storm season. The preferred method will be for the contractor to use hand held computers, with stored system maps, to collect the data and store all information gathered. The second methods is to collect the same data manually using forms that identify each pole and correlate to a system map that will be supplied by Gulf power to the contractor. This collection process will be worked concurrently with the storm restoration process.

The following information is what has been initially sited as data that will need to be collected during the forensic sweep. Data may be added or deleted as the program develops:

- Pole Down/leaning
- Conductor/Cable – Down/Low/Unearthed (OVH/URD)
- Equipment Damage (OVH/URD)
- Lighting Damage
- Hardware Damage
- Guying Damage - Broken/Missing/Slack

Restoration Area Managers

The three RAM's are responsible for:

- A. Ensuring that all of their direct reports have a storm assignment and are trained prior to June 1 annually.
- B. Ensuring that feeder maps are current and sufficient quantities are available.
- C. Directing the restoration activities for their specific restoration area.
- D. Determining amount of damage to distribution system for specific restoration area.
- E. Determining manpower/equipment needs for their specific restoration area.
- F. Coordinating manpower/equipment needs with the CEMC for their specific restoration area.
- G. Directing manpower resources to maximize productivity and restoration effort for their specific restoration area.
- H. Ensuring manpower assigned to their specific restoration area are working safely.

Distribution Operations Center Guidelines
--

A. **Initial Storm Assignment of DOC Coordinators**

In the event that it is decided to de-centralize control from the DOC to substation team leaders, DOC coordinators will be assigned to substations as needed depending on areas affected. During periods of de-centralized control, a staff of 4 coordinators will remain in the DOC, 2 from 0600 to 1800 and 2 from 1800 to 0600.

In the event of a major hurricane, DOC coordinators assigned to out of town storm assignments will be sent to their assignment prior to landfall (category 2 or higher). Based on storm predictions, selected DOC coordinators will travel to appropriate areas at least 12 hours in advance of landfall. Which coordinators and to where they will travel will be decided by the DOC Supervisor and

Restoration Area Managers. Hotel arrangements will be made in advance by the CEMC.

Transmission/System Control/System Protection – Section XVII

This part of the Storm Recovery Procedures is intended to provide a plan of action for Transmission/Substation/System Control and System Protection, in the event of a hurricane or major disaster striking Gulf Power Company's service area.

These procedures are designed to complement the overall company restoration efforts and to be flexible enough to handle a variety of situations. Depending on the severity of the storm all or part of these procedures may be implemented.

Depending on the severity of the storm, resources may be utilized from other Southern Company Operating Companies. These resources will be identified annually and notified of the need prior to landfall.

A. Transmission Team Leader (TTL)

The TTL is responsible for the overall Transmission Lines/Substation restoration effort. The TTL communicates the status of the restoration progress to the CEMC. The TTL is responsible for the restoration of service and safety of all personnel assigned to the transmission restoration effort. The TTL continuously monitors restoration activities, determines manpower needs, and requests manpower.

B. Two Restoration Areas

During storm conditions the Transmission System will be divided into two restoration areas. Each will be under the direction of a Transmission Construction Leader (TCL).

C. Transmission Construction Leader (TCL)

Reports directly to the TTL. The TCL is in charge of transmission lines restoration activities for the area to which they are assigned. The TCL directs the activities and restoration efforts for all transmission line personnel assigned to their restoration area.

D. Aerial Patrol Coordinator

Reports directly to the TTL. The Aerial Patrol Coordinator is responsible for working with System Control to determine priority of lines to be

patrolled, communicating with Air Operations, getting patrol results to the appropriate TCL and maintaining a status or work on-going with each line. The APC will be located with System Control.

Reports directly to the TSRL and is responsible for the operation of the Gulf Power Company's transmission system. System Control will begin communications with CEMC whenever a hurricane enters the Gulf of Mexico or a storm already in the Gulf of Mexico has the potential to become a hurricane. System Control will coordinate data from the National Weather Service to the CEMC. System Control will report to CEMC all transmission lines out, priority of lines needed for load restoration and system requirements.

Aerial patrols of transmission lines out of service will begin after the hurricane or storm has passed and it is safe to fly. System Control will coordinate aerial patrols with the CEMC. The CEMC is responsible for Aircraft Operations. Trained evaluators will be available for each restoration area. Depending of the severity of the storm, a maximum of four fixed wing and three helicopters may be put in service. Aerial evaluators will be used in securing a broad view and assess transmission line damage from the hurricane or storm. Evaluators will communicate their findings to System Control. System Control will compile the information and inform the TTL of the work required to restore service.

Land evaluations will begin as soon as weather and ground conditions permit. Evaluations will be immediately communicated to the TTL.

CEMC Aircraft Operations is responsible for releasing any aircraft to its home base. A complete inspection of the entire transmission system will be performed by aerial evaluation.

The Substation Engineer will assign Substation Techs to visit substations under their control after the storm to check breakers, differential operations, voltage levels and report findings to System Control.

After the storm has passed Substation Personnel should report to the System Protection Manager (or designee with pre-arranged plans in the event of loss of communications) and receive instructions necessary to take action to repair any transmission related substation equipment, receive instructions for substation evaluation and to perform switching necessary for transmission restoration. These personnel will remain in the assigned area and keep communications open with the System Protection Manager in order to be available promptly as transmission repairs are completed and ready to be energized. Evaluation may require implementing the written substation battery procedure for storm restoration at certain substations which will be determined by the Transmission Team Leader or his designee.

Pre- Storm Preparations

Throughout storm preparations, during the storm and after the storm, System Protection personnel will establish and maintain radio communications with the System Protection Manager, if at all possible. The possibility that generating plant, transmission, and distribution substation priorities can change at any time in a time of emergency, makes this communications link essential.

The System Protection Manager (or an assigned System Protection employee) will remain with Transmission System Control. This person will monitor system activities and identify protection and control schemes which will need attention after the storm has past. System Protection personnel who are not assigned prior to the storm are to stay at home or at a suitable storm shelter with their families. They must be available (with radio communications with the System Protection Manager) and should stay in a location to be available immediately following the storm.

