

One Energy Place  
Pensacola, Florida 32520

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September 4, 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. 980001-EI, **Transmission Revenue**

Enclosed are an original and ten copies of Gulf Power Company's Issues and Positions concerning Transmission Revenue 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,

*Susan D. Cranmer*  
Susan D. Cranmer

Assistant Secretary and Assistant Treasurer

- ACK \_\_\_\_\_
- AFA *Handwritten*
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_ lw
- CTR \_\_\_\_\_
- EAG *Bederman* Enclosure
- LEG 1 cc: Beggs and Lane
- LIN 3 J. A. Stone, Esquire
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

U9730 SEP-8 88

#F30-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power )  
 Cost Recovery Clauses and Generating ) Docket No. 980001-EI  
 Performance Incentive Factor - ) Filed: September 4, 1998  
**Transmission Reconsideration** )  
 \_\_\_\_\_ )

**PRELIMINARY STATEMENT OF GULF POWER COMPANY  
REGARDING ISSUES AND POSITIONS**

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

**Transmission Reconsideration Issues**

**ISSUE 1:** Does the FERC require that revenue from non-firm transmission services subject to FERC jurisdiction be reflected as a revenue credit in the derivation of firm transmission service rates subject to FERC jurisdiction?

**GULF:** Yes.

**ISSUE 2:** Should revenue from non-firm transmission services that must be reflected as a revenue credit in the derivation of firm transmission service rates subject to FERC jurisdiction be credited directly to retail ratepayers through the retail fuel cost recovery clause that is subject to FPSC jurisdiction?

**GULF:** No.

Respectfully submitted this 4<sup>th</sup> day of September, 1998.

*Russell A. Badders*

\_\_\_\_\_  
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DOCUMENT FILED DATE  
 09730 SEP-8 1998  
 PENSACOLA, FLORIDA  
 PUBLIC SERVICE COMMISSION

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost )  
Recovery Clause with Generating )  
Performance Incentive Factor )  
\_\_\_\_\_ )

Docket No. 980001-EI

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail this 4<sup>th</sup> day of September 1998 on the following:

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