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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

DOCKET NO. 100001-EI

DATED: September 27, 2010

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FLORIDA PUBLIC UTILITIES COMPANY
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS

The following is the preliminary statement of issues and positions filed on behalf of the Florida Public Utilities Company, consistent with the schedule for this Docket:

Florida Public Utilities Company (Company-Specific)

ISSUE 3A: Should the Commission approve FPUC's proposal to apply the fuel revenue recovered from the GSLD-1 class for the January 2009 billing period to the fuel portion of bad debt associated with the GSLD-1 class for the same period?

FPUC's Position: Yes. In order to capture the pre- and post-bankruptcy costs associated with the Northeast Division's GSLD1 customer, two separate bills to the customer were generated, consistent with the GSLD1 rate structure. The timing of the bills resulted in the sum of the two bills totalling more than would have been billed if the bankruptcy had not occurred. The net amount of the GSLD1 excess fuel revenue adjustment is \$100,076, and if applied to the customer's bankruptcy-related bad debt write-off would reduce the GSLD1 Accounts Receivable for fuel revenue. The application of the excess fuel revenue would not have any impact on other rate classes, and would result in a \$100,148 reduction in fuel revenue for the GSLD1 rate class.

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 6: What are the appropriate actual benchmark levels for calendar year 2010 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPUC's Position: No position at this time.

ISSUE 7: What are the appropriate estimated benchmark levels for calendar year 2011 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

FPUC's Position: No position at this time.

ISSUE 8: What are the appropriate fuel adjustment true-up amounts for the period January 2009 through December 2009?

FPUC's Position:

Northwest Division (Marianna): \$1,378,165 (Underrecovery)
Northeast Division (Fernandina Beach): \$2,241,870 (Overrecovery)

ISSUE 9: What are the appropriate fuel adjustment true-up amounts for the period January 2010 through December 2010?

FPUC's Position:

Northwest Division (Marianna): \$84,888 (Underrecovery)
Northeast Division (Fernandina Beach): \$494,751 (Underrecovery)

ISSUE 10: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2011 to December 2011?

FPUC's Position:

Northwest Division (Marianna): \$1,463,053 (Underrecovery)
Northeast Division (Fernandina Beach): \$1,747,119 (Overrecovery)

ISSUE 11: 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 2011 through December 2011?

FPUC's Position:

Northwest Division (Marianna): 1.00072
Northeast Division (Fernandina Beach): 1.00072

ISSUE 12: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2011 through December 2011?

FPUC's Position:

Northwest Division (Marianna): [REDACTED]
Northeast Division (Fernandina Beach): \$40,892,517

ISSUE 13: What are the appropriate levelized fuel cost recovery factors for the period January 2011 through December 2011?

FPUC's Position:

Northwest Division (Marianna): 7.609¢ /kwh
Northeast Division (Fernandina Beach): 6.640 ¢ /kwh

ISSUE 14: 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?

FPUC's Position:

Northwest Division (Marianna): 1.0000 (All rate schedules)
Northeast Division (Fernandina Beach): 1.0000 (All rate schedules)

ISSUE 15: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

FPUC's Position:

Northwest Division

<i>Rate Schedule</i>	<i>Adjustment</i>
RS	\$0.11925
GS	\$0.11560
GSD	\$0.10977

GSLD	\$0.10586
OL,O11	\$0.08619
SL1, SL2, and SL3	\$0.08566
Step rate for RS	
RS with less than 1,000 kWh/month	\$0.11553
RS with more than 1,000 kWh/month	\$0.12553


Northeast Division*Rate Schedule**Adjustment*

RS	\$0.10007
GS	\$0.09735
GSD	\$0.09327
GSLD	\$0.09500
OL	\$0.07158
SL	\$0.07179
Step rate for RS	
RS with less than 1,000 kWh/month	\$0.09630
RS with more than 1,000 kWh/month	\$0.10630

ISSUE 16: What should be the effective date of the fuel adjustment charge and capacity cost recovery charge for billing purposes?

FPUC's Position: The effective date for FPUC's cost recovery factors should be January 1, 2011, beginning with the first billing cycle for the period January 2011.

RESPECTFULLY SUBMITTED this 27th day of September, 2010.

BY: 
Beth Keating
Akerman Senterfitt Attorneys at Law
106 East College Avenue
Highpoint Center, 12th Floor
Tallahassee, FL 32301
(850)224-9634

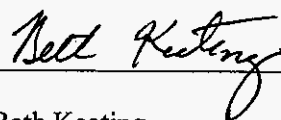
Attorneys for Florida Public Utilities Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following parties of record this 27th day of September, 2010:

Florida Public Utilities Company Thomas A. Geoffroy/ Curtis Young P.O. Box 3395 West Palm Beach, FL 33402-3395	Cecilia Bradley, Esq. Office of the Attorney General PL-01, The Capitol Tallahassee, FL 32399-1050
Lisa Bennett, Esq. Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399	Office of Public Counsel Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Paula K. Brown Tampa Electric Company P.O. Box 111 Tampa, FL 33601-0111	John T. Burnett, Esq. Progress Energy Florida, Inc. P.O. Box 14042 St. Petersburg, FL 33733-4042
Paul Lewis, Jr. Progress Energy Florida, Inc. 106 E. College Ave., Suite 800 Tallahassee, FL 32301	James D. Beasley, Esq. J. Jeffry Wahlen, Esq. Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302
Jeffrey A. Stone, Esq. Russell A. Badders, Esq. Steve R. Griffin, Esq. Beggs & Lane P.O. Box 12950 Pensacola, FL 32591-2950	John Butler, Esq. Managing Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420
R. Wade Litchfield Vice President/Assoc. Gen. Counsel Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420	John W. McWhirter, Jr., Esq. McWhirter Law Firm P.O. Box 3350 Tampa, FL 33601-3350

Ms. Susan Ritenour Secretary and Treasurer Gulf Power Company One Energy Place Pensacola, FL 32520-0780	James W. Brew, Esq. Brickfield, Burchette, Ritts & Stone, P.C.. Eighth Floor, West tower 1025 Thomas Jefferson Street, NW Washington, DC 20007
Shayla L. McNeill, Capt. USAF AFLSA/JACL-ULT 139 Barnes Dr., Suite 1 Tyndall AFB, FL 32403-5319	Jon C. Moyle, Jr., Esq. Vicki G. Kaufman, Esq. Keefe, Anchors, Gordon & Moyle 118 North Gadsden St. Tallahassee, FL 32301
Randy B. Miller White Springs Agricultural Chemicals, Inc. P. O. Box 300 15843 Southeast 78 th St. White Springs, FL 32096	Patrick K. Wiggins Post Office Drawer 1657 Tallahassee, FL 32302



Beth Keating
Akerman Senterfitt Attorneys at Law
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Highpoint Center, 12th Floor
Tallahassee, FL 32301
(850)224-9634