After the Storm

System Protection personnel should report to the Transmission System Control Office, contact the System Protection Manager, and receive instructions necessary to take action to repair any P&C scheme requiring attention and/or receive instructions for substation P&C evaluation.

System Protection personnel assigned to Plant Smith, Crist and Scholz should contact the System Protection Manager to receive instructions. If contact cannot be made, they should contact the Transmission System Control for instructions. They should communicate to the System Protection Manager or System Control their assessment of problems with protection or control schemes. If contact cannot be made with either of the above by working with plant personnel, P&C repairs should be initiated in order to restore the generating plant units and switchyards.

P&C Resources

The System Protection Manager will dispatch personnel according to damage. If conditions warrant, he/she shall decide whether changes in dispatched locations should be made and will inform the TTL.

The System Protection Manager shall evaluate requests for additional relay personnel and equipment during and after the storm, and make recommendations regarding these requests. If additional personnel are required, this request shall be directed to the CEMC Human Resources team.

Air Operations – Section XVIII

Air Operations (Air Ops) is responsible for providing aircraft and the overall coordination for aerial storm restoration evaluation flights and other support flights as directed by CEMC.

Execute Air Operations Checklist A – to be completed annually prior to hurricane season's start on June 1 of each year.

Air Operations Pre-Hurricane Checklist A To be completed by June 1st of each year

- Verify all phone numbers and points of contact
- Print kneeboard sized in-flight contact list
- Update and mount large transmission line wall map at Storm Center and ensure a duplicate map is available for use in System Control
- Inventory headsets, adaptors and battery chargers
- Update County Map Books used in flight, as necessary
- Ensure adequate supply of Vendor Notification and Damage Report blank forms
- Contact each vendor to review commitments, pricing, aircraft availability
- Ensure firm price quotes and clear understanding of pricing structure, including incentives/penalties for prompt response and reservation pricing
- Meet with Transmission employees to review their needs, list of observers, and desired information flow
- Notify observers of any updates to in-flight materials, radios, etc.

Vendors will commence restoration flights as soon as practicable after notification from Air Ops that their services will be required. Aircraft employed in these restoration flights may include fixed-wing and/or rotary-winged aircraft. Vendors are expected to arrive in our service area as soon as safe flight conditions permit following landfall. An airfield or off-field site to pick-up observers (Gulf Power, Southern Company OpCo or SCS employees trained to perform in-flight patrols of transmission facilities) will be selected by Gulf Power and the aircraft vendor. Upon arrival, the vendor will notify Air Ops of their

availability. Air Ops may need to contact local airfields to verify operational status and fuel availability.

Air Ops will notify observers to meet the aircraft at the pre-selected sites. Air Ops will ensure that observers are issued the appropriate radios, headsets, and maps. Observers will radio Air Ops with information concerning the progress of the flight including take-off and landing times and periodic position reports. Air Ops will maintain a log of these reports to assist in aircraft separation and to aid in verifying vendor billings. Air Ops will also use this information to update progress on the large wall-mounted Transmission System Map, indicating lines that have been patrolled aurally. This map will provide an instant overview of Air Ops activities and aid in planning subsequent patrols.

System Control will provide Air Ops a prioritized list of transmission lines they want patrolled. Air Ops will then assign aircraft to general geographic areas and suggest flight routes to cover the desired transmission lines. If required, Air Ops will also coordinate special clearances through TFR areas.

If available, a Transmission department designated employee will, through direct radio contact with the airborne observers, record the observer's damage assessment reports. This information will then be provided to the Transmission department for further action and to System Control. After minor storm damage and as a back up plan for major storm damage, Air Ops will record the damage assessment reports and distribute them to the Transmission department and System Control.

Gulf's primary communications channel for Air Operations is the Southern Linc radio network. The plan calls for Southern Linc radios in each aircraft and several on the ground to receive damage assessment information and direct air operations.

As a secondary plan, or backup, Gulf will utilize satellite telephones assigned to the Air Operations team. These telephones will be used in the aircraft and on the ground by Air Ops, CEMC, and System Control.

As a tertiary plan, Gulf will use the VHF-band radio frequency 122.95 MHZ. If this frequency is unusable for any reason, Gulf Power Company will be assigned another frequency by the FAA. In the event Ground to Air communications are limited to VHF radios, Air Ops may launch a fixed-wing aircraft to function as an airborne communication relay (on Gulf Power Company assigned frequency) to pass damage assessment information to Air Ops. This frequency will also be used by vendor aircraft to notify Air Ops of destination field, ETA, hours of fuel available and other flight related information.

Information Technology – Section XIX

The purpose of this procedure is to provide a guide for responding to an emergency situation that has disrupted the information processing facilities at Gulf Power. Critical systems will be given priority in the restoration effort.

Overview

If an emergency situation is one for which advanced warning can be given – such as a storm – the following steps will be taken prior to it affecting the Gulf Power service area and upon request of the Company Emergency Management Center (CEMC.)

Information Technology Management Team

Review the schedules and storm assignments of IR employees to determine who may be unavailable to report for duty. If employees are unavailable, notify Human Resources advising employees' reason(s).

IT CNS CS Field Ops South and Telecommunications Engineering

Remind/instruct clients to secure all computer-related equipment.

- Power it down.
- Unplug it.
- Move it to interior offices and away from windows.

This will be accomplished via e-mail and a message on the company's phone system.

When the emergency situation has passed and it has been determined that work can begin safely the damages will be assessed and the appropriate actions determined.

Information Technology personnel will work to restore the telecommunications infrastructure in order to provide the necessary communications requirements for the company. The local area networks (LANS) and wide area networks (WANS) will also need to be operational as quickly as possible.

In addition, IT personnel will coordinate vendors and in-house support analysts and technicians to repair, restore and/or acquire and install computer-related equipment, telephones, and fax machines that are damaged during the disaster.

A copy of the SoLINC Radio Operating Instructions and talk group assignments can be found in each Radio Storm Kit. Additional copies can be obtained from the CEMC.

The company uses 44 talk group modes on the Southern LINC radio system for normal radio communications, with an additional 56 talk groups provisioned for emergency and other contingency needs.

