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Matthew M. Childs, P.A.

July 17, 1998

Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
4075 Esplanade Way, Room 110  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
58 JUL 17 PM 4:08  
RECORDS AND  
REPORTING

RE: DOCKET NO. 980007-EI

Dear Ms. Bayó:

Enclosed for filing please find the original and ten (10) copies of Florida Power & Light Company's List of Issues and Positions in the above referenced docket.

Also enclosed is a formatted double sided high density 3.5 inch diskette containing the List of Issues and Positions for Florida Power & Light Company.

RECEIVED & FILED

Very truly yours,

*[Signature]*  
FPSC-BUREAU OF RECORDS

*[Signature]*

Matthew M. Childs, P.A.

- ACK
- AFA *[Handwritten]*
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG *[Handwritten]*
- LEG \_\_\_\_\_
- LIN 3
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

MMC/ml

cc: All Parties of Record

Miami  
305 577 7000  
305 577 7001 Fax

West Palm Beach  
561 650 7200  
561 655 1509 Fax

Kel West  
305 292 7272  
305 292 7271 Fax

DOCUMENT NUMBER-DATE

58 JUL 17 08  
582 65 4106  
582 951 4106 Fax

RECORDS AND REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental )  
Recovery Clause )

DOCKET NO. 980007-EI  
FILED: JULY 17, 1998

FLORIDA POWER & LIGHT COMPANY'S  
ISSUES AND POSITIONS

1. What is the appropriate final environmental cost recovery true-up amount for the twelve month period ending September 30, 1997?  
  
FPL: \$2,157,919 overrecovery for the period including interest.
2. What is the estimated environmental cost recovery true-up amount for the period October, 1997 through September, 1998?  
  
FPL: \$926,229 underrecovery for the period including interest.
3. What is the total environmental cost recovery true-up amount during the period October, 1998 through December, 1998?  
  
FPL: \$1,231,690 net overrecovery for the period including interest. However, FPL is not proposing to reflect this overrecovery during the October 1998 through December 1998 period but instead FPL proposes to reflect this amount during the January 1999 through December 1999 period. (See Issue No. 10)
4. What is the appropriate projected environmental cost recovery amount for the period October, 1998 through December, 1998?  
  
FPL: The total environmental cost recovery amount, adjusted for revenue taxes is \$4,909,380. This amount does not include the net overrecovery for prior periods.
5. What should be the effective date of the new environmental cost recovery factors for billing purposes?

FPL: FPL is not proposing new environmental cost recovery factors for the October 1998 through December 1998 period.

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, 1998 through December, 1998?

FPL: Because FPL is not proposing a change in the environmental cost recovery factors, there are no proposed changes in depreciation rates.

7. How should the newly proposed environmental costs be allocated to the rate classes?

FPL: Since FPL is not proposing a change in the factors, the currently approved allocation should be continued.

8. What are the appropriate environmental cost recovery factors for the period October, 1998 through December, 1998 for each rate group?

FPL: The appropriate factors for each rate group should continue to be those last approved by the Commission in Order No. PSC-97-1047-FOF-EI.

#### Company-Specific Environmental Cost Recovery Issues

9. Should the Commission approve FPL's proposal to recover the costs of the Wastewater and Stormwater Discharge Elimination Project through the Environmental Cost Recovery Clause?

FPL: Yes. The Wastewater and Stormwater Discharge Elimination Project is designed to eliminate the release of contaminants to the environment by eliminating discharges of wastewater and stormwater in plant operations. Completion of this project will ensure that FPL is in compliance with the new environmental requirements related to wastewater and stormwater. FPL's preliminary cost estimate totals approximately \$13 million and these costs are not otherwise being recovered by FPL.

10. Should the Commission approve FPL's request for authorization to extend its currently approved Environmental Compliance Factors for the period October 1998 through December 1998 and to allow prior period true-up amounts to be reflected in the calendar year 1999 period?

**FPL:** Yes. A calculation of new environmental factors reflecting projections for the period and the net true-up amount would not produce factors significantly different from those currently in effect. Therefore, FPL believes that a change to customers bills for the three month period of October through December 1998 is not warranted.

In Order No. PSC-98-0691-FOF-PU, Docket No. 980259-PU dated May 19, 1998, the Commission found that Fuel, Capacity, and Environmental Factors should be determined on a calendar year basis beginning in 1999. As part of the transition to 1999, the Commission approved FPL's Fuel Factors through December 1998 and also extended FPL's Capacity Factors for the three month period of October 1998 through December 1998. Extending the ECRC factors for the period October 1998 through December 1998 would be consistent with the earlier Commission decisions. Therefore, the Commission should authorize FPL to extend its currently authorized environmental factors.

**WITNESSES AND SUBJECT MATTER**

<u>WITNESS</u>	<u>SPONSOR</u>	<u>SUBJECT MATTER</u>	<u>EXHIBIT TITLES</u>
K.M. DUBIN	FPL	ECRC Projections for October through December 1998	Appendices I and II
K.M. DUBIN	FPL	ECRC Final True-Up for October 1996 through September 1997	Forms 42-1A through 42-8A

WITNESS

R.R. LABAUVE

SPONSOR

FPL

SUBJECT MATTER

New Environmental  
Compliance  
Activities

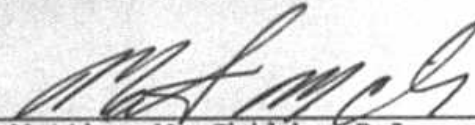
EXHIBIT TITLES

Exhibits

Respectfully submitted,

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Attorneys for Florida Power  
& Light Company

By:

  
Matthew M. Childs, P.A.

CERTIFICATE OF SERVICE  
DOCKET NO. 980007-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's List of Issues and Positions has been furnished by Hand Delivery (\*), or U.S. Mail this 17th day of July, 1998, to the following:

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