

Ruth Nettles

From: Woods, Vickie [vf1979@att.com]
Sent: Friday, February 01, 2008 12:29 PM
To: Filings@psc.state.fl.us
Subject: 070300/070304-EI AT&T Florida's Prehearing Statement
Attachments: 070300_0.pdf; LEGAL-#702795-v1-070300_070304-EI_Prehearing_Statement.DOC

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B. Docket No. 070300-EI

Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C. submitted by Florida Public Utilities Company

Docket No. 070304-EI

Petition for rate increase by Florida Public Utilities Company

- C. AT&T Florida
on behalf of Tracy W. Hatch and Jennifer S. Kay
- D. 25 pages total (includes letter, certificate of service and pleading)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Prehearing Statement

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February 1, 2007

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No.: 070300-EI: Review of 2007 Electric Infrastructure
Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C.
submitted by Florida Public Utilities Company**

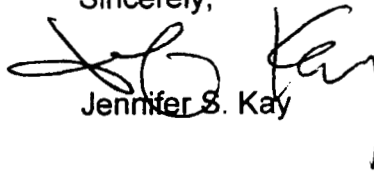
**Docket No. 070304-EI: Petition for rate increase by Florida
Public Utilities Company**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's
Prehearing Statement, which we ask that you file in the captioned dockets.

Copies have been served to the parties shown on the attached Certificate of
Service.

Sincerely,



Jennifer S. Kay

cc: All Parties of Record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.
Lisa S. Foshee

CERTIFICATE OF SERVICE
Docket Nos. 070300-EI and 070304-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 1st day of February, 2008 to the following:

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Jennifer S. Kay

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Florida Public Utilities Company. | DOCKET NO. 070300-EI

In re: Petition for rate increase by Florida Public Utilities Company. | DOCKET NO. 070304-EI

Filed: February 1, 2008

AT&T FLORIDA'S PREHEARING STATEMENT

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), in compliance with the Order No. PSC-07-0647-PCO-EI Order Consolidating Dockets for Hearing issued on August 9, 2007 and Order No. PSC-07-0811-PCO-EI issued on October 8, 2007, hereby submits its Prehearing Statement for Dockets Nos. 070300-EI and 070304-EI.

A. Witnesses

AT&T FLORIDA proposes to call the following witness to offer testimony on the issues in this docket:

Kirk Smith - AT&T FLORIDA filed the Direct Testimony of Kirk Smith to explain the Process to Engage Third-Party Attachers (attached to the Testimony as Exhibit KS-1) and its value. In an abundance of caution, to the extent the Process to Engage Third-Party Attachers is deemed relevant to any or all of Issues 1-13, AT&T FLORIDA offers Kirk Smith's Testimony for those issues.

AT&T FLORIDA reserves the right to call additional witnesses to respond to Florida Public Service Commission ("Commission") inquiries, to issues raised by Florida

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Public Utilities Company (“FPUC”) or the Office of Public Counsel (“OPC”) in rebuttal testimony, to issues not raised in AT&T Florida’s direct testimony, and to address issues not designated that may be designated by the Prehearing Officer at the prehearing conference to be held on February 11, 2008. Accordingly, AT&T Florida reserves the right to supplement and revise this list as appropriate.

B. Exhibits

- * KS-1 attached to Direct Testimony of Kirk Smith
Process to Engage Third-Party Attachers
- * All responses filed by any party in response to discovery issued by AT&T Florida or any other party.
- * AT&T Florida’s responses to discovery issued by any party.
- * All transcripts of any deposition that may take place prior to the discovery cut-off date.

AT&T Florida expressly reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section “A” above. AT&T Florida expressly reserves the right to utilize any exhibits introduced by any party or AT&T Florida and the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

As a result of cooperative, good faith negotiations, AT&T Florida, FPUC, Embarq Florida, Inc., and Florida Cable Telecommunications Association have reached an agreement wherein these parties have committed that they will support the jointly developed terms and conditions contained in the Process to Engage Third-Party

Attachers, a copy of which is attached to Kirk Smith's Direct Testimony as Exhibit KS-1. OPC has indicated that it has no objection to the stipulation.

