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August 12, 1996

HAND-DELIVERED

Blanca S. Bayo, Director  
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ACK \_\_\_\_\_  
AFA 1  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
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SEC 1  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

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

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and fifteen copies of The Florida Industrial Power Users Group's Prehearing Statement in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Yours truly,

*Joseph A. McGlothlin*  
Joseph A. McGlothlin

JAM/pw  
Encls.

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
08442 AUG 12 1996  
EPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Fuel and Purchased Power ) DOCKET NO. 960001-EI  
Cost Recovery Clause and )  
Generating Performance Incentive ) FILED: August 12, 1996  
Factor. )  
\_\_\_\_\_ )

THE FLORIDA INDUSTRIAL POWER  
USERS GROUP'S PREHEARING STATEMENT

The Florida Industrial Power Users Group (FIPUG), 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

08442 AUG 12 88

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, 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.
2. ISSUE: What are the estimated fuel adjustment true-up amounts for the period April, 1996 through September, 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.
3. ISSUE: What are the total fuel adjustment true-up amounts to be collected during the period October, 1996 through March, 1997?  
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, 1996 through March, 1997?  
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 and capacity cost recovery charge for billing purposes?  
FIPUG: The factor should be effective beginning with the specified fuel cycle and thereafter for the period October, 1996, through March, 1997. Billing cycles may start before April 1, 1996, and the last cycle may be read after September 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, 1996 through March, 1997?

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

9. ISSUE: Should an electric utility be permitted to include, for retail fuel cost recovery purposes, fuel costs of generation at any of its units which exceed, on a cents-per-kilowatt-hour basis, the average fuel cost of total generation (wholesale plus retail) out of those same units?

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.

10. ISSUE: Should the investor-owned electric utilities continue to file Fuel Cost Recovery Forms, PSC/EAG8(10/94) as required by Commission Directive issued April 24, 1980?

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

- 11a. ISSUE: Should Florida Power and Light Company recover replacement energy costs incurred as a result of outages at Plant St. Lucie and Plant Turkey Point during the period September 1994 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.

11b. ISSUE: Should Florida Power and Light Company recover costs associated with the thermal power uprate of Turkey Point Units 3 and 4?

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: Has Florida Power and Light Company appropriately included 42% of the Cypress Energy Company settlement payment for recovery through the fuel costs recovery clause as directed in Order No. PSC-96-0889-FOF-EU?

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.

12a. ISSUE: Has Florida Power Corporation confirmed the validity of the methodology used to determine the equity component of Electric Fuels Corporation's capital structure for calendar year 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.

12b. ISSUE: Has Florida Power Corporation 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.

12c. ISSUE: Has Florida Power Corporation appropriately included the Orlando Cogen, L.P. settlement payment for recovery through the fuel cost recovery clause as directed by Order No. PSC-96-0898-AS-EQ?

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.

13a. ISSUE: What is the appropriate 1995 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.

13b. ISSUE: Has Tampa Electric Company adequately justified any costs associated with the purchase of coal from Gatliff Coal Company that exceed the 1995 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.

13c. ISSUE: What is the appropriate 199 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.

13d. ISSUE: Has Tampa Electric Company adequately justified any costs associated with transportation services provided by affiliates of Tampa Electric Company that exceed the 1995 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.

13e. ISSUE: Has Tampa Electric Company adequately justified any costs associated with transportation services provided by affiliates of Tampa Electric Company that exceed the 1995 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.

14. ISSUE: What is the appropriate GPIF reward or penalty for performance achieved 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.

15. ISSUE: What should the GPIF targets/ranges be for the period October, 1996 through March, 1997?

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.

16a. ISSUE: Should Florida Power and Light Company's request to exclude the outage hours due to excess cooling canal vegetation at Turkey Point Unit 3 be approved?

- 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.
- 16b. ISSUE: Should Florida Power and Light Company's request to file targets on an annual basis rather than on a six-month basis be approved?
- 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: Should Gulf Power Company be allowed to use seasonal historical data to project heat rates for the next 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.
18. ISSUE: Should the additional generation due to scrubbing be removed from Tampa Electric Company's heat rate calculation for Big Bend Unit 3?
- 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.
- 19a. ISSUE: What is the appropriate final capacity cost recovery true-up amount 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.
- 19b. ISSUE: What is the appropriate final 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.
- 20a. ISSUE: What is the estimated capacity cost recovery true-up amount for the period April, 1996 through September, 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.

- 20b. ISSUE: What is the estimated capacity cost recovery true-up amount for the period October, 1995 through September, 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.
- 21a. ISSUE: What is the total capacity cost recovery true-up amount to be collected during the period October, 1996 through March, 1997?
- 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.
- 21b. ISSUE: What is thte total capacity cost recovery true-up amount to be collected during the period October, 1996 through September, 1997?
- 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.
- 22a. ISSUE: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period October, 1996 through March, 1997?
- 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.
- 22b. ISSUE: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period October, 1996 through September, 1997?
- 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.
- 23a. ISSUE: What are the projected capacity cost recovery factors for the period October, 1996 through March, 1997?
- 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.
- 23b. ISSUE: What are the projected capacity cost recovery factors for the period October, 1996 through September, 1997?



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: Has Florida Power and Light Company appropriately included 58% of the Cypress Energy Company settlement payment for recovery through the capacity cost recovery clause as directed in Order No. PSC-96-0889-FOF-EU?

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.

24b. ISSUE: Should the Commission approve Florida Power and Light Company's request to implement its capacity cost recovery factor on an annual basis for the period October, 1996 through September, 1997?

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:

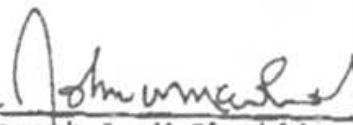
None at this time.

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 August, 1996:

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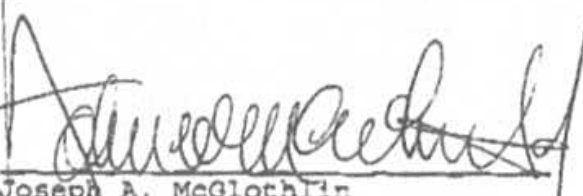
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