

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause.) DOCKET NO. 950007-EI) FILED: July 12, 1995

FLORIDA INDUSTRIAL POWER USERS GROUP'S PREHEARING STATEMENT

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-95-0771-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, Rief and Bakas, 117 South Gadsden Street, 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 Group's Statement of Basic Position:

None at this time.

E. STATEMENT OF ISSUES AND POSITIONS:

1. ISSUE: What are the appropriate final environmental cost recovery true-up amounts for the period ending March 31, 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.

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2. ISSUE: What are the estimated environmental cost recovery true-up amounts 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.
3. ISSUE: What are the total environmental cost recovery 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.
4. ISSUE: What are the appropriate projected environmental cost amounts for the period October, 1995 through March, 1996?
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. ISSUE: What should be the effective date of the new environmental cost recovery factors for billing purposes?
FIPUG: The factor should be effective beginning with the specified environmental cost recovery cycle and thereafter for the period October, 1995 through March, 1996. Billing cycles may start before October 1, 1995, and the last cycle may be read after March 31, 1996, so that each customer is billed for six months regardless of when the adjustment factor became effective.
6. ISSUE: What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery true-up amounts to be collected during the period October, 1995 through March, 1996?
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: Should the Commission approve the recovery of the cost for dismantlement associated with investments for approved projects through the Environmental 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.
8. ISSUE: How should the newly proposed environmental costs be allocated to the rate classes?
- 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. ISSUE: What are the appropriate Environmental Cost Recovery Factors for the period October, 1995 through March, 1996 for each rate group?
- 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 Environmental Cost Recovery Issues

Florida Power & Light Company

- 10a. ISSUE: Should the Commission approve Florida Power & Light's request to recover the cost of the National Pollutant Discharge Elimination System permit fees to the Florida Department of Environmental Protection pursuant to Rule 62-4.052, Florida Administrative Code, through the Environmental 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.
- 10b. ISSUE: Should the Commission approve Florida Power & Light Company's request to recover the cost of fuel discharge response and clean-up activities pursuant to Florida Department of Environmental Protection Rule 17-762.820, Florida Administrative Code, through the Environmental 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.

Gulf Power Company

- 11a. ISSUE: What is the appropriate amount, if any, of dismantlement costs associated with Gulf Power Company's approved investments to be recovered through the Environmental 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.

- 11b. ISSUE: Should the Commission approve Gulf Power Company's request to recover the cost of the National Pollutant Discharge Elimination System permit fees to the Florida Department of Environmental Protection pursuant to Rule 62-4.052, Florida Administrative Code, through the Environmental 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.

- 11c. ISSUE: Should the Commission approve Gulf Power Company's request to recover the cost of compliance with the Florida Department of Environmental Protection Rule 17-551, Florida Administrative Code, Control of Lead and Copper through the Environmental 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.

- 11d. ISSUE: Should the Commission approve Gulf Power Company's request to recover the costs of the mobile equipment purchase for Substation Contamination Investigation through the Environmental Cost Recovery Clause?

- 11e. ISSUE: Should the Commission approve recovery of Gulf Power Company's costs of Generation Steam Studies through the Environmental 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.

- 11f. ISSUE: Should the Commission approve recovery of Gulf Power Company's costs of Climate Challenge through the Environmental 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.

11g. ISSUE: What adjustment, if any, should be made to address the resolution of the O&M expenses identified in Disclosure No. 3 of the PSC Audit Report for the six-month period ended March 31, 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.

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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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 12th day of July, 1995.

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