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98 AUG -5 PM 4:36
RECORDS AND
REPORTING

August 5, 1998

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. 980007-EI

Dear Ms. Bayó:

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

Also enclosed is a 3.5 inch diskette containing the Preliminary List of Issues and Positions 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.

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

Sincerely,

[Signature]
John Roger Howe
Deputy Public Counsel

- ACK _____
- AFA *[Signature]*
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG *[Signature]*
- LEG _____
- LIN 3
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- QTH _____

DOCUMENT NUMBER-DATE
08305 AUG -5 98
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost)
recovery clause.)
_____)

Docket No. 980007-EI

Filed: August 5, 1998

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-98-0815-PCO-EI, issued June 19, 1998, submit this Prehearing Statement.

APPEARANCES:

JOHN ROGER HOWE, 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
08309 AUG-5 98
FPSC-RECORDS/REPORTING

Generic Environmental Cost Recovery Issues

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

OPC:

FPL: No position at this time.

GULF: No position at this time.

ISSUE 1A: What are the appropriate final environmental cost recovery true-up amounts for the period ending March 31, 1998?

OPC:

TECO: No position at this time.

ISSUE 2: What are the estimated environmental cost recovery true-up amounts for the period October 1997 through September 1998?

OPC:

FPL: No position at this time.

GULF: No position at this time.

ISSUE 2A: What are the estimated environmental cost recovery true-up amounts for the period April 1998 through September 1998?

OPC:

TECO: No position at this time

ISSUE 3: What are the total environmental cost recovery true-up amounts to be collected?

OPC:

FPL: No position at this time.

GULF: No position at this time.

TECO: No position at this time

ISSUE 4: What are the appropriate projected environmental cost recovery amounts for the period October 1998 through December 1998?

OPC:

FPL: No position at this time.

GULF: No position at this time.

TECO: No position at this time

ISSUE 5: Should the Commission allow the electric utilities to keep their environmental cost recovery factors at the rate set by Order Nos. PSC-97-1047-FOF-EI and PSC-98-0408-FOF-EI for the projected period October 1998 through December 1998?

OPC: No position at this time

ISSUE 6: What is the appropriate recovery period to collect the total environmental cost recovery true-up amounts?

OPC:

FPL: No position at this time.

GULF: No position at this time.

TECO: No position at this time

ISSUE 7: What should be the effective date of the environmental cost recovery factors for billing purposes?

OPC: No position at this time

ISSUE 8: What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery true-up amounts to be collected?

OPC:

FPL: No position at this time.

GULF: No position at this time.

TECO: No position at this time

ISSUE 9: What are the appropriate Environmental Cost Recovery Factors for the period beginning October 1998 for each rate group?

OPC:

FPL: No position at this time.

GULF: No position at this time.

TECO: No position at this time

Company-Specific Fuel Adjustment Issues

Florida Power & Light Company

ISSUE 10: Should the Commission approve Florida Power & Light Company's request for recovery of costs of the Wastewater/Stormwater Discharge Elimination Project through the Environmental Cost Recovery Clause?

OPC: No position at this time.

ISSUE 10A: How should the newly proposed environmental costs for the Wastewater/Stormwater Discharge Elimination Project be allocated to the rate classes?

OPC: No position at this time.

Gulf Power Company

ISSUE 11: What adjustment, if any, should be made to the Environmental Cost Recovery Clause to reflect an amount which may be in base rates for the costs of the underground fuel storage tanks which have been replaced by aboveground fuel storage tanks as reported in Audit Disclosure No. 1 of the Florida Public Service Commission's Environmental Cost Recovery Clause Audit Report for the Period Ended September 30, 1997?

OPC: 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.

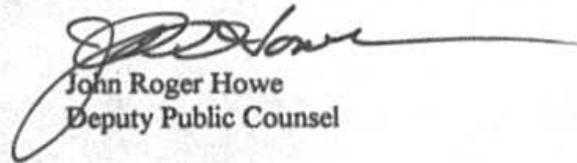
H. PENDING MOTIONS: None.

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



John Roger Howe
Deputy Public Counsel

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(850) 488-9330

Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE
980007-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Public Counsel's Prehearing Statement has been furnished by U.S. Mail or hand-delivery (*) on this 5th day of August, 1998, to the following:

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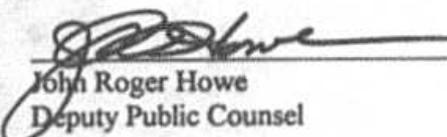
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