

ORIGINAL



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison St.
Room 812
Tallahassee, Florida 32399-1400
850-488-9330

February 6, 1998

Ms Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

RE: Docket No. 980001-E1

Dear Ms. Bayó:

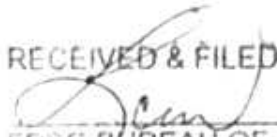
Enclosed are an original and fifteen copies of the Public Counsel's Prehearing Statement in the above-referenced docket.

Also enclosed is a 3.5 inch diskette containing the Preliminary List of Issues and Positions in WordPerfect for Windows 6.1. Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,


John Roger Howe
Deputy Public Counsel

ACK Handwritten
AFA
APP
CAF JRH/dsb
CMU Enclosures
CTR
EAG Behrmann
LEG 1
LIN 3
GPC
RCH
SEC 1
WAS
OTH

RECEIVED & FILED

FPSG-BUREAU OF RECORDS

DOCUMENT CONTROL DATE
01957 FEB-08
FPSG-BUREAU OF RECORDS

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power)
Cost Recovery Clause with) DOCKET NO 980001-EI
Generating Performance Incentive) FILED: February 6, 1998
Factor)
_____)

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-98-0046-PCO-EI, issued January 6, 1998, submit this Prehearing Statement.

APPEARANCES:

JOHN ROGER HOWE, Esquire
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
On behalf of the Citizens of the State of Florida

A. WITNESSES:

None.

B. EXHIBITS:

None.

C. STATEMENT OF BASIC POSITION

None necessary.

DOCUMENT NUMBER DATE
01957 FEB-6 98
FPSC-REGULATORY REPORTING

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

Generic Fuel Adjustment Issues

ISSUE 1: What are the appropriate final fuel adjustment true-up amounts for the period April, 1997, through September, 1997?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time
Marianna: No position at this time
GPC: No position at this time.
TECO: No position at this time.

ISSUE 2: What are the estimated fuel adjustment true-up amounts for the period October, 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time
Marianna: No position at this time
GPC: No position at this time
TECO: No position at this time.

ISSUE 3: What are the total fuel adjustment true-up amounts to be collected/refunded during the period April, 1998, through September, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time
FPUC: Fernandina: No position at this time
Marianna: No position at this time
GPC: No position at this time
TECO: No position at this time

ISSUE 4: What are the appropriate levelized fuel cost recovery factors for the period April, 1998, through September, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time

FPUC: Fernandina: No position at this time
Marianna: No position at this time
GPC: No position at this time.
TECO: No position at this time.

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

OPC: The factor should be effective beginning with the specified fuel cycle and thereafter for the period April, 1998, through September, 1998. Billing cycles may start before April 1, 1998, and the last cycle may be read after September 30, 1998, so that each customer is billed for six months regardless of when the adjustment factor became effective.

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?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time
GPC: No position at this time.
TECO: No position at this time.

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

OPC:

FPC: No position at this time.
FPL: No position at this time
FPUC: Fernandina: No position at this time
Marianna: No position at this time
GPC: No position at this time
TECO: No position at this time.

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 April, 1998, through September, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time

FPUC: Fernandina No position at this time
Marianna No position at this time
GPC: No position at this time
TECO: No position at this time

Company-Specific Fuel Adjustment Issues

FLORIDA POWER CORPORATION

ISSUE 9A: Should the Commission approve Florida Power Corporation's request to recover the cost of converting Suwannee Unit 3 to burn natural gas?

OPC: No position at this time.

ISSUE 9B: Has Florida Power Corporation properly calculated the replacement fuel costs associated with the Crystal River Unit 3 outage as directed by Order No. PSC-97-0840-S-EI, in Docket No. 970261-EI, issued July 14, 1997?

OPC: No position at this time.

ISSUE 9C: Has Florida Power Corporation properly removed the costs associated with the Lake Cogen settlement which had been previously included in fuel underrecovery balances in Florida Power's monthly "A" Schedules?

OPC: No position at this time.

ISSUE 9D: Has Florida Power Corporation properly calculated the transmission revenue associated with economy, Schedule C, and broker energy sales between itself and directly interconnected utilities as directed by Order No. PSC-98-0073-FOF-EI, in Docket No. 980001-EI, issued January 13, 1998?

OPC: No position at this time.

FLORIDA POWER AND LIGHT COMPANY

ISSUE 10A: Has Florida Power & Light Company properly calculated the transmission revenue associated with economy, Schedule C, and broker energy sales between itself and directly interconnected utilities as directed by Order No. PSC-98-0073-FOF-EI in Docket No. 980001-EI, issued January 13, 1998?

