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Matthew M. Childs, P.A.

April 23, 1999

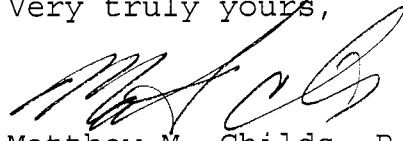
Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, FL 32399-0850

RE: UNDOCKETED - MERCHANT PLANT STUDY

Dear Ms. Bayó:

Enclosed for filing please find the original and fifteen(15) copies of Florida Power & Light Company's Preliminary List of Issues in the above-referenced docket.

Very truly yours,



Matthew M. Childs, P.A.

MMC/ml

cc: Robert V. Elias, Esq., Legal Division
Leslie J. Paugh, Esq., Legal Division
James D. Beasley, Esq., Ausley & McMullen
James A. McGee, Esq., Florida Power Corp.

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DOCUMENT NUMBER-DATE

~~05266 APR 23 1999~~

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Merchant Plant Study)
_____)

UNDOCKETED
DATE: APRIL 23, 1999

FLORIDA POWER & LIGHT COMPANY'S
PRELIMINARY LIST OF ISSUES

At the request of the Commission Staff, Florida Power & Light Company ("FPL") hereby files a preliminary list of potential issues. Please understand that the outcome of the appeal of the recent Duke Need Determination proceeding will affect some or all of these issues.

1. How does actual loss of load a) for FPL and b) for Peninsular Florida for the last fifteen years compare to a loss of load reliability level of one day in ten years?
2. What reporting rules are there at the state and federal level for loss of load?
3. As to reporting rules for loss of load, to what extent do they apply to municipals, REA's and joint power authorities.
4. What reports has the PSC issued in connection with the so-called "Christmas freeze"?
5. What annual or other periodic reports has the PSC issued to the legislature concerning the adequacy of the 10-year site plans?

6. On what occasions has the Commission established reliability criteria that public utilities or electric utilities, subject to its jurisdiction, must meet.

7. Which of the following actions are among the FPSC powers under the "Grid Bill"?
 - a) to order an electric utility to build or otherwise acquire generating capacity to serve its own firm retail electric service obligations

 - b) to order an electric utility to build or otherwise acquire generating capacity to serve its own firm wholesale electric service obligations

 - c) to order an electric utility to build or otherwise acquire generating capacity to serve the firm electric retail service obligations of another electric utility

 - d) to order an electric utility to build or otherwise acquire generating capacity to serve the firm electric wholesale service obligations of another electric utility

 - e) to order an electric utility to build or otherwise acquire transmission to serve its own firm retail electric service obligations

 - f) to order an electric utility to build or otherwise acquire transmission to serve its own firm wholesale electric service obligations

 - g) to order an electric utility to build or otherwise acquire transmission to serve the firm electric retail service obligations of another electric utility

- h) to order an electric utility to build or otherwise acquire transmission to serve the firm electric wholesale service obligations of another electric utility
8. Has the Commission ever defined or addressed the term "benefits" or "mutual benefits" as used in the Grid Bill?
9. Does the Commission also have jurisdiction over an EWG to prescribe uniform systems and classifications of accounts and prescribe a rate structure as addressed by F.S. § 366.04 (2) (a) and (b) or address territories as specified by 366.04(2) (d) and (e)?
10. What obligations to provide electric service does an EWG have independent of any bilateral agreement for such service?
11. What obligations do cogenerators and small power producers and others owning generating facilities have under the Grid Bill?
12. Does Rule 25-22.082 apply to Duke re: RFP's?

Dated this 23rd day of April, 1999.

Respectfully submitted,

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Tallahassee, FL 32301-1804
Attorneys for Florida Power
& Light Company

By: 

Matthew M. Childs, P.A.