



PUBLIC COUNSEL

STATE OF FLORIDA OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison St Room 812 Tallahassee, Florida 32399-1400 850-488-9330

January 23, 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-E

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Public Counsel's Preliminary List of Issues and Positions in the above-referenced docket

Also enclosed is a 3.5 inch diskette containing the Preliminary List of Issues and Positions 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

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Sincerely,

John Roger Howe Deputy Public Counsel

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power)	
Cost Recovery Clause with)	DOCKET NO. 980001-EI
Generating Performance Incentive)	FILED: January 23, 1998
Factor)	
)	

PUBLIC COUNSEL'S PRELIMINARY LIST OF ISSUES AND POSITIONS

The Office of Public Counsel hereby submits its preliminary list of issues and positions

Generic Fuel Adjustment Issues

What are the appropriate final fuel adjustment true-up amounts for the period ISSUE 1:

April, 1997, through September, 1997?

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

What are the estimated fuel adjustment true-up amounts for the period ISSUE 2:

October, 1997, through March, 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

What are the total fuel adjustment true-up amounts to be collected/refunded ISSUE 3:

during the period April, 1998, through September, 1998?

OPC:

FPC No position at this time.

FPL: No position at this time

Fernandina No position at this time FPUC:

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 April, 1998, through September, 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: TECO: No position at this time No position at this time.

ISSUE 5:

What should be the effective date of the new 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 April, 1998, through September, 1998. Billing cycles may start before April 1, 1998, and the last cycle may be read after September 30, 1998, so that each customer is billed for six 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?

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 group 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 April, 1998,

through September, 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

Company-Specific Fuel Adjustment Issues

FLORIDA POWER CORPORATION

ISSUE 9A: Should the Commission approve Florida Power Corporation's request to

recover the cost of converting Suwannee Unit 3 to burn natural gas?

OPC: No position at this time.

ISSUE 9B: Has Florida Power Corporation properly calculated the replacement fuel costs

associated with the Crystal River Unit 3 outage as directed by Order No

PSC-97-0840-S-El, in Docket No. 970261-El, issued July 14, 1997?

OPC: No position at this time.

ISSUE 9C: Has Florida Power Corporation properly removed the costs associated with

the Lake Cogen settlement which had been previously included in fuel

underrecovery balances in Florida Power's monthly "A" Schedules?

OPC: No position at this time.

ISSUE 9D: Has Florida Power Corporation properly calculated the transmission revenue

associated with economy, Schedule C, and broker energy sales between itself and directly interconnected utilities as directed by Order No PSC-98-0073-

FOF-EI, in Docket No. 980001-EI, issued January 13, 1998?

OPC: No position at this time

FLORIDA POWER AND LIGHT COMPANY

ISSUE 10A: Has Florida Power & Light Company properly calculated the transmission revenue associated with economy, Schedule C, and broker energy sales between itself and directly interconnected utilities as directed by Order No. PSC-98-0073-FOF-EI in Docket No. 980001-EI, issued January 13, 998?

OPC:

No position at this time

GULF POWER COMPANY

ISSUE 11A: Has Gulf Power Company properly calculated the transmission revenue associated with economy, Schedule C, and broker energy sales between itself and directly interconnected utilities as directed by Order No PSC-98-0073-FOF-EI in Docket No. 980001-EI, issued January 13, 998?

OPC:

No position at this time

TAMPA ELECTRIC COMPANY

ISSUE 12A: Has Tampa Electric Company properly calculated the transmission revenue associated with economy, Schedule C, and broker energy sales between itself and directly interconnected utilities as directed by Order No PSC-98-0073-FOF-EI in Docket No. 980001-EI, issued January 13, 1998?

OPC: No position at this time

ISSUE 12B: Through what methodology should Tampa Electric be authorized to continue the temporary base rate reduction pursuant to the stipulation approved by the Commission in Order No PSC-96-1300-S-EI in Docket No 960409-EI, issued October 24, 1996?

OPC: No position at this time.

ISSUE 12C: Did Tampa Electric properly calculate the true-up adjustment of the refund credit factor as agreed to in the stipulation approved in Order No. PSC-96-0670-S-EI in Docket No. 950379-EI, issued May 20, 1996?

OPC: No position at this time

Generic Generating Performance Incentive Factor Issues

ISSUE 13: What is the appropriate GPIF reward or penalty for performance achieved

during the period April, 1997, through September, 1997?

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 14: What should the GPIF targets/ranges be for the period April, 1998, through

September, 1998?

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

Generic Capacity Cost Recovery Issues

ISSUE 15: What is the appropriate final capacity cost recovery true-up amount for the

period April, 1997, through September, 1997?

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 16: What is the estimated capacity cost recovery true-up amount for the period

October, 1997, through March, 1998?

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 17 What is the total capacity cost recovery true-up amount to be collected during the period April, 1998, through September, 1998?

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 18: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period April, 1998, through September, 1998?

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 are the projected capacity cost recovery factors for the period April, 1998, through September, 1998?

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 20A: Should FPL's original projections for capacity payments to Osceola and Okeelanta Qualifying Facilities for the period June, 1997, through September, 1998, be excluded?

OPC: No position at this time

Respectfully submitted,

Jack Shreve Public Counsel

John Roger Howe Deputy Public Counsel

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(850) 488-9330

Attorneys for the Citizens of the State of Florida

CERTIFICATE OF SERVICE DOCKET NO. 980001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Public Counsel's Freliminary List of Issues and Positions has been furnished by U.S. Mail or hand-delivery (*) on this 23rd day of January, 1998, to the following:

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