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TALLAHASSEE

July 12, 1995

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Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Rm. 110  
Tallahassee, Florida 32399-0850

Re: Docket No. 950001-EI, Fuel Adjustment Clause; and  
Docket No. 950007-EI, Environmental Cost Recovery Clause.

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and 15 copies each of the Florida Industrial Power Users Group's Prehearing Statements in the above dockets. Also enclosed is a diskette containing the pleadings.

ACK ✓

Please acknowledge receipt on the extra copies enclosed and return them to me. Thank you for your assistance.

Yours truly,

Joseph A. McGlothlin

1 JAM/jfg  
3 Enclosures

RECEIVED & FILED

DOCUMENT NUMBER DATE

06601 JUL 12 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Fuel and Purchased Power ) DOCKET NO. 950001-EI  
Cost Recovery Clause and )  
Generating Performance Incentive ) FILED: July 12, 1995  
Factor. )  
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**THE FLORIDA INDUSTRIAL POWER  
USERS GROUP'S PREHEARING STATEMENT**

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-95-0771-PCO-EI, through its undersigned counsel, files its Prehearing Statement. FIPUG reserves the right to amend this prehearing statement.

A. APPEARANCES:

JOSEPH A. MCGLOTHLIN, VICKI GORDON KAUFMAN, McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, 117 South Gadsden Street, Tallahassee, Florida 32301

On behalf of the Florida Industrial Power Users Group.

B. WITNESSES:

None at this time.

C. EXHIBITS:

None at this time.

D. STATEMENT OF BASIC POSITION:

Florida Industrial Power Users Groups' Statement of Basic Position:

None at this time.

DOCUMENT NUMBER-DATE  
06601 JUL 12 95  
FPSC-RECORDS/REPORTING

E. STATEMENT OF ISSUES AND POSITIONS:

Generic Fuel Adjustment Issues

1. ISSUE: What are the appropriate final fuel adjustment true-up amounts for the period October, 1994 through March, 1995?  
FIPUG: FIPUG 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, 1995 through September, 1995?  
FIPUG: FIPUG 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, 1995 through March, 1996?  
FIPUG: FIPUG 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, 1995 through March, 1996?  
FIPUG: FIPUG 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. ISSUE: What should be the effective date of the new fuel adjustment charge, oil backout charge and capacity cost recovery charge for billing purposes?  
The factor should be effective beginning with the specified fuel cycle and thereafter for the period October, 1995, through March, 1996. Billing cycles may start before October 1, 1995, and the last cycle may be read after March 31, 1996, so that each customer is billed for six months regardless of when the adjustment factor became effective.
6. ISSUE: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class?  
FIPUG: FIPUG 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 rate group adjusted for line losses?

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

8. ISSUE: What is the appropriate revenue tax factor to be applied in calculating each company's levelized fuel factor for the projection period of October, 1995 through March, 1996?

FIPUG: FIPUG 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

##### Florida Power & Light Company

- 9a. ISSUE: Should FPL recover the costs associated with purchasing 462 rail cars for use at Plant Scherer through the Fuel and Purchased Power Cost Recovery Clause?

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

- 9b. ISSUE: Should FPL make any adjustment to its fuel cost recovery projections to take into account sales under its Real Time Pricing - General Service (RTP-GX) rate schedule?

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

- 9c. ISSUE: Should FPL be allowed to recover through the Fuel Cost Recovery Clause the cost of implementing a change from an 18-month fuel cycle operation to a 24-month fuel cycle operation of St. Lucie Units 1 and 2?

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

Florida Power Corporation

10a: ISSUE: Should FPC recover the cost associated with converting the Intercession City Units P7 and P9 from distillate fuel oil to natural gas through the Fuel and Purchased Power Cost Recovery Clause?

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

10b: ISSUE: Should FPC include the increase in fuel cost associated with the Auburndale Power Partners settlement in the Fuel and Purchased Power Cost Recovery Clause?

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

10c: ISSUE: Has FPC confirmed the validity of the methodology used to determine the equity component of Electric Fuels Corporation's capital structure for calendar year 1994?

