

ORIGINAL

Matthew M. Childs, P.A.

October 19, 2000

By Hand Delivery

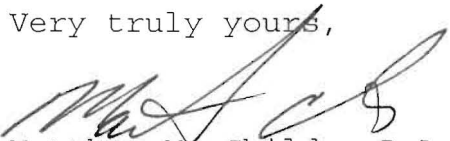
Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, FL 32399-0850

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RECORDS AND REPORTING

RE: DOCKET NO. 000001-EI

Dear Ms. Bayó:

Enclosed for filing please find the original and 15 copies of Florida Power & Light Company's List of Issues and Positions in regards to the above referenced docket.

Very truly yours,

Matthew M. Childs, P.A.

MMC/ml
Enclosures

cc: All Parties of Record

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power)
Cost Recovery Clause and)
Generating Performance)
Incentive Factor)
_____)

DOCKET NO. 000001-EI
FILED: OCTOBER 19, 1999

FLORIDA POWER & LIGHT COMPANY'S
LIST OF ISSUES AND POSITIONS

FUEL ADJUSTMENT ISSUES

1. What are the appropriate final fuel adjustment true-up amounts for the period January, 1999 through December, 1999.

FPL: \$96,356,314 underrecovery. This amount has already been included in customer charges from June 15, 2000 through December, 2000 as a result of the midcourse correction approved by the Commission in Order No. PSC-00-1081-PCO-EI.

2. What are the estimated/actual fuel true-up amounts for the period January through December, 2000 based upon seven months actual and five months revised estimates?

FPL: \$518,005,376 underrecovery.

3. What are the total fuel adjustment true-up amounts to be collected/refunded during the period January, 2001 through December, 2001?

FPL: \$259,002,688 underrecovery. To mitigate the impact of the underrecovery, FPL is proposing to spread the estimated/actual true-up underrecovery of \$518,005,376 over a two-year period.

4. What are the appropriate levelized fuel cost recovery factors for the period January, 2001 through December, 2001?

FPL: 2.925 cents/kwh is the levelized recovery charge to be collected during the period January, 2001 through December, 2001.

- 4a. What is the appropriate projected total jurisdictional fuel cost recovery amount to be included in the recovery factor for the period January, 2001 through December, 2001.

FPL: \$2,562,708,028, as shown in Appendix II, page 3, Schedule E-1, line 30.

5. What should be the effective date of the new fuel adjustment charge and capacity cost recovery charge for billing purposes?

FPL: The Company is requesting that the new Fuel Cost Recovery Factors should become effective with customer bills for January, 2001 through December, 2001. This will provide 12 months of billing on the Fuel Cost Recovery and Capacity Cost Recovery Factors for all customers.

6. What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class?

FPL: The appropriate Fuel Cost Recovery Loss Multipliers are provided in response to Issue No. 7.

7. What are the appropriate Fuel Cost Recovery Factors for each rate group adjusted for line losses? **FPL:**

GROUP	RATE SCHEDULE	AVERAGE FACTOR	FUEL RECOVERY LOSS MULTIPLIER	FUEL RECOVERY FACTOR
A	RS-1,GS-1,SL-2	2.925	1.00198	2.931
A-1*	SL-1,OL-1,PL1	2.864	1.00198	2.870
B	GSD-1	2.925	1.00191	2.930
C	GSLD-1 & CS-1	2.925	1.00077	2.927
D	GSLD-2,CS-2, OS-2 & MET	2.925	0.99503	2.910
E	GSLD-3 & CS-3	2.925	0.95800	2.802
GROUP	RATE SCHEDULE	AVERAGE FACTOR	FUEL RECOVERY LOSS MULTIPLIER	FUEL FACTOR
A	RST-1,GST-1 ON-PEAK	3.213	1.00198	3.219
	OFF-PEAK	2.798	1.00198	2.803
B	GSDT-1,CILC-1(G) ON-PEAK	3.213	1.00191	3.219
	OFF-PEAK	2.798	1.00191	2.803
C	GSLDT-1 & CST-1 ON-PEAK	3.213	1.00077	3.215
	OFF-PEAK	2.798	1.00077	2.800
D	GSLDT-2 & CST-2 ON-PEAK	3.213	0.99503	3.197
	OFF-PEAK	2.798	0.99503	2.784
E	GSLDT-3,CST-3 CILC-1(T)&ISST-1(T) ON-PEAK	3.213	0.95800	3.078
	OFF-PEAK	2.798	0.95800	2.680
F	CILC-1(D)& ISST-1(D) ON-PEAK	3.213	0.99431	3.195
	OFF-PEAK	2.798	0.99431	2.782

*WEIGHTED AVERAGE 16% ON-PEAK AND 84% OFF-PEAK

8. What is the appropriate revenue tax factor to be applied in calculating each company's levelized fuel factor for the projection period of January, 2001 through December, 2001?

FPL: 1.01597 is the revenue tax factor to be applied for the projection period of January, 2001 through December, 2001.

- 8.a. How should the Commission's decision in Docket No. 991779-EI, concerning the application of incentives to wholesale power sales, be implemented?

FPL: FPL believes that the methodology for implementing the application of incentives to wholesale power sales as proposed by Staff and described in Staff's memorandum dated September 20, 2000 is appropriate.

- 8.b. What is the appropriate estimated benchmark level for calendar year 2001 for gains on non-separated wholesale energy sales eligible for a shareholder incentive pursuant to the Commission's decision in Docket No. 991779-EI?