Storm and spare talk group modes will be assigned by affected area operations management and communicated to IT CNS CS Field Ops South for coordination.

When normal communications methods are disrupted, radio communications using amateur radio frequencies coordinated with the Amateur Radio Emergency Service (ARES) is available for voice and data transmissions between the various restoration locations within Gulf Power Company and between Gulf Power Company and other outside agencies such as the various county Emergency Operations Centers (EOC), the state EOC, and various support functions such as the American Red Cross. Communications would normally be conducted on the 2 meter and 70 cm amateur frequencies for local information transfer and on the 75 and 40 meter HF bands for communications to Tallahassee.

Commercial or business communications can only be conducted on Amateur Radio frequencies during an emergency when the normal forms of communications have been disrupted and must be returned to the normal modes when they become operational. During the emergency, the FCC regulations of Part 97 of the Communications Act of 1934 must be followed by using only licensed control operators on the allocated amateur radio frequencies.

When an emergency condition exists IT personnel will be dispatched as required to support the company's coordinated restoration effort.

All IT work requests and trouble calls should be reported to the Information Technology Customer Support Center.

IT personnel will be dispatched according to service-affecting priority levels.

Major Hurricane Category 3, 4 or 5 – Section XX

This section establishes a plan of action for rebuilding and/or repairing the company's generation, transmission, substation and distribution systems due to the devastation caused by a Major Category 3, 4 or 5 hurricane. This effort could take weeks – maybe even months – rather than days to restore service to our customers. Part of planning for such a restoration effort is complicated by the fact that no one really comprehends the potential destruction that accompanies a Major Category 3, 4 or 5 hurricane.

Objective

The overall objective of the plan is developed to ensure the safety of all personnel working on the restoration effort, to restore service to our customers in the most efficient and effective manner, to ensure the company is ready to put additional personnel to work upon arrival to assigned restoration areas and to leverage the knowledge we have to better manage large numbers of people.

Restoration areas will be a vital part of the storm recovery plan for a Major Category 3, 4 or 5 hurricane because there will be portions of the service area where the devastation will require total rebuilding of the company's distribution system. With this magnitude storm, Gulf Power's plan includes rebuilding or repairing substations, building new feeders and then restoring service to those homes or businesses left standing. The plan has three zones. The one closest to the center would have total destruction; the electrical system would require a total rebuild. The next zone is a mixture with some repair, some rebuild and some services restored. Away from the landfall – 60 or 100 miles – is an area where repairs can be done and service restored. The plan to rebuild the devastated areas is a change from the way we normally operate following a less severe hurricane. This is different, because in the past we've taken everything in each of the three large districts through one central restoration area headquarters. With a Major Category 3, 4 or 5 hurricane, there could be as many as eight restoration areas reporting directly to the Company Emergency Management Center (Exhibit A). In those areas, we will have to establish independent restoration areas, much like we've grown accustomed to at Pine Forest, Fort Walton Beach and Panama City. Each of these restoration areas would be staffed according to the Major Hurricane Category 3, 4 or 5 Restoration Organizational Chart (Exhibit B). Each restoration area would have their own nucleus of people that know that area and can begin the restoration process while additional personnel are being dispatched. Those areas where typical restoration efforts would be conducted, Pine Forest, Fort Walton Beach and Panama City, would become the default restoration centers. For example, if we

only had to set up a restoration area to cover southwest Pensacola, then everything else remains under Pine Forest, unless we set up a separate center to handle the Gulf Breeze peninsula and Santa Rosa Island. So those three centers remain and they handle everything that's not specifically set up under a new restoration area. Each of the restoration areas would have a Restoration Area Managers (RAM) in charge that has experience in managing similar areas. It is possible that an additional 8,000 personnel could be added to Gulf's existing workforce. If all eight restoration areas are established and the additional personnel were divided evenly between the eight restoration area headquarters – that would be at least 1,000 additional personnel per restoration area. With the additional personnel, the line techs and the service techs may become team leaders for the incoming crews. The plan uses an existing Engineering & Construction Supervisor's area and makes a restoration area out of it. This allows for better organization, at least electrically and geographically, of what the boundaries are; and to already have people knowledgeable about that area. The plan is to leverage the knowledge of our existing workforce to put these large numbers of additional people to work so that we are more productive. One major obstacle we may face is that our support and communication systems may not be functional after a Major Category 3, 4 or 5 hurricane. From an operational standpoint, these things make our job easier and they have been available when storms have hit our service area in the past. Our Major Category 3, 4 or 5 hurricane Storm Recovery Procedures deals with how we restore service when we have fewer of those support and communication systems available and at the same time have larger numbers of outside crews on our system assisting us with our restoration effort.

With this additional section to our storm plan, Gulf Power is prepared to move immediately, with purpose, planning and forethought to repair our system and restore service to our customers as timely as possible.

This section is intended to provide an action plan which will extend the normal emergency procedure to cover the likelihood of major category 3 or greater hurricane conditions. Extreme conditions will call for special automotive equipment, additional fleet support personnel and more attention to communication and coordination efforts. Assignment and relocation of all fleet personnel will as usual be at the discretion of the Fleet Services Support Team Leader.

Previously established storm procedure guidelines V (3) GUIDELINES FOR EMPLOYEE PROVIDED VEHICLE SUPPORT, and V (4) GUIDELINES FOR RENTAL VEHICLE SUPPORT, will apply.

Sections V (5), V (6), and V (7) have been appended to provide added support for extreme conditions.

(V-5) Equipment Support

The CEMC Fleet Support Team Leader will make arrangements to facilitate the acquisition of special equipment. This will include All Terrain Vehicles, Dozers, Front-end loaders etc. (Additional excavating and land clearing contractors have been added to the storm vendor list)

(V-6) Maintenance Support

The Fleet Services Support Team Leader will arrange for outside mechanic support and coordinate and communicate efforts through the CEMC. (In addition to mechanics traveling with outside restoration teams, extreme conditions will call for additional mechanics equipped with garage service trucks. The other operating companies and Altec will be the best source for additional maintenance support).

(V-7) Parts Support

Added parts activity will require additional qualified parts personnel. The Fleet Services Support Team Leader is responsible for appointing inside and/or arranging for outside parts support personnel.