In addition, based on AT&T Florida's review of the project details that FPUC has included in its Storm Hardening Plan filed with the Commission on July 3, 2007 (the "Plan"), and with the agreement between the above-referenced parties to support the Process to Engage Third-Party Attachers, AT&T Florida has no objections to FPUC's Plan at this time. AT&T Florida has filed testimony to explain the Process to Engage Third-Party Attachers and its value. AT&T Florida respectfully requests that the Commission approve the Process to Engage Third-Party Attachers in its Order in this docket.

D. AT&T Florida's Position on the Issues

As previously stated, based on AT&T Florida's review of the project details that FPUC has included in its Plan and with the agreement between the parties referenced in Section "C" above to support the Process to Engage Third-Party Attachers, AT&T Florida takes no position on Issues 1 through 144 at this time. AT&T Florida reserves the right to raise objections regarding FPUC's Plan as AT&T Florida receives more detailed information about specific projects, as contemplated by Rule 25-06342(7) and the Process to Engage Third-Party Attachers.

ISSUE 1: Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0345(2), F.A.C.? [Rule 25-6.0342(3)(a)]

POSITION: AT&T Florida has no position at this time.

ISSUE 2: Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)]

POSITION: AT&T Florida has no position at this time.

ISSUE 3: Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]

POSITION: AT&T Florida has no position at this time.

ISSUE 4: Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations? [Rule 256.0342(3)(b)3]

POSITION: AT&T Florida has no position at this time.

ISSUE 5: Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]

POSITION: AT&T Florida has no position at this time.

ISSUE 6: Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25- 6.0341, F.A.C? [Rule 25-6.0342(3)(d)]

POSITION: AT&T Florida has no position at this time.

ISSUE 7: Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]

POSITION: AT&T Florida has no position at this time.

ISSUE 8: Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as

critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3. are to be made? [Rule 25-6.0342(4)(b)]

POSITION: AT&T Florida has no position at this time.

ISSUE 9: Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]

POSITION: AT&T Florida has no position at this time.

ISSUE 10: Does the Company's Plan provide a reasonable estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]

POSITION: AT&T Florida has no position at this time.

ISSUE 11: Does the Company's Plan provide an estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]

POSITION: AT&T Florida has no position at this time.

ISSUE 12: Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]

POSITION: AT&T Florida has no position at this time.

ISSUE 13: Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties? [Rule 25-6.0342(1) and (2)]

POSITION: AT&T Florida has no position at this time.

10 POINT INITIATIVES

ISSUE 14: Should the Commission approve FPUC's request to implement a 3/6 tree trimming cycle instead of a 3/3 cycle? (S-New)

POSITION: AT&T Florida has no position at this time.

ISSUE 15: Has FPUC complied with the Commission's 10 point initiatives? (S-New)

POSITION: AT&T Florida has no position at this time.

COSTS FOR STORM HARDENING AND 10 POINT INITIATIVES

ISSUE 16: Is the company's projected plan to accelerate the replacement of the existing wood 69 kv transmission system with concrete poles reasonable and cost-effective and if not, what adjustments are necessary to the company's projected test year rate base? (O-7)

POSITION: AT&T Florida has no position at this time.

ISSUE 17: Should amortization expense be increased by \$354,600 annually to offset the projected \$7,092,000 total cost of FPUC's proposed 20 year storm hardening project to replace its wood transmission poles with concrete poles? (S-66)

POSITION: AT&T Florida has no position at this time.

ISSUE 18: Should Account 593, Maintenance of Overhead Lines, be increased by \$352,260 for three additional tree trimming crews? (S-60 & S-62)

POSITION: AT&T Florida has no position at this time.

ISSUE 19: Should Account 593, Maintenance of Overhead Lines, be increased by \$219,833 for pole inspections? (S-63)

POSITION: AT&T Florida has no position at this time.

