

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

RECEIVED
OCT 22 11 41 04
RECORDS & REPORTING

October 22, 1998

HAND DELIVERED

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause
with Generating Performance Incentive Factor;
EPSC Docket No. 980001-EJ

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and ten (10) copies of Tampa Electric Company's Statement of Issues and Positions.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

ACK _____
AFA Handwritten
APP _____
CAF _____
CMU _____
CIR _____
CIR _____ JDB/pp
EAC Behrman measures
LEG 1 cc: All Parties of Record (w/encls.)
LIR 3
OPC _____
RDR _____
SEC 1
WAS _____
OTH _____

RECEIVED & FILED

EPSC BUREAU OF RECORDS

DOCUMENT FILED DATE

11830 OCT 22 98

RECORDS & REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased)
Power Cost Recovery Factor)
and Generating Performance)
Incentive Factor.)
_____)

DOCKET NO. 980001-EI
FILED: October 22, 1998

**TAMPA ELECTRIC COMPANY'S
STATEMENT OF ISSUES AND POSITIONS**

Tampa Electric Company ("Tampa Electric" or "the company") hereby submits its Statement of the Issues and Positions to be taken up at the hearing scheduled to commence on November 23, 1998 in the above docket.

FUEL ADJUSTMENT

Issue No. 1: What is the appropriate final true-up amount for Tampa Electric Company for the October 1, 1997 through March 31, 1998 period?

Tampa Electric's Position: \$53,414 overrecovery. (Witness: Zwolak)

Issue No. 2: What is the appropriate projected fuel adjustment true-up amount for the period April 1998 through December 1998, based upon actual data for the period April 1998 through August 1998 and revised estimates for the period September 1998 through December 1998?

Tampa Electric's Position: \$5,207,699 overrecovery. (Witness: Zwolak)

Issue No. 3: What is the appropriate end of period total net true-up amount for Tampa Electric Company as of December 31, 1998?

Tampa Electric's Position: \$5,261,113 overrecovery through December 31, 1998.
(Witness: Zwolak)

DOCUMENT NUMBER DATE

11830 OCT 22 98

FILED: PECO-03/REPORTING

Issue No. 4: What is the appropriate levelized fuel adjustment factor for Tampa Electric to apply during the period January 1999 through December 1999?

Tampa Electric's Position: The appropriate factor is 2.255 cents per KWH before the normal application of factors that adjust for variations in line losses. (Witness: Zwolak)

COMPANY SPECIFIC FUEL ADJUSTMENT ISSUES

Issue No. 5: (Deferred from August 1998 hearing.) What is the appropriate 1997 benchmark price for coal Tampa Electric Company purchased from its affiliate, Gatliff Coal Company?

Tampa Electric's Position: \$43.20/Ton. (Witness: Burkhardt)

Issue No. 6: (Deferred from August 1998 hearing.) Has Tampa Electric Company adequately justified any costs associated with the purchase of coal from Gatliff Coal Company that exceed the 1997 benchmark price?

Tampa Electric's Position: Yes. Tampa Electric's actual costs are at or below the benchmark and, therefore, this issue is moot. (Witness: Burkhardt)

Issue No. 7: (Deferred from August 1998 hearing.) What is the appropriate 1997 waterborne coal transportation benchmark price for transportation services provided by affiliates of Tampa Electric Company?

Tampa Electric's Position: \$28.10/Ton. (Witness: Burkhardt)

Issue No. 8: (Deferred from August 1998 hearing.) Has Tampa Electric Company adequately justified any costs associated with transportation services provided by affiliates of Tampa Electric Company that exceed the 1997 waterborne transportation benchmark price?

Tampa Electric's Position: Yes. Tampa Electric's actual costs are at or below the benchmark and, therefore, this issue is moot. (Witness: Burkhardt)

CAPACITY COST RECOVERY

Issue No. 9: What is the appropriate final true-up amount for Tampa Electric for the October 1, 1997 through March 31, 1998 period?

Tampa Electric's Position: The appropriate final true-up amount is \$347,147 underrecovery. (Witness: Zwolak)

Issue No. 10: What is the appropriate projected capacity cost recovery true-up amount for the period April 1998 through December 1998, based upon actual data for the period April 1, 1998 through August 31, 1998 and revised estimates for the period September 1, 1998 through December 31, 1998?

Tampa Electric's Position: \$803,517 underrecovery. (Witness: Zwolak)

Issue No. 11: What is the appropriate end of period capacity cost recovery total net true-up as of December 31, 1998?

Tampa Electric's Position: \$1,150,664 underrecovery. (Witness: Zwolak)

Issue No. 12: What is the appropriate capacity cost recovery factor for Tampa Electric to apply during the period January 1999 through December 1999?

Tampa Electric's Position: The appropriate factor is 0.156 cents per KWH before applying the 12 CP and 1/13 allocation methodology, and producing the capacity recovery factors by rate schedule. (Witness: Zwolak)

GENERATING PERFORMANCE INCENTIVE FACTOR

Issue No. 13: What is the appropriate GPIF Reward or Penalty for the period October 1997 through March 1998 for Tampa Electric:

Tampa Electric's Position: A penalty in the amount of \$188,281. (Witness: Keselowsky)

Issue No. 14: What are the appropriate GPIF targets and ranges for the period October 1998 through December 1998?

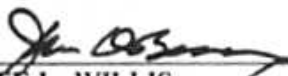
Tampa Electric's Position: The appropriate targets and ranges are shown in Attachment "A" to the prefiled testimony of Mr. George A. Keselowsky designated (PROJECTION), also attached hereto as Attachment "A". (Witness: Keselowsky)

Issue No. 15: What are the appropriate GPIF targets and ranges for the period January 1999 through December 1999?

Tampa Electric's Position: The appropriate targets and ranges are shown in Attachment "A" to prefiled testimony of Mr. George A. Keselowsky designated (1999 PROJECTION), also attached hereto as Attachment "B". (Witness: Keselowsky)

DATED this 22nd day of October, 1998.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Issues and Positions, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 22nd day of October 1998 to the following:

Ms. Leslie G. Paugh*
Staff Counsel
Division of Legal Services
Florida Public Service Comm'n.
101 East Gaines Street
Tallahassee, FL 32399-0863

Mr. James A. McGee
Senior Counsel
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733

Mr. Joseph A. McGlothlin
Ms. Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas
117 S. Gadsden Street
Tallahassee, FL 32301

Mr. Jack Shreve
Office of Public Counsel
Room 812
111 West Madison Street
Tallahassee, FL 32399-1400

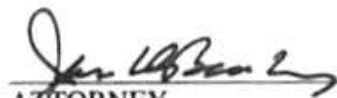
Mr. Kenneth A. Hoffman
Rutledge, Ecenia, Underwood,
Purnell & Hoffman
Post Office Box 551
Tallahassee, FL 32302-0551

Mr. Matthew M. Childs
Steel Hector & Davis, Suite 601
215 South Monroe Street
Tallahassee, FL 32301

Mr. John W. McWhirter
McWhirter, Reeves, McGlothlin,
Davidson & Bakas
Post Office Box 3350
Tampa, FL 33601

Ms. Suzanne Brownless
Suzanne Brownless P.A.
1311-B Paul Russell Road #201
Tallahassee, FL 32301

Mr. Jeffrey A. Stone
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32576


ATTORNEY

tec-980001#3 ISS