Communication needs will be coordinated with the CEMC – IT Team. If Southern Linc is operational, the SINGLE POINT OF CONTACT for fleet repairs will be Southern LINC radio # 5115. For improved communication and coordination the SINGLE POINT OF CONTACT person will be located in the CEMC with the CEMC Fleet Services Team Leader. The CEMC Fleet Services Team Leader will be contacted for all other fleet equipment needs.

In the event of a Major Category 3, 4 or 5 hurricane Gulf's Logistics team will implement the following procedures:

Establish Primary Staging Sites in each District. Emergency food distribution and lodging needs would be coordinated from these staging areas:

Pensacola District

Pensacola Interstate Fairgrounds:	6655 Mobile Hwy.
Bronson Field:	Hwy 98
Pensacola Civic Center:	201 E. Gregory Street
Avalon Industrial Park:	5953 Commerce Rd

Ft. Walton District

Ft. Walton Beach Office: 140 Hollywood Blvd. SW
Crestview Office: 1655 S. Ferdon Blvd.

Panama City District

Frank Brown Park: 16200 W. Hwy 98
Panama City Office: 1230 E. 15th Street

Incoming additional personnel will be assigned to a specific Primary Staging Site where they will receive all meals. Lodging will also be coordinated from these staging sites.

Food

An agreement has been executed with Buffalo Rock to supply portable kitchen facilities at all Primary Staging sites. The contacts for Buffalo Rock are:

Dick Hansen & Craig Holmes
Catering Manager/Catering Coordinator

Buffalo Rock was selected due to past performance and availability of equipment at various locations. With 24 hours notice, Buffalo Rock will be operational at any and all Staging Sites. A preliminary menu has been coordinated with the vendor.

Staffing

Operation personnel in the CEMC will notify the Logistics Team of the number of incoming personnel to expect at each of the Primary Staging Sites. This information will be communicated to the appropriate District Team Leaders. The Districts will be responsible for adequately staffing each staging location and providing their personnel with the appropriate storm duty assignment.

Lodging

In the event of a major category 3, 4 or 5 hurricane the Logistics Team will assess needs of site and crews. The logistics team will coordinate food sites in emergency staging areas and provide secure non-traditional support for emergency personnel and crews when traditional lodging and basic needs' resources are not available.

The Housing Director for the University of West Florida, has given us tentative agreement to use any open facility(s) (Dormitory, Commons Building, and/or Field House) that are available for the purpose of emergency use during a hurricane. We also have confirmation from UWF's Emergency Coordinator that Gulf Power with approval from a representative of Gulf Power's Safety & Health Team is authorized to use undamaged buildings or facilities on the UWF campus, provided those locations are not already taken by the Escambia County Emergency Management Center.

CEMC Operations

- At least 1 HR storm team member will remain in the temporary CEMC at Pine Forest during the storm. Additional personnel will report as soon as conditions are safe.

Family Services

- Provide Search & Rescue operations
- Assist with recovery and relocation of belongings from destroyed/damaged property
- Provide emergency check cashing services
- Allow employees to use Hadji Shrine Temple and other designated shelters in FWB & PC as temporary shelter in the event of massive evacuations or massive destruction after the storm
- Bring in Employee Assistance Program counselors for employees

Communications With Employees

- Communicate through Emergency Broadcast System, if phone and/or radio systems are inoperable
- Make Department Heads responsible for locating and reporting to HR on their employees

Warehouse Operations

The immediate priority for Warehouse Operations would be to re-establish a centralized material distribution network to support the company's restoration efforts. If post disaster damage assessments confirm catastrophic damage, Warehouse Operations would make preparations to get the Central Receiving Location and manned Storerooms operational at the non-company Staging Areas identified in each District location.

Initially, the sites would stock items from the approved Storm Material List (SML). Each day, for the duration of the restoration effort, the manned

Storerooms would prepare a list of material needed to support the area and forward this information to the Central Receiving Location. The Central Receiving Location would make scheduled deliveries to the manned Staging Areas overnight to ensure materials are available for the next day.

Each Staging Area will be manned by a Material Person (Gulf Power or Non-Gulf Personnel). All "Non-Gulf Power" crews should bring their own Material Person equipped with a full size pick-up truck and low-boy flatbed trailer.

Currently, there are a total of 20 Warehouse Storekeepers and Stockhandlers, along with 3 employees that are licensed to operate tractor trailer trucks. This should be a sufficient number of personnel to cover warehouse operations in case we need to relocate warehouses in all 3 districts. Gulf Power Company, Warehouse Operations, would use a combination of existing employees and our strategic alliance suppliers to meet the needs of the Company's restoration efforts.

CREQ employees (excluding those already assigned to company-wide storm restoration) will be assigned to company facilities before the storm makes landfall.

When conditions allow for safe travel, a CREQ representative will evaluate pre-assigned company facilities. CREQ will immediately begin getting all company facilities repaired and to secure the perimeter of company facilities to minimize further damage to the facility. Damage could be from wet carpet, windows blown out and/or water which blew in through walls/windows, etc. CREQ will determine if the facilities are suitable for use for their original purpose or for storm restoration purposes. If health related conditions are found at any company facility the CREQ Team Leader shall contact the CEMC Safety & Health Team for assistance. Once CREQ makes its use suitability determination, the CEMC Safety & Health representative shall verify that a company facility is safe for personnel to occupy.

Before any company facility can be used for lodging, a representative from the CEMC Safety & Health Team will need to ascertain if the facility has any conditions that might make it unhealthy for personnel to occupy. Anytime a company facility is identified as unsafe and/or due to health risk should not be occupied, the CEMC Project Services Manager and/or the CEMC Specialist should be notified. This will increase the communications regarding company owned facilities and the availability for using company facilities to support the company's restoration effort.

Public Affairs

Pre-Storm

Establish a location for Public Affairs employees to meet post-storm, OR, provide each employee with specific instructions regarding their storm duty assignment and location based on the most current information available regarding the hurricane.