ISSUE 20: Should Account 593, Maintenance of Overhead Lines, be increased by \$27,000 for the development and implementation for Post Storm Data Collection and Forensic Review? (S-64)

POSITION: AT&T Florida has no position at this time.

ISSUE 21: What is the appropriate amount of annual NURC expense for transmission access? (O-57)

POSITION: AT&T Florida has no position at this time.

ISSUE 22: Is the company's requested additional expense for transmission inspections reasonable and supported, and if not, what adjustment should be made? (O-61)

POSITION: AT&T Florida has no position at this time.

ISSUE 23: Is the company's request for an additional employee to handle joint-use audits reasonable and supported, and if so, what is the appropriate amount of test year expense? (O-63)

POSITION: AT&T Florida has no position at this time.

ISSUE 24: Is the company's request for contractor expense to handle joint pole inspections reasonable and supported, and if not, what adjustments should be made? (O-64)

POSITION: AT&T Florida has no position at this time.

ISSUE 25: Is the company's request for recovery of additional expense to inspect and test substation equipment costs reasonable and supported, and if not, what adjustments are necessary? (O-59)

POSITION: AT&T Florida has no position at this time.

ISSUE 26: Is the company's request for recovery of an additional expense to provide personnel for the two county emergency operating centers reasonable, supported and annually recurring, and if not, what adjustment should be made? (O-67)

POSITION: AT&T Florida has no position at this time.

ISSUE 27: Is the company's request for an additional expense for maintenance of the automated mapping/facilities mapping (AM/FM) systems software reasonable and supported, and if not, what adjustment should be made? (O-68)

POSITION: AT&T Florida has no position at this time.

ISSUE 28: Is the company's request for increased travel and PURC costs reasonable and supported, and if not, what adjustment should be made? (O-62)

POSITION: AT&T Florida has no position at this time.

ISSUE 29: What adjustments, if any, should be made to rate base associated with the storm hardening Rule 25-6.0342 and 10 point initiatives requirements? (S-26)

POSITION: AT&T Florida has no position at this time.

ISSUE 30: What adjustments, if any, should be made to operating expenses associated with the storm hardening Rule 25-6.0342 and 10 point initiatives requirements? (S-61)

POSITION: AT&T Florida has no position at this time.

TEST PERIOD

ISSUE 31: Are the historical test year ended December 31, 2006, and the projected test year ending December 31, 2008, the appropriate test years to be utilized in this docket? (S-New)

POSITION: AT&T Florida has no position at this time.

ISSUE 32: Are FPUC's forecasts of Customers, KWH and KW by Rate Class for the projected 2008 test year appropriate? (S-1)

POSITION: AT&T Florida has no position at this time.

QUALITY OF SERVICE

ISSUE 33: Is the quality of electric service provided by FPUC adequate? (S-2)

POSITION: AT&T Florida has no position at this time.

RATE BASE

ISSUE 34: Has the Company removed all non-utility activities from rate base? (S-3)

POSITION: AT&T Florida has no position at this time.

ISSUE 35: Should the company's request to receive a full 13-month average recovery for a transformer that is not projected to be placed in service until the 2008 test year be approved? (O-2)

POSITION: AT&T Florida has no position at this time.

ISSUE 36: Has the company provided sufficient evidence to support its projected plant additions for the 2008 test year? (O-1)

POSITION: AT&T Florida has no position at this time.

ISSUE 37: Is FPUC's requested level of Plant in Service in the amount of \$79,641,581 for the December 2008 projected test year appropriate? (S-4)

POSITION: AT&T Florida has no position at this time.

ISSUE 38: Is the FPUC's requested level of Common Plant Allocated in the amount of \$1,853,396 for the December 2008 projected test year appropriate? (S-5)

POSITION: AT&T Florida has no position at this time.

ISSUE 39: Should an adjustment be made for Plant Retirements for the projected test year? (S-7)

POSITION: AT&T Florida has no position at this time.

