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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for authority to DOCKET NO. 981591-EG implement Good Cents Conversion Program by Gulf Power Company. FILED: SEPTEMBER 1, 1999

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-99-1217-PCO-EG, filed June 18, 1999, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

None.

b. <u>All Known Exhibits</u>

None.

EAG

PAI _ SEC _ WAW _ OTH _

c. <u>Staff's Statement of Basic Position</u>

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.

- d. <u>Staff's Position on the Issues</u>
- ISSUE 1: Is Gulf Power Company's proposed Good Cents Conversion Program cost-effective?

AFA _____ POSITION: No position at this time pending evidence adduced at hearing.

CAF CMU ISSUE 2: Is Gulf Power Company's cost-effectiveness analysis based CTR _____ on accurate assumptions?

LE® _____POSITION: No position at this time pending evidence adduced at hearing.

DOCUMENT NUMBER-DATE

10453 SEP-18

FPSC-RECORDS/REPORTING

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- ISSUE 3: Under Gulf Power Company's proposed Good Cents Conversion Program, are customers likely to replace existing inefficient heating, ventilating, and air conditioning (HVAC) equipment only if it fails?
- **POSITION:** No position at this time pending evidence adduced at hearing.
- ISSUE 4: Is Gulf Power Company's proposed Good Cents Conversion Program an energy conservation program, or, rather, electricity competing with natural gas?
- **POSITION:** No position at this time pending evidence adduced at hearing.
- ISSUE 5: Is Gulf Power Company's proposed Good Cents Conversion Program consistent with the Florida Energy Efficiency and Conservation Act?
- **POSITION:** No position at this time pending evidence adduced at hearing.
- ISSUE 6: Has Gulf Power Company incorporated reasonable summer peak demand assumptions in its cost-effectiveness analysis?
- **POSITION:** No position at this time pending evidence adduced at hearing.
- ISSUE 7: Has Gulf Power Company incorporated reasonable winter peak demand assumptions in its cost-effectiveness analysis?
- **POSITION:** No position at this time pending evidence adduced at hearing.
- ISSUE 8: Has Gulf Power Company incorporated reasonable annual energy usage assumptions in its cost-effectiveness analysis?
- **POSITION:** No position at this time pending evidence adduced at hearing.

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- ISSUE 9: Should the Commission approve Gulf Power Company's proposed Good Cents Conversion Program, including approval for cost recovery through the Energy Conservation Cost Recovery (ECCR) Clause?
- **POSITION:** No position at this time pending evidence adduced at hearing.
- ISSUE 10: Should the docket be closed?
- **POSITION:** No position at this time pending evidence adduced at hearing.
- e. <u>Pending Motions</u>

None.

f. Pending Confidentiality Claims or Requests

None.

g. Compliance with Order No. PSC-99-1217-PCO-EG

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

Respectfully submitted this 1st day of September, 1999.

Olins) TIFEANX R./COLLINS

Staff Coursel Florida Bar No. 0152218

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for authority to implement Good Cents Conversion Program by Gulf Power Company.

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DOCKET NO. 981591-EG FILED: SEPTEMBER 1, 1999

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 1st day of September, 1999, to the following:

Beggs & Lane	Macfarlane Ferguson Law Firm
Jeffrey Stone	Ansley Watson, Jr., Esq.
Russell Badders	P.O. Box 1531
P.O. Box 12950	111 Madison Street, #2300
Pensacola, Florida 32576	Tampa, Florida 33601

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TIFFANY R/ COLLINS Staff/Counsel Florida Bar No. 0152218

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