Assign one Public Affairs person to the impacted county's Emergency Operations Center, who would be positioned there before the storm makes landfall, during (if facility is rated for the expected wind velocity) and after the storm. The Public Affairs person would handle media interviews and maintain a dialog on restoration efforts between CEMC and the EOC location. Media must be advised that all restoration information will be disseminated from the EOC location.

Distribute press releases to all media detailing the potential impact of the storm to Gulf Power facilities, how much help would be expected from our sister companies and other utilities, and that many people should expect not to have electricity for at least a month, or until their homes could receive it.

Assign one Public Affairs person to the CEMC before, during and after the storm to communicate restoration updates to the Public Affairs employee at the county's Emergency Operations Center.

Communication would be via telephone land lines until such time as that service was no longer available. Communication would then be maintained with either Southern Linc or cell phone. The Public Affairs person would also be responsible for updating Gulf Today.

Make necessary system contacts to ensure System Emergency Communication Team is on standby. This should include photography back-up.

Post Storm

External

All media updates to stress that restoration process is DIFFERENT to change customer expectations.

Determine when (or if) to bring in Southern Company System Emergency Communication Team.

There would be no change to the storm procedure as it relates to the re-routing of inbound customer calls. Calls would be routed to other companies until which time Gulf Power Customer Service employees could take the calls. A broadcast message would be placed on the phone switch that mirrors the communications from Public Affairs.

Corporate Security & Risk Management

The Corporate Security & Risk Management Manager and/or the alternate will notify CEMC Management who will be the CEMC Security Team Leader to be placed in the CEMC Operations at Pine Forest and/or at the Alabama Power Birmingham location. Also, present will be four voluntary contract Guard Service employees to provide security responsibilities at and around the Pine Forest facility. The Security Team Leader will instruct the guards as to what personal articles are to be brought when assigned to the Storm facility. Corporate Security Department will provide the other tools needed. After the storm subsides to a reasonable strength, the Security Team Leader will evaluate the immediate area and assign job duties to the Guards as needed. After the job duties are assigned, the Security Team Leader will begin to use any communication tools available to locate Corporate Security personnel. After Security personnel are located, up to date information can be relayed and specific job duties can be assigned.

The Security & Risk Management Manager and/or the alternate will assign security personnel as required when the CEMC establishes restoration areas and staffs according to the Major Hurricane Category 3, 4 or 5 Restoration Organizational Chart (Exhibit B). The security representative will be located at each site and will interface with site management as needed.

If needed, additional security personnel will be brought in from other Southern Company Security Departments as necessary to supplement Gulf Power's Security & Risk Management staff. The request for additional security personnel shall be coordinated through the CEMC Human Resources Team. This procedure will allow the appropriate CEMC team to better prepare for providing support (Logistics, fueling and etc.) for the additional personnel.

Safety & Health

The current Safety & Health team would be overwhelmed by such an event. It would be necessary to bring additional safety and health experts from within the Southern Company as well as qualified safety and health contractors. Additional personnel requests will be coordinated through the CEMC Human Resources

Team and any contractor requirements will be coordinated with the CEMC Supply Chain Management Team.

Safety & Health personnel will be assigned to specific districts before the storm makes landfall. A representative of Safety & Health would also be assigned to the CEMC to handle any/all matters pertaining to the area of safety and health. Significant contractor, building safety, and other related issues would have to be addressed with the assistance of safety & health personnel.

When conditions allow for safe travel, the Safety & Health Representatives will be in the field providing assistance to all personnel working on the restoration effort. If health conditions are found at any company facility the CREQ Team Leader shall contact the CEMC Safety & Health Team for assistance. The CEMC Safety & Health representative shall determine if a company facility is unsuitable because of health concerns for personnel to occupy. He/she maybe needed to provide assistance to the field operations and to the personnel responsible for the positions as shown on the Major Hurricane Category 3, 4 or 5 Restoration Organizational Chart (Exhibit B).

Nursing services (first aid stations) would be staffed by Georgia Power Company, Alabama Power Company and/or contract nursing professionals. Alabama Power Company would provide up to 3 nurses. The contract nursing agency would provide additional resources. Georgia Power Company would provide 2 - 3 nurses. The Wellness Coordinator for Gulf Power Company would be in charge of first aid coordination efforts and action plan development. A minimum of one station will be set up in a strategic location and staffed by 1-2 nurses, dependent upon availability. Other locations will be established as needed. Portable shelter and equipment (cots, first aid supplies, coolers and ice & etc.) will be needed at each first aid station for the sixteen hour per day coverage. If necessary, flight arrangements for nursing personnel will be made in advance, possibly through the CEMC Air Operations Team.

In the event communication capabilities are non-existing because of damage caused by the hurricane, this plan will instruct personnel of their respective assignments, who to contact, and directions on where to report as soon as conditions are safe to travel.

In order to ensure compliance with accounting and regulatory Accounting personnel may be rotated between storm and regular work assignment requirements. It may also be necessary to utilize non-Accounting / Finance employees as well as subsidiary employees as storm accountants. The need for personnel to perform accountant storm duty will be identified and initiated by the CEMC Human Resources team. CEMC Human Resources will assign as many accountants as necessary to assist in the restoration effort.

Power Generation will continue to operate under the plant specific restoration plans. If additional personnel are needed to support the plant operations, the request will be coordinated with the CEMC Human Resources Team.

All environmental concerns and/or issues will be handled in accordance with current operating procedures and guidelines. Any exceptions and/or needs for environmental assistance should be directed to the CEMC Specialist and/or CEMC Operations staff.

Power Delivery

(1) General

Power Delivery Operations will follow existing 2006 Storm Procedure as well as Section XX objectives in restoring service to customers.

(2) Organization

Under this section, each district has a separate detail plan outlining their restoration plan. When operating under this section, there could be as many as eight restoration areas reporting directly to the Company Emergency Management Center (Exhibit A) and each of the eight restoration areas would be staffed in accordance with the Major Hurricane Category 3, 4 or 5 Restoration Organizational Chart (Exhibit B). A new Section XVI-F, Forestry Services, has been added to this section.

