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ORIGINAL
FILE COPY

July 22, 1997

HAND DELIVERED

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

Re: Environmental Cost Recovery Clause
FPSC Docket No. 970007-EI

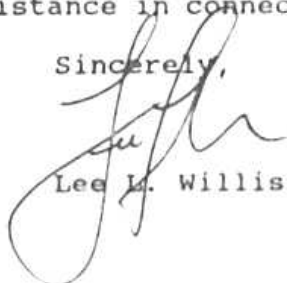
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Statement of Issues and Positions.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,



Lee L. Willis

- ACK
- AFA
- APP
- CAF
- CMU
- LIR
- EAG
- LEA
- LEP
- RE
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- SI
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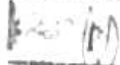
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LLW/pp
Enclosures

cc: All Parties of Record (w/enc.)

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RECEIVED & FILED



FPSC-BUREAU OF RECORDS

DOCUMENT

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost)
Recovery Clause.)
_____)

DOCKET NO. 970007-EI
FILED: July 22, 1997

**TAMPA ELECTRIC COMPANY'S
STATEMENT OF ISSUES AND POSITIONS**

Tampa Electric Company ("Tampa Electric" or "the company") hereby submits its Statement of the Issues and Positions to be taken up at the hearing scheduled to commence on August 14, 1997 in the above docket.

Issue No. 1: What are the appropriate final environmental cost recovery true-up amounts for the period ending March 31, 1997?

Tampa Electric's Position: An overrecovery of \$156,449.
(Witness: Branick)

Issue No. 2: What are the estimated environmental cost recovery true-up amounts for the period April 1997 through September 1997?

Tampa Electric's Position: An underrecovery of \$843,546.
(Witness: Branick)

Issue No. 3: What are the total environmental cost recovery true-up amounts to be collected during the period October 1997 through March 1998?

Tampa Electric's Position: An underrecovery of \$687,097.
(Witness: Branick)

Issue No. 4: What are the appropriate projected environmental cost recovery amounts for the period October 1997 through March 1998?

Tampa Electric's Position: \$3,837,658. (Witness: Branick)

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FPSC-RECORDS/REPORTING

Issue No. 5: What should be the effective date of the new environmental cost recovery factors for billing purposes?

Tampa Electric's Position: The factor should be effective beginning with the specified environmental cost recovery cycle and thereafter for the period October 1997 through March 1998. Billing cycles may start before October 1, 1997, and the last cycle may be read after March 31, 1998, so that each customer is billed for six months regardless of when the adjustment factor became effective.

Issue No. 6: What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery true-up amounts to be collected during the period October 1997 through March 1998?

Tampa Electric's Position: The depreciation rates used to develop the depreciation expense included in the total environmental cost recovery true-up amounts to be collected during the period October 1997 through March 1998 are the latest approved depreciation rates per Docket No. 950499-EI, Order No. PSC-96-0399-FOF-EI. (Witness: Branick)

Issue No. 7: How should the newly proposed environmental costs be allocated to the rate classes?

Tampa Electric's Position: The Commission has directed in Order No. 94-0044 that "costs required for compliance with the Clean Air Act Amendments of 1990 (CAAA) shall be allocated to the rate classes on an per kilowatt hour, or energy basis." Tampa Electric is proposing to classify and allocate all newly proposed environmental costs on an energy basis. (Witness: Branick)

Issue No. 8: What are the appropriate Environmental Cost Recovery Factors for the period October 1997 through March 1998 for each rate group?

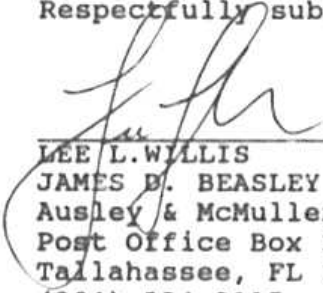
Tampa Electric's Position: Tampa Electric's proposed Environmental Cost Recovery Factors for the period October 1997 through March 1998 for each rate group are as follows:

<u>Rate Class</u>	<u>ECRC Factor (¢/kWh)</u>
RS,RST	0.054
GS,GST,TS	0.054
GSD,GSDT	0.054
GSLD,GSLDT,SBF,SBFT	0.053
IS1,IST1,SBI1,IS3,IS3T,SBI3	0.052
SL/OL	0.054

(Witness: Branick)

DATED this 22nd day of July, 1997.

Respectfully submitted,



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Tallahassee, FL 32302
(904) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing State of Issues and Positions filed on behalf of Tampa Electric Company has been furnished by hand delivery (*) or U. S. Mail on this 22nd day of July, 1997 to the following:

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