

ORIGINAL



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February 9, 1998

Ms Blanca S Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

RE: Docket No. 980001-EI

Dear Ms. Bayo

Enclosed are an original and fifteen copies of Citizens' Response to Florida Power Corporation's Motion for Reconsideration in the above-referenced docket

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

Sincerely,

Stephen C. Burgess  
Deputy Public Counsel

- ACK
- AFA Wentner
- APP \_\_\_\_\_
- CAF \_\_\_\_\_ SCB/dsb
- CMU \_\_\_\_\_ Enclosures
- CTR \_\_\_\_\_
- EAG Pohrman
- LEG 1
- LIN 3
- OPC \_\_\_\_\_
- RCR \_\_\_\_\_
- REC 1
- WAS \_\_\_\_\_
- OTU \_\_\_\_\_

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FPSC-BUREAU OF RECORDS

DOCUMENT FILED DATE  
02023 FEB-98



4. The Citizens find no evidence through which the Commission can determine to an acceptable degree of specificity and certainty:

- (i) how transmission rates are established for the wholesale jurisdiction;
- (ii) exactly which wholesale customers are supporting the capital transmission costs, and,
- (iii) whether and by what mechanism those customers will receive the entire benefit of the incremental revenues.

5. Without information to satisfy the questions enumerated above, the Commission would merely be granting Florida Power Corporation windfall revenue if it were to adopt the company's recommended separation factor. Florida Power Corporation's overall company transmission revenue would be increased, while its actual revenue requirement remains constant.

WHEREFORE, the Citizens of the State of Florida respectfully urge the Public Service commission to reject Florida Power Corporation's Motion for Reconsideration

Respectfully submitted,

Jack Shreve  
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Deputy Public Counsel

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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 Citizens' Response to Florida Power Corporation's Motion for Reconsideration has been furnished to the following parties by hand-delivery(\*) or U.S. Mail this 9th day of February, 1998:

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