ISSUE 40: What adjustments, if any, should be made to accumulated depreciation to reflect the Commission's decision in Docket No. 070382-EI? (S-8) (O-3)

POSITION: AT&T Florida has no position at this time.

ISSUE 41: Is FPUC's requested level of accumulated depreciation for Plant in Service in the amount of \$35,667,257 for the December 2008 projected test year appropriate? (S-9)

POSITION: AT&T Florida has no position at this time.

ISSUE 42: Is FPUC's requested level of accumulated depreciation for Common Plant Allocated in the amount of \$660,224 for the December 2008 projected test year appropriate? (S-10)

POSITION: AT&T Florida has no position at this time.

ISSUE 43: Is FPUC's requested level of Construction Work in Progress in the amount of \$75,000 for December 2008 projected test year appropriate? (S-11)

POSITION: AT&T Florida has no position at this time.

ISSUE 44: What is the appropriate projection methodology and balance of cash to be included in the 2008 working capital requirement? (O-10)

POSITION: AT&T Florida has no position at this time.

ISSUE 45: What is the appropriate balance of ~~other~~ special deposits to be included in the 2008 working capital requirement? (O-9)

POSITION: AT&T Florida has no position at this time.

ISSUE 46: Has the company implemented all existing and available means through Rule 25-6.097, Florida Administrative Code, and the company's customer deposit policy during 2006 and 2007 to lessen the amount of uncollectible accounts that currently exist? (O-54)

POSITION: AT&T Florida has no position at this time.

ISSUE 47: Has the Company estimated an appropriate balance in its accumulated provision for uncollectible accounts? (S-14)

POSITION: AT&T Florida has no position at this time.

ISSUE 48: Should an adjustment be made to prepaid pension expense in the calculation of working capital? (S-15)

POSITION: AT&T Florida has no position at this time.

ISSUE 49: What is the appropriate balance of regulatory assets retirement plan to be included in working capital? (O-14)

POSITION: AT&T Florida has no position at this time.

ISSUE 50: Is the balance for prepaid insurance which is allocated to the electric operations based on an appropriate allocation methodology? (S-16)

POSITION: AT&T Florida has no position at this time.

ISSUE 51: What is the appropriate balance of accounts receivable to be included in working capital? (O-12)

POSITION: AT&T Florida has no position at this time.

ISSUE 52: What is the appropriate balance of unbilled revenue to be included in working capital? (O-19)

POSITION: AT&T Florida has no position at this time.

ISSUE 53: What is the appropriate balance of temporary services to be included in working capital? (O-15)

POSITION: AT&T Florida has no position at this time.

ISSUE 54: Is the Company's working capital treatment of over and under recovery of fuel and conservation costs appropriate? (S-19)

POSITION: AT&T Florida has no position at this time.

ISSUE 55: Should Accounts Payable be increased to correct a posting error? (S-20)

POSITION: AT&T Florida has no position at this time.

ISSUE 56: What is the appropriate balance of deferred debit rate case expense to be included in working capital? (O-16)

POSITION: AT&T Florida has no position at this time.

ISSUE 57: What is the appropriate balance of deferred debits other to be included in working capital? (O-18)

POSITION: AT&T Florida has no position at this time.

ISSUE 58: Has the Company properly estimated its materials and supplies expense? (S-21)

POSITION: AT&T Florida has no position at this time.

ISSUE 59: Has the Company properly estimated its injuries and damage reserve? (S-22)

POSITION: AT&T Florida has no position at this time.

ISSUE 60: Is FPUC's request to increase its storm damage reserve and annual accrual appropriate? (S-23)

POSITION: AT&T Florida has no position at this time.

ISSUE 61: Should Taxes Accrued - Gross Receipts Tax be reduced to remove the portion related to non-electric operations? (S-24)

POSITION: AT&T Florida has no position at this time.

ISSUE 62: Is FPUC's requested level of Working Capital in the amount of a negative \$1,310,654 for the December 2008 projected test year appropriate? (S-25)

POSITION: AT&T Florida has no position at this time.

