

Tropicana

7/22 11:15 am



Matthew A. Kane, Jr.
Associate General Counsel

July 21, 1994

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399

ORIGINAL
FILE COPY

RE: Docket No. 940001-EI

Dear Ms. Bayo:

Enclosed for filing please find the original and fifteen (15) copies of Tropicana Products, Inc. Issues and Positions in the above-referenced docket.

Sincerely,

Matthew A. Kane, Jr.

ssm
Enclosures

ACK cc: All Parties of Record

AFA _____

APP _____

CAF (1072194.1) _____

CMU _____

CTR _____

CRB 6 Dudley

LEG Brown

LIN 3

WFC _____

RCH _____

SEC 1

WAS _____

WTH _____

RECEIVED & FILED
Mac
DIVISION OF RECORDS

DOCUMENT NUMBER - DATE
07438 JUL 22 8
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

TROPICANA PRODUCTS, INC.
PRELIMINARY LIST OF ISSUES AND POSITIONS

Tropicana Products, Inc. ("Tropicana") hereby submits its Preliminary List of Issues and Positions in the above-captioned proceeding. Tropicana reserves the right to amend this preliminary statement.

A. APPEARANCES:

RICHARD A. ZAMBO, ESQ., 598 S.W. Hidden River Avenue, Palm City, Florida 34990, and MATTHEW A. KANE, JR., ESQ., Tropicana Products, Inc., P.O. Box 338, Bradenton, Florida, 34206.

On behalf of Tropicana Products, Inc.

B. WITNESSES:

None at this time.

C. EXHIBITS:

None at this time.

D. STATEMENT OF BASIC POSITION:

Tropicana Products, Inc. Statement of Basic Position:

The Florida Power & Light capacity payment recovery factor does not reflect the benefits of self service cogeneration to the general body of rate payoffs.

E. STATEMENT OF ISSUES AND POSITIONS:

Generic Fuel Adjustment Issues

1. ISSUE: What are the appropriate final fuel adjustment true-

DOCUMENT NUMBER-DATE

07438 JUL 22 1994

FPSC-RECORDS/REPORTING

up amounts for the period October, 1993 through March 1994?

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

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

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

3. ISSUE: What are the total fuel adjustment true-up amounts to be collected during the period October, 1994 through March, 1995.

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

4. ISSUE: What are the appropriate levelized fuel cost recovery factors for the period October, 1994 through March, 1995?

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

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

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

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

TROPICANA:

Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

7. ISSUE: What are the appropriate fuel cost recovery factors for each rage group adjusted for line losses?

TROPICANA:

Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Company-Specific Fuel Adjustment Issues

TROPICANA: None at this time.

8. ISSUE: What is the appropriate GPIF reward or penalty for performance achieved during the period October, 1993 through March, 1994?

TROPICANA:

Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

9. ISSUE: What should the GPIF targets/ranges be for the period October, 1994 through March, 1995?

TROPICANA:

Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Company-Specific GPIF Issues

TROPICANA: None at this time.

Generic Oil Backout Issues

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

TROPICANA:

Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

conference.

11. ISSUE: What is the estimated oil backout true-up amount for the period April, 1994 through September, 1994 period?

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

12. ISSUE: What is the total out backout true-up amount to be collected during the October 1994 through March, 1995?

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

13. ISSUE: What is the projected oil backout cost recovery factor for the period October, 1994 through March, 1995?

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Generic Capacity Cost Recovery Factor Issue

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

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

15. ISSUE: What is the estimated capacity cost recovery true-up amount for the period April, 1994 through September, 1994?

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

16. ISSUE: What is the total capacity cost recovery true-up

amount to be collected during the period October, 1994 through March, 1995?

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

17. ISSUE: What is the appropriate capacity cost recovery factor for the period October, 1994 through March, 1995?

TROPICANA: Tropicana has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.

Company-Specific Issues

TROPICANA: The Florida Power and Light capacity payment recovery factor does not reflect the economic benefits of Tropicana's self-service cogeneration operation to the general body of rate payoff.

F. STIPULATED ISSUES:

None at this time.

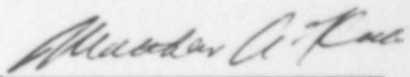
G. PENDING MOTIONS:

Tropicana has no pending motions.

H. OTHER MATTERS:

None at this time.

RICHARD A. ZAMBO
Florida Bar No. 312525
RICHARD A. ZAMBO, P.A.



MATTHEW A. KANE, JR.
Tropicana Products, Inc.
P.O. Box 338
Bradenton, FL 34209

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Tropicana Products, Inc. Preliminary List of Issues and Positions has been furnished by *Express Mail and U.S. Mail to the following parties of record this 21st day of July, 1994:

*Martha Carter Brown
Division of Legal Services
FL. Public Service Commisison
101 East Gaines Stree
Tallahassee, FL 32399

Jack Shreve, Public Counsel
John Roger Howe
Office of the Public Counsel
The Claude Pepper Building
111 West Madison Street
Tallahassee, FL 32301

J. Edison Holland
Jeffrey A. Stone
Beggs and Lane
Post Office Box 12950
Pensacola, FL 32476

Lee L. Willis
James D. Beasley
Macfarlane Ausley Ferguson
& McMullen
Post Office Box 391
Tallahassee, FL 32302

Robert S. Goldman
Messr, Vickers, Caparello,
Post Office Drawer 1876
Tallahassee, FL 32302-1876

James A. McGee
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733

Matthew M. Childs
Steel, Hector and Davis
First Florida Bank Building
Suite 601
215 South Monroe Street
Tallahassee, FL 32301-1804

Stephen Feldman
P. O. Box 0291000
Miami, FL 33102-9100

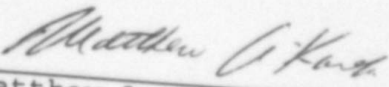
Suzanne Brownless
2546 Blairstone Pines Dr.
Tallahassee, FL 32301

Mark K. Logan
Bryant, Miller & Olive
201 So. Monroe Street
Suite 500
Tallahassee, FL 32301

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

Thomas J. Schmidt
Orgulf Transport Co.
1400-580 Building
P.O. Box 1460
Cincinnati, OH 45201

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGLothlin
Davidson & Bakas
315 South Calhoun Street
Suite 716
Tallahassee, FL 32301


Matthew A. Kane, Jr.