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July 21, 1994

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HAND DELIVERED

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 E. Gaines Street  
Tallahassee, Florida 32301

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

Dear Ms. Bayo:

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 and the original and 15 copies of  
the Florida Industrial Power Users Group's Prehearing Statement in  
Docket No. 940042-EI.

ACK \_\_\_\_\_  
APP \_\_\_\_\_ I have enclosed a diskette containing the above pleadings  
entitled 940001.ps and 940042.ps. Please acknowledge receipt on  
the extra copy of each enclosed and return them to me. Thank you  
for your assistance.

CTR \_\_\_\_\_  
EFG 6. Dudley  
LEG Brown  
MKT 3  
OFC VGK/bam  
RCA \_\_\_\_\_  
SEC / Enclosures  
W.S. \_\_\_\_\_  
QTR \_\_\_\_\_

RECEIVED & FILED  
EPSC-BUREAU OF RECORDS

Sincerely,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

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

) Docket No. 940001-EI  
)  
)  
)

) Filed: July 21, 1994  
)

THE FLORIDA INDUSTRIAL POWER USERS GROUP'S  
PREHEARING STATEMENT

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-94-0818-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 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

1. ISSUE: What are the appropriate final 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.

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FPSC-RECORDS/REPORTING

2. ISSUE: What are the estimated fuel adjustment true-up amounts 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.

3. ISSUE: What are the total fuel adjustment true-up amounts to be collected during the period October, 1994 through March, 1995?

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. ISSUE: What are the appropriate levelized fuel cost recovery factors for the period October, 1994 through March, 1995?

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. STIPULATED ISSUE: 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 October, 1994, through March, 1995. Billing cycles may start before October 1, 1994, and the last cycle may be read after March 31, 1995, so that each customer is billed for six months regardless of when the adjustment factor became effective.

6. ISSUE: 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. ISSUE: What are the appropriate fuel cost recovery factors for each rate group adjusted for line losses?

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.

8. ISSUE: What is the appropriate revenue tax factor to be applied in calculating each company's levelized fuel factor for the projection period of October, 1994 through March, 1995?

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 Fuel Adjustment Issues

Florida Power & Light Company

9. ISSUE: Is FPL's proposed new methodology for allocating fuel costs to the various customer classes appropriate?

FIPUG: Yes. Agree with FPL.

Florida Power Corporation

10a. ISSUE: Should FPC be permitted to recover the costs associated with the accelerated purchase of locomotives?

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.

10b. ISSUE: Is it appropriate for FPC to differentiate fuel charges by metering voltage?

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.

Tampa Electric

11a. ISSUE: Has Tampa Electric Company adequately justified any costs associated with the purchase of coal from Gatliff Coal Company that are in excess of the 1993 benchmark price?

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.

11b. ISSUE: Has Tampa Electric Company adequately justified any costs associated with transportation services provided by affiliates of Tampa Electric Company that are in excess of the 1993 waterborne transportation benchmark price?

ISSUE: 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.

11c. ISSUE: Has Tampa Electric Company prudently administered its contract with Consol Coal Company?

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.

Gulf Power Company

12. ISSUE: What costs, if any, are appropriate for Gulf to recover through the fuel cost recovery clause as a result of the Peabody contract suspension?

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 Generating Performance Incentive Factor Issues

13. ISSUE: What is the appropriate GPIF reward or penalty for performance achieved 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.

14. ISSUE: What should the GPIF targets/ranges be for the period October, 1994 through March, 1995?

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 Oil Backout Issues

15. ISSUE: What is the final oil backout 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.

16. ISSUE: What is the estimated oil backout true-up amount for the period April, 1994 through September, 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.

17. ISSUE: What is the total oil backout true-up amount to be collected during the period October, 1994 through March, 1995?

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. ISSUE: What is the projected oil backout cost recovery factor for the period October, 1994 through March, 1995?

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

19. ISSUE: 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.

20. ISSUE: 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.

21. ISSUE: What is the total capacity cost recovery true-up amount to be collected during the period October, 1994 through March, 1995?

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.

22. ISSUE: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period October, 1994 through March, 1995?

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.

23. ISSUE: What is the appropriate capacity cost recovery factor for the period October, 1994 through March, 1995?

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 Capacity Cost Recovery Issues

##### Florida Power and Light

24a. ISSUE: Was it appropriate for FPL to change the amount of annual capacity credit associated with the St. Johns River Power Park from \$63,975,761 to \$56,945,592?

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.

24b. ISSUE: How should FPL recover capacity costs from customers who take standby power?

FIPUG: Agree with FPL.

Tampa Electric Company

25a. ISSUE: Other than economy sales and revenues from the seven entities that were separated out in TECO's last rate case, should Tampa Electric credit all nonfuel revenues from off-system sales back to the retail ratepayers through the fuel adjustment clause and the capacity cost recovery clause?

FIPUG: Yes.

F. STIPULATED ISSUES:

None at this time.

G. PENDING MOTIONS:

FIPUG has no pending motions.

H. OTHER MATTERS:

None at this time.

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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 21st day of July, 1994:

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