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November 13, 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

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

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and ten (10) copies of Tampa Electric Company's Motion for Leave to File Supplemental Testimony.

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,

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APP.

CAP JDB/pp

Enclosures CN

James D. Beasley

Bennie All Parties of Record (w/enc.) 1.04 EIVED & FILED 1.17 UN OF RECORDS 082 RC++ ...... DOCUMENT NUMBER-DATE SEC \_\_\_\_ 12769 NOV 13 8 WAS ..... FPSC-RECORDS/REPORTING OTH \_\_\_\_\_

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery Clause And Generating Performance Incentive Factor.

DOCKET NO. 980001-EI FILED: November 13, 1998

## TAMPA ELECTRIC COMPANY'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY

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Pursuant to Fla. Admin. Code Rule 28-106.204, Tampa Electric Company ("Tampa Electric" or "the company") moves the Commission for leave to file supplemental prepared direct testimony addressing a newly raised issue in this docket, as grounds therefor, says:

1. In its Final List of Issues dated October 29, 1998, the Commission's Staff raised an issue regarding the appropriate treatment of coal quality adjustments (commonly referred to as Btu adjustments) in performing the Gatliff benchmark calculations. The Staff has also requested discovery in connection with this issue, going back to 1993.

2. The due date for Tampa Electric's submission of direct testimony to be considered at the November hearing in this docket was October 5, 1998. Tampa Electric could not have anticipated Staff raising this issue prior to the due date for filing direct testimony, especially since it is an issue that has not been formally raised in previous fuel adjustment hearings where the benchmark calculation has been reviewed. Basic fairness and the need for a complete record for the Commission's consideration of Staff's issue warrant Tampa Electric being an afforded opportunity to submit supplemental prepared direct testimony addressing this new issue. Such testimony is being prepared on an expedited basis and will address only the new issue raised by Staff.

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3. Pursuant to the Uniform Rules of Procedure, Tampa Electric has conferred with other parties of record in this docket relative to this motion. Set forth below is an indication as to each party whether the party has an objection to the motion:

OPC does not object; Staff does not object; FIPUG was informed of the motion but we were unable to ascertain whether or not they had any objection.

WHEREFORE, Tampa Electric Company moves the Commission for leave to submit supplemental Prepared Direct Testimony of witness Hornick and Brown.

DATED this / day of November, 1998.

Respectfully submitted,

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

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of Tampa Electric Company's Motion to File Supplemental Testimony has been furnished by U. S. Mail or hand delivery (\*) on this <u>13</u><sup>B</sup> day of

November, 1998 to the following:

Ms. Leslie J. Paugh\* Staff Counsel Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0863

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