

STEEL ■  
HECTOR  
■ DAVIS  
INTERNATIONAL™

Steel Hector & Davis LLP  
200 South Biscayne Boulevard  
Suite 4000  
Miami, FL 33131-2398  
305.577.7000  
305 577 7001 Fax  
www.steelhector.com

John T. Butler  
305 577 2939  
jbutler@steelhector.com

October 14, 2003

**-VIA FEDERAL EXPRESS-**

Blanca S. Bayó  
Director, Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

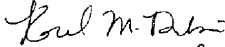
**Re: Docket No. 030001-EI**

Dear Ms. Bayó

I am enclosing for filing in the above docket the original and seven (7) copies of Florida Power & Light Company's Prehearing Statement, together with a diskette containing the electronic version of same. The enclosed diskette is HD density, the operating system is Windows 2000, and the word processing software in which the documents appear is Word 2000.

If there are any questions regarding this transmittal, please contact me at 305-577-2939.

Very truly yours,

  
John T. Butler *for JTB*

Enclosure

cc: Counsel for Parties of Record (w/encl.)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: Fuel and Purchased Power )  
Cost Recovery Clause and )  
Generating Performance )  
Incentive Factor )

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DOCKET NO. 030001-EI  
FILED: OCTOBER 15, 2003

**FLORIDA POWER & LIGHT COMPANY'S  
PREHEARING STATEMENT**

Pursuant to Order No. PSC-03-0113-PCO-EI, issued January 21, 2003, as amended by Order No. PSC-03-0427-PCO-EI, issued March 28, 2003 establishing the prehearing procedure in this docket, Florida Power & Light Company ("FPL") hereby submits its Prehearing Statement.

**A. APPEARANCES**

John T. Butler, Esq.  
STEEL HECTOR & DAVIS LLP  
200 South Biscayne Boulevard  
Suite 4000  
Miami, Florida 33131-2398  
Telephone: (305) 577-2939  
Attorneys for Florida Power  
& Light Company

R. Wade Litchfield, Esq.  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
Telephone 561-691-7101

**B. WITNESSES**

<u>WITNESS</u>	<u>SUBJECT MATTER</u>	<u>ISSUES</u>
G. Yupp	Fuel Adjustment	1 - 9
J. R. Hartzog	True-Up	1 - 9
K. M. Dubin	and Projections	1 - 9
K. M. Dubin	Benchmark Levels for Gains Eligible for Shareholder Incentive	10 - 11

G Yupp K. M. Dubin	Hedging, Risk Management, Fuel Procurement	12, 14a-14b
K. M. Dubin	Plant Scherer Railcars	14c
F. Inzarry	GPIF Reward, Targets / Ranges	18-19
K. M. Dubin	Capacity Cost Recovery True-Up and Projections	24-29
K. M. Dubin	Incremental Plant Security Expenses	30-32A

C. **EXHIBITS**

<b><u>EXHIBITS</u></b>	<b><u>WITNESS</u></b>	<b><u>DESCRIPTION</u></b>
(GY-1)	G. Yupp	Appendix I/ Fuel Cost Recovery Forecast Assumptions
(KMD-1 and KMD-2)	K. M. Dubin	Appendix I and II Fuel Cost Recovery and Capacity Cost Recovery – Final True-up Calculation – January, 2002 through December, 2002
(KMD-3 and KMD-4)	K. M. Dubin	Appendix I and II/Fuel Cost Recovery and Capacity Cost and Recovery Estimated/Actual True-up for January, 2003 through December, 2003
(KMD-5)	G. Yupp K. M. Dubin J. R. Hartzog	Appendix II/Fuel Cost Recovery E Schedules, Levelized Fuel Cost Recovery Factors for January, 2004 through December, 2004
(KMD-6)	K. M. Dubin	Appendix III / Capacity Cost Recovery Factors for January, 2004 through December, 2004
(FI-1)	F. Inzarry	GPIF, Performance Results January, 2002 through December, 2002

(FI-2)

F. Irizarry

GPIF, Targets and Ranges,  
January, 2004 through  
December, 2004

D. **STATEMENT OF BASIC POSITION**

None necessary.

**E. STATEMENT OF ISSUES AND POSITIONS**

**FUEL ADJUSTMENT ISSUES**

**ISSUE 1:** What are the appropriate final fuel adjustment true-up amounts for the period January, 2002 through December, 2002?

**FPL:** \$72,467,176 under-recovery This amount was included in the midcourse correction that became effective in April 2003. (DUBIN)

**ISSUE 2:** What are the appropriate estimated/actual fuel adjustment true-up amounts for the period January, 2003 through December 2003?