ISSUE 63: What is the test year balance of working capital? (O-20)

POSITION: AT&T Florida has no position at this time.

ISSUE 64: Is FPUC's requested rate base in the amount of \$43,020,996 for the December 2008 projected test year appropriate? (S-27)

POSITION: AT&T Florida has no position at this time.

COST OF CAPITAL

ISSUE 65: What is the appropriate return on common equity for the projected test year? (S-28)

POSITION: AT&T Florida has no position at this time.

ISSUE 66: Has the company supported its requested deviation from using a matching thirteen-month average test year cost of capital and rate base with its use of a year-end capital structure reconciled to a 13-month average rate base? (O-21)

POSITION: AT&T Florida has no position at this time.

ISSUE 67: What is the appropriate interest coverage ratio to be used in calculating the cost of long-term debt for the test year? (O-22)

POSITION: AT&T Florida has no position at this time.

ISSUE 68: What is the appropriate projected cost rate for long-term debt? (O-23)

POSITION: AT&T Florida has no position at this time.

ISSUE 69: What is the appropriate projected cost rate for short-term debt? (O-24)

POSITION: AT&T Florida has no position at this time.

ISSUE 70: Should the company's request to change the amortization methodology for deferred income taxes from the average rate assumption method (ARAM) to the straight-line method be approved? (O-26)

POSITION: AT&T Florida has no position at this time.

ISSUE 71: What is the appropriate amount of accumulated deferred taxes to include in the capital structure? (S-29)

POSITION: AT&T Florida has no position at this time.

ISSUE 72: What is the appropriate amount and cost rate of the unamortized investment tax credits to include in the capital structure? (S-30)

POSITION: AT&T Florida has no position at this time.

ISSUE 73: Does the Company's 2008 projected capital structure reflect deferred taxes resulting from common plant? (S-31)

POSITION: AT&T Florida has no position at this time.

ISSUE 74: What is the appropriate weighted average cost of capital including the proper components, amounts, and cost rates associated with the capital structure for the test year ending December 31, 2008? (S-32)

POSITION: AT&T Florida has no position at this time.

NET OPERATING INCOME

ISSUE 75: Should an adjustment be made to remove Franchise Fees from operating revenues and taxes other than income? (S-33)

POSITION: AT&T Florida has no position at this time.

ISSUE 76: Should an adjustment be made to remove the gross receipts tax from operating revenues and taxes other than income? (S-34)

POSITION: AT&T Florida has no position at this time.

ISSUE 77: Has the Company properly estimated an appropriate amount of forfeited discounts in calculating the revenues for 2008? (S-35)

POSITION: AT&T Florida has no position at this time.

ISSUE 78: Has FPUC made the appropriate test year adjustments to remove fuel revenues and fuel expenses recoverable through the Fuel Adjustment Clause? (S-36)

POSITION: AT&T Florida has no position at this time.

ISSUE 79: Has FPUC made the appropriate test year adjustments to remove conservation revenues and conservation expenses recoverable through the Conservation Cost Recovery Clause? (S-37)

POSITION: AT&T Florida has no position at this time.

ISSUE 80: What is the appropriate projected test year miscellaneous **service** revenue? (O-30)

POSITION: AT&T Florida has no position at this time.

ISSUE 81: What is the appropriate projected test year temporary service revenue? (O-31)

POSITION: AT&T Florida has no position at this time.

ISSUE 82: What is the appropriate amount for projected rent from electric property? (O-33)

POSITION: AT&T Florida has no position at this time.

ISSUE 83: Is FPUC's projected level of Total Operating Revenues in the amount of \$17,186,965 for the December 2008 projected test year appropriate? (S-38)

POSITION: AT&T Florida has no position at this time.

ISSUE 84: What are the appropriate escalation factors for use in forecasting the test year budget? (S-39)

POSITION: AT&T Florida has no position at this time.

