

JACK SHREVE PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330



July 7, 1995

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

RE: Docket No. 950001-EI

Dear Ms. Bayo:

Enclosed please find the original and fifteen (15) copies of the Public Counsel's Preliminary List of Issues and Positions for filing in the above-referenced dockets.

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

JRH/bgm Enclosures

RECEIVED & FILED

99 THE RECORDS

DOCUMENT DATE

06454 JUL-78

FPSC-RECORDS/REPORTING

FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor

DOCKET NO. 950001-EI FILED: July 7, 1995

PUBLIC COUNSEL'S PRELIMINARY LIST OF ISSUES AND POSITIONS

The Office of Public Counsel hereby submits its preliminary list of issues and positions.

Generic Fuel Adjustment Issues

ISSUE 1: What are the appropriate final fuel adjustment true-up amounts for the period October 1994 through March 1995?

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 April 1995 through September 1995?

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 during the period October 1995 through March 1996?

1

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 October 1995 through March 1996?

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 oil backout charge for billing purposes?

OPC: The factor should be effective beginning with the specified fuel cycle and thereafter for the period October, 1995 through March, 1996. Billing cycles may start before October 1, 1995, and the last cycle may be read after March 31, 1996, 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 October, 1995 through March, 1996?

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

None 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 October, 1994 through March, 1995?

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 October, 1995 through March, 1996?

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 GPIF Issues

OPC knows of no company specific GPIF issues at this time

Generic Oil Backout Issues

ISSUE 15: What is the final oil backout true-up amount for the October, 1994 through March, 1995 period?

OPC:

fi (100 t) (3

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

ISSUE 16: What is the estimated oil backout true-up amount for the period April, 1995 through September, 1995?

OPC:

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

ISSUE 17: What is the total oil backout true-up amount to be collected during the period October, 1995 through March, 1996?

OPC:

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

ISSUE 18: What is the projected oil backout cost recovery factor for the period October, 1995 through March, 1996?

OPC:

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

Company-Specific Oil Backout Issues

OPC knows of no company-specific oil backout issues at this time.

Generic Capacity Cost Recovery Issues

ISSUE 19: What is the appropriate final capacity cost recovery true-up amount for the period October, 1994 through March, 1995?

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 20: What is the estimated capacity cost recovery true-up amount for the period April, 1995 through September, 1995?

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 21: What is the total capacity cost recovery true-up amount to be collected during the period October, 1995 through March, 1996?

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 22: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period October, 1995 through March, 1996?

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 23: What are the projected capacity cost recovery factors for the period October, 1995 through March, 1996?

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

None at this time.

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 Tallahassee, FL 32399-1400

(904) 488-9330

Attorneys for the Citizens of the State of Florida

CERTIFICATE OF SERVICE DOCKET NO. 950001-EI

I HEREBY certify that a copy of the foregoing PUBLIC COUNSEL'S PRELIMINARY LIST OF ISSUES AND POSITIONS has been served by *hand delivery or U.S. mail to the following parties of record on this 7th day of July, 1995.

JAMES A. McGEE, ESQUIRE GERALD A. WILLIAMS, ESQUIRE Florida Power Corporation P.O. Box 14042 St. Petersburg, FL 33733

SUZANNE BROWNLESS, ESQUIRE Suzanne Brownless, P.A. 1311-B Paul Russell Road Suite 202 Tallahassee, FL 32301

JOSEPH A. McGLOTHLIN, ESQUIRE VICKI GORDON KAUFMAN, ESQUIRE McWhirter, Reeves, McGlothlin, Davidson & Bakas 315 South Calhoun Street Suite 716 Tallahassee, Fl 32301

JOHN W. McWHIRTER, JR., ESQUIRE McWhirter, Reeves, McGlothlin, Davidson & Bakas P.O. Box 3350 Tampa, FL 33601

RICHARD A. SALEM, ESQUIRE MARIAN B. RUSH, ESQUIRE Salem, Saxon & Neilsen, P.C. Suite 3200, One Barnett Plaza 101 East Kennedy Blvd. P.O. Box 3399 Tampa, FL 33601 *VICKI JOHNSON, ESQUIRE LORNA R. WAGNER, ESQUIRE Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

LEE L. WILLIS, ESQUIRE

JAMES D. BEASLEY, ESQUIRE

Macfarlane, Ausley, Ferguson,

& McMullen

P.O. Box 391

Tallahassee, FL 32302

PETER J.P. BRICKFIELD, ESQUIRE MICHAEL E. KAUFMAN, ESQUIRE Brickfield, Burchette & Ritts, P.C. 1025 Thomas Jefferson St., N.W. Eight Floor - West Tower Washington, DC 20005

MATTHEW M. CHILDS, ESQUIRE Steel Hector & Davis 215 S. Monroe St., Suite 601 Tallahassee, FL 32301-1804

G. EDISON HOLLAND, JR., ESQUIRE JEFFREY A. STONE, ESQUIRE RUSSELL A. BADDERS, ESQUIRE Beggs & Lane P.O. Box 12950 Pensacola, FL 32576-2950 NORMAN H. HORTON, JR., ESQUIRE Messer, Vickers, Caparello, Madsen, Lewis, Goldman & Metz P.O. Box 1876 Tallahassee, FL 32302-1876

> John Roger Howe Deputy Public Counsel