FPL: \$47,377,541, subject to adjustments in the April, 2001 filing.

- 8.c. Should FPL be authorized to delay requesting recovery of the costs associated with the St. Lucie Spent Fuel Storage Project through the Fuel Cost Recovery Clause?

FPL: Yes. FPL requests authorization to delay requesting recovery of appropriate costs associated with this project at some future date, including costs incurred in 2001, once FPL makes a decision on which alternative or alternatives to use. FPL is not requesting recovery through the Fuel Cost Recovery Clause at this time, although FPL will be incurring costs beginning in 2001 necessary for the St. Lucie Spent Fuel Storage Project.

GENERATING PERFORMANCE INCENTIVE FACTOR (GPIF) ISSUES

9. What is the appropriate GPIF reward or penalty for performance achieved during the period of January, 1999 through December, 1999?

FPL: \$6,973,751 reward.

10. What should the GPIF Target/Ranges be for the period of January, 2001 through December, 2001?

FPL: The Targets and Ranges should be as set forth in the Testimony and Exhibits of R. Silva including the following:

PLANT/UNIT	EAF TARGET (%)	HEAT RATE HR. TARGET (BTU/Kwh)
CAPE CANAVERAL 1	84.5	9581
CAPE CANAVERAL 2	94.5	9721
LAUDERDALE 4	93.2	7337
LAUDERDALE 5	93.2	7336
MANATEE 1	78.3	10066
MANATEE 2	90.1	10216
MARTIN 1	87.7	9734
MARTIN 2	90.9	9876
MARTIN 3	92.5	6874
MARTIN 4	93.1	6797
PORT EVERGLADES 3	84.5	9447
PORT EVERGLADES 4	93.7	9632
TURKEY POINT 1	92.4	9319
TURKEY POINT 3	86.0	11121
TURKEY POINT 4	93.6	11095
ST. LUCIE 1	85.7	10817
ST. LUCIE 2	85.7	10821
SCHERER 4	89.9	10043

GPIF SYSTEM WEIGHTED AVERAGE NET OPERATING HR 9841

CAPACITY COST RECOVERY ISSUES

11. What is the appropriate final capacity cost recovery true-up amount for the period January, 1999 through December, 1999?

FPL: \$16,458,284 overrecovery.

12. What is the estimated/actual capacity true-up amount for the period January, 2000 through December, 2000, which is based upon eight months actual costs and four months revised estimates?

FPL: \$42,411,275 overrecovery.

13. What is the total capacity true-up amount to be collected/refunded during the period January, 2001 through December, 2001?

FPL: \$58,869,559 overrecovery.

14. What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period January, 2001 through December, 2001?

FPL: \$427,597,309.

15. What are the appropriate Capacity Cost Recovery Factors for the period January, 2001 through December, 2001 for each rate group?

FPL:

RATE CLASS	CAPACITY RECOVERY FACTOR (\$/KW)	CAPACITY RECOVERY FACTOR (\$/KWH)
RS1	-	0.00527
GS1	-	0.00492
GSD1	1.86	-
OS2	-	0.00305
GSLD1/CS1	1.87	-
GSLD2/CS2	1.86	-
GSLD3/CS3	1.98	-
CILCD/CILCG	1.96	-
CILCT	1.95	-
MET	1.92	-
OL1/SL1/PL1	-	0.00191
SL2	-	0.00340

RATE CLASS	CAPACITY RECOVERY FACTOR (RESERVATION DEMAND CHARGE) (\$/KW)	CAPACITY RECOVERY FACTOR (SUM OF DAILY DEMAND CHARGE)(\$/KW)
ISST1D	.24	.11
SST1T	.23	.11
SST1D	.23	.11

WITNESSES AND SUBJECT MATTER


WITNESS	SPONSOR	SUBJECT MATTER	EXHIBIT TITLES
G. YUPP	FPL	Fuel Cost Recovery Forecast Assumptions	GY - 1
K.M. DUBIN	FPL	Fuel Cost Recovery and Capacity Cost Recovery Estimated/Actual True-Up January, 2000 through December, 2000	KMD - 3 KMD - 4
G. YUPP K.M. DUBIN R.L. WADE	FPL FPL FPL	Levelized Fuel Cost Recovery Factors for January, 2001 through December, 2001	KMD - 5
K.M. DUBIN	FPL	Capacity Cost Recovery Factors for January, 2001 through December, 2001	KMD - 6
K.M. DUBIN	FPL	Levelized Fuel Cost Recovery and Capacity Cost Recovery Final True-up for January, 1999 through December, 1999	KMD - 1 KMD - 2

WITNESS	SPONSOR	SUBJECT MATTER	EXHIBIT TITLES
R. SILVA	FPL	GPIF, Performance Results January, 1999 - December, 1999	RS - 1
R. SILVA	FPL	GPIF, Incentive Factor Targets & Ranges January, 2001- December, 2001	RS - 2

Dated this 19th day of October, 2000.

Respectfully submitted,

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 Attorneys for Florida Power
 & Light Company

BY: 

 Matthew M. Childs, P.A.

CERTIFICATE OF SERVICE
DOCKET NO. 000001-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's List of Issues and Positions have been furnished by Hand Delivery (*), or U.S. Mail this 19th day of October, 2000, to the following:

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