(3) Distribution Operations Center Guidelines

The Distribution Operations Center Guidelines will be changed to bring all 4 operators (Day and Night Shifts) to the Pace Blvd Office before travel conditions become unsafe. These operators would sleep and work in shifts at Pace Blvd. until conditions allowed for them to travel home. This arrangement would provide 24 hour coverage. Decentralizing of the Distribution Operations Center would remain the same as already written in Sections XVI-A (3) and XVI-A (4) of the 2006 Storm Recovery Procedures.

(4) Work Order Number For Storm Restoration

This section would remain the same as already written in the 2006 Storm Recovery Procedures.

Western: Pensacola Areas I and II

This plan for a major hurricane uses the same strategy for a category two or less storm but breaks up this District from two Restoration Area Managers for the entire District into four (4) Restoration Area Managers per the Major Hurricane Category 3, 4 or 5 Restoration Organizational Chart (Exhibit B). Each of the four (4) Restoration Area Managers will report directly to the CEMC Project Services Manager and/or his alternate. This plan strengthens our response because the overall damage will be high in all areas and with a high storm surge of 20 feet or more, the coastal and low areas, (downtown Pensacola), will have extreme problems.

Pre-storm planning for early evacuation of personnel, trucks, and equipment is going to be essential. The plan is to have no equipment under a shed or in a building during the storm. All trucks and equipment in the coastal and low areas, (ex., Gulf Breeze and Wright Street), should be moved to Ellyson Industrial Park or the Fairgrounds to weather the storm, and then be relocated to the assigned restoration area staging site.

After the storm passes and the storm surge recedes, traveling will be difficult. Roads will be blocked, (they will be cleared), bridges will be washed-out, (there are other routes); All employees are expected to come to work.

The established storm assignments by substations with team leaders and their teams will make initial damage assessments on all feeders leaving each substation as we normally do.

This flexible plan allows each restoration area to be expanded to as many as 1,000 or more line personnel, while using the local Engineering & Construction area personnel as the coordinators for the additional line personnel.

Keep something important in mind; anything can be rebuilt or repaired because we built it in the first place, but the safety of all personnel is paramount for the restoration effort.

Central: Fort Walton

The following plan is based on the criteria established by the CEMC for potential storms classified as Category 3, 4 and 5. Due to the high storm surge and large amounts of rain that could be associated with such a storm, early evacuation of personnel, trucks, and equipment from the Fort Walton and Destin offices is essential.

The plan is to move the line and service trucks to the primary staging locations listed in Table 1 below. After the storm has passed, a damage assessment of the district will determine the magnitude of the impact and possibly dictate the deployment of a second Power Delivery Manager to assist with the restoration effort. In the event of this requirement, the district will be divided into a north area consisting of Crestview and DeFuniak Springs, and a south area made up of Fort Walton and Destin. Implementing this plan will utilize the additional staging areas listed also.

Table 1

<u>Location</u>	<u>Primary Staging Areas</u>	<u>Additional Staging Areas</u>
Fort Walton Beach (RAH)*	Okaloosa Fairgrounds	Meigs Middle School -- Shalimar
Destin	Okaloosa Bus Barn-- Niceville	Mullet Festival Site-- Niceville
Crestview (RAH)*	Super Flea Inc. Lot @ I-10	Old Wal-Mart Parking Lot
DeFuniak Springs	Walton County Fairgrounds	None

*Restoration Area Headquarters (RAH)

With the possibility existing that the Destin area may be isolated due to the inability to use the bridges – Destin, Mid-Bay, and Hwy. 331 bridges. If access by the bridges is not available then helicopters, barges, and ferries to transport personnel and vehicles will be required-- staging will be from Niceville. The on-site staging area for Destin will be the old Wal-Mart parking lot.

There is a good possibility the Destin office will be severely damaged and unusable, therefore plans for a portable building to serve as the temporary office to be installed should be made by contacting the CEMC Supply Chain Management Team. Destin will be under the direction of the Fort Walton, Crestview, or Panama City Beach restoration area based on the ability to transport personnel, material, and equipment in the most effective manner into the area.

The district has 24 distribution substations that will need to be evaluated and have damage assessment performed on the lines leaving them. Responsibility for these substations is shown in the Table 2 below. This will require the assignment of additional personnel to these substations as team leaders, evaluators, drivers, and support personnel so that a timely and accurate assessment of the situation can be made.

This section plans for portable buildings to serve as temporary offices would need to be installed to sites as needed. The request for portable buildings shall be coordinated with the CEMC Supply Chain Management Team.

Table 2

Location	Number of Substations
Fort Walton Beach	9
Destin	5
Crestview	10

Plan for the function of Gulf Power Company field personnel to change to leading foreign crews around, guiding them to damaged areas, and instructing the foreign and contract crews on how Gulf wants the system re-built.

Substation List and Responsibility Assignment for Restoration

Fort Walton

AF Hurlburt	Fort Walton	Hurlburt	Niceville
Ocean City	Shalimar	Sullivan Street	Turner
Valparaiso			

Crestview

Airport	Baker	Crestview City	DeFuniak Springs
East Crestview	Laurel Hill	Milligan	Paxton
Ponce De Leon	South Crestview		

Destin

Crystal Beach	Destin	Miramar	Santa Rosa
San Destin			

Eastern: Panama City

This section plans for people, crews, and food to be bussed in from outside the Panama City service area to restore facilities for a period of time until hotel /motel/ restaurant accommodations are back in service or available.

This section plan includes relocating fleet vehicles to area(s) remote from the site of the strike zone of the hurricane. Areas available include the field behind Ebro City Hall on Highway 79 and the Lynn Haven Waste Disposal Site which is located on Highway 77 just south of Bozeman School. If conditions warrant, fleet vehicles would be moved further north to Chipley.

The District would be subdivided into two Restoration Area Managers in accordance with the Major Hurricane Category 3, 4 or 5 Restoration

Organizational Chart (Exhibit B). Each of the Restoration Area Managers would report directly to the CEMC Project Service Manager and/or his alternate.

One team would consist of the Panama City Beach and the Northern District areas. The second team would include the rest of the Panama City town area.