**FPL:** \$344,729,859 under-recovery (DUBIN)

**ISSUE 3:** What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January, 2004 through December, 2004?

**FPL:** \$344,729,859 under-recovery (DUBIN)

**ISSUE 4:** What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January, 2004 through December, 2004?

**FPL:** 1.01597. (DUBIN)

**ISSUE 5:** What are the appropriate projected net fuel and purchased power cost recovery amounts to be included for the period January, 2004 through December, 2004?

**FPL:** \$3,380,102,249. (DUBIN)

**ISSUE 6:** What are the appropriate levelized fuel cost recovery factors for the period January, 2004 through December, 2004?

**FPL:** 3.742 cents/kWh. (DUBIN)

**ISSUE 7:** What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

**FPL:** The appropriate Fuel Cost Recovery Loss Multipliers are provided in response to Issue No. 8 (DUBIN)

**ISSUE 8:** What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

**FPL:**

GROUP	RATE SCHEDULE	AVERAGE FACTOR	FUEL RECOVERY LOSS MULTIPLIER	FUEL RECOVERY FACTOR
A	RS-1,GS-1,SL2	3.742	1.00206	3.750
A-1*	SL-1,OL-1,PL-1	3.670	1.00206	3.678
B	GSD-1	3.742	1.00199	3.749
C	GSLD-1 & CS-1	3.742	1.00093	3.745
D	GSLD-2,CS-2,OS-2 & MET	3.742	.99366	3.718
E	GSLD-3 & CS-3	3.742	.95529	3.575
GROUP	RATE SCHEDULE	AVERAGE FACTOR	FUEL RECOVERY LOSS MULTIPLIER	FUEL RECOVERY FACTOR
A	RST-1,GST-1			
	ON-PEAK	4.081	1.00206	4.090
	OFF-PEAK	3.591	1.00206	3.599
B	GSDT-1,CILC-1(G)			
	ON-PEAK	4.081	1.00199	4.090
	OFF-PEAK	3.591	1.00199	3.598
C	GSLDT-1 & CST-1			
	ON-PEAK	4.081	1.00093	4.085
	OFF-PEAK	3.591	1.00093	3.595
D	GSLDT-2 & CST-2			
	ON-PEAK	4.081	.99497	4.061
	OFF-PEAK	3.591	.99497	3.573
E	GSLDT-3,CST-3			
	CILC-1(T)&ISST-1(T)			
	ON-PEAK	4.081	.95529	3.899
	OFF-PEAK	3.591	.95529	3.431

F	CILC-1(D) & ISST-1(D)			
	ON-PEAK	4.081	.99317	4.054
	OFF-PEAK	3.591	.99317	3.567

\*WEIGHTED AVERAGE 16% ON-PEAK AND 84% OFF-PEAK (DUBIN)

**ISSUE 9:** What should be the effective date of the fuel adjustment charge and capacity cost recovery charge for billing purposes?

**FPL:** The Company is requesting that the new Fuel Cost Recovery and Capacity Cost Recovery Factors should become effective with customer bills for January, 2004 through December, 2004. This will provide 12 months of billing on the Fuel Cost Recovery and Capacity Cost Recovery Factors for all customers. (DUBIN)

**ISSUE 10:** What are the appropriate actual benchmark levels for calendar year 2003 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**FPL:** \$21,657,720. (DUBIN)

**ISSUE 11:** What are the appropriate estimated benchmark levels for calendar year 2004 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**FPL:** \$13,554,731 subject to adjustments in the April 2004 filing to include all actual data for the year 2003. (DUBIN)

**ISSUE 12:** What is the appropriate base level for operation and maintenance expenses for non-speculative financial and/or physical hedging programs to mitigate fuel and purchased power price volatility?

**FPL:** There is no one general base level that would be appropriate for the expanded hedging program. Each category of cost requested for recovery must be evaluated on a case by case, item by item basis to determine what portion, if any, of that category of cost was included in FPL's 2002 MFRs. (DUBIN)

#### COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

**ISSUE 14a:** Were Florida Power & Light's actions through July 31, 2003, to mitigate fuel and purchased power price volatility through implementation of its non-speculative financial and/or physical hedging programs prudent?

**FPL:** Yes. FPL has prudently implemented hedging strategies throughout 2003 consistent with its market view and hedging capabilities. The severe spikes in natural gas prices and cooling-degree days in the first quarter of 2003 could not have been predicted from the fundamentals in the market at the time FPL put its hedges in place for that period. In response to the fundamental market changes that were seen in early 2003, FPL has been increasing its hedging activity for the remainder of 2003 and for 2004, consistent with the presentation that FPL made to the parties in this docket (No. 030001-EI) on June 30, 2003. (YUPP)

**ISSUE 14b:** Are Florida Power & Light's actual and projected operation and maintenance expenses for 2002 through 2004 for its non-speculative financial and /or physical hedging programs to mitigate fuel and purchased power price volatility reasonable for cost recovery purposes?

