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February 6, 1995

HAND DELIVERED

IN REPLY REFER TO:

Tallahassee

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

Re: Fuel and Purchased Power Cost Recovery Clause  
with Generating Performance Incentive Factor;  
FPSC Docket No. 950001-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Statement of Issues and Positions.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

*James D. Beasley*  
James D. Beasley

- ACK
- AFA
- APP
- BAR
- BRU
- ETR
- EAG  *D. Daley*
- LES  *1*
- EM  *4*
- CF
- RCR
- SEC  *1*
- WAS
- OTH

cc: All Parties of Record (w/enc.)

RECEIVED & FILED  
*mar*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01307 FEB-68

FPSC-RECORDS/REPORTING

BEFORE THE FLOFLIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased )  
Power Cost Recovery Factor )  
and Generating Performance )  
Incentive Factor. )

DOCKET NO. 950001-EI  
FILED: February 6, 1995

**TAMPA ELECTRIC COMPANY'S  
STATEMENT OF ISSUES AND POSITIONS**

Tampa Electric Company ("Tampa Electric" or "the company") hereby submits its Statement of the Issues and Positions to be taken up at the hearing scheduled to commence on March 8, 1995 in the above docket.

**FUEL ADJUSTMENT**

**Issue No. 1:** What is the appropriate final true-up amount for Tampa Electric Company for the April 1, 1994 through September 30, 1994 period?

**Tampa Electric's Position:** An over/(under)-recovery of \$3,968,565. (Witness: Pennino)

**Issue No. 2:** What is the appropriate projected fuel adjustment true-up amount for the period October 1, 1994 through March 31, 1995, based upon actual data for the period October 1, 1994 through November 30, 1994 and revised estimates for the period December 1, 1994 through March 31, 1995?

**Tampa Electric's Position:** An over/(under)-recovery of \$2,455,113. (Witness: Pennino)

**Issue No. 3:** What is the appropriate end of period total net true-up amount for Tampa Electric Company as of March 31, 1995?

**Tampa Electric's Position:** An over/(under)-recovery of \$6,423,678. (Witness: Pennino)

DOCUMENT NUMBER-DATE

01307 FEB-6 95

FPSC-RECORDS/REPORTING

Issue No. 4: What is the appropriate levelized fuel adjustment factor for Tampa Electric to apply during the period April 1, 1995 through September 30, 1995?

Tampa Electric's Position: 2.386 cents per KWH before application of the factors which adjust for variations in line losses. (Witness: Pennino)

#### CAPACITY COST RECOVERY

Issue No. 5: What is the appropriate final true-up amount for Tampa Electric for the April 1, 1994 through September 30, 1994 period?

Tampa Electric's Position: The appropriate final true-up amount is an over/(under)-recovery of (\$35,650). (Witness: Pennino)

Issue No. 6: What is the appropriate capacity cost recovery true-up amount for the period October 1, 1994 through March 31, 1995, based upon actual data for the period October 1, 1994 through November 30, 1994 and revised estimates for the period December 1, 1994 through March 31, 1995?

Tampa Electric's Position: An over/(under)-recovery of \$1,065,382. (Witness: Pennino)

Issue No. 7: What is the appropriate end of period capacity cost recovery total net true-up as of March 31, 1995?

Tampa Electric's Position: An over/(under)-recovery of \$1,029,732. (Witness: Pennino)

Issue No. 8: What is the appropriate capacity cost recovery factor for Tampa Electric to apply during the period April 1, 1995

through September 30, 1995?

**Tampa Electric's Position:** .142 cents per KWH before applying the 12 CP and 1/13 allocation methodology, and producing the capacity recovery factors by rate schedule. (Witness: Pennino)

#### **GPIF**

**Issue No. 9:** What is the appropriate GPIF reward or penalty for Tampa Electric for performance achieved during the period April 1, 1994 through September 30, 1994?

**Tampa Electric's Position:** Reward of \$146,321 (adjusted to include regulatory assessment fee of one-twelfth of one-percent) for performance experienced during the period April 1, 1994 through September 30, 1994. (Witness: Keselowsky)

**Issue No. 10:** What are the appropriate GPIF targets and ranges for Tampa Electric to apply to the period April 1, 1995 through September 30, 1995?

**Tampa Electric's Position:** As set forth in Attachment "A" to the Prepared Direct Testimony of George A. Keselowsky, filed January 17, 1995. (Witness: Keselowsky)

#### **OIL BACKOUT COST RECOVERY**

**Issue No. 11:** What is the appropriate end of period total net true-up amount for Tampa Electric Company for the period April 1994 - September 1994?

**Tampa Electric's Position:** An over/(under)-recovery of (\$62,379). (Witnesses: Cantrell; Townes)

Issue No. 12: What is Tampa Electric's estimated true-up amount for the six months ending March 31, 1995?

Tampa Electric's Position: An over/(under)-recovery of \$182,138. (Witnesses: Cantrell; Townes)

Issue No. 13: What is the appropriate oil backout true-up amount to be included during the period April 1, 1995 through September 30, 1995?

Tampa Electric's Position: An over/(under)-recovery of \$153,138. (Witnesses: Cantrell; Townes)

Issue No. 14: What is the appropriate oil backout cost recovery factor to be applied by Tampa Electric during the period April 1995 - September 1995?

Tampa Electric's Position: .081 cents per KWH. (Witnesses: Cantrell; Townes)

#### OFF-SYSTEM SALES

Issue No. 15:<sup>1</sup> Other than economy sales and revenues from the seven entities that were separated out in TECO's last rate case, should Tampa Electric credit all non-fuel revenues from off-system sales back to the retail ratepayers through the fuel adjustment clause and the capacity cost recovery clause?

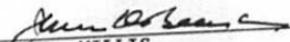
Tampa Electric's Position: No. The level of sales and resulting revenues from long-term firm off-system sales vary subsequent to a rate case. In Docket No. 920324-EI it was

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<sup>1</sup>This issue was deferred from the August 1994 fuel adjustment proceeding. It was identified as Issue 25a in the August 9, 1994 Prehearing Order.

On December 20, 1994 the Commission (941155-EQ (Joint Petition for Expedited Approval of Contract Modifications to a 1989 Standard Offer Contract by Tampa Electric Company, Orange Cogeneration Limited Partnership and Polk Power Partners, L.P.) to approve certain assignments and modifications of a standard offer contract Tampa Electric had entered into. One of the issues included in the Staff's recommendation was whether a \$1,106,760 option payment from Polk Power Partners, L.P. to Tampa Electric "should be examined during Tampa Electric's next fuel adjustment proceeding." Tampa Electric does not know whether the Staff will pursue this issue or, if the Staff does pursue the issue, how it will be framed. Nevertheless, Tampa Electric has submitted testimony of Mr. D. M. Mestas, Jr. addressing, in a general way, the Staff's reference to the upcoming fuel hearing in its report and recommendation in Docket No. 941155-EQ and making Mr. Mestas available as a witness to respond to any questions concerning the Polk option payment to Tampa Electric which may be raised at the hearing.

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Attorneys for Tampa Electric Company

- 6 -

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Statement of Issues and Positions, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (\*) on this 6<sup>th</sup> day of February, 1995 to the following:

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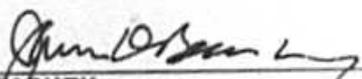
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