OPC: No position at this time.

GULF POWER COMPANY

ISSUE 11A: Has Gulf Power Company properly calculated the transmission revenue associated with economy, Schedule C, and broker energy sales between itself and directly interconnected utilities as directed by Order No. PSC-98-0073-FOF-EI in Docket No. 980001-EI, issued January 13, 1998?

OPC: No position at this time.

TAMPA ELECTRIC COMPANY

ISSUE 12A: Has Tampa Electric Company properly calculated the transmission revenue associated with economy, Schedule C, and broker energy sales between itself and directly interconnected utilities as directed by Order No. PSC-98-0073-FOF-EI in Docket No. 980001-EI, issued January 13, 1998?

OPC: No position at this time.

ISSUE 12B: Through what methodology should Tampa Electric be authorized to continue the temporary base rate reduction pursuant to the stipulation approved by the Commission in Order No. PSC-96-1300-S-EI in Docket No. 960409-EI, issued October 24, 1996?

OPC: No position at this time.

ISSUE 12C: Did Tampa Electric properly calculate the true-up adjustment of the refund credit factor as agreed to in the stipulation approved in Order No. PSC-96-0670-S-EI in Docket No. 950379-EI, issued May 20, 1996?

OPC: No position at this time.

Generic Generating Performance Incentive Factor Issues

ISSUE 13: What is the appropriate GPIF reward or penalty for performance achieved during the period April, 1997, through September, 1997?

OPC:

FPC: No position at this time.

FPL: No position at this time.

GPC: No position at this time.

TECO: No position at this time.

ISSUE 14: What should the GPIF targets/ranges be for the period April, 1998, through September, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

Generic Capacity Cost Recovery Issues

ISSUE 15: What is the appropriate final capacity cost recovery true-up amount for the period April, 1997, through September, 1997?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 16: What is the estimated capacity cost recovery true-up amount for the period October, 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 17: What is the total capacity cost recovery true-up amount to be collected during the period April, 1998, through September, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 18: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period April, 1998, through September, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 19: What are the projected capacity cost recovery factors for the period April, 1998, through September, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

Company-Specific Capacity Cost Recovery Issues

FLORIDA POWER AND LIGHT COMPANY

ISSUE 20A: Should FPL's original projections for capacity payments to Osceola and Okeelanta Qualifying Facilities for the period June, 1997, through September, 1998, be excluded?

OPC: No position at this time.

E. STATEMENT OF LEGAL ISSUES AND POSITIONS: None at this time

F. STATEMENT OF POLICY ISSUES AND POSITIONS: None at this time

G. STIPULATED ISSUES: None

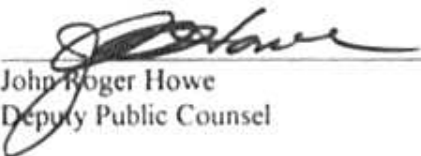
H. PENDING MOTIONS: None.

I. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Respectfully submitted,

JACK SHREVE
Public Counsel



John Roger Howe
Deputy Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

(850) 488-9330

Attorneys for the Citizens
of the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 980001-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing Public Counsel's Prehearing Statement has been furnished by U.S. Mail or hand-delivery (*) on this 6th day of February, 1998, to the following:

Leslie J. Paugh, Esquire
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370, Gunter Building
Tallahassee, Florida 32399-0872

Matthew M. Childs, P.A.
Steel Hector & Davis, LLP
215 South Monroe Street
Suite 601
Tallahassee, Florida 32301-1804

John W. McWhirter, Jr., Esquire
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
Post Office Box
3350 Tampa, Florida 33601-3350

Jeffrey A. Stone, Esquire
Russell A. Badders, Esquire
Beggs & Lane
Post Office Box 12950
Pensacola, Florida 32576-2950

Joseph A. McGlothlin, Esquire
Vicki Gordon Kaufman, Esquire
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

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

Suzanne Brownless, Esquire
Suzanne Brownless, P.A.
1311-B Paul Russell Road
Suite 201
Tallahassee, Florida 32301

James A. McGee, Esquire
Florida Power Corporation
Post Office Box 14042
St. Petersburg, Florida 33733-4042

Kenneth A. Hoffman, Esquire
Rutledge, Ecenia, Underwood,
Purnell, & Hoffman, P.A.
Post Office Box 551
Tallahassee, Florida 32302-0551



John Roger Howe
Deputy Public Counsel