



JACK SHREVE  
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

ORIGINAL

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. 980007-EI

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.

- ACK \_\_\_\_\_
- AFA Handwritten
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG Tew
- LEG 1
- LIN 3 JRH/dsb
- OPC \_\_\_\_\_
- RCH Enclosures
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Sincerely,

*[Signature]*  
Jo In Roger Howe  
Deputy Public Counsel

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE  
01325 JAN 23 8  
DOCUMENT NUMBER - DATE  
01325 JAN 23 8  
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost )  
recovery clause. )  
\_\_\_\_\_ )

Docket No. 980007-EI

Filed: January 23, 1998

**PUBLIC COUNSEL'S PRELIMINARY LIST OF  
ISSUES AND POSITIONS**

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

**Generic Environmental Cost Recovery Issues**

**ISSUE 1:** What are the appropriate final environmental cost recovery true-up amounts for the period April, 1997, through September, 1997?

**OPC:**  
TECO: No position at this time.

**ISSUE 1A:** What are the appropriate final environmental cost recovery true-up amounts for the period October, 1996, through September, 1997?

**OPC:**  
FPL: No position at this time.  
GPC: No position at this time.

**ISSUE 2:** What are the estimated environmental cost recovery true-up amounts for the period October, 1997, through March, 1998?

**OPC:**  
TECO: No position at this time.

**ISSUE 3:** What are the total environmental cost recovery true-up amounts to be collected/refunded during the period April, 1998, through September, 1998?

**OPC:**  
TECO: No position at this time.

**ISSUE 3A:** What are the total environmental cost recovery true-up amounts to be collected/refunded during the period October, 1998, through September, 1999?

**OPC:**  
FPL: No position at this time.  
GPC: No position at this time.

DOCUMENT NUMBER-DATE

01329 JAN 23 98

FPSC-RECORDS/REPORTING

ISSUE 4: What are the appropriate projected environmental cost recovery amounts to be included in the recovery factors for the period April, 1998, through September, 1998?

OPC: TECO: No position at this time

ISSUE 5: What should be the effective date of the new environmental cost recovery factors for billing purposes?

OPC: The factor should be effective beginning with the specified billing 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.

Respectfully submitted,

JACK SHREVE  
Public Counsel

  
John Roger Howe  
Deputy Public Counsel

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

(850) 488-9330

Attorneys for the Citizens of  
the State of Florida

**CERTIFICATE OF SERVICE**  
**980007-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing Public Counsel's Preliminary 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:

Leslie J. Paugh, Esquire\*  
Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 370, Gunter Building  
Tallahassee, Florida 32399-0872

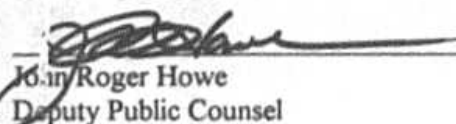
Matthew M. Childs, P.A.  
Steel Hector & Davis, LLP  
215 South Monroe Street  
Suite 601  
Tallahassee, Florida 32301-1804

Lee L. Willis, Esquire  
James D. Beasley, Esquire  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32301

Jeffrey A. Stone, Esquire  
Russell A. Badders, Esquire  
Beggs & Lane  
Post Office Box 12950  
Pensacola, Florida 32576

John W. McWhirter, Jr., Esquire  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
Post Office Box 3350  
Tampa, Florida 33601

Joseph A. McGlothlin, Esquire  
Vicki Gordon Kaufman, Esquire  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301

  
\_\_\_\_\_  
Roger Howe  
Deputy Public Counsel