ISSUE 85: Are the trend rates used by FPUC to calculate projected O&M expenses appropriate? (S-40)

POSITION: AT&T Florida has no position at this time.

ISSUE 86: Is the company's requested additional cost for the audit of inventory, cash and other processes reasonable and supported, and if not, what adjustment is necessary? (O-38)

POSITION: AT&T Florida has no position at this time.

ISSUE 87: Is the company's request for an additional new position for internal control and the Sarbanes Oxley compliance costs reasonable and supported, and if so, what are the appropriate test year expenses? (O-39)

POSITION: AT&T Florida has no position at this time.

ISSUE 88: Is the company's requested increase in lock box expense reasonable and supported, and if not, what adjustment is necessary? (O-40)

POSITION: AT&T Florida has no position at this time.

ISSUE 89: What is the appropriate amount of test year internal and external audit fees? (O-42)

POSITION: AT&T Florida has no position at this time.

ISSUE 90: Is the company's requested increase in janitorial, elevator, air conditioning and landscaping expense reasonable and supported, and if not, what adjustment is necessary? (O-43)

POSITION: AT&T Florida has no position at this time.

ISSUE 91: Is the company's requested increase in costs "to keep managers informed on various issues" reasonable and supported, and if not, what adjustment is necessary? (O-44)

POSITION: AT&T Florida has no position at this time.

ISSUE 92: Should an adjustment be made to Other Professional Services for the December 2008 projected test year? (S-41)

POSITION: AT&T Florida has no position at this time.

ISSUE 93: Should an adjustment be made to Advertising Expense for the December 2008 projected test year? (S-42)

POSITION: AT&T Florida has no position at this time.

ISSUE 94: Is the company's requested increase in customer information expense reasonable and supported, and if not what adjustments are appropriate? (O-53)

POSITION: AT&T Florida has no position at this time.

ISSUE 95: Has FPUC made the appropriate adjustments to remove Lobbying expenses, Other Political Expenses and Charitable expenses from the December 2008 projected test year? (S-43)

POSITION: AT&T Florida has no position at this time.

ISSUE 96: Should an adjustment be made to FPUC's requested level of Salaries and Employee Benefits for the December 2008 projected test year? (S-44)

POSITION: AT&T Florida has no position at this time.

ISSUE 97: Is the company's requested salary adjustment for executives reasonable and supported, and if not, what adjustment is necessary? (O-35)

POSITION: AT&T Florida has no position at this time.

ISSUE 98: Should an adjustment be made to Account 920, Administrative and General Salaries, to reflect the appropriate allocation factor? (S-45)

POSITION: AT&T Florida has no position at this time.

ISSUE 99: Is the Company's 2008 projection for medical expense appropriate? (S-46)

POSITION: AT&T Florida has no position at this time.

ISSUE 100: Should an adjustment be made to Other Post Employment Benefits Expense for the December 2008 projection for medical expense? (S-47)

POSITION: AT&T Florida has no position at this time.

ISSUE 101: What is the appropriate amount of annual storm expense accrual? (O-56)

POSITION: AT&T Florida has no position at this time.

ISSUE 102: Should an adjustment be made to the accrual for property damage for the December 2008 projected test year? (S-48)

POSITION: AT&T Florida has no position at this time.

ISSUE 103: What is the appropriate amount for projected general liability expense? (O-45)

POSITION: AT&T Florida has no position at this time.

ISSUE 104: What is the appropriate amount of test year property insurance? (O-46)

POSITION: AT&T Florida has no position at this time.

ISSUE 105: Is the Company's 2008 projection for Insurance Costs appropriate? (S-49)

POSITION: AT&T Florida has no position at this time.

ISSUE 106: Should an adjustment be made to the accrual for the Injuries & Damages Reserve for the December 2008 projected test year? (S-50)

POSITION: AT&T Florida has no position at this time.

ISSUE 107: Should the Company be allowed to charge its customers for the projected economic development donations? (S-51)

POSITION: AT&T Florida has no position at this time.

