

ORIGINAL



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
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Tallahassee, Florida 32399-1400  
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February 2, 1998

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

RE: Docket No. 980002-EG


Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Public Counsel's Prehearing Statement in the above-referenced docket.

Also enclosed is a 3.5 inch diskette containing the Preliminary List of Issues and Positions in WordPerfect for Windows 6.1. Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

  
John Roger Howe  
Deputy Public Counsel

ACK ✓  
AFA   
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
DTZ \_\_\_\_\_

JRH/dsb

Enclosures

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RECEIVED & FILED

  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01698 FEB-28

FPSC-RECORDS/REPORTING

ORIGINAL

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Conservation Cost Recovery )  
Factor. )

DOCKET NO. 980002-EG  
FILED: February 2, 1998

**PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL**

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-98-0036-PCO-EG, issued January 6, 1998, submit this Prehearing Statement.

**APPEARANCES:**

JOHN ROGER HOWE, Esquire  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399-1400  
On behalf of the Citizens of the State of Florida.

**A. WITNESSES:**

None.

**B. EXHIBITS:**

None.

**C. STATEMENT OF BASIC POSITION**

None at this time.

**D. STATEMENT OF FACTUAL ISSUES AND POSITIONS**

DOCUMENT NUMBER-DATE

01698 FEB-28

FPSC-RECORDS/REPORTING

## Generic Conservation Cost Recovery Clause Issues

ISSUE 1: What are the appropriate end-of-period final true-up amounts for the period October, 1996, through September, 1997?

OPC:

|                 |                           |
|-----------------|---------------------------|
| FPC :           | No position at this time. |
| FPL :           | No position at this time. |
| FPUC: Marianna: | No position at this time. |
| Fernandina:     | No position at this time. |
| GPC :           | No position at this time. |
| TECO:           | No position at this time. |
| CHESAPEAKE :    | No position at this time. |
| CITY GAS :      | No position at this time. |
| PEOPLES GAS :   | No position at this time. |
| PELPLES GAS     |                           |
| WEST REGION:    | No position at this time. |
| ST. JOE:        | No position at this time. |

ISSUE 2: What is the appropriate projected end of period total net true-up amount for the period October, 1997, through March, 1998?

OPC:

|                 |                           |
|-----------------|---------------------------|
| FPC :           | No position at this time. |
| FPL :           | No position at this time. |
| FPUC: Marianna: | No position at this time. |
| Fernandina:     | No position at this time. |
| GPC :           | No position at this time. |
| TECO:           | No position at this time. |
| CHESAPEAKE :    | No position at this time. |
| CITY GAS :      | No position at this time. |
| PEOPLES GAS :   | No position at this time. |
| PELPLES GAS     |                           |
| WEST REGION:    | No position at this time. |
| ST. JOE:        | No position at this time. |

ISSUE 3: What are the appropriate conservation cost recovery factors for the period April, 1998, through March, 1999?

OPC:

|                 |                           |
|-----------------|---------------------------|
| FPC :           | No position at this time. |
| FPL :           | No position at this time. |
| FPUC: Marianna: | No position at this time. |
| Fernandina:     | No position at this time. |
| GPC :           | No position at this time. |
| TECO:           | No position at this time. |
| CHESAPEAKE :    | No position at this time. |
| CITY GAS :      | No position at this time. |
| PEOPLES GAS :   | No position at this time. |
| PELPLES GAS     |                           |
| WEST REGION:    | No position at this time. |
| ST. JOE:        | No position at this time. |

**Company-Specific Conservation Cost Recovery Issues**

FLORIDA POWER CORPORATION

ISSUE 4: Is FPC's calculation of its residential revenue decoupling true-up balance proper?

OPC: No position at this time.

ISSUE 5: Should FPC's request to collect the decoupling true-up underrecovery over a 24-month period, instead of the normal 12 months, be approved?

OPC: No position at this time.

E. STATEMENT OF LEGAL ISSUES AND POSITIONS: None at this time.

F. STATEMENT OF POLICY ISSUES AND POSITIONS: None at this time.

G. STIPULATED ISSUES: None.

H. PENDING MOTIONS: None.

I. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Respectfully submitted,

JACK SHREVE  
Public Counsel

  
John Roger Howe  
Deputy Public Counsel

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c/o The Florida Legislature  
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(904) 488-9330

Attorneys for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE  
DOCKET NO. 980002-EG**

I HEREBY CERTIFY that a true and correct copy of the PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL has been furnished by \*hand-delivery or by U.S. Mail to the following parties on this 2nd day of February, 1998:

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