STEEL HECTOR DAVIS

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Matthew M. Childs, P.A.

October 22, 1998

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

RE: DOCKET NO.980001-EI

Dear Ms. Bayó:

Enclosed for filing please find the original and ten(10) copies of Florida Power & Light Company's List of Issues and Positions in the above-referenced docket.

Also enclosed is a formatted high density 3.5 inch diskette containing the List of Issues and Positions of Florida Power & Light Company.

Very truly yours,

Matthew M. Childs, P.A.

AU OF RECORDS

MMC/ml

Sc: All Parties of Record

Mann West Palm Beach

Tatlahassen

Key West

London Cara La Page

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power) DOCKET NO. 980001-EI cost recovery clause and) FILED: OCTOBER 22, 1998 generating performance) incentive factor)

FLORIDA POWER & LIGHT COMPANY'S LIST OF ISSUES AND POSITIONS

FUEL ADJUSTMENT ISSUES

- What are the appropriate final fuel adjustment true-up amounts for the period October, 1997 through March, 1998?
 - FPL: \$13,491,200 overrecovery.
- What are the estimated/actual fuel true-up amounts for the period April, 1998 through December, 1998 based upon five months actual and four months revised estimates?
 - FPL: \$129,170,389 underrecovery.
- 3. What are the total fuel adjustment true-up amounts to be collected/refunded during the period January, 1999 through December, 1999?
 - FPL: \$115,679,187 underrecovery.
- 4. What are the appropriate levelized fuel cost recovery factors for the period January, 1999 through December, 1999?
 - PPL: 1.976 cents/kwh is the levelized recovery charge to be collected during the period January, 1999 through December, 1999.
- 5. What should be the effective date of the new fuel adjustment charge and capacity cost recovery charge for billing purposes?

FPL: The Company is requesting that the new Fuel Cost Recovery and Capacity Cost Recovery Factors should become effective with customer bills for January 1999 through December 1999. This will provide 12 months of billing on the Fuel Cost Recovery and Capacity Cost Recovery Factors for all customers.

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?

FPL: The appropriate Fuel Cost Recovery Loss Multipliers are provided in response to Issue No. 7.

7. What are the appropriate Fuel Cost Recovery Factors for each rate group adjusted for line losses?

FPL:

GROUI	RATE SCHEDULE	AVERAGE FACTOR	FUEL RECOVERY LOSS MULTIPLIER	FUEL RECOVERY FACTOR
A	RS-1,GS-1,SL-2	1.976	1.00205	1.980
A-1*	SL-1,OL-1,PL-1	1.945	1.00205	1.949
В	GSD-1	1.976	1.00204	1.980
C	GSLD-1 & CS-1	1.976	1.00172	1.980
D	GSLD-2,CS-2, OS-2 & MET	1.976	0.99595	1.968
E	GSLD-3 & CS-3	1.976	0.95798	1.893
A	RST-1,GST-1 ON-PEAK OFF-PEAK	2.136 1.908	1.00205 1.00205	2.140 1.912
В	GSDT-1,CILC-1(G) ON-PEAK OFF-PEAK	2.136 1.908	1.00204	2.140 1.912
C	GSLDT-1 & CST-1 ON-PEAK OFF-PEAK	2.136 1.908	1.00172 1.00172	2.140 1.911

GROUP	RATE	AVERAGE FACTOR	FUEL RECOVERY LOSS MULTIPLIER	FUEL RECOVERY FACTOR
D	GSLDT-2 & CST-2	2.136	0.99595	2.127
	ON-PEAK OFF-PEAK	1.908	0.99595	1.900
Е	GSLDT-3, CST-3 CILC-1(T)& ISST-1(T)			
	ON-PEAK OFF-PEAK	2.136	0.95798 0.95798	2.046 1.828
F	CILC-1(D)& ISST-1(D)			9 (a-20)
	ON-PEAK OFF-PEAK	2.136 1.908	0.99793 0.99793	2.132 1.904

*WEIGHTED AVERAGE 16% ON-PEAK AND 84% OFF-PEAK

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?

FPL: 1.01609 is the revenue tax factor to be applied for the projection period of January, 1999 through December, 1999.

GENERATING PERFORMANCE INCENTIVE FACTOR (GPIF) ISSUES

- What is the appropriate GPIF reward or penalty for performance achieved during the period of October, 1996 through September, 1997?
 FPL: \$9,353,960 reward.
- 10. What should the GPIF Target/Ranges be for the period of October, 1998 through December, 1998?

