BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate) increase by GTE FLORIDA) INCORPORATED.

DOCKET NO. 920188-TL ORDER NO. PSC-92-0234-PCO-TL ISSUED: 4/23/92

ORDER GRANTING IN PART AND DENYING IN PART REQUEST FOR WAIVER BY GTE FLORIDA INCORPORATED

On March 13, 1992, GTE Florida Incorporated (GTEFL or the Company) filed a its Request for Waiver (Petition) of several Minimum Filing Requirements (MFRs). The Petition is made pursuant to Rule 25-4.141(4) which authorizes the Commission to waive specific data requirements "upon a showing that production of the data would be impractical or impose an excessive economic burden upon the company." The specific MFR schedules and the Company's arguments for waiver are set forth below.

MFR Schedule B6-b

This schedule requires the listing of lead times for items comprising 80% of the Materials and Supplies ("M&S") balance for the current and prior two years. GTEFL asserts that it can provide this lead time information for 1991. However, the Company is unable to provide the information for the prior two years because GTEFL has historically treated such information as a management tool rather than an accounting record. Therefore, the Company has not retained the information. For this reason GTEFL contends that it is impractical, if not impossible, to provide the 1990 and 1989 figures for this schedule.

It is the Company's view that the Commission's interest in lead times for M&S will be satisfied by GTEFL's 1991 lead time information. The Company asserts that the 1991 information is the best and most current indicator of GTEFL's material and supply inventory management.

Upon review, we grant the request for waiver. However, we note that this schedule has been included in our MRF requirements for years. Thus, the Company should have retained the information. We will expect to receive this schedule in the Company's filings for future rate cases.

MFR Schedule C-4h

This schedule requires a listing of Operations and Maintenance ("O&M") expense amounts by Part 32 account summary detail. The categories of Part 32 accounts include Plant Specific, Plant Non-Specific, Customer Operations, and Corporate Operations expenses.

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Prior to 1988, GTEFL was required to maintain its expense accounts using Part 31 accounts which are different from Part 32. In addition, Part 31 utilized several account categories which are different in content from Part 32 categories. The Company asserts that because of the change from the Part 31 account format used in 1987 to the use of Part 32 starting in 1988, some individual accounts and categories for 1987 are not comparable to individual accounts and categories for other years. However, GTEFL contends that total O&M expense for 1987 will provide useful information for comparison to total O&M expenses for 1991.

In completing Schedule C-4h for 1987, GTEFL requests a waiver which will permit it to list total 1987 O&M expense and compare the 1987 total expense grown by the composite growth and inflation factor to total 1991 O&M expense. It is the Company's position that this approach will avoid the burden and problems of mapping 1987 amounts recorded in Part 31 Uniform System of Accounts ("USOA") detail to Part 32 accounts required by the FCC for post-1987 expenses. The Company contends that this remapping process would be difficult, inaccurate and very time-consuming for the benefit that would be derived. The Company concludes that use of a higher level comparison of benchmark O&M expenses to current expense still meets the overall objective of Schedule C-4h.

We deny the Company's request to use total O&M expense to do the benchmark. We need the specific information to do a meaningful benchmark test. However, we find it appropriate for the Company to file this schedule using individual 1988 accounts as the beginning information instead of 1987.

MFR Schedule A-2a, A-2b

These two schedules require rate base and income statement amounts by Part 32 account categories for GTEFL's last rate case. GTEFL's last rate case took place in 1981 in Docket No. 810095-TP; thus, the amounts requested were recorded on GTEFL's books in Part 31 accounts. For the same reason set forth for MFR Schedule C-4h, GTEFL requests a waiver to provide the information required in Column 2 of Schedules A-2a and A-2b at a high enough level of aggregation to avoid the burden of remapping Part 31 accounts.

We deny the Company's request for waiver. We do not find the fact that the last rate case was in 1981 to be a persuasive reason for the Company not to provide the needed information.

MFR Schedule C-11c

This schedule requests a breakdown of annual employee compensation by salaried and hourly company personnel. GTEFL can provide this information in the format requested for the years 1989 forward. For 1988, however, GTEFL has not retained the management reports necessary to separate employee compensation between salaried and hourly personnel. To provide this breakdown for 1988 would require GTEFL to manually review all employee payroll records for 1988 and summarize those records into salaried and hourly wage GTEFL can provide the information requested on categories. Schedule C-11c on a total company basis for 1988 and, to facilitate comparison of the amounts on this schedule, GTEFL will include detail for the other years by salaried, hourly, contract and total company basis. To avoid the economic burden of manually reviewing individual employee payroll records, GTEFL requests a waiver to provide 1988 information on a total company basis only.

