

One Energy Place  
Pensacola, Florida 32520

Tel 850 444 6000

ORIGINAL



January 30, 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 Prehearing Statement of Gulf Power Company 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.

Sincerely,

ACK	
AFA	<u>Handwritten</u>
APP	_____
CAF	_____
CMU	_____

Susan D. Cranmer  
Assistant Secretary and Assistant Treasurer

CTR	_____
EAG	<u>Ballinger</u>
LEG	<u>1</u>
LIN	<u>3</u>
CFC	_____
RCH	_____
SEC	<u>1</u>
WAS	_____
OTH	_____

Enclosure  
EGC-2  
Beggs and Lane  
Jeffrey A. Stone, Esquire

DOCUMENT NUMBER-DATE  
01663 FEB-2 88  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

IN RE: Conservation Cost Recovery )  
Clause )  
\_\_\_\_\_)

Docket No. 980002-EG  
Filed: February 2, 1998

PREHEARING STATEMENT OF GULF POWER COMPANY

Gulf Power Company, ("Gulf Power", "Gulf", or "the "Company"), by and through its undersigned attorneys, and pursuant to Commission Order No. PSC-98-0036-PCO-EG issued January 6, 1998 and Rule 25-22.038(3), Florida Administrative Code, files this prehearing statement, saying:

A. APPEARANCES:

JEFFREY A. STONE, Esquire, and RUSSELL A. BADDERS, Esquire, of Beggs & Lane, 700 Blount Building, 3 West Garden Street, P.O. Box 12950, Pensacola, FL 32576-2950  
On behalf of Gulf Power Company.

B. WITNESSES: All witnesses known at this time, who may be called by Gulf Power Company, along with the subject matter and issue numbers which will be covered by his testimony, are as follows:

<u>Witness</u> <u>(Direct)</u>	<u>Subject Matter</u>	<u>Issues</u>
1. Margaret D. Neyman	Components of Gulf's Conservation Plan and associated costs; projections and program results	1, 2, 3

DOCUMENT NUMBER-DATE  
01663 FEB-28  
FPSC-RECORDS/REPORTING

C. EXHIBITS:

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>
_____ (MDN-1)	Neyman	Schedules CT-1 through CT-6
_____ (MDN-2)	Neyman	Copy of Staff's First Set of Interrogatories to Gulf Power Company, Docket No. 960002, October 30, 1996, Question No. 1.
_____ (MDN-3)	Neyman	Schedules C-1 through C-5

D. STATEMENT OF BASIC POSITION

Gulf Power Company's Statement of Basic Position:

It is the basic position of Gulf Power Company that the proposed ECCR factor presents the best estimate of Gulf's Conservation expense for the period April 1998 through March 1999, including the true-up calculations and other adjustments allowed by the Commission.

E. STATEMENT OF ISSUES AND POSITIONS

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 of \$520,590. (Neyman)(Based on Staff's Preliminary Statement of Issues and Positions, Gulf and Staff are in agreement)

**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 of \$809,972. (Neyman)(Based on Staff's Preliminary Statement of Issues and Positions, Gulf and Staff are in agreement)

**ISSUE 3:** What are the appropriate conservation cost recovery factors by customer class 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:

<b>RATE CLASS</b>	<b>CONSERVATION COST RECOVERY FACTORS ¢/KWH</b>
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). (Based on Staff's Preliminary Statement of Issues and Positions, Gulf and Staff are in agreement)

**Company-Specific Conservation Cost Recovery Issues**

NO COMPANY-SPECIFIC ISSUES WITH REGARD TO GULF POWER COMPANY HAVE BEEN RAISED IN THE PRELIMINARY LIST OF ISSUES AND POSITIONS SUBMITTED BY ANY PARTY AND RECEIVED BY GULF POWER COMPANY PRIOR TO THE FILING OF THIS PREHEARING STATEMENT.

E. STIPULATED ISSUES

GULF: Yet to be determined. Gulf is willing to stipulate that the testimony of all witnesses whom no one wishes to cross examine be inserted into the record as though read, cross examination be waived, and the witness's attendance at the hearing be excused.

G. PENDING MOTIONS:

GULF: None.

H. OTHER MATTERS:

GULF: If other issues are raised for determination at the hearings set for February 25 - 27, 1998, Gulf respectfully requests an opportunity to submit additional statements of position and, if necessary, file additional testimony.

Dated this 30th day of January 1998

Respectfully submitted,

*Russell A. Badders*

**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 7455

**Beggs & Lane**

P. O. Box 12950

(700 Blount Building)

Pensacola, FL 32576-2950

(850) 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 30th day of January 1998 to the following:

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

Vicki Kaufman, Esquire  
McWhirter Reeves McGlothlin  
Davidson Rief & Bakas  
117 S. Gadsden Street  
Tallahassee FL 32301

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

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

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

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

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

Wayne L. Schiefelbein, Esq.  
Gatlin, Woods, Carlson & Cowdery  
1709-D Mahan Drive  
Tallahassee FL 32308

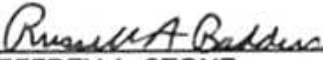
James D. Beasley, Esquire  
Ausley & McMullen  
P. O. Box 391  
Tallahassee FL 32302

Ansley Watson, Jr., Esquire  
Macfarlane Ferguson & McMullen  
P. O. Box 1531  
Tampa FL 33601-1531

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