

McWhirter Reeves

ATTORNEYS AT LAW

TAMPA OFFICE:
400 N. TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P.O. BOX 3350, TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO: TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

January 5, 1999

VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting Gunter Building 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

Re:

Docket No. 990001-EI (Transmission)

Dear Ms. Bayo:

WAS __

Enclosed for filing and distribution are the original and ten copies of Florida Industrial Power Users Group's Prehearing Statement in the above docket. Also enclosed is a diskette containing this document in WordPerfect 5.1 format.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, PA EPORTING

Sincerely,

ACK

AFA Landwilli Indon Laufman

APP Vicki Gordon Kaufman

CAF VGK/pw

CMU Encls.

CTR

EAG Dehnom an

LEG L

LIN 3

OPC

RCH —

BOCUMENT NUMBER-DATE

SEC L

OO 125 JAN-5 B

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power)	
Cost Recovery Clause and)	Docket No. 990001-EI
Generating Performance Incentive)	
Factor.)	Filed: January 5, 1999
)	

FLORIDA INDUSTRIAL POWER USERS GROUP'S PREHEARING STATEMENT (TRANSMISSION)

The Florida Industrial Power Users Group (FIPUG), through its undersigned counsel, files its Prehearing Statement. FIPUG reserves the right to amend this Prehearing Statement.

A. APPEARANCES:

JOHN W. McWHIRTER, JR., McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A., 400 North Tampa Street, Suite 2450 (33602-5126), Post Office Box 3350, Tampa, Florida 33601-3350; JOSEPH A. McGLOTHLIN, VICKI GORDON KAUFMAN, McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A., 117 South Gadsden Street, Tallahassee, Florida 32301.

On behalf of the Florida Industrial Power Users Group.

B. <u>WITNESSES</u>:

None at this time.

C. <u>EXHIBITS</u>:

None at this time.

D. STATEMENT OF BASIC POSITION:

Florida Industrial Power Users Group's Statement of Basic Position:

None at this time.

E. <u>STATEMENT OF ISSUES AND POSITIONS</u>:

1. <u>ISSUE</u>: Does the FERC require that revenue from non-firm transmission services subject to FERC jurisdiction be reflected as a revenue credit in the derivation of firm transmission service rates subject to FERC jurisdiction?

DOCUMENT NUMBER-DATE 00125 JAN-58

<u>FIPUG</u>: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

2. **ISSUE**: How should the transmission revenues associated with economy transactions over the Energy Broker Network be separated between the retail and wholesale jurisdictions?

<u>FIPUG</u>: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

3. <u>ISSUE</u>: How should Florida Power Corporation allocate transmission revenues associated with economy transactions over the Energy Broker Network between the retail and wholesale jurisdictions?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

4. <u>ISSUE</u>: How should Florida Power & Light allocate transmission revenues associated with economy transactions over the Energy Broker Network between the retail and wholesale jurisdictions?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

5. <u>ISSUE</u>: How should Gulf Power Company allocate transmission revenues associated with economy transactions over the Energy Broker Network between the retail and wholesale jurisdictions?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

6. <u>ISSUE</u>: How should Tampa Electric Company allocate transmission revenues associated with economy transactions over the Energy Broker Network between the retail and wholesale jurisdictions?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

F. OTHER ISSUES:

None at this time.

G. <u>STIPULATED ISSUES</u>:

None at this time.

H. PENDING MOTIONS:

FIPUG has no pending motions.

I. <u>OTHER MATTERS</u>:

None.

John W. McWhirter, Jr.
Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

400 North Tampa Street Suite 2450 (33602-5126) Post Office Box 3350 Tampa, Florida 33601-3350

Attorneys for Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Industrial Power Users Group's Prehearing Statement has been furnished by hand delivery(*) or by U.S. Mail to the following parties of record this 5th day of January, 1999:

Leslie Paugh*
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Gerald L. Gunter Building, Room 390Q
Tallahassee, Florida 32399-0850

G. Edison Holland Jeffrey A. Stone Beggs and Lane Post Office Box 12950 Pensacola, Florida 32576

James A. McGee Florida Power Corporation Post Office Box 14042 St. Petersburg, Florida 33733

Matthew M. Childs Steel Hector & Davis 215 South Monroe Street Suite 601 Tallahassee, Florida 32301-1804 Suzanne Brownless 1311-B Paul Russell Road Suite 201 Tallahassee, Florida 32301

Jack Shreve, Public Counsel John Roger Howe Office of the Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400

Lee L. Willis
James D. Beasley
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302

Kenneth A. Hoffman Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. Post Office Box 551 Tallahassee, Florida 32302

Ulli Inductaufman
Vicki Gordon Kaufman