

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by Tampa Electric Company for Approval of Cost Recovery for a New Environmental Program, the Big Bend Units 1 & 2 Flue Gas Desulfurization System

DOCKET NO. 980693-EI

FILED: AUGUST 13, 1998

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-98-0864-PCO-EI, issued June 30, 1998, and Order No. PSC-98-0934-PCO-EI, issued July 9, 1998, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff has no witnesses at this time.

b. All Known Exhibits

Staff has no exhibits at this time.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and upon discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

ACK _____ Issue 1: Has Tampa Electric Company (TECO) adequately explored
AFA _____ alternatives to the construction of a Flue Gas
APP _____ Desulfurization (FGD) system on Big Bend Units 1 and 2?

CAF _____ Position: No position at this time, pending further discovery and
CMU _____ the evidence adduced at hearing.

CTR _____ Issue 2: Is the fuel price forecast used by TECO in its selection
EAG _____ of a CAAA Phase II Compliance plan reasonable?

LEG _____ 5 Position: No position at this time, pending further discovery and
LIN _____ the evidence adduced at hearing.

DPC _____

RCH _____

SEC 1 _____

WAS _____

OTH _____

DOCUMENT NO.
08641-98
8-13-98

Issue 3: Are the economic and financial assumptions used by TECO in its selection of a CAAA Phase II Compliance plan reasonable?

Position: No position at this time, pending further discovery and the evidence adduced at hearing.

Issue 4: Did TECO reasonably consider the environmental compliance costs for all regulated air, water and land pollutants in its selection of the proposed FGD system on Big Bend Units 1 and 2 for sulfur dioxide (SO₂) compliance purposes?

Position: No position at this time, pending further discovery and the evidence adduced at hearing.

Issue 5: Has TECO demonstrated that its proposed FGD system on Big Bend Units 1 and 2 for SO₂ compliance purposes is the most cost-effective alternative available?

Position: No position at this time, pending further discovery and the evidence adduced at hearing.

Issue 6: Should the Commission approve TECO's request for recovery of allowance for funds used during construction (AFUDC) for the proposed FGD system on Big Bend Units 1 and 2?

Position: No position at this time, pending further discovery and the evidence adduced at hearing.

Issue 7: Should TECO's petition for cost recovery of a FGD system on Big Bend Units 1 and 2 through the Environmental Cost Recovery Clause (ECRC) be granted?

Position: No position at this time, pending further discovery and the evidence adduced at hearing.

Issue 8: Should this docket be closed?

Position: No position at this time, pending further discovery and the evidence adduced at hearing.

e. Pending Motions

There are three pending motions in this docket. Florida Industrial Power User's Group filed a Motion to Dismiss on July 23, 1998. The Office of Public Counsel filed a Suggestion that the Florida Public Service Commission, on Its Own Motion, Dismiss Tampa Electric Company's Petition Without Prejudice on July 29, 1998. Tampa Electric Company filed its Memorandum in Opposition to the Florida Industrial Power Users Group's Motion to Dismiss on July 30, 1998. In accordance with the instructions of the Prehearing Officer, a recommendation addressing these Motions will be prepared for consideration by the full Commission at the September 1, 1998, Agenda Conference.

f. Compliance with Order No. PSC-98-0864-PCO-EI, issued June 30, 1998, and Order No. PSC-98-0934-PCO-EI, issued July 9, 1998

Staff has complied with all requirements of the Order Establishing Procedure and the Second Procedural Order entered in this docket.

Respectfully submitted this 13th day of August, 1998.



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Petition by Tampa Electric
Company for Approval of Cost
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2 Flue Gas Desulfurization
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DOCKET NO. 980693-E1

FILED: AUGUST 17, 1998

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that one true and correct copy of Staff's
Prehearing Statement has been furnished by U.S. Mail this 17th day
of August, 1998, to the following:

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