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August 5, 1998

VIA HAND DELIVERY

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

Re: Docket No. 980001-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.

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98 AUG -5 PM 1:47
RECORDS AND REPORTING

ACK ✓ Sincerely,
AFA *Handover*
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CAF Vicki Gordon Kaufman
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REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power)
 Cost Recovery Clause and)
 Generating Performance Incentive)
 Factor.)

Docket No. 980001-EI

Filed: August 5, 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, Decker, Kaufman, Arnold & Steen, 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, Decker, Kaufman, Arnold & Steen, 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 Fuel Adjustment Issues

1. **ISSUE:** What are the appropriate final fuel adjustment 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.
2. **ISSUE:** What are the appropriate estimated fuel adjustment true-up 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.
3. **ISSUE:** What are the appropriate total fuel adjustment true-up amounts to be collected/refunded?

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 is the appropriate recovery period to collect/refund the total fuel adjustment true-up amounts?

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:** Should the Commission allow the electric utilities to keep their levelized fuel cost recovery factors at the rate set by Order No. PSC-98-0412-FOF-EI, in Docket No. 980001-EI, issued March 20, 1998, for the period October 1998 through December 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.
6. **ISSUE:** What are the appropriate levelized fuel cost recovery factors for the period October 1998 through December 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:** What should be the effective date of the new fuel adjustment charge and capacity cost recovery charge 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.
8. **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/delivery voltage level 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.
9. **ISSUE:** What are the appropriate Fuel Cost Recovery Factors for each rate class/delivery voltage level class 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.
10. **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 1998 through December 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.

Company-Specific Fuel Adjustment Issues

Florida Power Corporation

- 11A. **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 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.
- 11B. **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.
- 11C. **ISSUE:** Has Florida Power Corporation properly calculated the 1997 price for waterborne transportation services provided by Electric Fuels Corporation?

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.

Tampa Electric Company

12A. **ISSUE:** What is the appropriate 1997 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.

12B. **ISSUE:** Has Tampa Electric Company adequately justified any costs associated with the purchase of coal from Gatliff Coal Company that exceed the 1997 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.

12C. **ISSUE:** What is the appropriate 1997 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.

12D. **ISSUE:** Has Tampa Electric Company adequately justified any costs associated with transportation services provided by affiliates of Tampa Electric Company that exceed the 1997 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.

12E. **ISSUE:** How should Tampa Electric Company continue the temporary base rate reduction pursuant to the stipulation approved by the Commission by Order No. PSC-96-1300-S-EI, in Docket No. 960409-EI, issued October 24, 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.

Generic Generating Performance Incentive Factor Issues

13. **ISSUE:** What is the appropriate GPIF reward or penalty for performance achieved during 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.

14. **ISSUE:** What should the GPIF targets/ranges be for the period October 1998 through December 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.

Generic Capacity Cost Recovery Factor Issues

15A. **ISSUE:** What is the appropriate final capacity cost recovery true-up amount 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.

15B. **ISSUE:** What is the appropriate final capacity cost recovery true-up amount 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.

16A. **ISSUE:** What is the estimated capacity cost recovery true-up amount 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.

16B. **ISSUE:** What is the estimated capacity cost recovery true-up amount for the period October 1997 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.

17. **ISSUE:** What is the total capacity cost recovery true-up amount to be collected/refunded?

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:** What is the appropriate recovery period to collect/refund the total capacity cost recovery true-up amounts?

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.

19. **ISSUE:** What is the appropriate projected net purchased power capacity cost recovery amount to be included in the recovery factor for the period October 1998 through December 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.

20A. **ISSUE:** Should the Commission allow Florida Power Corporation and Tampa Electric Company to keep their capacity cost recovery factors at the rate set by Order No. PSC-98-0412-FOF-EI, in Docket No. 980001-EI, issued March 20, 1998, for the period October 1998 through December 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.

20B. **ISSUE:** Should the Commission allow Gulf Power Company to keep its capacity cost recovery factors at the rate set by Order No. PSC-97-1045-FOF-EI, in Docket No. 970001-EI, issued September 5, 1997, for the period October 1998 through December 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.

21. **ISSUE:** What are the projected capacity cost recovery factors for the period October 1998 through December 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.

F. **OTHER ISSUES:**

None at this time.

G. **STIPULATED ISSUES:**

None at this time.

H. **PENDING MOTIONS:**

FIPUG has no pending motions.

I. **OTHER MATTERS:**

None.

Vicki Gordon Kaufman

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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 foregoing **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 **5th day of August, 1998**:

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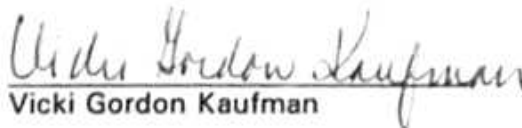
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