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# AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET P.O. BOX 391 (ZIP 32302) TALLAHASSEE, FLORIDA 32301 (850) 224-9115 FAX (850) 222-7560

January 11, 1999

## HAND DELIVERED

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

> Re: Conservation Cost Recovery Clause <u>FPSC Docket No. 990002-EG</u>

Dear Ms. Bayo:

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Enclosed for filing in the above docket are the original and ten (10) copies of Tampa Electric Company's Statement of Issues and Positions.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

		Sincerely,	
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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery Clause.

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DOCKET NO. 990002-EG FILED: January 11, 1998

### TAMPA ELECTRIC COMPANY'S STATEMENT OF ISSUES AND POSITIONS

Tampa Electric Company ("Tampa Electric" or "the company"), hereby submits its Statement of the Issues and Positions to be taken up at the hearing scheduled to commence on February 10, 1999 in the above docket.

#### **CONSERVATION COST RECOVERY**

**Issue No. 1**: What was the actual true-up amount for the October 1997 - March 1998 period for Tampa Electric?

Tampa Electric's Position: An overrecovery of \$975,858, including interest. (Witness: Bryant)

**Issue No. 2**: What is the appropriate projected end of period total net true-up amount for Tampa Electric for the period April 1998 - March 1999?

Tampa Electric's Position: An overrecovery of \$2,262,323, including interest. (Witness:

Bryant)

**Issue No. 3**: What are the appropriate conservation cost recovery factors to be applied by Tampa Electric during the period April 1999 through December 1999?

Tampa Electric's Position: 0.017 cents per KWH for Interruptible, 0.132 cents per KWH

for Residential, 0.118 cents per KWH for General Service Non-Demand and Temporary Service,

0.104 cents per KWH for General Service Demand and Electric Vehicle - Experimental -DOCUMENT NUMBER-DATE

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Secondary, 0.103 cents per KWH for General Service Demand and Electric Vehicle - Experimental - Primary, 0.098 cents per KWH for General Service Large Demand and Firm Standby - Secondary, 0.097 cents per KWH for General Service Large Demand and Firm Standby - Primary, 0.096 cents per KWH for General Service Large Demand and Firm Standby - Subtransmission, and 0.059 cents per KWH for Lighting. (Witness: Bryant)

DATED this <u>//</u> day of January, 1999.

Respectfully submitted,

JAMES D. BEASLEY Ausley & McMullen Post Office Box 391 Tallahassee, Florida 32302 (850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing Statement of Issues and Positions,

filed on behalf of Tampa Electric Company, has been furnished by U.S. Mail or hand delivery (\*)

on this <u>//</u><sup>±</sup> day of January, 1999 to the following:

Mr. William C. Keating\* Staff Counsel Division of Legal Services Florida Public Service Commission Gerald L. Gunter Building - #370Q 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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Mr. Charles A. Guyton Steel Hector & Davis 215 S. Monroe Street Suite 601 Tallahassee, FL 32301

Mr. Joseph A. McGlothlin Ms. Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas 117 S. Gadsden Street Tallahassee, FL 32301

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