PLANT/UNIT	EAF TARGET(%)	HEAT RATE HR. TARGET (BTU/Kwh)
CAPE CANAVERAL 2	93.6	9613
LAUDERDALE 4	96.0	7262
LAUDERDALE 5	63.7	7257
FORT MYERS 2	93.9	9156
MANATEE 2	88.8	10198
MARTIN 3	81.5	6999
MARTIN 4	96.0	6913
PORT EVERGLADES 3	96.0	9801
RIVIERA 3	94.4	9781
RIVIERA 4	93.6	9913
SANFORD 5	89.9	9955
TURKEY POINT 3	67.1	11030
TURKEY POINT 4	93.6	11138
ST. LUCIE 1	92.8	10871
ST. LUCIE 2	57.1	10876
SCHERER 4	. 94.6	10175

GPIF SYSTEM WEIGHTED AVERAGE NET OPERATING HR 9235

10. What should the GPIF Target/Ranges be for the period of January, 1999 through December 1999?

PLANT/UNIT	EAF TARGET(%)	HEAT RATE HR. TARGET (BTU/Kwh)
CAPE CANAVERAL 2	93.6	9602
LAUDERDALE 4	93.2	7290
LAUDERDALE 5	93.2	7289
FORT MYERS 2	90.0	9188
MANATEE 2	88.8	10138
MARTIN 3	92.3	7016
MARTIN 4	93.6	6926
PORT EVERGLADES 3	80.4	9786
PORT EVERGLADES 4	96.0	9836
RIVIERA 3	94.4	9770
SANFORD 4	91.0	9737
SANFORD 5	89.9	9939
TURKEY POINT 3	93.6	11047
TURKEL POINT 4	84.3	11166
ST. LUCIE 1	83.6	10879
ST. LUCIE 2	93.6	10895
SCHERER 4	86.6	10120

GPIF SYSTEM WEIGHTED AVERAGE NET OPERATING HR 9512

CAPACITY COST RECOVERY ISSUES

12. What is the appropriate final capacity cost recovery true-up amount for the period April, 1997 through March 1998?

FPL: \$11,771,496 overrecovery.

13. What is the estimated/actual capacity true-up amount for the peliod April, 1998 through December, 1998, which is based upon five months actual costs and four months revised estimates?

FPL: \$65,406,291 overrecovery.

14. What is the total capacity true-up amount to be collected/refunded during the period January, 1999 through December, 1999?

FPL: \$77,177,787 overrecovery.

15. 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?

FPL: \$390,683,195.

16. What are the appropriate Capacity Cost Recovery Factors for the period January, 1999 through December, 1999 for each rate group?

FPL:

RATE CLASS	CAPACITY RECOVERY FACTOR (\$/KW)	FACTOR (\$/KWH)
RS1	-	0.00514
GS1	-	0.00467
GSD1	1.89	-
OS2		0.00332
GSLD1/CS1	1.86) = 1
GSLD2/CS2	1.87	S28
GSLD3/CS3	1.80	-
CILCD/CILCG	1.92	
CILCT	1.84	
MET	1.88	-
OL1/SL1/PL-1	-	0.00241
SL2	-	0.00342

RATE CLASS	CAPACITY RECOVERY FACTOR (RESERVATION DEMAND CHARGE) (\$/KW)	CAPACITY RECOVERY FACTOR (SUM OF DAILY DEMAND CHARGE) (\$/KW)
ISSTID	.24	.12
SSTIT	.23	.11
SSTID	.24	.11

WITNESSES AND SUBJECT MATTER

WITNESS	SPONSOR	SUBJECT MATTER	EXHIBIT TITLES
R. SILVA	FPL	Fuel Cost Recovery Forecast Assumptions	Appendix I
K.M. DUBIN	FPL	Fuel Cost Recovery, Estimated/Actual True-Up April 1998 through December 1998	Appendix II
R. STLVA K.M. DUBIN R.L. WADE	FPL FPL FPL	Levelized Fuel Cost Recovery Factors for January 1999 through December 1999	Appendix II
K.M. DUBIN	FPL	Capacity Cost Recovery Factors for January 1999 through December 1999	Appendix III

WITNESS	SPONSOR	SUBJECT MATTER	EXHIBIT TITLES
R. SILVA	FPL	GPIF, True-up and Projections	Performance Results
			Targets and Ranges October 1998- December 1998
			Targets and Ranges January 1999- December 1999

Dated this 22nd day of October, 1998.

Respectfully submitted,

STEEL HECTOR & DAVIS LLP
215 South Monroe Street
Suite 601
Tallahassee, FL 32301-1804
Attorneys for Florida Power
& Light Company

BV.

Matthew M. Childs, P.A.

CERTIFICATE OF SERVICE DOCKET NO. 980001-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Issues and Positions have been furnished by Hand Delivery, ** or U.S. Mail this 22nd day of October, 1998, to the following:

Leslie J. Paugh, Esq.**
Division of Legal Services
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By: Matthew M. Childs, P.A.