The Beach Area would be worked in two sections:
Hathaway and Long Beach Subs
Lullwater and Phillips Inlet Subs

Since the Panama City Beach Office is located in a possible tidal surge zone, staging for both sections would be set up at the Frank Brown Park, 16200 W. Hwy 98 (Back Beach Road). Prior to the strike of the hurricane, all essential materials stored at the Panama City Beach Warehouse would be relocated to the staging area in Ebro or further north if needed. Relocation of materials will be coordinated with the CEMC Supply Chain Management Team.

The Northern District area would be handled as in current procedures. If additional staging sites are needed, the specific site will be selected from the pre-identified staging sites prior to the hurricane impacting the Northern District area.

The Panama City Town area would be worked in three sections as follows:

Area 1:

(Proposed Staging Area: West Building Supply (Closed) parking lot at 239 West 15th Street)
Shipyard Sub
Greenwood Sub
Jenks Avenue Sub
Oak Avenue Sub

Area 2:

(Proposed Staging Area: Panama City Mall, 2150 Martin Luther King, Jr. Blvd. (Highway 231)
Bay County Sub
Northside Sub
Hiland City Sub

Area 3:

(Proposed Staging Area: Wal-Mart building parking lot, 230 Tyndall Parkway, Callaway)

Redwood Sub

IPC Sub

Parker Sub

Long Point Sub

Tyndall Sub

Plan includes utilizing company senior line personnel and pre-identified retirees, working for a contractor, to serve as team leaders for contract crews. In addition, other qualified company personnel (Field Service Representatives and Customer Service Representatives and etc.) will be used to serve as general guides for contract crews.

Additional personnel requests and any additional support requests will be made to the CEMC. An example of such support would be for the CEMC Supply Chain Management Team to ensure the night time refueling of vehicles at identified sites.

Forestry Services

The Forestry Team Leader will remain at the CEMC. The team leader will make arrangements to bring foreign crews onto Gulf's system to fulfill the needs of the various restoration areas. The Team Leader will monitor the movement of crews between restoration areas and advise Logistics of these movements as the restoration progresses.

A Forestry Coordinator will be located at each restoration site. The coordinator will interface with the site manager and various substation team leaders to determine the resources necessary to restore service throughout the restoration area. Additional coordinators will be brought in from other Southern Company Forestry Services Departments as necessary to supplement Gulf Power's Forestry Services staff. The Coordinator will dispatch crews to the various substations and coordinate the movement of crews between substations as the restoration progresses.

A Forestry Supervisor will be assigned to each substation that has an inordinately large number of crews assigned to it. The Forestry Supervisor will assist the Substation Team Leader by managing the crews and moving them to the appropriate field location as needed to restore service. The forestry Supervisor may be a contractor supervisor or a Southern company employee.

Each contingent of approximately five crews will have a General Foreman monitoring the crews' activities to insure safety and productivity are maintained at a high level throughout the restoration event.

Layers of supervision may be added or deleted to the organizational structure depending on the volume of crews flowing into any one location.

A. TRANSMISSION/SYSTEM CONTROL

The first priority would be restoration of any generation not in service. The best source available for effected Plant would be identified, if necessary repaired, and returned to service in order to provide Station Service at the Plant.

The three Transmission Restoration Areas may be expanded to five or six and the procedures outlined followed. Transmission lines would be patrolled aerially in order of importance as determined by System Control. Those lines undamaged would be returned to service in accordance with System Control Procedures. Repair of damaged lines and return to service would be in priority order set by System Control. Order of patrol evaluation should be set in advance by System Control and updated annually. The order of patrol should be determined by assuming an inability to determine what lines are out and what lines are not out, and then determine which lines are most important to patrol/evaluate. The CEMC has responsibility for Aircraft Operations and should provide staging areas in advance of any storm. In the event of a Major Category 3, 4 or 5 hurricane all helicopters and fixed wing aircraft will be required for transmission restoration effort.

Distribution will have staging areas strategically located throughout the service area. If possible, Transmission could use those same areas to stage crews. Transmission should coordinate activities with the effected Staging Site Manager and/or Restoration Area Manager.

Distribution can make repairs and be prepared to energize feeders upon approval of System Control in order to maintain system stability.

In the event communications are out of service, patrol reports would be hand delivered to the TCL of the restoration area and then forwarded by hand to System Control until radio communications are restored.

With the additional transmission crews Gulf Power would use line tech's assigned to Transmission work and Substation Tech's as evaluators and as crew guides.

B. SYSTEM PROTECTION

Pre-Storm Preparations

Throughout storm preparations, during the storm and after the storm, System Protection personnel will establish and maintain radio communications with the System Protection Manager, if at all possible. The possibility that generating plant, transmission, and distribution substation priorities can change at any time in a time of emergency, makes this communications link essential.

Personnel Assignments

System Protection's emphasis after the storm will be to evaluate the generating units, generating plant switchyard, and major substations to determine protection & control problems and restoration plans.

For a storm of this magnitude, all assignments of System Protection personnel outside of the System Protection function will be cancelled. Assistance from other operating company system protection departments will probably be requested through the CEMC Human Resources Team. Therefore, it is imperative that P&C problems at bulk power and other major substations be evaluated and necessary checkout be coordinated by Gulf System Protection personnel. For this reason, all System Protection employees will likely be assigned substations to evaluate, make repairs, and place in service.

Pre-Storm Assignments

System Protection employees will be placed in strategic locations as follows:

Plant Crist - Three System Protection employees will be in place at Plant Crist prior to the storm. Their functions will be to assess the P&C damage associated with the generating plant and its switchyards, post-storm. They will evaluate the damage and communicate with the System Protection Manager to develop a restoration plan.

Plant Smith – Two System Protection employees will be in place at Plant Smith prior to the storm. Their functions will be to assess the P&C damage associated with the generating plant and its switchyards, post-storm. They will evaluate the damage and communicate with the System Protection Manager to develop a restoration plan.

Ft. Walton District – Two System Protection employees will be in place at Crestview District Office. Their functions will be to assess the P&C damage at substations, when dispatched by the System Protection Manager, post-storm.

They will evaluate the damage and communicate with the System Protection Manager to develop a restoration plan for these substations.