**FPL:** Yes. Since the inception of its expanded hedging program in 2002, FPL has prudently managed the program to increase the sophistication of its market analysis, forecasting, trade monitoring, and risk management capabilities. This is facilitating the expansion of FPL's hedging activities on a well-informed and well-controlled basis. None of the disclosures in Staff's audit warrants an adjustment to FPL's hedging program expenses (YUPP, DUBIN)

**ISSUE 14c:** Should the Commission approve FPL's request to recover the cost for 137 additional railcars to deliver coal to Plant Scherer?

**FPL:** Yes. These railcars are necessary to provide transportation for low cost powder river basin coal for Plant Scherer Unit 4. (YUPP, DUBIN)

#### **GENERATING PERFORMANCE INCENTIVE FACTOR (GPIF) ISSUES**

**ISSUE 18:** What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January, 2002 through December, 2002 for each investor-owned electric utility subject to the GPIF?

**FPL:** \$7,449,429 reward. (IRIZARRY)

**ISSUE 19:** What should the GPIF target/ranges be for the period January, 2004 through December, 2004 for each investor-owned electric utility subject to the GPIF?

**FPL:** The targets and ranges should be as set forth in the Testimony and Exhibits of F. Irizarry including the following.



PLANT/UNIT	EAF TARGET (%)	HEAT RATE HR. TARGET (BTU/KWH)
CAPE CANAVERAL 2	89.8	9528
LAUDERDALE 4	79.6	7473
LAUDERDALE 5	89.5	7467
MANATEE 1	93.7	10,427
MANATEE 2	75.2	10,384
MARTIN 1	91.5	10,130
MARTIN 2	92.1	10,086
MARTIN 3	94.6	6885
MARTIN 4	92.0	6844
PORT EVERGLADES 3	92.7	9819
PORT EVERGLADES 4	89.7	9859
SCHERER 4	84.0	10,189
ST. LUCIE 1	86.8	10,860
ST. LUCIE 2	85.4	10,900
TURKEY POINT 3	75.8	11,140
TURKEY POINT 4	93.6	11,134

(IRIZARRY)

#### GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

**ISSUE 24:** What are the appropriate final capacity cost recovery true-up amounts for the period January, 2002 through December, 2002?

**FPL:** \$12,676,723 over-recovery. (DUBIN)

**ISSUE 25:** What are the appropriate estimated/actual capacity cost recovery true-up amounts for the period January, 2003 through December, 2003?

**FPL:** \$16,048,425 over-recovery. (DUBIN)

**ISSUE 26:** What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January, 2004 through December, 2004?

**FPL:** \$28,725,148 over-recovery (DUBIN)

**ISSUE 27:** What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January, 2004 through December, 2004?

**FPL:** \$665,069,770 (DUBIN)

**ISSUE 28:** What are the appropriate jurisdictional separation factors to be applied to determine the capacity costs to be recovered during the period January, 2004 through December, 2004?

**FPL:** The appropriate jurisdictional separation factors are  
 FPSC 98.84301%  
 FERC 115699% (DUBIN)

**ISSUE 29:** What are the appropriate capacity cost recovery factors for the period January, 2004 through December, 2004?

**FPL:**

RATE CLASS	CAPACITY RECOVERY FACTOR (\$/KW)	CAPACITY RECOVERY FACTOR (\$/KWH)
RS1	-	.00625
GS1	-	.00613
GSD1	2.35	-
OS2	-	.00603
GSLD1/CS1	2.39	-
GSLD2/CS2	2.30	-
GSLD3/CS3	2.25	-
CILCD/CILC	2.37	-
G		
CILCT	2.33	-
MET	2.38	-
OL1/SL1/PL1	-	.00170
SL2	-	.00410

RATE CLASS	CAPACITY RECOVERY FACTOR (RESERVATION DEMAND CHARGE) (\$/KW)	CAPACITY RECOVERY FACTOR (SUM OF DAILY DEMAND CHARGE) (\$/KW)
ISST1D	.29	.14
SST1T	.27	.13
SST1D	.28	.13

(DUBIN)

**ISSUE 30:** What is the appropriate period to establish a base line for incremental post-September 11, 2001, security expenses?

**FPL:** For the purpose of comparing incremental power plant security costs to base costs, the appropriate comparison is to FPL's 2002 MFRs. (DUBIN)

**ISSUE 31:** What is the appropriate base line for operational and maintenance expenses for post-September 11, 2001, security measures?

