LAW OFFICES

## MESSER, VICKERS, CAPARELLO, MADSEN, LEWIS, GOLDMAN & METZ

SUITE 701
218 SOUTH MONROE STREET
POST OFFICE BOX 1876

TALLAHASSEE, FLORIDA 02002-1076

TELEPHONE (904) 222-0720 TELECOPIER (904) 224-4359 ULISHAL

SUITE 900
2000 PALM BEACH LAKES BOULEVARD
WEST PALM BEACH, FLORIDA 33409
TELEPHONE (407) 640-0820
TELECOPIER (407) 640-8202

REPLY TO Tallahassee

July 21, 1994

Ms. Blanca Bayo, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0850 HAND DELIVERY

Re: Florida Public Utilities Company Docket No. 940001-EI

Dear Ms. Bayo:

Enclosed for filing on behalf of Florida Public Utilities Company in connection with the hearing scheduled to begin August 11, 1994 in this docket are the original and 15 copies of the Company's Prehearing Statement. Also enclosed is a computer diskette containing the document called "stmt.fpu" in WordPerfect 5.1 format.

Please acknowledge receipt of this document by stamping the enclosed extra copy of this letter.

Thank you for your assistance.

Floyd R. Se

Brews

07ri -----

FRS/amb Enclosures

cc: Parties of Record (with enclosures)
Mr. George Bachman (with enclosures)

3)

FPSC-BUREAU DE RECORDS,

DOCUMENT NUMBER -DATE

07401 JUL 21 %

FPSC-RECORDS/REPORTING

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power Cost Recovery Clause and Generating Performance Incentive Factor.

Docket No. 940001-EI Filed: July 21, 1994

# PREFERRING STATEMENT OF PLORIDA PUBLIC UTILITIES COMPANY

Florida Public Utilities Company, through undersigned counsel, respectfully submits its prehearing statement.

Floyd R. Self
Messer, Vickers, Caparello, Madsen & Goldman, P. A. Post Office Box 1876 Tallahassee, FL 32302-1876

On behalf of Florida Public Utilities Company

# B. WITNESSES

Issues Subject Matter 1-8 Witness Purchased power cost recovery; true-up Bachman (Marianna and (FPU) Fernandina Beach Divisions) C. EXHIBITS

Description Schedules E, E1, E1b, E2, E4, E8, E10, E11, H1 Witness Exhibit No. Bachman & M1 (Marianna Division) (GMB-2) Schedules E, E1, E1b, E2, E4, E8, E8A, E10, E11, H1 & Fl (Fernandina Beach Division)

> DOCUMENT NUMBER-DATE 07401 JUL 21 &

FPSC-RECORDS/REPORTING

#### D. BASIC POSITION

Florida Public Utilities has properly projected its costs and calculated its true-up amounts and purchased power cost recovery factors. Those factors should be approved by the Commission.

# E. ISSUES AND POSITIONS

ISSUE 1: What are the appropriate final fuel adjustment true-up amounts for the period October, 1993

#### FPU's Position:

Marianna: \$10,735 (overrecovery)

Fernandina Beach: \$215,029 (overrecovery)

ISSUE 2: What are the estimated fuel adjustment true-up amounts for the period April, 1994 through

#### FPU's Position:

Marianna: \$38,323 (underrecovery)

Fernandina Beach: \$74,042 (overrecovery)

ISSUE 3: What are the total fuel adjustment true-up amounts to be collected during the period October, 1994

#### FPU's Position:

Marjanna: \$27,588 (underrecovery)

Fernandina Beach: \$289,071 (overrecovery)

ISSUE 4: What are the appropriate levelized fuel cost recovery factors for the period October, 1994

#### FPU's Position:

Marianna: 2.98238#/kwh

Fernandina Beach: 3.87688¢/kwh 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?

Agrees with Staff.

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

# FPU's Position:

## Marianna

| nna                    | Multiplier |
|------------------------|------------|
| Rate Schedule          | 1.0126     |
| RS                     | 0.9963     |
| GS                     | 0.9963     |
| GSD                    | 1.0126     |
| GSLD<br>OL. OL-2       | 0.9881     |
| OL, OB 5<br>SL-1, SL-2 |            |
| SL-1,                  |            |

# Fernandina Beach

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

# FPU's Position:

### Marianna

| anna                    | Adjustment   |
|-------------------------|--|
| Rate Schedule           | 4.936¢/kwh<br>4.704¢/kwh                             |
| RS<br>GS<br>GSD<br>GSLD | 4.330¢/kwh<br>4.170¢/kwh<br>3.047¢/kwh<br>2.973¢/kwh |
| OL, OL-2<br>SL-1, SL-2  |  |

#### Fernandina Beach

| Rate Schedule | Adjustment  |
|---------------|-------------|
| RS            | .05098¢/kwh |
| GS            | .04832¢/kwh |
| GSD           | .04643¢/kwh |
| OL & SL       | .04058¢/kwh |

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 October, 1994 through March, 1995?

FPU's Position: Agrees with Staff.

Dated this 21st day of July, 1994.

Respectfully submitted,
MESSER, VICKERS, CAPARELLO, MADSEN
& GOLDMAN, P. A.
Post Office Box 1876
Tallahassee, FL 32302-1876
(904) 222-0720

Floyd R. Self

Attorneys for Florida Public Utilities Company

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true copies of Florida Public Utilities Company's Prehearing Statement have been served upon the following parties by U. S. Mail this 21st day of July, 1994:

Matthew M. Childs, Esq. Steel, Hector & Davis 215 S. Monroe St., Suite 601 Tallahassee, FL 32301

N. 1. . . .

Martha Brown, Esq.
Division of Legal Services
Florida Public Service
Commission
101 E. Gaines St.
Tallahassee, FL 32399-0850

Mr. James McGee Florida Power Corporation P.O. Box 14042 St. Petersburg, FL 33733

Vicki Gordon Kaufman McWhirter, Grandoff & Reeves 315 S. Calhoun St., Suite 716 Tallahassee, FL 32301

James D. Beasley, Esq.
Macfarlane, Ausley, Ferguson &
McMullen
P.O. Box 391
Tallahassee, FL 32302

Zori G. Ferkin
DEWEY BALANTINE
1775 Pennsylvania Avenue, N. W.
Washington, DC 20006-4605

G. Edison Holland, Esq. Beggs and Lane P.O. Box 12950 Pensacola, FL 32576

Mr. Barry N. P. Huddleston Public Affairs Specialist Destec Energy, Inc. 2500 CityWest Blvd., Suite 150 Houston, TX 77210-4411

Suzanne Brownless, Esq. 2546 Blairstone Pines Dr. Tallahassee, FL 32301

Mr. Richard Zambo, Esq. 598 S. W. Hidden River Ave. Palm City, FL 34990-1406

Matthew A. Kane, Jr., Esq. Tropicana Products, Inc. P.O. Box 338 Bradenton, FL 34206

Jack Shreve, Esq.
Public Counsel
Office of the Public Counsel
111 W. Madison St., Room 812
Tallahassee, FL 32301

Eugene M. Trisko, Esq. P.O. Box 596 Berkeley Springs, WV 25411

Floyd R | Self