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STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison Street
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Tallahassee, Florida 32399-1400
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ORIGINAL
FILE COPY

February 25, 1994

Mr. Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399-0863

Re: Dockets Nos. 940001-BA, 940002-EG, 940003-GU, and 940012-EI

Dear Mr. Tribble:

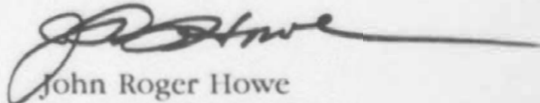
Enclosed please find the original and fifteen (15) copies, each, of the Prehearing Statement of the Office of Public Counsel for filing in the above-referenced dockets. A diskette in IBM-compatible WordPerfect 5.1 is also submitted.

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

- ACK _____
- AEA 5 _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EIG _____
- LEG 1 _____
- LIN 4 _____
- OPC _____
- ROH _____
- SEC 1 _____
- WAS _____
- OTH _____

JRH/gmr

Sincerely,


John Roger Howe
Deputy Public Counsel

DOCUMENT NUMBER-DATE
01912 FEB 25 94
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Fuel and Purchased Power) DOCKET NO. 940001-EI
Cost Recovery Clause with) FILED: February 25, 1994
Generating Performance Incentive)
Factor)
_____)

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-94-0067-PCO-EI, issued January 21, 1994, submit this Prehearing Statement.

APPEARANCES:

JOHN ROGER HOWE, Esquire, Deputy Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400
On behalf of the Citizens of the State of Florida

A. WITNESSES:

None.

B. EXHIBITS:

None.

C. STATEMENT OF BASIC POSITION

None necessary.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

Generic Fuel Adjustment Issues

ISSUE 1: What are the appropriate final fuel adjustment true-up amounts for the period April 1993 through September 1993?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 2: What are the estimated fuel adjustment true-up amounts for the period October 1993 through March 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 3: What are the total fuel adjustment true-up amounts to be collected during the period April 1994 through September 1994?

OPC

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 4: What are the appropriate levelized fuel cost recovery factors for the period April 1994 through September 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 5: What should be the effective date of the new fuel adjustment charge, oil backout charge and conservation cost recovery charge for billing purposes?

OPC: The factor should be effective beginning with the specified fuel cycle and thereafter for the period April,

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 2: What are the estimated fuel adjustment true-up amounts for the period October 1993 through March 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 3: What are the total fuel adjustment true-up amounts to be collected during the period April 1994 through September 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 4: What are the appropriate levelized fuel cost recovery factors for the period April 1994 through September 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 5: What should be the effective date of the new fuel adjustment charge, oil backout charge and conservation cost recovery charge for billing purposes?

OPC: The factor should be effective beginning with the specified fuel cycle and thereafter for the period April,

1994 through September, 1994. Billing cycles may start before April 1, 1994, and the last cycle may be read after September 30, 1994, so that each customer is billed for six months regardless of when the adjustment factor becomes effective.

ISSUE 6: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 7: What are the appropriate Fuel Cost Recovery Factors for each rate group adjusted for line losses?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 8: What is the appropriate revenue tax factor to be applied in calculating each company's levelized fuel factor for the projection period of April through September, 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

Company-Specific Fuel Adjustment Issues

Florida Power Corporation

ISSUE 9: Should the Commission approve FPC's proposed refinement to its previously approved market pricing mechanism for water-borne

transportation services to provide for potential purchases of foreign coal?

OPC: No position at this time.

ISSUE 10: How should the affiliated coal transportation market-based pricing methodology be amended to address additional transportation charges incurred by Electric Fuels Corporation due to government impositions not considered at the time the methodology was established?

OPC: No position at this time.

Tampa Electric Company

ISSUE 11: Has Tampa Electric Company prudently administered its contract with Zeigler Coal Company and prudently purchased replacement coal intended to replace the coal it did not receive from Zeigler during the United Mine Workers strike?

OPC: No position at this time.

Generic Generating Performance Incentive Factor Issues

ISSUE 12: What is the appropriate GPIF reward or penalty for performance achieved during the period April, 1993 through September, 1993?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 13: What should the GPIF targets/ranges be for the period April, 1994 through September, 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

Company-Specific GPIF Issues

OPC knows of no company specific GPIF issues at this time

Generic Oil Backout Issues

ISSUE 14: What is the ~~estimated oil backout true-up~~ amount for the April, 1993 through September, 1993 period?

OPC:

FPL: No position at this time.
TECO: No position at this time.

ISSUE 15: What is the estimated oil backout true-up amount for the period October, 1993 through March, 1994?

OPC:

FPL: No position at this time.
TECO: No position at this time.

ISSUE 16: What is the total oil backout true-up amount to be collected during the period April, 1994 through September, 1994?

OPC:

FPL: No position at this time.
TECO: No position at this time.

ISSUE 17: What is the projected oil backout cost recovery factor for the period April, 1994 through September, 1994?

OPC:

FPL: No position at this time.
TECO: No position at this time.

Company-Specific Oil Backout Issues

OPC knows of no company-specific oil backout issues at this time.

Generic Capacity Cost Recovery Issues

ISSUE 18: What is the appropriate final capacity cost recovery true-up amount for the period April, 1993 through September, 1993?

OPC:

FPC: No position at this time.

FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 19: What is the estimated capacity cost recovery true-up amount for the period October, 1993 through March, 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 20: What is the total capacity cost recovery true-up amount to be collected during the period April, 1994 through September, 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 21: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period April, 1994 through September, 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 22: What are the projected capacity cost recovery factors for the period April, 1994 through September, 1994?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

Company-Specific Capacity Cost Recovery Issues

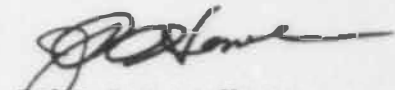
OPC knows of no company-specific capacity cost recovery issues at this time.

- E. STATEMENT OF LEGAL ISSUES AND POSITIONS: None at this time.
- F. STATEMENT OF POLICY ISSUES AND POSITIONS: None at this time.
- G. STIPULATED ISSUES: None.
- H. PENDING MOTIONS: None.
- I. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Respectfully submitted,

Jack Shreve
Public Counsel



John Roger Howe
Deputy Public Counsel

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Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE
DOCKET NO. 940001-EI

I HEREBY certify that a copy of the foregoing 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 25th day of February, 1994.

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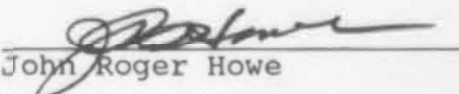
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