**FPL:** There were no incremental power plant security expenses resulting from the events of September 11, 2001, or from Homeland Security responses included in FPL's 2002 MFRs. Therefore, there is no need to compare such expenses to a "base line" to determine the appropriate amount to be recovered through the Capacity Cost Recovery Factor. None of the disclosures in Staff's audit warrants an adjustment to the manner in which FPL determines incremental power plant security expenses. (DUBIN)

**ISSUE 32A:** Are Florida Power & Light's actual and projected expenses for 2002 through 2004 for its post-September 11, 2001, security measures reasonable for cost recovery purposes?

**FPL:** Yes All the post-September 11, 2001 security costs that FPL is seeking recovery for are required by NRC Orders, Coast Guard Rule and/ or recommendations from the Department of Homeland Security authorities None of the disclosures in Staff's audit warrants an adjustment to the manner in which FPL determines incremental power plant security expenses (DUBIN)

#### **WITNESSES AND SUBJECT MATTER**

<b>WITNESS</b>	<b>SPONSOR</b>	<b>SUBJECT MATTER</b>	<b>EXHIBIT TITLES</b>
G. YUPP	FPL	Fuel Cost Recovery Forecast Assumptions	GY-1
K. M. DUBIN	FPL	Fuel Cost Recovery and Capacity Cost Recovery Estimated/Actual True-Up January, 2003 through December, 2003	KMD-3 KMD-4
G YUPP K. M. DUBIN	FPL FPL	Levelized Fuel Cost Recovery Factors for January, 2004 through	KMD-5

J. R. HARTZOG	FPL	December, 2004	
K. M. DUBIN	FPL	Capacity Cost Recovery Factors for January, 2004 through December, 2004	KMD-6
K. M. DUBIN	FPL	Levelized Fuel Cost Recovery and Capacity Cost Recovery Final True-up for January, 2002 Through December, 2002	KMD-1 KMD-2
F. IRIZARRY	FPL	GPIF, Performance Results January, 2002 – December, 2002	FI-1
F. IRIZARRY	FPL	GPIF, Incentive Factor Targets & Ranges January, 2004 – December, 2004	FI-2

**F. STATEMENT OF LEGAL ISSUES AND POSITIONS**

**FPL:** None at this time.

**G. STATEMENT OF POLICY ISSUES AND POSITIONS**

**FPL:** None at this time.

**H. STIPULATED ISSUES**

**FPL:** None at this time.

**I. PENDING MOTIONS**

FPL has no outstanding motions at this time.

**J. PENDING REQUEST FOR CONFIDENTIALITY**

Florida Power & Light Company's Request for Confidential Classification for specified responses to Staff's First Set of Interrogatories and Staff's First Request for Production of Documents, filed on September 24, 2001, pending. FPL anticipates that it will file a further request for confidential classification with respect to the testimony and exhibits of Staff witness Kathy Welch.

**K. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE**

There are no requirements of the Order Establishing Procedure with which FPL can not comply.

Respectfully submitted,

R. Wade Litchfield, Esq.  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
Telephone: (561) 691-7101

STEEL HECTOR & DAVIS LLP  
200 South Biscayne Boulevard  
Suite 4000  
Miami, Florida 33131-2398  
Telephone: (305) 577-2939  
Attorneys for Florida Power  
& Light Company

By: Carol M. Ruiz for JTB  
John T. Butler, Esq.  
Florida Bar No. 283479

**CERTIFICATE OF SERVICE**

**Docket No. 030001-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by Federal Express (\*) or United States Mail on the 14<sup>th</sup> day of October, 2003, to the following:

Wm. Cochran Keating, IV, Esq. (\*)  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Robert Vandiver, Esq.  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399

Lee L. Willis, Esq.  
James D. Beasley, Esq.  
Ausley & McMullen  
Attorneys for Tampa Electric  
P.O. Box 391  
Tallahassee, Florida 32302

James A. McGee, Esq.  
Progress Energy Florida, Inc.  
P.O. Box 14042  
St. Petersburg, Florida 33733

Joseph A. McGlothlin, Esq.  
Vicki Gordon Kaufman, Esq.  
McWhirter, Reeves, McGlothlin,  
Davidson, et al.  
Attorneys for FIPUG  
117 South Gadsden Street  
Tallahassee, Florida 32301

Norman H. Horton, Esq.  
Floyd R. Self, Esq.  
Messer, Caparello & Self  
Attorneys for FPUC  
215 South Monroe Street, Suite 701  
Tallahassee, Florida 32302-0551

John W. McWhirter, Jr., Esq.  
McWhirter, Reeves, McGlothlin,  
Davidson, et al.  
Attorneys for FIPUG  
P O. Box 3350  
Tampa, Florida 33602

Jeffrey A. Stone, Esq.  
Russell A. Badders, Esq.  
Beggs & Lane  
Attorneys for Gulf Power  
P.O. Box 12950  
Pensacola, Florida 32576-2950

By:     *Kevin M. Butler*     for JTB  
John T. Butler