

One Energy Place
Pensacola, Florida 32520

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ORIGINAL



November 3, 1998

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

Dear Ms. Bayo:

RE: Docket No. 980002-EG

Enclosed are an original and ten copies of the Prehearing Statement of Gulf Power Company.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Statement in WordPerfect for Windows 6.1 format as prepared on a Windows NT based computer.

Sincerely,

Susan D. Cranmer

Susan D. Cranmer
Assistant Secretary and Assistant Treasurer

- PICK _____
- WFA Handwritten _____
- APP _____
- CAT _____
- CI _____
- C _____
- E Ballinger _____
- LE 1 _____
- LR 3 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

lw

Enclosure

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

DOCUMENT NUMBER-DATE

~~12867~~ NOV-4 98

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Conservation Cost Recovery)
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_____)

Docket No. 980002-EG
Date Filed: Nov. 4, 1998

PREHEARING STATEMENT OF GULF POWER COMPANY

Gulf Power Company, ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned attorneys, and pursuant to Order No. PSC-98-1239-PCO-EG and Rule 25-22.038(3), Florida Administrative Code, files this prehearing statement, saying:

A. APPEARANCES:

JEFFREY A. STONE, Esquire, and RUSSELL A. BADDERS,
Esquire, of Beggs & Lane, 700 Blount Building, 3 West Garden
Street, P.O. Box 12950, Pensacola, FL 32576-2950
On behalf of Gulf Power Company.

DOCUMENT NUMBER-DATE

12367 NOV-4 88

FPSC-RECORDS/REPORTING

B. WITNESSES: All witnesses known at this time, who may be called by Gulf Power Company, along with the subject matter and issue numbers which will be covered by the witness' testimony, are as follows:

| <u>Witness (Direct)</u> | <u>Subject Matter</u> | <u>Issues</u> |
|-----------------------------|--|---------------|
| 1. Margaret D. Neyman | Components of Gulf's Conservation Plan and associated costs; projections and program results | 1, 2, 3 |

C. EXHIBITS:

| <u>Exhibit Number</u> | <u>Witness</u> | <u>Description</u> |
|-----------------------|----------------|-----------------------------|
| _____ (MDN-1) | Neyman | Schedules CT-1 through CT-6 |
| _____ (MDN-2) | Neyman | Schedules C-1 through C-5 |

D. STATEMENT OF BASIC POSITION

Gulf Power Company's Statement of Basic Position:

It is the basic position of Gulf Power Company that the proposed ECCR factor presents the best estimate of Gulf's Conservation expense for the period January 1999 through December 1999, including the true-up calculations and other adjustments allowed by the Commission.

E. STATEMENT OF ISSUES AND POSITIONS

Generic Energy Conservation Cost Recovery Issues

ISSUE 1: What are the appropriate adjusted net true-up amounts for the period October 1, 1997, through March 31, 1998?

GULF: Over recovery \$167,208. (Neyman)

ISSUE 2: What are the appropriate conservation cost recovery factors by customer class for the period January 1999 through December 1999?

GULF: See table below: (Neyman)

| RATE CLASS | CONSERVATION COST RECOVERY FACTORS ¢/KWH |
|-------------------|---|
| RS, RST | 0.021 |
| GS, GST | 0.020 |
| GSD, GSDT | 0.020 |
| LP, LPT | 0.019 |
| PX, PXT, RTP | 0.018 |
| OSI, OSII | 0.018 |
| OSIII | 0.019 |
| OSIV | 0.023 |
| SBS | 0.018 |

Company-Specific Conservation Cost Recovery Issues

NONE RAISED AS TO GULF POWER COMPANY

F. STIPULATED ISSUES

GULF: Yet to be determined. Gulf is willing to stipulate that the testimony of all witnesses whom no one wishes to cross examine be inserted into the record as though read, cross examination be waived, and the witness's attendance at the hearing be excused.

G. PENDING MOTIONS:

GULF: None.

H. OTHER MATTERS:

GULF: To the best knowledge of counsel, Gulf has complied, or is able to comply, with all requirements set forth in the orders on procedure and/or the Commission rules governing this prehearing statement. If other issues are raised for determination at the hearings set for November 23-25, 1998, Gulf respectfully requests an opportunity to submit additional statements of position and, if necessary, file additional testimony.

Dated this 3rd day of November, 1998.

Respectfully submitted,



JEFFREY A. STONE

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RUSSELL A. BADDERS

Florida Bar No. 007455

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(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery)
_____)

Docket No. 980002-EG

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail this 3rd day of November 1998 to the following:

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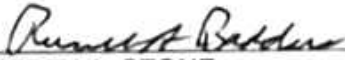
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