MCWHIRTER REEVES

ATTORNEYS AT LAW

ORIGINAL

OCT 25 PM 2:

JENED-FPSC

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P.O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

October 25, 2000

VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Betty Easley Conference Center 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re: Docket No.: 000002-EG

Dear Ms. Bayo:

On behalf of the Florida Industrial Power users Group (FIPUG), enclosed for filing and distribution are the original, 15 copies and disk containing the following:

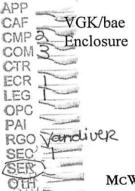
▶ The Florida Industrial Power Users Group's Prehearing Statement.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me in the envelope provided. Thank you for your assistance.

Sincerely,

Villie Gordon Laufman

Vicki Gordon Kaufman



REGEIVED & FILED

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A. 5 0 0CT 25 8

DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost Recovery Clause

. /

Docket No. 000002-EG

Filed: October 25, 2000

The Florida Industrial Power Users Group's Prehearing Statement

The Florida Industrial Power Users Group (FIPUG) hereby files its Prehearing Statement.

A. APPEARANCES:

JOHN W. MCWHIRTER, JR., McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A., 400 North Tampa Street, Suite 2450, Tampa, Florida 33601-3350 and JOSEPH A. MCGLOTHLIN and VICKI GORDON KAUFMAN, McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A., 117 South Gadsden Street, Tallahassee, Florida 32301.

On Behalf of the Florida Industrial Power Users Group.

B. WITNESSES:

None.

C. EXHIBITS:

None.

D. STATEMENT OF BASIC POSITION:

None necessary.

E. STATEMENT OF ISSUES AND POSITIONS:

Generic Energy Conservation Cost Recovery Issues

- 1. **ISSUE:** What is the final end-of-the-period true-up amount for the period January, 1999 through December, 1999?
 - **FIPUG:** FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

DOCUMENT NUMBER-DATE 13651 OCT 258 FPSC-RECORDS/REPORTING

- 2. ISSUE: What are the appropriate conservation cost recovery factors for the period January, 2001 through December, 2001?
 FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
 - **FIPUG:** FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

<u>Company Specific Issues</u>

<u>Gulf Power Company:</u>

- **ISSUE 3:** Should Gulf Power Company (GPC) be allowed to recover expenses associated with two research programs that are located outside of its service area?
- **FIPUG:** FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Tampa Electric Company:

- **ISSUE 4:** Is Tampa Electric Company providing special treatment to its Energy Subsidiaries by giving them access to its customer data base?
- FIPUG: Yes.

Florida Power and Light Company:

- **ISSUE 5:** Is Florida Power and Light Company providing special treatment to its Energy Subsidiaries by giving them access to its customer data base?
- FIPUG: Yes.

F. STIPULATED ISSUES:

None.

G. PENDING MOTIONS:

None.

H. OTHER MATTERS:

-

None at this time.

Villie Andon Kaufman John W. McWhirter, Jr.

John W. McWhirter, Jr. McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A. 400 North Tampa Street, Suite 2450 Tampa, Florida 33601-3350

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A. 117 South Gadsden Street Tallahassee, Florida 32301

Attorneys for the Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I HERBY CERTIFY that a true and correct copy of the foregoing FIPUG Prehearing Statement has been furnished by hand delivery(*) or U.S. Mail this <u>25th</u> day of October, 2000 to the following:

(*)Wm. Cochran Keating Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32302-1876

Debbie Stitt St. Joe Natural Gas Company, Inc. Post Office Box 549 Port St. Joe, Florida 32456

John Roger Howe Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399-1400

Charles A. Guyton Steel Hector and Davis 215 South Monroe Street, Suite 601 Tallahassee, Florida 32301

Wayne L. Schiefelbein 2145 Delta Boulevard Suite 200 Tallahassee, Florida 32303

James A. McGee Florida Power Corporation Post Office Box 14042 St. Petersburg, Florida 33733 Norman Horton, Jr. Messer, Caparello & Self Post Office Drawer 1876 Tallahassee, Florida 32399-0850

Kenneth Hoffmanh Rutledge, Ecenia, Underwood, Purnell & Hoffman, P. A. 215 South Monroe Street, Suite 420 Tallahassee, Florida 32301

Jeffrey A. Stone Beggs and Lane Post Office Box 12950 Pensacola, Florida 32576

Richard A. Zambo, P.A. 598 S.W. Hidden River Avenue Palm City, Florida 34990

Lee L. Willis James D. Beasley Ausley & McMullen 227 South Calhoun Street Tallahassee, Florida 32302

Mike Palecki City Gas Company of Florida 955 East 25th Street Hialeah, Florida 33013

. _ ... _....

Ansley Watson, Jr. MacFarlane, Ferguson & McMullen 2300 First Florida Tower 111 Madison Street Post Office Box 1531 Tampa, Florida 33601-1531

•

,

Debra Swim Legal Environmental Assistance Foundation, Inc. 1114 Thomasville Road, Suite E Tallahassee, Florida 32303-6290

Uillii Inlon Kaufman Vicki Gordon Kaufman