



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison St  
Room 812  
Tallahassee, Florida 32399-1400  
850-488-9330

ORIGINAL  
RECEIVED PSC  
OCT 22 PM 4:28  
RECEIVED  
REPLYING

October 22, 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. 980001-EI

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Public Counsel's Preliminary List of Issues and Positions 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

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

- ACK \_\_\_\_\_
- AFA Uandrei
- APP JRH/dsb
- CAF \_\_\_\_\_
- CMU Enclosures
- CTH \_\_\_\_\_
- EAG Bohrman
- LEI 1
- LIR 3
- OPF \_\_\_\_\_
- RCM \_\_\_\_\_
- SE 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT FILED DATE  
11838 OCT 22 8

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power	)	
Cost Recovery Clause with	)	DOCKET NO. 980001-EI
Generating Performance Incentive	)	FILED: October 22, 1998
Factor	)	
<hr/>		

**PUBLIC COUNSEL'S PRELIMINARY LIST OF  
ISSUES AND POSITIONS**

The Office of Public Counsel hereby submits its preliminary list of issues and positions.

**Generic Fuel Adjustment Issues**

**ISSUE 1:** What are the appropriate final fuel adjustment true-up amounts for the period April, 1998, through September, 1998?

**OPC:**

FPC:	No position at this time.
FPL:	No position at this time.
FPUC:	Fernandina: No position at this time.
	Marianna: No position at this time.
GPC:	No position at this time.
TECO:	No position at this time.

**ISSUE 2:** What are the estimated fuel adjustment true-up amounts for the period October, 1998, through December, 1998?

**OPC:**

FPC:	No position at this time.
FPL:	No position at this time.
FPUC:	Fernandina: No position at this time.
	Marianna: No position at this time.
GPC:	No position at this time.
TECO:	No position at this time.

**ISSUE 3:** What are the total fuel adjustment true-up amounts to be collected/refunded during the period January, 1999, through December, 1999?

**OPC:**

FPC: No position at this time.  
FPL: No position at this time.  
FPUC: Fernandina: No position at this time.  
Marianna: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

**ISSUE 4:** What are the appropriate levelized fuel cost recovery factors for the period January, 1999, through December, 1999?

**OPC:**

FPC: No position at this time.  
FPL: No position at this time.  
FPUC: Fernandina: No position at this time.  
Marianna: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

**ISSUE 5:** What should be the effective date of the new fuel adjustment charge for billing purposes?

**OPC:** The factor should be effective beginning with the specified fuel cycle and thereafter for the period January, 1999, through December, 1999. Billing cycles may start before January 1, 1999, and the last cycle may be read after December 31, 1999, so that each customer is billed for three months regardless of when the adjustment factor became effective.

**ISSUE 6:** What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

**OPC:**

FPC: No position at this time.  
FPL: No position at this time.  
FPUC: Fernandina: No position at this time.  
Marianna: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

**ISSUE 7:** What are the appropriate Fuel Cost Recovery Factors for each rate class/delivery voltage level class adjusted for line losses?

**OPC:**

FPC: No position at this time.  
FPL: No position at this time.  
FPUC: Fernandina: No position at this time.  
Marianna: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

**ISSUE 8:** What is the appropriate revenue tax factor to be applied in calculating each company's levelized fuel factor for the projection period of January, 1999, through December, 1999?

**OPC:**

FPC: No position at this time.  
FPL: No position at this time.  
FPUC: Fernandina: No position at this time.  
Marianna: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

**ISSUE 9:** What is the appropriate revenue tax factor to be applied in calculating each company's levelized fuel factor for the projection period of October, 1998, through December, 1998?

**OPC:**

FPC: 1.00083  
FPUC Marianna: 1.00083  
Fernandina Beach: 1.01609  
GULF: 1.01609  
TECO: 1.00083

**Company-Specific Fuel Adjustment Issues**

**FLORIDA POWER CORPORATION**

**ISSUE 10:** Has Florida Power Corporation confirmed the validity of the methodology used to determine the equity component of Electric Fuels Corporation's capital structure for calendar year 1997?

OPC:

FPC: No position at this time.

ISSUE 10A: Has Florida Power Corporation properly calculated the market price true-up for coal purchases from Powell Mountain?

OPC:

FPC: No position at this time.

ISSUE 10B: Has Florida Power Corporation properly calculated the 1997 price for waterborne transportation services provided by Electric Fuels Corporation?