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

10d. ISSUE: Has FPC properly calculated the market price true-up for coal purchases from Powell Mountain?

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

Tampa Electric Company

11a: ISSUE: What is the appropriate 1994 benchmark price for coal Tampa Electric Company purchased from its affiliate, Gatliff Coal Company?

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

11b: ISSUE: Has Tampa Electric Company adequately justified any costs associated with the purchase of coal from Gatliff Coal Company that exceed the 1994 benchmark price?

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

11c: ISSUE: What is the appropriate 1994 waterborne coal transportation benchmark price for transportation services provided by affiliates of Tampa Electric Company?

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

11d: ISSUE: Has Tampa Electric Company adequately justified any costs associated with transportation services provided by affiliates of Tampa Electric Company that exceed the 1994 waterborne transportation benchmark price?

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

11e: ISSUE: Should TECO separate Oil Backout Cost Recovery costs by wholesale and retail jurisdiction prior to calculating the oil backout factor?

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

11f: ISSUE: Should TECO refund the non-jurisdictional portion of Oil Backout Cost Recovery costs previously recovered from its ratepayers?

FIPUG: FIPUG 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 Generating Performance Incentive Factor Issues

12. ISSUE: What is the appropriate GPIF reward or penalty for performance achieved during the period October, 1994 through March, 1995?

FIPUG: FIPUG 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 should the GPIF targets/ranges be for the period October, 1995 through March, 1996?

FIPUG: FIPUG 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

14. ISSUE: Should Gulf Power Company's October 1994 through March 1995 GPIF amount be adjusted to exclude Plant Daniel Unit 1 and Unit 2?

FIPUG: FIPUG 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 Oil Backout Issues

15. ISSUE: What is the final oil backout true-up amount for the October, 1994 through March, 1995 period?

FIPUG: FIPUG 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 estimated oil backout true-up amount for the period April, 1995 through September, 1995?

FIPUG: FIPUG 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 total oil backout true-up amount to be collected during the period October, 1995 through March, 1996?

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

18. ISSUE: What is the projected oil backout cost recovery factor for the period October, 1995 through March, 1996?

FIPUG: FIPUG 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 Issues

19. ISSUE: What is the appropriate final capacity cost recovery true-up amount for the period October, 1994 through March, 1995?

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

20. ISSUE: What is the estimated capacity cost recovery true-up amount for the period April, 1995 through September, 1995?
- FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
21. ISSUE: What is the total capacity cost recovery true-up amount to be collected during the period October, 1995 through March, 1996?
- FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
22. ISSUE: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period October, 1995 through March, 1996?
- FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
23. ISSUE: What is the projected capacity cost recovery factors for the period October, 1995 through March, 1996?
- FIPUG: FIPUG 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 Capacity Cost Recovery Issue

##### Florida Power Corporation

24. ISSUE: Should the Commission allow FPC to recover the Termination Payments associated with its settlement agreement with Auburndale Power Partners, Limited Partnership?
- FIPUG: FIPUG has no position at this time, but reserves the right to take a position on this issue by the date of the prehearing conference.
- 24a: ISSUE: Is it reasonable and appropriate for Gulf Power Company to change the cycle for setting the purchased power capacity cost recovery factors from two sets of six-month factors (October-March; April-September) to one set of twelve-month factors (October-September)?



FIPUG: FIPUG 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 Aerial Coal Inventory Issue

25. ISSUE: Should the Commission approve a permanent change in the frequency of aerial coal inventory surveys from quarterly to semi-annually?

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

F. STIPULATED ISSUES:

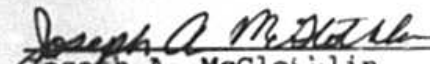
None at this time.

G. PENDING MOTIONS:

FIPUG has no pending motions.

H. OTHER MATTERS:

None at this time.

  
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Attorneys for the Florida  
Industrial Power Users Group

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Florida Industrial Power Users Group's Prehearing Statement has been furnished by hand delivery\* or by U.S. Mail to the following parties of record this 12th day of July, 1995:

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