LAW OFFICES

McWhirter, Reeves, McGlothlin, Davidson & Bakas

JOHN W. BAKAS, JR.
LEWIS J. CONWELL
LINDA C. DARSEY
C. THOMAS DAVIDSON
ALIGNES S. DAVIS
STEPHES O. DECKER
ENRICO G. GONZALEZ
LESLIE JOUGHIN, III
VICKI GOHDON KAUFMAN
JOSEPH A. MCGLOTHLIN
RICHARD S. MCIVER
JOHN W. MCWHIRTER, JR.
RICHARD W. REEVES
FRANK J. RIEF, III
MATTHEW D. SOYSTER

PAUL A. STRASKE

100 North Tampa Street, Suite 2000 Tampa, Florida 33602-5126

Mailing Address: Tampa P.C. Box 3350, Tampa, Florida 33601-3350

TELEPHONE (813) 224-0866

Fax (813) 221-1854

CABLE GRANDLAW

PLEASE REPLY TO: TALLAHASSEE

February 25, 1994

TALLAHASSEE OFFICE
315 SOUTH CALBOUN STREET
SUTTE 716
TALLAHASSEE, FLORIDA 32301

Telephone (904) 222-2525 Fax (904) 222-5606

FHE COPY

HAND DELIVERED

Mr. Steve Tribble, Director Division of Records and Reporting 101 East Gaines Street Tallahassee, Florida 32399

Re: Docket No. 940001-KI; In Re: Fuel and Purchased Power Cost Recovery Clause and Generating Performance Incentive Factor; Docket No. 940002-EG; In Re: Conservation Cost Recovery Clause; and Docket No. 940042-EI; In Re: Environmental Cost Recovery Clause.

Dear Mr. Tribble:

Enclosed for filing and distribution are the original and 15 copies of the Florida Industrial Power Users Group's Prehearing Statement in Docket No. 940001-EI; the original and 15 copies of the Florida Industrial Power Users Group's Prehearing Statement in Docket No. 940002-EG; and the original and 15 copies of the Florida Industrial Power Users Group's Prehearing Statement in Docket No. 940042-EI.

APP ____ Please acknowledge receipt on the extra copy of each enclosed and return them to me. Thank you for your assistance.

CMU ____

LIN - VGK/bam

OPC Enclosures

RCH SEC 1

WAS ____

OTH ____

Sincerely,

Ja Michigan Kaufman

DOCUMENT NUMBER-DATE

01941 FEB 25 &

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power Cost Recovery Clause and)) Docket No. 940001-EI			
Generating Performance Incentive Factor.)	Filed:	February	25,	1994

THE FLORIDA INDUSTRIAL POWER USERS GROUP'S PREHEARING STATEMENT

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-94-0067-PCO-EI, through its undersigned counsel, files its Prehearing Statement. FIPUG reserves the right to amend this prehearing statement.

A. APPEARANCES:

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

On behalf of the Florida Industrial Power Users Group.

B. WITNESSES:

None known at this time.

C. EXHIBITS:

None at this time.

D. STATEMENT OF BASIC POSITION:

Florida Industrial Power Users Groups' Statement of Basic Position:
None at this time.

E. STATEMENT OF ISSUES AND POSITIONS:

Generic Fuel Adjustment Issues

 ISSUE: What are the appropriate final fuel adjustment trueup amounts for the period April, 1993 through September, 1993?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

DOCUMENT NUMBER-DATE

0 | 94 | FEB 25 å

FPSC-RECORDS/REPORTING

- 2. <u>ISSUE:</u> What are the estimated fuel adjustment true-up amounts for the period October, 1993 through March, 1994?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 3. <u>ISSUE:</u> What are the total fuel adjustment true-up amounts to be collected during the period April, 1994 through September, 1994?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 4. <u>ISSUE:</u> What are the appropriate levelized fuel cost recovery factors for the period April, 1994 through September, 1994?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 5. <u>STIPULATED ISSUE:</u> What should be the effective date of the new fuel adjustment charge, oil backout charge and conservation cost recovery charge for billing purposes?
 - The factor should be effective beginning with the specified fuel cycle and thereafter for the period April, 1994, through September, 1994. Billing cycles may start before April 1, 1994, and the last cycle may be read after September 30, 1994, so that each customer is billed for six months regardless of when the adjustment factor became effective.
 - 6. <u>ISSUE:</u> What are the appropriate fuel recovery loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

7. <u>ISSUE</u>: What are the appropriate fuel cost recovery factors for each rate group adjusted for line losses?

FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Company-Specific Fuel Adjustment Issues

FIPUG: None at this time.

Generic Genciating Perform

8. <u>ISSUE</u>: What is the appropriate GPIF reward or penalty for performance achieved during the period April, 1993 through Sept. 1993?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

9. <u>ISSUE</u>: What should the GPIP targets/ranges be for the period April, 1994 through September, 1994?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Company-Specific GPIF Issues

FIPUG: None at this time.

Generic Oil Rockout V----

- 10. <u>ISSUE</u>: What is the final oil backout true-up amount for the April, 1993 through September, 1993 period?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 11. <u>ISSUE</u>: What is the estimated oil backout true-up amount for the period October, 1993 through March, 1994 period?

- FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 12. <u>ISSUE:</u> What is the total oil backout true-up amount to be collected during the period April, 1994 through September, 1994?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 13. <u>ISSUE:</u> What is the projected oil backout cost recovery factor for the period April, 1994 through September, 1994?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Generic Capacity Cost Recovery Factor Issue

- 14. <u>ISSUE:</u> What is the final capacity cost recovery true-up amount for the October, 1993 through March, 1994 period?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 15. <u>ISSUE:</u> What is the estimated capacity cost recovery true-up amount for the period April, 1994 through September 1994?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 16. <u>ISSUE:</u> What is the total capacity cost recovery true-up amount to be collected during the period October, 1993 through March, 1994?
 - FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

17. <u>ISSUE</u>: What is the total capacity cost recovery true-up amount to be collected during the period October, 1993 through March, 1994?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

18. <u>ISSUE</u>: What is the appropriate capacity cost recovery factor for the period October, 1993 through March, 1994?

FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Company-Specific Issues

FIPUG: None at this time.

F. STIPULATED ISSUES:

None at this time.

G. PENDING MOTIONS:

FIPUG has no pending motions.

H. OTHER MATTERS:

None at this time.

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson & Bakas
315 South Calhoun Street
Suite 716
Tallahassee, Florida 32301

Attorneys for the Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Industrial Power Users Group's Prehearing Statement has been furnished by hand delivery* or by U.S. Mail to the following parties of record this 25th day of February, 1994:

Martha Carter Brown* Division of Legal Services Pla. Public Service Commission Palm City, FL 34990 101 East Gaines Street Tallahassee, FL 32399

G. Edison Holland Jeffrey A. Stone Beggs and Lane Post Office Box 12950 Pensacola, FL 32576

Robert S. Goldman Messer, Vickers, Caparello, Macfarlane Ausley Ferguson
Madsen, Lewis and Metz & McMullen

Macfarlane Ausley Ferguson

Macfarlane Ausley Fergus Post Office Drawer 1876 Tallahassee, FL 32302-1876

Matthew M. Childs Steel, Hector and Davis First Florida Bank Building Suite 601 215 South Monroe Street Tallahassee, FL 32301-1804

Suzanne Brownless 2546 Blairstone Pines Drive Tallahassee, FL 32301

Richard Zambo 598 SW Hidden River Avenue

Jack Shreve, Public Counsel John Roger Howe Office of the Public Counsel The Claude Pepper Building 111 West Madison Street Tallahassee, FL 32301

Lee L. Willis James D. Beasley Post Office Box 391 Tallahassee, FL 32302

James A. McGee Florida Power Corporation Post Office Box 14042 St. Petersburg, FL 33733

Stephen Feldman P.O. Box 0291000 Miami, FL 33102-9100

Vicki Gordon Kaufman