Tel 850 444 6000



January 22, 1998

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

Dear Ms. Bayo:

RE: Docket No. 980002-EG

Enclosed are an original and ten copies of the Preliminary Statement of Gulf Power Company Regarding Issues and Positions to be filed in the above docket.

Also enclosed is a 3.5 inch double sided, high density diskette containing the Statement in WordPerfect for Windows 6.1 format as prepared on a Windows NT based computer.

0	Sino	erely,
ACK, WE	\$	ian D. Cranner
AFALLANDE	esey	0
APP		aff D. Cranmer
CAF	Si	and Assistant Treasurer
CMU	38	<
CTR R.O.O	Ćasl	
(EAG) Ballin	3 Eaci	osure
LEG _	cc:	Beggs and Lane
LIN 3		Jeffrey A. Stone, Esquire
OFC		
RCII		
SEC _	-	

WAS ____



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Conservation Cost Recovery)		
Clause)	Docket No.	980002-EG
		Filed: Jar	uary 23, 1998

PRELIMINARY STATEMENT OF GULF FOWER COMPANY REGARDING ISSUES AND POSITIONS

Gulf Power Company, ("Gulf Power", "Gulf", or "the "Company"), by and through its undersigned attorneys, files this preliminary statement of issues and positions, saying:

Generic Energy Conservation Cost Recovery Issues

ISSUE 1: What is the appropriate adjusted net true-up amount for the period October, 1996 through September, 1997?

GULF: Over recovery \$520,590. (Neyman)

ISSUE 2: What is the appropriate projected end-of-period total net true-up amount for the period October, 1997 through March, 1998?

GULF: Over recovery \$809,972. (Neyman)

PIC A G

ISSUE 3: What is the appropriate conservation cost recovery factor for the period April, 1998 through March, 1999?

GULF: The Company's proposed conservation cost recovery factors by customer class for the period April 1998 through March 1999 are as follows:

RATE CLASS	CONSERVATION COST RECOVERY FACTORS ¢/KWH	
RS, RST	0.020	
GS, GST	0.020	
GSD, GSDT	0.019	
LP, LPT	0.018	
PX, PXT, RTP, CSA	0.018	
OSI, OSII	0.018	
OSIII	0.019	
OSIV	0.020	
SBS	0.018	

(Neyman).

Gulf Power Company-Specific Conservation Cost Recovery Issues

NONE RAISED BY GULF POWER COMPANY

Dated this 22nd day of January, 1998.

Respectfully submitted,

JEFFREY A. STONE

Florida Bar No. 32595

RUSSELL A. BADDERS

Florida Bar No. 007455

Beggs & Lane

P. O. Box 12950

(700 Blount Building)

Pensacola, FL 32576-2950

(904) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery)
) Docket No. 980002-EG

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail this 22rdday of January 1998 to the following:

Norman Horton, Jr., Esquire Messer, Vickers, Caparello, French and Madsen P. O. Box 1876 Tallahassee FL 32302

Jack Shreve, Esquire
Office of Public Counsel
111 W. Madison St., Suite 812
Tallahassee FL 32399-1400

Stuart L. Shoaf St. Joe Natural Gas Company P. O. Box 549 Port St. Joe FL 32456

Charles A. Guyton, Esquire Steel, Hector & Davis 215 S. Monroe, Suite 601 Tallahassee FL 32301

James D. Beasley, Esquire Ausley & McMullen P. O. Box 391 Tallahassee FL 32302

Ansley Watson, Jr., Esquire Macfarlane Ferguson & McMullen P. O. Box 1531 Tampa FL 33601-1531 Vicki Kaufman, Esquire McWhirter Reeves McGlothlin Davidson Rief & Bakas 117 S. Gadsden Street Tallahassee FL 32301

William Keating, Esquire Staff Counsel FL Public Service Commission 2540 Shumard Oak Boulevard Tallahassee FL 32399-0863

James McGee, Esquire Florida Power Corporation P. O. Box 14042 St. Petersburg FL 33733-4042

Wayne L. Schiefelbein, Esq. Gatlin, Woods, Carlson & Cowdery 1709-D Mahan Drive Tallahassee FL 32308 John W. McWhirter, Jr., Esq. McWhirter, Reeves, McGlothlin, Davidson Rief & Bakas, P.A. P. O. Box 3350 Tampa FL 33601

Kenneth A. Hoffman, Esq. Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee FL 32302-0551

Debra Swim, Esquire LEAF, Inc. 1115 N. Gadsden Street Tallahassee FL 32303

JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 0007455
Beggs & Lane
P. O. Box 12950
Pensacola FL 32576
(850) 432-2451
Attorneys for Gulf Power Company