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RECORDS AND  
REPORTING

November 4, 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 Prehearing Statement in the above-referenced docket.

Also enclosed is a 3.5 inch diskette containing Public Counsel's Prehearing Statement 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 Handover  
APP \_\_\_\_\_  
CAF JRH/dsb  
CMU \_\_\_\_\_  
CTR Enclosures  
EAG Bohrman  
LEG 1  
LIN 3  
OPD \_\_\_\_\_  
ROH \_\_\_\_\_  
SEC 1  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE  
2305 NOV -4 98  
DIV OF RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power )  
 Cost Recovery Clause with )  
 Generating Performance Incentive )  
 Factor )  
 \_\_\_\_\_ )

DOCKET NO. 980001-EI  
 FILED: November 4, 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-98-1184-PCO-EI, issued September 4, 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 at this time. However, exhibits may be introduced as necessary during examination of witnesses.

C. STATEMENT OF BASIC POSITION

None Necessary.

DOCUMENT NUMBER-DATE

12385 NOV-4-98

FPSC-RECORDS/REPORTING

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

Generic Fuel Adjustment Issues

ISSUE 1: What is the appropriate final fuel adjustment true-up amount for Florida Power & Light Company for the period October, 1997, through March, 1998?

OPC:

FPL: No position at this time.

ISSUE 2: What are the estimated fuel adjustment true-up amounts for the period April, 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 from January, 1999, to 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, to 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 fuel adjustment charge and capacity cost recovery 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 twelve 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, to 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.

**Company-Specific Fuel Adjustment Issues**

**Florida Power Corporation**

**ISSUE 9A:** 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: No position at this time.

**ISSUE 9B:** Has Florida Power Corporation properly calculated the market price true-up for coal purchases from Powell Mountain?

OPC: No position at this time.

**ISSUE 9C:** Has Florida Power Corporation properly calculated the 1997 price for waterborne transportation services provided by Electric Fuels Corporation?

OPC: No position at this time.

**ISSUE 9D:** Should the Commission approve Florida Power Corporation's request to recover the cost of converting Debarry Unit 8 to burn natural gas?

OPC: No position at this time.

**Tampa Electric Company**

**ISSUE 10A:** What is the appropriate 1997 benchmark price for coal Tampa Electric Company purchased from its affiliate, Gatliff Coal Company?

OPC: No position at this time.

**ISSUE 10B:** 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: No position at this time.

**ISSUE 10C:** Should the Commission disallow recovery of any BTU premium adjustment for years 1993 through 1997, inclusive, which Tampa Electric Company paid to Gatliff Coal Company that exceeds the benchmark for coal purchases established in Docket No. 930001-EI and approved by Order No. PSC-93-0443-FOF-EI, issued March 23, 1993?

OPC: Yes.

**ISSUE 10D:** What is the appropriate 1997 waterborne coal transportation benchmark price for transportation services provided by affiliates of Tampa Electric Company?

OPC: No position at this time.

**ISSUE 10E:** 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: No position at this time.

**ISSUE 10F:** How should Tampa Electric Company conclude the refund credit factor as agreed to in the Stipulation approved in Order No. PSC-96-1300-S-EI, in Docket No. 960409-EI, issued October 24, 1996?

OPC: No position at this time.

**Generic Generating Performance Incentive Factor Issues**

**ISSUE 11A:** What is the appropriate GPIF reward or penalty for performance achieved by Florida Power & Light Company during the period October, 1996, through September, 1997?

**OPC:**

FPL: No position at this time.

**ISSUE 11B:** What is the appropriate GPIF reward or penalty for performance achieved by Florida Power Corporation, Tampa Electric Company, and Gulf Power Company 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 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.

**ISSUE 12B:** 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.

**Company-Specific Generating Performance Incentive Factor Issues**

**Florida Power & Light Company**

**ISSUE 13:** What heat rate results for the Turkey Point Units 3 and 4 should be incorporated into the results for the period October, 1996, through September, 1997?

OPC: No position at this time.

**Tampa Electric Company**

**ISSUE 14:** Should the heat rate for Tampa Electric Company's Big Bend Unit 3 be adjusted for the power used by the scrubber at Big Bend Unit 4?

OPC: No position at this time.

**Generic Capacity Cost Recovery Factor Issues**

**ISSUE 15:** What is the appropriate final capacity cost recovery true-up amount for Florida Power & Light Company for the period October, 1996, through September, 1997?

**OPC:**

FPL: No position at this time.

**ISSUE 16:** What is the estimated capacity cost recovery true-up amount for Florida Power & Light Company and Gulf Power Company for the period October, 1997, through December, 1998?

**OPC:**

FPL: No position at this time.

GPC: No position at this time.

**ISSUE 17:** What is the estimated capacity cost recovery true-up amount for Florida Power Corporation and Tampa Electric Company for the period April, 1998, through December, 1998?



OPC:

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

ISSUE 18: 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 19: 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 20: 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

Florida Power and Light Company

ISSUE 21A: What is the appropriate final capacity cost recovery true-up amount for the period April, 1997, through March, 1998?

OPC: No position at this time.

ISSUE 21B: What is the estimated/actual capacity true-up amount for the period April, 1998, through December, 1998, which is based upon five months actual costs and four months revised estimates?

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.

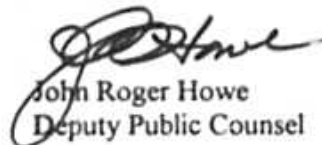
H. PENDING MOTIONS: None.

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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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 PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL has been served by \*hand delivery or U.S. Mail to the following parties of record on this 4th day of November, 1998.

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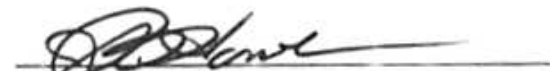
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