ChIPLEY - One System Protection employee will be in place at Chipley District Office. This employee will assess the P&C damage at substations when dispatched by the System Protection Manager, post-storm. They will evaluate the damage and communicate with the System Protection Manager to develop a restoration plan for these substations.

Other System Protection Personnel – Personnel unassigned to the above locations will stay at home or at a suitable storm shelter with their families. They must be available (with radio communications with the System Protection Manager) and should stay in a location to be available immediately following the storm.

During the Storm – The System Protection Manager (or an assigned System Protection employee) will remain with the Transmission System Control Office. They will monitor system activities and identify P&C schemes, which will need attention after the storm has past. A preliminary substation restoration plan will be developed as outage information is received including numbers of outside protection & control personnel needed.

After the Storm - The System Protection personnel assigned to Plant Crist & Plant Smith will report their initial assessments. This will be used to develop the restoration plan for the plants, 230 kV transmission substations, and other major substations as first priority. All System Protection personnel should report in to the Transmission System Control Office and contact the System Protection Manager, to receive instructions necessary to take action to repair or coordinate the repair of P&C schemes.

After all P&C repairs are made, the System Protection personnel will be released to the CEMC Human Resources team by the System Protection Manager for re-deployment in the Company's restoration effort. Outside protection & control personnel will be released to the CEMC as well.

If significant damage to Gulf Power Company's geographical area should occur, Aircraft Operations will do the following:

Depending on the conditions of the runways, there might be a heavier use of helicopters than fixed wing aircraft to meet our aircraft needs. We currently rely heavily on fixed wing aircraft because of the lower cost.

If communication towers (Southern Linc) are restricted or not operating at all, we might need to fall back on VHF/UHF technology.

CEMC - Aircraft Operations

Team will work closely with the CEMC – IT Team to ensure communication capabilities.

If the decision is made to relocate the helicopters and/or fixed wing aircraft, Transmission will dispatch qualified transmission/substation personnel to travel with the aircraft to their relocation sites. When the pilot determines it's safe to return to Gulf's geographical area, the transmission/substation personnel will begin patrolling the transmission system upon the return flight. Communications method will be determined prior to the aircraft relocation effort.

CEMC Aircraft Operations will be located with the CEMC Operations and CEMC Transmission System Control Teams at the Pace Blvd. Office.

Information Technology (IT)

In the event that a storm of this magnitude hit the Gulf Power storm area significant disruption of the existing telecommunication network would be likely.

Communications among certain key locations and to some geographic areas would probably diminished, if not absent.

As with all other storms that affect the area, the Field Operations manager, engineers, and specialists will meet to assess the damage to all transport, Southern Communications, Voice, EMS, and Data networks. They will:

- Identify and prioritize the restoration plan.
- Determine parts and labor required to restore service.
- Develop plan for communications internal and external to Telecommunications.
- Create work plan with technician/assigned contractors

Portions of the infrastructure may need to be rebuilt due to damage caused by high winds and/or rising water.

Restoration times will vary depending on the extent of the damage, access to the affected sites, and the availability of personnel and material.

In the event that SoLINC is down we may be able to use the Amateur Radio Network, our existing 450MHz radio system, and the Isolated Site Operations feature of SoLINC for some means of communication.

Sustained winds of 150 to 200 mph with the possibility of tornadoes

While SoLINC buildings are constructed of concrete and steel and bolted to a concrete slab and are not likely to be severely damaged due to wind alone, our Microwave dishes and antennas may be misaligned, damaged and/or blown down requiring replacement and/or repair.

Fiber is located on many of our Transmission and some Distribution lines. Once the damage is assessed, the existing Telecommunications Fiber Restoration Plan will be consulted to determine the necessary action steps.

15 to 25 foot storm surge

Nine locations have been identified as critical to the Telecommunications infrastructure. If these facilities are severely flooded we would experience serious complications with our communications networks.

The initial flooding and the addition of significant rainfall (24 inches in 24 hours) will increase the likelihood of travel problems and guy structures washing out. It will be extremely important to attempt to locate our people strategically to aid in the restoration effort.

- It is **imperative** that all Gulf Power and visiting crews are instructed never to intentionally sever a transmission or distribution line without verifying the existence of fiber, as this could terminate previously existing communications.

Crist and/or Smith Generating Plants are unable to generate

If the plants are unable to generate, station service will be lost. Battery back-ups are in place and should last long enough to get a temporary generator on-line if necessary.

Over half of our Transmission and Distribution lines cannot be energized without repairs

The Telecommunications Fiber Restoration Plan will be consulted to determine whether any severed lines have fiber on them and the appropriate rerouting steps will take place.

As previously stated, it is imperative that all Gulf Power and visiting crews are instructed never to intentionally sever a transmission or distribution line without verifying the existence of fiber, as this could terminate previously existing communications.

Over 300,000 customers are out-of-service

Restoration of communications is critical to the effort to restore electricity to our customers.

Work is required to fully reoccupy all of our offices

We should have all communications circuits rerouted by the time the buildings are ready to be reoccupied. At that time a more long-term restoration plan will be put in place based on the damage sustained.

8,000 non-Gulf restoration people are being brought in

We do not typically provide telecommunications assistance to visiting companies as they generally bring their own equipment and support. IT personnel's SoLINC radios do utilize the CrossFleet function and will be able to talk to any visiting personnel with SoLINC radios.

Summary:

This document highlights the efforts and organization involved in planning for and responding to hurricanes and natural disasters by Gulf Power Company.

Conclusion:

Overall, Gulf's storm plan works extremely well and is a very solid plan. Gulf will always take the opportunity to incorporate lessons learned, although each storm may be different, the plan allows the flexibility to respond appropriately to the situation.

Communications is one of the keys to a successful restoration, and communications interruptions can be one the largest hurdles to overcome. In most cases Southern Company's internal communications network, SouthernLINC Wireless, has remained operational and provided the communications needed to facilitate the restoration process. However, the plan recognizes that there is no system that is immune from the impacts of a hurricane, which is why Gulf's plan also calls for the use of satellite telephones when other communications systems are inoperable.

A history of continuous learning from previous experience, along with a focus on the importance of communications, has led to the evolution of a storm plan that is capable of meeting Gulf's needs, even when faced with the most devastating of storms.