ISSUE 108: Is the amount projected for 2008 economic development donations reasonable? (S-52)

POSITION: AT&T Florida has no position at this time.

ISSUE 109: Is the level of overhead cost allocation for the 2008 projected test year appropriate? (S-53)

POSITION: AT&T Florida has no position at this time.

ISSUE 110: Should Account 903, Customer Records and Collection Expenses, be increased to reflect an increase in postage expense? (S-54)

POSITION: AT&T Florida has no position at this time.

ISSUE 111: Should Account 903, Customer Records and Collection Expenses, be reduced to remove costs related to propane, merchandising and jobbing, and conservation? (S-55)

POSITION: AT&T Florida has no position at this time.

ISSUE 112: What is the appropriate total amount, amortization period and test year expense for Rate Case Expense for the December 2008 projected test year? (S-56)

POSITION: AT&T Florida has no position at this time.

ISSUE 113: What is the appropriate period for the amortization of rate case expense? (S-57)

POSITION: AT&T Florida has no position at this time.

ISSUE 114: Should an adjustment be made to uncollectible expense in Account 904, Uncollectible Accounts, for the December 2008 projected test year? (S-58)

POSITION: AT&T Florida has no position at this time.

ISSUE 115: Should an adjustment be made to Pension Expense for the December 2008 projected test year? (S-59)

POSITION: AT&T Florida has no position at this time.

ISSUE 116: What is the appropriate amount of test year maintenance of station equipment? (O-49)

POSITION: AT&T Florida has no position at this time.

ISSUE 117: What is the appropriate amount of test year maintenance of poles and towers? (O-50)

POSITION: AT&T Florida has no position at this time.

ISSUE 118: What is the appropriate amount of test year maintenance of overhead conductors? (O-51)

POSITION: AT&T Florida has no position at this time.

ISSUE 119: Is the company's request for recovery of tree replacement costs reasonable and supported, and if not, what adjustments are necessary? (O-58)

POSITION: AT&T Florida has no position at this time.

ISSUE 120: Is the company's request for recovery of an additional expense to promote growth within the community reasonable and supported, and if not, what adjustments are necessary? (O-60)

POSITION: AT&T Florida has no position at this time.

ISSUE 121: Is FPUC's requested level of O&M Expense - Other in the amount of \$10,081,391 for the December 2008 projected test year appropriate? (S-65)

POSITION: AT&T Florida has no position at this time.

ISSUE 122: What adjustments, if any, should be made to the December 2008 projected test year depreciation expense to reflect the Commission's decisions regarding the depreciation study filed in Docket No. 070382-EI? (S-68)

POSITION: AT&T Florida has no position at this time.

ISSUE 123: What is the appropriate amount of Depreciation Expense for the December 2008 projected test year? (S-67)

POSITION: AT&T Florida has no position at this time.

ISSUE 124: Should an adjustment be made to Taxes Other Than Income Taxes for the December 2008 projected test year? (S-70)

POSITION: AT&T Florida has no position at this time.

ISSUE 125: Should an adjustment be made to Income Tax expense for the December 2008 projected test year? (S-71)

POSITION: AT&T Florida has no position at this time.

ISSUE 126: Is FPUC's projected Net Operating Income in the amount of \$206,341 for the December 2008 projected test year appropriate? (S-72)

POSITION: AT&T Florida has no position at this time.

REVENUE REQUIREMENTS

ISSUE 127: What is the appropriate net operating income multiplier for FPUC? (S-73)

POSITION: AT&T Florida has no position at this time.

ISSUE 128: Is FPUC's requested annual operating income increase of \$5,249,895 for the December 2008 projected test year appropriate? (S-74)

POSITION: AT&T Florida has no position at this time.

COST OF SERVICE AND RATE DESIGN

ISSUE 129: Are FPUC's estimated revenues from sales of electricity by rate class at present rates for the projected test year appropriate? (S-75)

POSITION: AT&T Florida has no position at this time.

