

# STATE OF FLORIDA OFFICE OF THE PUBLIC COUNSEL

ORIGINAL

c/o The Florida Legislature 111 West Madison St. Room 812 Tallahassee, Florida 32399-1400 850-488-9330

November 9, 2001



Ms. Blanca S. Bayó, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0870

RE: Docket No. 010001-EI

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Public Counsel's Supplemental Prehearing Statement in the above-referenced docket.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Robert D. Vandiver Associate Public Counsel

RDV/dsb

**Enclosures** 

APP
CAF
CMP
COMP
COTR
ECR
LEG
OPC
PAI
RGO
SEC
SERI
OTH

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

14287 NOV-95

FPSC-COMMISSION CLERK

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power	)	
Cost Recovery Clause with	)	DOCKET NO. 010001-EI
Generating Performance Incentive	)	FILED: November 9, 2001
Factor	)	
	)	

## SUPPLEMENTAL PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through their attorney, the Public Counsel, hereby file this Supplemental Prehearing Statement:

#### **Security Costs**:

<u>ISSUE 17B</u>: Should the Commission allow recovery of the investor owned utilities' incremental

security costs, related to recent increased national security concerns, through the Fuel and Purchased Power Cost Recovery Clause, on either an interim or permanent basis?

OPC: No. Such costs should be recovered through base rates.

<u>ISSUE 18K</u>: If the Commission votes in the affirmative on Issue 17B, what is the appropriate level

of FPL 2002 incremental security costs, related to recent increased national security concerns, allowed for recovery through the Fuel and Purchased Power Cost Recovery

Clause?

OPC: No position at this time.

DOCUMENT NUMBER-DATE

### **Revised Forecasts**

ISSUE 17C:

Should the Commission require the investor owned utilities' levelized fuel cost recovery factors and the purchased power capacity cost recovery factors for the period January, 2002 through December, 2002 to be based on updated energy, demand, and price forecasts that include the economic impact of increased national security concerns since September 11, 2001?

OPC:

No position at this time.

Respectfully submitted,

Jack Shreve Public Counsel

Robert D. Vandiver Associate Public Counsel

Office of the Public Counsel c/o The Florida Legislature 111 West Madison Street Tallahassee, Florida 32399-1400 (850) 488-9330

Attorneys for the Citizens of the State of Florida

## CERTIFICATE OF SERVICE DOCKET NO. 000001-EI

I HEREBY certify that a copy of the foregoing SUPPLEMENTAL PREHEARING

STATEMENT OF THE OFFICE OF PUBLIC COUNSEL has been served by \*hand delivery or U.S.

Mail to the following parties of record on this 9th day of November, 2001.

William Cochran Keating, Esquire\*
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370, Gunter Building
Tallahassee, Florida 32399-0872

Matthew M. Childs, P.A. Steel Hector & Davis, LLP 215 South Monroe Street Suite 601 Tallahassee, Florida 32301-1804

John W. McWhirter, Jr., Esquire McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. Post Office Box 3350 Tampa, Florida 33601-3350

Jeffrey A. Stone, Esquire Russell A. Badders, Esquire Beggs & Lane Post Office Box 12950 Pensacola, Florida 32576-2950

George Bachman
Florida Public Utilities
Post Office Box 3395
West Palm Beach, FL 33402-3395

Joseph A. McGlothlin, Esquire Vicki Gordon Kaufman, Esquire McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 South Gadsden Street Tallahassee, Florida 32301

Lee L. Willis, Esquire James D. Beasley, Esquire Ausley & McMullen Post Office Box 391 Tallahassee, Florida 32302

Suzanne Brownless, Esquire Suzanne Brownless, P.A. 1311-B Paul Russell Road Suite 201 Tallahassee, Florida 32301

James A. McGee, Esquire Florida Power Corporation Post Office Box 14042 St. Petersburg, Florida 33733-4042

Norman Horton, Esquire Messer Law Firm Post Office Box 1876 Tallahassee, FL 32302-1876 Kenneth A. Hoffman, Esquire Rutledge, Ecenia, Underwood, Purnell, & Hoffman, P.A. Post Office Box 551 Tallahassee, FL 32302-0551 Susan D. Ritenour
Assistant Secretary & Assistant Treasurer
Rates & Regulatory Matters
Gulf Power Company
One Energy Place
Pensacola, FL 32520

Robert D. Vandiver

Associate Public Counsel