

A. M. Lombardo
Assistant Vice President-Regulatory Relations



Suite 400 150 S. Monroe Street Tallahassee, FL 32301 904 224-7798

April 7, 1992

Mr. Steve C. Tribble Director, Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32301

920260-12

Re: Minimum Filing Requirements Waiver Requests

Dear Mr. Tribble:

Attached are requests for Waiver and Modification of certain schedules in the Florida Minimum Filing Requirements that Southern Bell plans to file May 1, 1992. Please forward your concurrence to me as soon as possible.

I can be reached at 224-7798 if you wish to discuss further.

Sincerely,

Anthony M. Lombardo

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Attachments

BellSouth Telecommunications, Inc.
d/b/a Southern Bell
Request for Waiver and Modification
of Minimum Filing Requirements

(A) Consolidation and Name Change

South Central Bell Telephone Company and BellSouth Services, Inc. were merged into Southern Bell Telephone and Telegraph Company on January 1, 1992. At that time, the name of Southern Bell Telephone and Telegraph Company was changed to BellSouth Telecommunications, Inc. In Order PSC 92-0079-FOF-TL in Docket 920009, the Commission approved the name change from Southern Bell Telephone and Telegraph Company to BellSouth Telecommunications, Inc. Because BellSouth Telecommunications Inc. is doing business as Southern Bell Telephone and Telegraph Company (Southern Bell), Southern Bell proposes to display the company name on the Minimum Filing Requirement schedules as Southern Bell for both historical and projected data. Where there might be confusion as to the data shown on a particular schedule, the schedule will be labeled to indicate the basis of the data shown.

(B) Last Rate Case Basis

Southern Bell proposes to use the forecasted 1990 data as reflected in Commission Order 20162 in Docket 880069-TL as the "last rate case data" for the purposes of this filing.

(C) Schedule B-3a, Balance Sheet

Southern Bell proposes to use the Part 32 accounts designated in Schedule B-1 of Form M in completing Schedule B-3a, as it did in the November 1991 Modified Minimum Filing Requirements (MMFR) in Docket 911109-TL.

(D) Schedule B-6a, Materials & Supplies

The detail requested in the Schedule B-6a format is not available in Southern Bell's accounting system. Therefore, Southern Bell proposes to provide material data in the format shown in Attachment 1, as it did in the November 1991 MMFRs in Docket 911109-TL.

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(E)
Schedule C-7 - Charitable Contributions and
Social Service Club Dues and Expenses

Under its current regulatory plan, Southern Bell excludes all of these expenses from regulatory treatment. Therefore, this schedule is not applicable and Southern Bell proposes to exclude it.

(F)
Schedule C-28, Cost of Equal Access and
Network Reconfiguration

Southern Bell proposes to provide the data in the revised format shown in Attachment 2. The format of Schedule C-28 requires more detail than is available from the Company's Equal Access/Network Reconfiguration tracking procedures.

(G)
Schedule D-9, Reconciliation of Jurisdictional
Rate Base and Capital Structure

Southern Bell proposes to provide these data in the revised format shown in Attachment 3, as it did in the November 1991 MMFRs. The original schedule allows no space for an allocation of total company balances to Florida, and assumes that all adjustments are separated using a single factor, which is not the case for Southern Bell.

(H)
Schedule C-11b - Breakdown of Personnel by Department

Southern Bell proposes to revise job titles where the titles listed in the schedule are no longer applicable (Attachment 4).

(I) Schedule C-24f - Independent Company Settlements

The pool data on page 2 of this schedule is prepared from the cost study data submitted by all pool participants. That study is not due until July 1, 1992. Southern Bell proposes to omit page 2 of Schedule C-24f from its May 1 filing, and instead provide the data when they are available this summer.

(J) Additional Minor Changes

In addition, Southern Bell proposes to make minor changes to the following forms:

- (1) Schedule A-6b Add lines for Cash Working Capital and Uncollectibles.
- (2) Schedule A-2a Omit line 7 "Vehicles and Other Work Equipment" (Part 31 account) and renumber lines so rows match A-2d.
- (3) Schedules B-4a and B-4b Add account 2220 and account 2351, and renumber the rows.
- (4) Schedules C-2a and C-2b Correct the calculation description.
- (5) Schedule B-3b Insert an additional column to show Southern Bell "Total Company" data.

Working Capital Materials and Supplies (M & S) Test Year and Two Prior Years Monthly

ATTACHMENT 1

FLORIDA PUBLIC SERVICE COMMISSION

Company

Southern Bell Telephone & Telegraph Co.

Docket No.

