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February 6, 1998

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Re: Document No. 980007-EI

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and ten copies of Florida Industrial Power Users Group's Prehearing Statement in the above docket. Also enclosed is a diskette containing this document in WordPerfect 5.1 format.

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

ACK Sincerely,
AFA *[Signature]*
APP *[Signature]*
CAF *[Signature]*
CMU Vicki Gordon Kaufman
CTR VGR/pw
EAG Encls.
LEG 1
LIN 3
OPC _____
RCH _____
SEC 1
WAS _____
OTH _____

RECEIVED & FILED
[Signature]
BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
01961 FEB-6 88
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost)
Recovery Clause)
_____)

Docket No. 980007-EI

Filed: February 6, 1998

**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:

JOHN W. McWHIRTER, JR., McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A., 100 North Tampa Street, Suite 2800, Post Office Box 3350, Tampa, Florida 33601-3350; JOSEPH A. McGLOTHLIN, VICKI GORDON KAUFMAN, McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A., 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 Group's Statement of Basic Position:

None at this time.

E. STATEMENT OF ISSUES AND POSITIONS:

Generic Environmental Cost Recovery Issues

1. **ISSUE:** What are the appropriate final environmental cost recovery true-up amounts for the period ending September 30, 1997?

DOCUMENT NUMBER-DATE

01961 FEB-6 88

FPSC-RECORDS/REPORTING

- 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 environmental cost recovery true-up amounts for the period October 1997 through March 1998?
- 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 environmental cost recovery true-up amounts to be collected during the period April 1998 through September 1998?
- 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 projected environmental cost recovery amounts for the period April 1998 through September 1998?
- 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 environmental cost recovery factors for billing purposes?
- 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.
6. **ISSUE:** What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery true-up amounts to be collected during the period beginning April 1998 through September 1998.
- 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:** How should the newly proposed environmental costs be allocated to the rate classes?
- 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 are the appropriate Environmental Cost Recovery Factors for the period April 1998 through September 1998 for each rate group?
- 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.

Company-Specific Environmental Cost Recovery Issues

Tampa Electric Company

9. **ISSUE:** Should the Commission approve Tampa Electric Company's request for recovery of costs of the Gannon Ignition Oil Tank Upgrade through the Environmental Cost Recovery Clause?
- 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 Commission approve Tampa Electric Company's request for recovery of costs of the Big Bend Fuel Oil Tank Number 1 Upgrade through the Environmental Cost Recovery Clause?
- 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.
11. **ISSUE:** Should the Commission approve Tampa Electric Company's request for recovery of costs of the Big Bend Fuel Oil Tank Number 2 Upgrade through the Environmental Cost Recovery Clause?
- 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.
12. **ISSUE:** Should the Commission approve Tampa Electric Company's request for recovery of costs of the Phillips Tank Number 1 Upgrade through the Environmental Cost Recovery Clause?
- 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.
13. **ISSUE:** Should the Commission approve Tampa Electric Company's request for recovery of costs of the Phillips Tank Number 4 Upgrade through the Environmental Cost Recovery Clause?
- 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 adjustment for SO₂ Allowances, if any, should be made to Tampa Electric Company's Environmental Cost Recovery Factor as a result of the Commission's decision in Docket No. 970171-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.

15. **ISSUE:** What is the appropriate methodology for determining the credit to the Environmental Cost Recovery Clause for the incremental SO₂ Allowance costs incurred as a result of the Lakeland and FMPA wholesale sales?

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. **OTHER ISSUES:**

16. **ISSUE:** Should the Commission approve a change in the frequency of the environmental cost recovery clause hearings from semi-annual hearings to annual hearings? If the change is approved, what 12-month period (fiscal or calendar) should be used and how should the change be implemented?

FIPUG: No.

G. **STIPULATED ISSUES:**

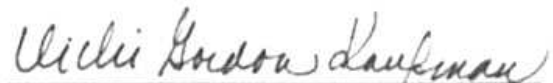
None at this time.

H. **PENDING MOTIONS:**

FIPUG has no pending motions.

I. **OTHER MATTERS:**

None.



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Attorneys for 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 **6th day of February, 1998**:

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