ISSUE 130: What is the appropriate cost of service methodology to be used in designing FPUC's rates? (S-76)

POSITION: AT&T Florida has no position at this time.

ISSUE 131: If a revenue increase is granted, how should the increase be allocated to rate classes? (S-77)

POSITION: AT&T Florida has no position at this time.

ISSUE 132: What are the appropriate customer charges? (S-78)

POSITION: AT&T Florida has no position at this time.

ISSUE 133: What are the appropriate demand charges? (S-79)

POSITION: AT&T Florida has no position at this time.

ISSUE 134: What are the appropriate energy charges? (S-80)

POSITION: AT&T Florida has no position at this time.

ISSUE 135: What are the appropriate service charges? (S-81)

POSITION: AT&T Florida has no position at this time.

ISSUE 136: What are the appropriate transformer ownership discounts? (S-82)

POSITION: AT&T Florida has no position at this time.

ISSUE 137: What are the appropriate Street and Outdoor Lighting rates? (S-83)

POSITION: AT&T Florida has no position at this time.

ISSUE 138: Should FPUC's Transitional Rate of non-profit sports fields be eliminated? (S-84)

POSITION: AT&T Florida has no position at this time.

ISSUE 139: What are the appropriate standby rates? (S-85)

POSITION: AT&T Florida has no position at this time.

ISSUE 140: What is the appropriate adjustment to account for the increase in unbilled revenues due to the recommended rate increase? (S-86)

POSITION: AT&T Florida has no position at this time.

ISSUE 141: What is the appropriate effective date for FPUC's new rates and charges? (S-87)

POSITION: AT&T Florida has no position at this time.

OTHER ISSUES

ISSUE 142: Should any of the \$790,784 interim rate increase granted by Order No. PSC-07-0897-PCO-EI be refunded to the ratepayers? (S-88)

POSITION: AT&T Florida has no position at this time.

ISSUE 143: Should FPUC be required to file, within 90 days after the date of the final order in this docket, a description of all entries or adjustments to its annual report, earnings surveillance reports, and books and records which will be required as a result of the Commission's findings in this docket? (S-89)

POSITION: AT&T Florida has no position at this time.

ISSUE 144: Should this docket be closed? (S-90)

POSITION: AT&T Florida has no position at this time.

E. AT&T Florida's Notice of Intent to Use Confidential Information at Hearing

As of the date of this filing, AT&T FLORIDA has no plans to use confidential information at the hearing.

F. Stipulations

As indicated in Section "C" above, AT&T Florida, FPUC, Embarq Florida, Inc. and the Florida Cable Telecommunications Association have reached an agreement wherein these parties have committed that they will support the jointly developed terms and conditions contained in the Process to Engage Third-Party Attachers. A copy of the agreement was filed on January 29, 2008. OPC has indicated that it has no objection to the stipulation.

G. Pending Motions

AT&T Florida is not aware of any pending motions in this proceeding.

H. Objections to Witness Qualifications

AT&T Florida is unable to address witness qualifications at this time, since no party has designated a witness as an expert. AT&T Florida expressly reserves the right to

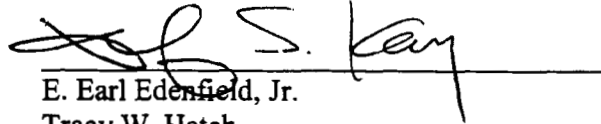
object to a witness' qualifications should a party or AT&T Florida designate a witness as an expert.

I. Other Requirements

AT&T Florida does not know of any requirement of the Order Establishing Procedure with which it cannot comply.

Respectfully submitted this 1st day of February, 2008.

AT&T Florida



E. Earl Edenfield, Jr.

Tracy W. Hatch

Jennifer S. Kay

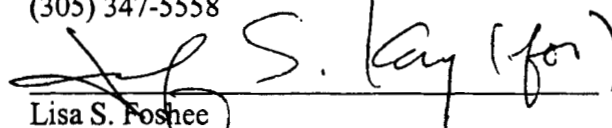
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