Test Year

1991

Schedule B-6a Page of

Witness Responsible

Check Whether Data Is: Historic [X] or Projected [] Average [X] or Year End []

Line		ACCOUNT 1220.1200 Plant Supplies Exempt		ACCOUNT 1220.1100 Plant Supplies Non-Exempt		ACCOUNT 1 Motor Voi Supplic	hicle	ACCOUNT 1220.1400 Central Office, Origination Termination Eqpt New		ACCOUNT 1220.1400 Central Office, Origination Termination EqptReuse		
No.	Year	Month	Consumed	Balanco	Consumed	Relance	Consumed	Balance	Consumed	Balance	Consumed	Belance
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
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1.												
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12.												
13.	Total for	Yoar										
14.	Monthly A	Average for Year										
			ACCOUNT 1220.1500 ACCOUNT 1220.1800				mom. T					
			Company Comm			Stock Held For Reuse		ACCOUNT 1220.1900 Other Material		TOTAL ACCOUNT 1220.1000		
Line			Equipment		3000 100 101 100 100 100 100 100 100 100		And Supplies		Material And Supplies			
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22.												
23.												
24.												
25.												
26.												
27.	Total for	Your										
28.		verage for Year										
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Cost of Equal Access and Network Reconfiguration

FLORIDA PUBLIC SERVICE COMMISSION Company Ducket No. Test Year

Schedule C-28 Page 1 of 1 Witness Responsible

Check Whether Data Is: Historic [] or Projected [] Average [] or Year End []

		Test Year			Test Year - 1			Total to Date		
Investment	Total	interstate	Intrastate	Total	Interstate	Intrastate	Total	Interstate	Intrastate	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	

- 1 General Support
- 2 Central Office Equipment
- 3 Info Orig/Term Equipment
- 4 Cable & Wire Facilities
- 5 Other
- 6 Subtotal (1 thru 5)
- 7 Accumulated depreciation
- 8 Associated deferred taxes
- 9 Unamortized investment tax credits
- 10 Subtotal (6 thru 9)

Expense

- 11 Plant Specific
- 12 Plant Non-specific
- 13 Depreciation
- 14 Customer Services
- 15 Corporate Operations
- 16 Other (includes Part 31 A/C Info.)
- 17 Subtotal (11 thru 16)
- 18
- 19 Total (17 + 18)
- 20 Amortization Amount

Supporting Schedules:	Recap Schedules:

Schedu	le D-9		RECONCILIATION	OF JURISDICTION	IAL RATE BASE AN	Page 1 of 2 Type of Data Shown: Historical Test Year Ended/_/Projected Test Year Ended/_/Prior Test Year Ended/_/_ Witness:				
FLORID COMPAN DOCKET		SSION	average rate ba (as shown on Sc	teconcile the to the D-la) with the teconcile B-lab the correction the dule B-lab the the prior y	the jurisdiction esponding time Provide this so					
Line No	Description	Long-Term Debt	Short-Term Debt	Preferred Stock	Customer Deposits	Common Equity	Tax Credits Zero Cost	Tax Credits Neighted Cost	Deferred Inc. Taxes	Total
	otal Company er Books (000)									
A	llocation Percentage									
F	lorida				****					
A	llocation Percentage									
R	egulated Florida						_ _			
I	ntrastate 1	*********	••	••••						******
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S	pecific Adjustments:									
S	ubtotal						**********			***********
P	'ro Rata Adjustments									
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		**********	************	22 443377 2222			#=====±±£9 \$ #		===== 6372	=======================================

Recap Schedules:

Supporting Schedules:

ichedule I	1-9	SCHEDULE OF PRO-RATA ADJUSTMENTS	Page 2 of 2			
LORIDA PL	BLIC SERVICE COMMISSION	EXPLANATION: List and describe the basis for the pro-rata adjustments appearing on Schedule D-9, page 1 of 2	Type of Data Shown: Historical Test Year Ended _/_/_ Projected Test Year Ended _/_/_ Prior Test Year Ended _/_/_/			
OCKET NO.	:		Witness:			
ine No	Description	Dollar Amount				
		Intrastate (000)				

Supporting Schedules:

Recap Schedules:

Breakdown of Personnel by Department

ATTACHMENT 4

FLORIDA PUBLIC SERVICE COMMISSION

Company

Southern Beil Telephone & Telegraph Co.

Schedule C-116 Page 1 of 1

Docket No.

Test Year

<u> 1991</u>

Witness Responsible:

Check Whether Data Is: Historic [X] or Projected [] Average [X] or Year End []

As of DECEMBER 31, 1991				Contract Personnel						
T :		Total Personnel Company Contract		Salaried						
Line No.	Department						ourly	or		
110.		Company		Supervisory	Other	Regular	Тетрогату	Supervisory	Foreman	Craft
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1.	COMPTROLLERS									
2.	CUSTOMER SERVICES									
3.	EXECUTIVE									
4.	LEGAL									
5.	MARKETING									
6.	NETWORK									
7.	OPERATOR SERVICES									
8.	PERSONNEL									
9.	PROPERTY, PROCUREMENT & SERVICES MANAGEMENT									

TOTAL

10.