

MACFARLANE AUSLEY FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

220 GADSDEN AVENUE
SUITE 1000
TALLAHASSEE, FLORIDA 32301
(904) 224-5000 FAX (904) 222-1760

100 MACFARLANE AVENUE, SUITE 2000
TALLAHASSEE, FLORIDA 32301
(904) 224-5000 FAX (904) 222-1760

400 GADSDEN AVENUE
SUITE 1000
TALLAHASSEE, FLORIDA 32301
(904) 224-5000 FAX (904) 222-1760

February 2, 1996

HAND DELIVERED

Tallahassee

ORIGINAL
FILE COPY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause
with Generating Performance Incentive Factor;
FPSC Docket No. 960001-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

JDB/pp
Enclosures

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

DOCUMENT NUMBER-DATE

01213 FEB-2 1996

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 960001-EI
FILED: February 2, 1996

ORIGINAL
FILE COPY

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 February 21, 1996 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, 1995 through September 30, 1995 period?

Tampa Electric's Position: An underrecovery of \$437,285.

(Witness: Pennino)

Issue No. 2: What is the appropriate projected fuel adjustment true-up amount for the period October 1, 1995 through March 31, 1996, based upon actual data for the period October 1, 1995 through November 30, 1995 and revised estimates for the period December 1, 1995 through March 31, 1996?

Tampa Electric's Position: An overrecovery of \$1,037,187.

(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, 1996?

Tampa Electric's Position: An overrecovery of \$599,902.

(Witness: Pennino)

DOCUMENT NUMBER-DATE

01213 FEB-28

FPSC-RECORDS/REPORTING

Issue No. 4: What is the appropriate levelized fuel adjustment factor for Tampa Electric to apply during the period April 1, 1996 through September 30, 1996?

Tampa Electric's Position: 2.390 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, 1995 through September 30, 1995 period?

Tampa Electric's Position: The appropriate final true-up amount is an overrecovery of \$179,568. (Witness: Pennino)

Issue No. 6: What is the appropriate capacity cost recovery true-up amount for the period October 1, 1995 through March 31, 1996, based upon actual data for the period October 1, 1995 through November 30, 1995 and revised estimates for the period December 1, 1995 through March 31, 1996?

Tampa Electric's Position: An underrecovery of \$17,956. (Witness: Pennino)

Issue No. 7: What is the appropriate end of period capacity cost recovery total net true-up as of March 31, 1996?

Tampa Electric's Position: An overrecovery of \$161,612. (Witness: Pennino)

Issue No. 8: What is the appropriate capacity cost recovery factor for Tampa Electric to apply during the period April 1, 1996 through September 30, 1996?

Tampa Electric's Position: .148 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, 1995 through September 30, 1995?

Tampa Electric's Position: Reward of \$376,230 (adjusted to include regulatory assessment fee of one-twelfth of one-percent) for performance experienced during the period April 1, 1995 through September 30, 1995. (Witness: Keselowsky)

Issue No. 10: What are the appropriate GPIF targets and ranges for Tampa Electric to apply to the period April 1, 1996 through September 30, 1996?

Tampa Electric's Position: As set forth in Attachment "A" to the Prepared Direct Testimony of George A. Keselowsky, filed January 22, 1996. (Witness: Keselowsky)

OIL BACKOUT COST RECOVERY

Issue No. 11: Should TECO separate Oil Backout Cost Recovery costs by wholesale and retail jurisdiction prior to calculating the oil backout factor?

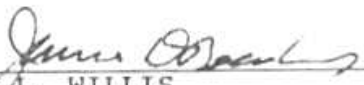
Tampa Electric's Position: No. Separation of Oil Backout costs would not be appropriate for reasons more fully discussed in the Prepared Direct Testimony of Elizabeth A. Townes. (Witness: Townes)

Issue No. 12: Should TECO refund the non-jurisdictional portion of Oil Backout Cost Recovery costs previously recovered from its ratepayers?

Tampa Electric's Position: No. If the Commission concludes that Oil Backout costs should be separated, such interpretation should be applied only on a prospective basis. A retroactive application would be unfair, for reasons more fully discussed in the Prepared Direct Testimony of Mary Jo Pennino. (Witness: Pennino)

DATED this 2nd day of February, 1996.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
Macfarlane Ausley Ferguson & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(904) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

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 2nd day of February, 1996 to the following:

Ms. Martha C. Brown*
Ms. Mary Elizabeth Culpepper
Division of Legal Services
Florida Public Service Comm'n.
101 East Gaines Street
Tallahassee, FL 32399-0863

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

Mr. Joseph A. McGlothlin
Ms. Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas
117 S. Gadsden Street
Tallahassee, FL 32301

Mr. Jack Shreve
Office of Public Counsel
Room 812
111 West Madison Street
Tallahassee, FL 32399-1400

Mr. Matthew M. Childs
Steel Hector & Davis
Suite 601
215 South Monroe Street
Tallahassee, FL 32301

Mr. John W. McWhirter
McWhirter, Reeves, McGlothlin,
Davidson & Bakas
Post Office Box 3350
Tampa, FL 33601

Ms. Suzanne Brownless
Suzanne Brownless P.A.
1311-B Paul Russell Road #202
Tallahassee, FL 32301

Mr. David M. Kleppinger
McNees, Wallace & Nurick
Post Office Box 1166
Harrisburg, PA 17108-1166

Mr. Floyd R. Self
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32301-1876

Mr. G. Edison Holland, Jr.
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32576

Mr. Barry Huddleston
Destec Energy
2500 CityWest Blvd. Suite 150
Houston, TX 77042

Mr. Eugene M. Tricko
Post Office Box 596
Berkeley Springs, WV 25411

Mr. Roger Yott
Air Products & Chemicals, Inc.
7540 Windsor Drive, Suite 301
Allentown, PA 18195

Mr. Richard J. Salem
Ms. Marian B. Rush
Salem, Saxon & Nielsen, P.A.
Post Office Box 3399
Tampa, FL 33601

Mr. Peter J. P. Brickfield
Brickfield, Burchette & Ritts
1025 Thomas Jefferson St. N.W.
Eighth Floor, West Tower
Washington, D.C. 20007-0805

Mr. Stephen R. Yurek
Dahlen, Berg & Co.
2150 Dain Bosworth Plaza
60 South Sixth Street
Minneapolis, MN 55402



ATTORNEY