OPC:

FPC: No position at this time.

TAMPA ELECTRIC COMPANY

ISSUE 11: What is the appropriate 1997 benchmark price for coal Tampa Electric Company purchased from its affiliate, Gatliff Coal Company?

OPC:

TECO: No position at this time.

ISSUE 11A: Has Tampa Electric Company adequately justified any costs associated with the purchase of coal from Gatliff Coal Company that exceed the 1997 benchmark price?

OPC:

TECO: No position at this time.

ISSUE 11B: What is the appropriate 1997 waterborne coal transportation benchmark price for transportation services provided by affiliates of Tampa Electric Company?

OPC:

TECO: No position at this time.

ISSUE 11C: Has Tampa Electric Company adequately justified any costs associated with transportation services provided by affiliates of Tampa Electric Company that exceed the 1997 waterborne transportation benchmark price?

OPC:

TECO: No position at this time.

### Generic Generating Performance Incentive Factor Issues

**ISSUE 12:** What is the appropriate GPIF reward or penalty for performance achieved during the period October 1997 through March 1998?

OPC:

FPC: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

**ISSUE 12A:** What is the appropriate GPIF reward or penalty for performance achieved during the period October, 1996, through September, 1997?

OPC:

FPL: No position at this time.

**ISSUE 13:** What should the GPIF targets/ranges be for the period October, 1998, through December, 1998?

OPC:

FPC: No position at this time.  
FPL: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

**ISSUE 13A:** What should the GPIF targets/ranges be for the period January, 1999, through December, 1999?

OPC:

FPC: No position at this time.  
FPL: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

### Generic Capacity Cost Recovery Issues

**ISSUE 14:** What is the appropriate final capacity cost recovery true-up amount for the period April, 1998, through September, 1998?

OPC:

FPC: No position at this time.  
FPL: No position at this time.

GPC: No position at this time.  
TECO: No position at this time.

ISSUE 15: What is the estimated capacity cost recovery true-up amount for the period October, 1998, through December, 1998?

OPC:

FPC: No position at this time.  
FPL: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

ISSUE 16: What is the total capacity cost recovery true-up amount to be collected/refunded during the period January, 1999, through December, 1999?

OPC:

FPC: No position at this time.  
FPL: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

ISSUE 17: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period January, 1999, through December, 1999?

OPC:

FPC: No position at this time.  
FPL: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

ISSUE 18: What are the projected capacity cost recovery factors for the period January, 1999, through December, 1999?

OPC:

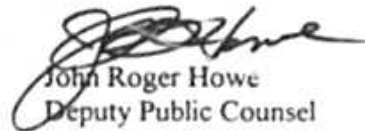
FPC: No position at this time.  
FPL: No position at this time.  
GPC: No position at this time.  
TECO: No position at this time.

**Company-Specific Capacity Cost Recovery Issues**

None at this time

Respectfully submitted,

Jack Shreve  
Public Counsel

  
John Roger Howe  
Deputy Public Counsel

Office of the Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Tallahassee, Florida 32399-1400

(850) 488-9330

Attorneys for the Citizens  
of the State of Florida



**CERTIFICATE OF SERVICE  
DOCKET NO. 980001-EI**

I HEREBY certify that a copy of the foregoing PUBLIC COUNSEL'S PRELIMINARY LIST OF ISSUES AND POSITIONS has been served by \*hand delivery or U.S. Mail to the following parties of record on this 22nd day of October, 1998.

Leslie J. Paugh, Esquire\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Joseph A. McGlothlin, Esquire  
Vicki Gordon Kaufman, Esquire  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301

Jeffrey A. Stone, Esquire  
Russell A. Badders, Esquire  
Beggs and Lane  
Post Office Box 12950  
Pensacola, FL 32576-2950


John W. McWhirter, Jr., Esquire  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
Post Office Box 3350  
Tampa, FL 33601-3350

Matthew M. Childs, Esquire  
Steel, Hector & Davis  
215 South Monroe Street  
Suite 601  
Tallahassee, FL 32301-1804

Lee L. Willis, Esquire  
James D. Beasley, Esquire  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32302

James A. McGee, Esquire  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, FL 33733

Kenneth A. Hoffman, Esquire  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman, P.A.  
Post Office Box 551  
Tallahassee, Florida 32302

  
\_\_\_\_\_  
John Roger Howe  
Deputy Public Counsel