We grant the requested waiver. However, we note that this schedule has been included in our MRF requirements for years. Thus, the Company should have retained the information. We will expect to receive this schedule in the Company's filings for future rate cases.

MFR Schedule F1-a

This schedule requests a listing of "out of service" credits broken down into business and residential subcategories. GTEFL does not separate "out of service" credit records for its business and residential customers. The only way for GTEFL to obtain this information would be to manually review and analyze every credit record. It is the Company's position that this would impose an excessive economic burden on GTEFL both in terms of costs and lost manhours. In lieu of breaking out the credits into business and residential subcategories, GTEFL proposes to provide the credits in total.

We grant the requested waiver.

MFR Schedule F-2

Demand and Facility information is no longer prepared by GTEFL in chart format as required by the MFR requirements. In 1989, GTEFL implemented its new Capital Program Management System ("CPMS"). CPMS no longer prepares this information in chart format but provides the same monthly historical and projected line capacity information in a report format. Because GTEFL no longer maintains this information in a chart format in the normal course

of business and uses the CPMS reports as its only tool in planning future facility requirements, GTEFL requests a waiver to use the CPMS format in this docket and all future filings before the Commission.

GTEFL also requests a waiver of the portion of Schedule F-2 that requires historical information about GTEFL's interoffice trunk group facilities. GTEFL states that because of a change in the identification codes used for trunk groups, the Company is not able to include 1988 trunking data on the same report used for this MFR without extensive manual effort to match up the old and new Because of the large amount of trunk group trunk group IDs. changes over the years, it would be difficult to match up the 1988 information to current trunk groups in the Traffic Trunk Estimate ("TTE") system. The Company contends that the process of matching up 1988 circuits with current circuits would be difficult and would While trunk group add little value to the review process. information for 1988 is available if needed, GTELL requests a waiver to provide this information on an exception basis and not as part of a single MFR schedule. It is the Company's view that this will ensure that the information is available on an as-needed basis.

We grant the requested waiver for this docket only.

MFR Schedules B-5a, C-24h, C-24i, and F-2

GTEFL intends to file an original and twenty copies of the MFRs. However, four schedules contain voluminous pages of material that are referred to infrequently. Schedule B-5a (monthly operating reports) consists of approximately 450 pages, Schedule C-24h (historical monthly separation studies) consists of approximately 60 pages, Schedule C-24i (traffic and revenue settlement contracts) consists of approximately 60 pages, and Schedule F-2 (demand and facility, and interoffice trunk reports) consists of approximately 850 pages. These four schedules together constitute a total of 1,420 pages of data.

It is GTEFL's understanding that these four schedules are reviewed by our staff but are not subject to frequent reference during the course of the proceeding. In an effort to reduce the economic burden of generating 20 copies of these schedules, GTEFL offers to file the original of all MFR schedules and 20 copies of all schedules except B-5a, C-24h, C-24i, and F-2. As to those four schedules, GTEFL proposes to provide us with two copies which will be directed to the attention of the our key staff members involved

with those schedules. The information would also be provided to any party requesting a copy of GTEFL's MFR filing.

We approve the request for waiver with one modification. In addition to the two sets of schedules proposed by the Company to be filed with the Commission, the Company shall file one set with OPC. All other parties may request a set if they want one.

It is therefore,

ORDERED by Commissioner Thomas M. Beard, as Prehearing Officer, that GTEFL's Request for Waiver of certain MFR Schedules is granted in part and denied in part as set forth in the body of this Order.

By ORDER of Commissioner Thomas M. Beard, as Prehearing Officer, this 23rd day of APRIL 1992.

THOMAS M. BEARD, Commissioner and Prehearing Officer

(SEAL)

CWM

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: 1) reconsideration within 10 days pursuant to Rule 25-22.038(2), Florida Administrative Code, if issued by a Prehearing Officer; 2)

reconsideration within 15 days pursuant to Rule 25-22.060, Florida Administrative Code, if issued by the Commission; or 3) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or wastewater utility. A motion for reconsideration shall be filed with the Director, Division of Records and Reporting, in the form prescribed by Rule 25-22.060, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.