has become placed system.

Jack L. Hanking Manager of Rates and Requirery Manager and Augusters Secretary

July 21, 1994

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 940001-EI

Enclosed are an original and fifteen copies of the Prehearing Statement of Gulf Power Company to be filed in

Also enclosed is a 3.5 inch double sided, high density diskette containing the Statement in WordPerfect 5.1 format Sincerely,

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LIN 3 cc: Beggs and Lane ROL.

Jeffrey A. Stone, Esq. SET / WAS _

DOCUMENT NUMBER-DATE

07403 JUL 21 #

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power Cost Recovery Clause and) Docket No. 940001-EI Generating Performance) Filed: July 21, 1994

PREHEARING STATEMENT OF GULF POWER COMPANY

Gulf Power Company ["Gulf Power", "Gulf", or "the Company"], by and through its undersigned attorneys, and pursuant to Rule 25-22.038(3), Florida Administrative Code, files this prehearing statement, saying:

A. APPEARANCES:

G. EDISON HOLLAND, JR., Esquire, JEFFREY A. STONE, Esquire, and TERESA E. LILES, Esquire, of Beggs & Lane, 700 Blount Building, 3 West Garden Street, P. O. Box 12950, Pensacola, Florida 32576-2950 On behalf of Gulf Power Company.

> DOCUMENT NUMBER-DATE 07403 JUL 21 3 FPSC-RECORDS/REPORTING

B. WITNESSES: All witnesses known at this time, who may be called by Gulf Power Company, along with the subject matter and as follows:

Witness (Direct)	Subject Matter	Issues
1. M. L. Gilchrist	Fuel Adjustment, true-up and projections; Peabody suspension agreement	1, 2, 4, 12
2. M. W. Howell	Purchased Power energy and capacity transactions, true- up and projections	1, 2, 4, 16, 17, 19
3. S. D. Cranmer	Fuel Adjustment, true-up and projections; capacity costs, true-up and projections	1, 2, 3, 4, 6, 7, 8, 16, 17, 18, 19, 20
4. G. D. Fontaine	GPIF, reward/penalty and targets and ranges	10, 11

C. EXHIBITS:

Witness	Description
Gilchrist	Coal Suppliers Oct '93 - Mar '94
Gilchrist	Projected vs. Actual Fuel Cost; Calculation of Net Fuel Savings Peabody Suspension Agreement
Howell	Projected Capacity Transactions Oct '94 - Mar '95
Cranmer	Fuel Cost Recovery Final True-up Calculation
Cranmer	Schedules E-1 through E-11; 12; 13; H-1; CCE-1, CCE-1a; CCE-1b; CCE-2; 6 monthly A-1 thru A-12, Nov. '93 thru May' 94; (development of fuel cost and capacity cost recovery factors)
Fontaine	GPIF Results Schedules
Fontaine	GPIF Targets and Ranges
	Gilchrist Gilchrist Howell Cranmer Cranmer

STATEMENT OF BASIC POSITION

Gulf Power Company's Statement of Basic Position:

proposed fuel factors present the best estimate of Gulf's fuel and proposed fuel factors present the best estimate or Guir's ruel and purchased power expense for the period October, 1994 through March, purchased power expense for the period october, 1994 through March, 1995 including the true-up calculations, GPIF and other adjustments E. STATEMENT OF ISSUES AND POSITIONS

- ISSUE 1: What are the appropriate final fuel adjustment true-up Generic Fuel Adjustment Issues
- amounts for the period October, 1993 through March, 1994? GULF:
- Under recovery \$810,768. (Gilchrist, Howell, Cranmer) ISSUE 2: What are the estimated fuel adjustment true-up amounts
- for the period April, 1994 through September, 1994? GULF: Under recovery \$1,969,504. (Gilchrist, Howell, Cranmer)
- ISSUE 3: What are the total fuel adjustment true-up amounts to be what are the total ruer adjustment true-up amounts to be collected during the period October, 1994 through March, GULF:
- \$2,780,272. (Cranmer)
- ISSUE 4: What are the appropriate levelized fuel cost recovery factors for the period October, 1994 through March, 1995? GULF:
- 2.179¢/KWH. (Gilchrist, Howell, Cranmer)
- What should be the effective date of the new fuel adjustment charge, oil backout charge, and conservation cost recovery charge for billing purposes? GULF:
- The factor should be effective beginning with the The factor should be effective beginning with the specified fuel cycle and thereafter for the period start before October, 1994 through March, 1995. Billing cycles may be start before October 1, 1994, and the last cycle may be read after March 31, 1995, so that each customer is read after March 31, 1995, so that each customer is billed for six months regardless of when the adjustment

ISSUE 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?

GULF: See table below: (Cranmer)

Group	Rate Schedules	Line Loss Multipliers
A	RS, GS, GSD, OSIII, OSIV	1.01228
В	LP	0.98106
С	PX	0.96230
D	OSI, OSII	1.01228

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

GULF: See table below: (Cranmer)

		Fuel (Cost Factors	¢/KWH
	Rate		Time	of Use
Group	Schedules	Standard	On-Peak	Off-Peak
λ	RS, GS, GSD, OSIII, OSIV	2.206	2.253	2.191
В	LP	2.138	2.184	2.123
С	PX	2.097	2.142	2.082
D	OSI, OSII	2.205	N/A	N/A

ISSUE 8: What is the appropriate revenue tax factor to be applied in calculating each company's levelized fuel factor for the projection period of October, 1994 through March, 1995?

