



STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

FILE COPY

c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400
904-488-9330

JACK SHREVE
PUBLIC COUNSEL

July 28, 1997

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

RE: Docket No. 970001-EI

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Prehearing Statement of the Office of Public Counsel in the above-referenced docket.

Also enclosed is a 3.5 inch diskette containing the Prehearing Statement of the Office of Public Counsel in WordPerfect for Windows 6.1. Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Stephen C. Burgess
Deputy Public Counsel

ACK _____
AFA Vandiner
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RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE

07625 JUL 28 5

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILE COPY

In Re: Fuel and Purchased Power)
Cost Recovery Clause with)
Generating Performance Incentive)
Factor)
_____)

DOCKET NO. 970001-EI
FILED: July 28, 1997

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-97-0794-PCO-EI, issued July 2, 1997, submit this Prehearing Statement.

APPEARANCES:

STEPHEN C. BURGESS, ESQUIRE
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
On behalf of the Citizens of the State of Florida

A. WITNESSES:

None.

B. EXHIBITS:

None.

C. STATEMENT OF BASIC POSITION

None Necessary.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

DOCUMENT NUMBER-DATE

07625 JUL 28 97

FPSC-RECORDS/REPORTING

Generic Fuel Adjustment Issues

ISSUE 1: What are the appropriate final fuel adjustment true-up amounts for the period October, 1996, through March, 1997?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 2: What are the estimated fuel adjustment true-up amounts for the period April, 1997, through September, 1997?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 3: What are the total fuel adjustment true-up amounts to be collected during the period October, 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 4: What are the appropriate levelized fuel cost recovery factors for the period October, 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.

GPC: No position at this time.
TECO: No position at this time.

ISSUE 5: What should be the effective date of the new fuel adjustment charge for billing purposes?

OPC: The factor should be effective beginning with the specified fuel cycle and thereafter for the period October 1997 through March 1998. Billing cycles may start before October 1, 1997, and the last cycle may be read after March 31, 1998, so that each customer is billed for six months regardless of when the adjustment factor became effective.

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

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 7: What are the appropriate Fuel Cost Recovery Factors for each rate group adjusted for line losses?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 8: What is the appropriate revenue tax factor to be applied in calculating each company's levelized fuel factor for the projection period of October, 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
FPUC: Fernandina: No position at this time.
Marianna: No position at this time.

GPC: No position at this time.
TECO: No position at this time.

ISSUE 9: How should transmission costs be accounted for when determining the transaction price of an economy, Schedule C, broker transaction between two directly interconnected utilities?

OPC: No position at this time.

ISSUE 10: If the cost of transmission is used to determine the transaction price of an economy, Schedule C, broker transaction between two directly interconnected utilities, how should the costs of this transmission be recovered?

OPC: No position at this time.

ISSUE 11: How should transmission costs be accounted for when determining the transaction price of economy, Schedule C, broker transaction that requires wheeling between two non-directly interconnected utilities?

OPC: No position at this time.

ISSUE 12: If the cost of transmission is used to determine the transaction price of an economy, Schedule C, broker transaction that requires wheeling between two non-directly interconnected utilities, how should the costs of this transmission be recovered?

OPC: No position at this time.

ISSUE 13: Does the 20% stockholder sharing of gains from economy energy sales continue to be necessary to encourage economy sales?

OPC: No.

ISSUE 14: 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?

OPC: No. The fuel cost assigned to the retail jurisdiction from any generating unit should never exceed the average cost of fuel actually burned at the unit to meet both wholesale and retail loads times the amount of energy allocable to the retail jurisdiction. Stated differently, a utility's decision to offer a wholesale customer less-than-average fuel costs out of a single or multiple generating units should not cause the fuel cost responsibility of the retail jurisdiction to be greater than the average.

Generic Generating Performance Incentive Factor Issues

ISSUE 15: What is the appropriate GPIF reward or penalty for performance achieved during the period October, 1996, through March, 1997?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 16: What should the GPIF targets/ranges be for the period October 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

Generic Capacity Cost Recovery Issues

ISSUE 17: What is the appropriate final capacity cost recovery true-up amount for the period October, 1996, through March 1997?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 18: What is the estimated capacity cost recovery true-up amount for the period April, 1997, through September, 1997?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 19: What is the total capacity cost recovery true-up amount to be collected during the period October, 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 20: What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period October, 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

ISSUE 21: What are the projected capacity cost recovery factors for the period October, 1997, through March, 1998?

OPC:

FPC: No position at this time.
FPL: No position at this time.
GPC: No position at this time.
TECO: No position at this time.

E. STATEMENT OF LEGAL ISSUES AND POSITIONS: None at this time.

F. STATEMENT OF POLICY ISSUES AND POSITIONS: None at this time.

G. STIPULATED ISSUES: None.

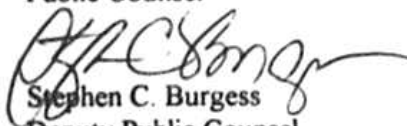
H. PENDING MOTIONS: None.

I. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Respectfully submitted,

Jack Shreve
Public Counsel



Stephen C. Burgess
Deputy Public Counsel

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Attorneys for the Citizens
of the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 970001-EI**

I HEREBY certify that a copy of the foregoing PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL has been served by *hand delivery or U.S. Mail to the following parties of record on this 28th day of July, 1997.

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