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OF COUNSEL:  
CHRISTINE E. EARLE

February 13, 1995

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. ~~950001~~-EI, Fuel and Purchased Power Cost  
Recovery Clause and Generating Performance Incentive  
Factor.

Docket No. 950002-EG, Conservation Cost Recovery Clause.

Docket No. 950007-EI, Environmental Cost Recovery Clause.

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and 15  
copies each of the Florida Industrial Power Users Group's  
Prehearing Statements, in the above dockets. Also enclosed is a  
diskette containing the pleadings.

Please acknowledge receipt on the extra copies enclosed and  
return them to me. Thank you for your assistance.

Sincerely,

*Vicki Gordon Kaufman*

Vicki Gordon Kaufman

VGK/jfg

Enclosures

*950001*  
DOCUMENT NUMBER-DATE  
01671 FEB 13 1995  
FPSC-RECORDS/REPORTING

*950002*  
DOCUMENT NUMBER-DATE  
~~01669~~  
01672 FEB 13 1995  
FPSC-RECORDS/REPORTING

*950007*  
DOCUMENT NUMBER-DATE  
01670 FEB 13 1995  
FPSC-RECORDS/REPORTING

ORIGINAL  
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 950001-EI  
Filed: February 13, 1995

FLORIDA INDUSTRIAL POWER  
USERS GROUP'S PREHEARING STATEMENT

Pursuant to Order No. PSC-95-0106-PCO-EI, the Florida Industrial Power Users Group files its 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

ISSUE 1: What are the appropriate final fuel adjustment true-up amounts for the period April, 1994 through September, 1994?

RECEIVED & FILED  
FPC RECORDS/REPORTING

DOCUMENT NUMBER-DATE  
01671 FEB 13 95  
FPC-RECORDS/REPORTING

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.

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

ISSUE 3: What are the total fuel adjustment true-up amounts to be collected during the period April, 1995 through September, 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.

ISSUE 4: What are the appropriate levelized fuel cost recovery factors for the period April, 1995 through September, 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.

ISSUE 5 (Stipulated): 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, 1995, through September, 1995. Billing cycles may start before April 1, 1995, and the last cycle may be read after September 30, 1995, 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?

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.

ISSUE 7: 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.

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 April, 1995 through September 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.

ISSUE 9: Is it appropriate to recover the cost of SO<sub>2</sub> emission allowances through the Fuel and Purchased Cost Recovery Clause?

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 and Light Company

ISSUE 10A: Is FPL's proposed new methodology for allocating fuel costs to the various customer classes appropriate?

FIPUG: Yes. Agree with FPL.

ISSUE 10B: Is it appropriate for Florida Power and Light Company to recover \$2,754,502 for modifications made to generating units through the fuel and Purchase Power Cost Recovery Clause?

FIPUG: No. These costs should be recovered through base rates.

#### Generic Generating Performance Incentive Factor Issues

ISSUE 11: What is the appropriate GPIF reward or penalty for performance achieved 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.

ISSUE 12: What should the GPIF targets/ranges be for the period April, 1995 through September, 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 GPIF Issues

##### Florida Power and Light Company

ISSUE 13: Should the forced outage hours for St. Lucie Unit 1 be adjusted to remove the outage hours caused by the June 6, 1994 severe thunderstorm?

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

ISSUE 14: What is the final oil backout true-up amount for the 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.

ISSUE 15: What is the estimated oil backout true-up amount 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.

ISSUE 16: What is the total oil backout true-up amount to be collected during the period April, 1995 through September, 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.

ISSUE 17: What is the projected oil backout cost recovery factor for the period April, 1995 through September, 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 Issues

ISSUE 18: What is the appropriate final 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.

ISSUE 19: What is the estimated capacity cost recovery true-up amount 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.

ISSUE 20: What is the total capacity cost recovery true-up amount to be collected during the period April, 1995 through September, 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.

ISSUE 21: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period April, 1995 through September, 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.

ISSUE 22: What are the projected capacity cost recovery factors for the period April, 1995 through September, 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 Corporation

ISSUE 22A: Is it appropriate for Florida Power Corporation to combine the capacity cost responsibilities of its RS and GS non-demand rate classes in the capacity cost recovery clause?

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 Company

ISSUE 22B: Should the \$1,106,760 "Option Payment" that Tampa Electric received from Polk in 1993 be treated as a credit in the capacity cost recovery clause?

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.

ISSUE 22C: 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.

*Vicki Gordon Kaufman*

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Attorneys for the Florida  
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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 13th day of February, 1995:

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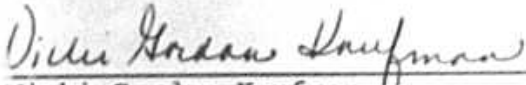
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