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Matthew M. Childs, P.A.

January 5, 1999

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

RE: DOCKET NO. 990001-EI
TRANSMISSION RECONSIDERATION

Dear Ms. Bayó:

Enclosed for filing please find the original and ten (10) copies of Florida Power & Light Company's Prehearing Statement in the above referenced docket.

Also enclosed is a formatted double sided high density 3.5 inch diskette containing the Prehearing Statement for Florida Power & Light Company.

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FPSC-BUREAU OF RECORDS

Very truly yours,


Matthew M. Childs, P.A.

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power)	DOCKET NO. 990001-EI
cost recovery clause and)	FILED: January 5, 1999
generating performance)	
incentive factor)	
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FLORIDA POWER & LIGHT COMPANY'S
PREHEARING STATEMENT
TRANSMISSION RECONSIDERATION

Pursuant to Order No. PSC-98-1270-PCO-EI, issued September 25, 1998, establishing the prehearing procedure in this docket, Florida Power & Light Company (FPL) hereby submits its Prehearing Statement.

A. APPEARANCES

Matthew M. Childs, P.A.
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Tallahassee, FL 32301

B. WITNESSES

<u>WITNESS</u>	<u>SUBJECT MATTER</u>	<u>ISSUES</u>
K.M. DUBIN	Transmission Revenue Allocation	1, 2, 4

C. EXHIBITS

None

D. STATEMENT OF BASIC POSITION

FPL's transmission revenue associated with economy transactions should continue to be separated based on energy. FPL's current energy and demand separation factors are very close therefore changing the calculation process at this time would not be beneficial because the resulting allocation of transmission revenue would not be materially different.

E. STATEMENT OF ISSUES AND POSITIONS

TRANSMISSION RECONSIDERATION ISSUES

1. 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?

FPL: Yes.

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

FPL: For FPL, such transmission revenues should continue to be separated based on energy.

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

FPL: N/A.

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

FPL: For FPL such transmission revenues should continue to be allocated between the retail and wholesale jurisdictions based on energy.

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

FPL: N/A.

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

FPL: N/A.

F. STIPULATED ISSUES

None at this time.

G. MOTIONS

None at this time.

Dated this 5th day of January, 1999.

Respectfully submitted,

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215 South Monroe Street
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Attorneys for Florida Power
& Light Company

BY: 

Matthew M. Childs, P.A.

**CERTIFICATE OF SERVICE
DOCKET NO. 990001-EI
TRANSMISSION RECONSIDERATION**

I **HEREBY CERTIFY** that a true and correct copy of Florida Power & Light Company's Prehearing Statements has been furnished by Hand Delivery,** or U.S. Mail this 5th day of January, 1999, to the following:

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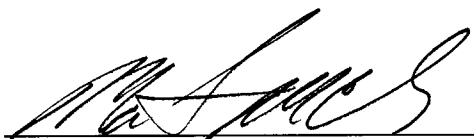
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