

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy conservation cost recovery clause.

DOCKET NO. 980002-EG

FILED: NOVEMBER 4, 1998

STAFF'S PREHEARING STATEMENT

Pursuant to PSC-98-1239-PCO-EG, issued September 21, 1998, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

None.

b. All Known Exhibits

None.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on 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.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN 3
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Staff takes no basic statement of position pending the evidence developed at hearing.

DOCUMENT NUMBER - DATE

12379 NOV -4 98

FPC-RECORDS/REPORTING

d. Staff's Positions on the Issues

Generic Conservation Cost Recovery Issues

ISSUE 1: What are the appropriate end-of-period final true-up amounts for the period October 1, 1997, through March 31, 1998.

POSITIONS:

FPC: \$12,735,283 Over Recovery
FPL: \$ 1,389,882 Under Recovery
GPC: \$ 167,208 Over Recovery

ISSUE 2: What are the appropriate conservation cost recovery factors for the period January 1999 through December 1999?

POSITIONS:

FPC: ECCR expenses should be reduced by \$47,485 for the estimated April 98/December 98 period as discussed in staff's audit. This reduction did not cause a change in the ECCR factors.

<u>Rate Class</u>	<u>ECCR Factor</u>
Residential	0.321 cents/Kwh
General Svc. Non-Demand	0.218 cents/Kwh
@ Primary Voltage	0.216 cents/Kwh
@ Transmission Voltage	0.214 cents/Kwh
General Svc. 100% Load Factor	0.159 cents/Kwh
General Svc. Demand	0.187 cents/Kwh
@ Primary Voltage	0.185 cents/Kwh
@ Transmission Voltage	0.183 cents/Kwh
Curtaillable	0.162 cents/Kwh
@ Primary Voltage	0.160 cents/Kwh
@ Transmission Voltage	0.159 cents/Kwh
Interruptible	0.154 cents/Kwh
@ Primary Voltage	0.152 cents/kwh
@ Transmission Voltage	0.151 cents/kwh
Lighting	0.078 cents/kwh

FPL:	<u>Rate Class</u>	<u>ECCR Factor</u>
	Residential	0.215 cents/Kwh
	General Svc.	0.202 cents/Kwh
	General Svc. Demand	0.191 cents/Kwh
	Sports Service 2	0.164 cents/Kwh
	General Svc. Large 1/Curtailable 1	0.190 cents/Kwh
	General Svc. Large 2/Curtailable 2	0.181 cents/Kwh
	General Svc. Large 3/Curtailable 3	0.163 cents/Kwh
	Interruptible Standby 1D	0.194 cents/Kwh
	Standby Supplemental 1T	0.148 cents/Kwh
	Standby Supplemental 1D	0.181 cents/Kwh
	Commercial Load Control D & G	0.175 cents/Kwh
	Commercial Load Control T	0.159 cents/Kwh
	Metropolitan Transit	0.188 cents/Kwh
	Outdoor/Street Lighting 1	0.141 cents/Kwh
	Street Lighting 2	0.168 cents/Kwh

GPC:	<u>Rate Class</u>	<u>ECCR Factor</u>
	RS, RST	0.021 cents/Kwh
	GS, GST	0.020 cents/Kwh
	GSD, GSdT	0.020 cents/Kwh
	LP, LPT	0.019 cents/Kwh
	PX, PXT, RTP, SBS	0.018 cents/Kwh
	OS-I, O-SII	0.018 cents/Kwh
	OS-III	0.019 cents/Kwh
	OS-IV	0.023 cents/Kwh

Company-Specific Conservation Cost Recovery Issues

Florida Power & Light Company

ISSUE 3: Has FPL accurately measured the savings that are attributed to the customers that are eligible for FPL's Commercial and Industrial Load Control (CILC) Program?

POSITION: Staff takes no position, pending the completion of additional discovery. This additional discovery will not be complete prior to the November 23, 1998, hearing in this docket, so this issue should be heard at a future date.

ISSUE 4: Should FPL customers who entered into agreements to participate in FPL's CILC program but have not taken service under the CILC program continue to be eligible for service under the CILC rate?

POSITION: Staff takes no position, pending the completion of additional discovery. This additional discovery will not be complete prior to the November 23, 1998, hearing in this docket, so this issue should be heard at a future date.

e. Pending Motions

Staff is not aware of any pending motions at this time.

f. Compliance with Order No. PSC-98-0036-PCO-EG

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

Respectfully submitted this 4th day of November, 1998.



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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 4th day of November, 1998, to the following:

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Docket No. 980002-EG

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