GULF: 1.01609. (Cranmer)

Company-Specific Fuel Adjustment Issues

Gulf Power Company

- What costs, if any, are appropriate for Gulf to recover through the fuel cost recovery clause as a result of the Peabody contract suspension?
- Gulf should recover all costs associated with the Peabody contract suspension, including the suspension payment and GULF: the costs of purchasing replacement coal. These costs were prudently incurred and resulted in net fuel savings for the customers totalling approximately \$14,479,865. (Gilchrist)

Generic Generating Performance Incentive Factor Issues

- ISSUE 13: What is the appropriate GPIF reward or penalty for performance achieved during the period October, 1993 through March, 1994?
- Penalty \$84,941. (Fontaine) GULF:
- ISSUE 14: What should the GPIF targets/ranges be for the period October, 1994 through March, 1995?
- See table below: (Fontaine) GULF:

	EAF	POF	EUOF	Heat Rate
Unit	83.6	8.8	7.6	10,410
Crist 6		8.8	22.0	10,317
Crist 7	69.2		3.5	10,137
Smith 1	87.7	8.8		10,237
Smith 2	84.8	12.6	2.6	
Daniel 1	85.4	0.0	14.6	10,287
Daniel 2	94.8	0.0	5.2	9,923

EAF = Equivalent Availability Factor

POF = Planned Outage Factor

EUOF = Equivalent Unplanned Outage Factor

Company-Specific GPIF Issues

NO COMPANY-SPECIFIC ISSUES WITH REGARD TO GULF POWER COMPANY HAVE BEEN RAISED IN THE PRELIMINARY LIST OF ISSUES AND POSITIONS SUBMITTED BY ANY PARTY

Generic Capacity Cost Recovery Issues

- ISSUE 19: What is the final capacity cost recovery true-up amount for the period October, 1993 through March, 1994?
- GULF: Under recovery \$1,135,019. (Howell, Cranmer)
- ISSUE 20: What is the estimated capacity cost recovery true-up amount for the period April, 1994 through September, 1994?
- GULF: Over recovery \$56,118. (Howell, Cranmer)
- What is the total capacity cost recovery true-up amount to be collected during the period October, 1994 through March, 1995?
- GULF: \$1,078,901. (Cranmer)
- What is the appropriate projected net purchased power capacity cost amount to be included in the recovery factor for the period October, 1994 through March, 1995?
- GULF: \$6,956,372.1 (Howell, Cranmer)

This figure differs from the amount stated in Gulf's Preliminary List of Issues and Positions due to a correction in the load research data used in the calculation of this amount. The revised amount is also reflected in Gulf Power's Amended Petition filed concurrently herewith.

ISSUE 23: What are the appropriate capacity cost recovery factors for the period October, 1994 through March, 1995?

GULF: See table below: (Cranmer)

RATE CLASS	CAPACITY COST RECOVERY FACTORS ¢/KWH²
RS, RST	0.224
GS, GST	0.219
GSD, GSDT	0.170
LP, LPT	0.147
PX, PXT	0.119
OSI, OSII	0.014
OSIII	0.132
OSIV	0.015
SS	0.363

Company-Specific Capacity Cost Recovery Issues

NO COMPANY-SPECIFIC ISSUES WITH REGARD TO GULF POWER COMPANY HAVE BEEN RAISED IN THE PRELIMINARY LIST OF ISSUES AND POSITIONS SUBMITTED BY ANY PARTY

F. STIPULATED ISSUES

GULF: Yet to be determined. Gulf is willing to stipulate that the testimony of all witnesses whom no one wishes to cross examine be inserted into the record as though read, cross examination be waived, and the witness's attendance at the hearing be excused.

G. PENDING MOTIONS

GULP: None.

²Certain of the factors listed differ from those stated in Gulf's Preliminary List of Issues and Positions due to a correction in the load research data used in calculating the factor. The revised factors are also reflected in Gulf Power's Amended Petition filed concurrently herewith.

H. OTHER MATTERS:

GULP:

To the best knowledge of counsel, Gulf has complied, or is able to comply, with all requirements set forth in the orders on procedure and/or the Commission rules governing this prehearing statement. If other issues are raised for determination at the hearings set for August 11-12, 1994, Gulf respectfully requests an opportunity to submit additional statements of position and, if necessary, file additional testimony.

Dated this 20th day of July, 1994.

Respectfully submitted

G. EDISON HOLLAND, JR. Florida Bar No. 261599

JEFFREY A. STONE

Florida Bar No. 325953

TERESA E. LILES

Florida Bar No. 510998

Beggs & Lane

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Pensacola, Florida 32576-2950

(904) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Fuel and Purchased Power Cost Recovery Clause with Generating) Docket No. 940001-EI Performance Incentive Factor

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail the 2/5+ day of July, 1994 on the following:

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Jack Shreve, Esq. Office of Public Counsel 111 W. Madison Street Suite 812 Tallahassee, FL 32399-1300

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