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RECORDS AND
REPORTING

Steel Hector & Davis LLP
215 South Monroe, Suite 601
Tallahassee, Florida 32301-1804
850.222.2300
850.222.8410 Fax
www.steelhector.com

Matthew M. Childs, P.A.

October 22, 1998

Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, FL 32399-0850

RE: DOCKET NO. 980007-EI

Dear Ms. Bayó:

Enclosed for filing please find the original and ten (10) copies of Florida Power & Light Company's List of Issues and Positions in the above referenced docket.

Also enclosed is a formatted double sided high density 3.5 inch diskette containing the List of Issues and Positions for Florida Power & Light Company.

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Very truly yours,

Matthew M. Childs, P.A.

1 MMC/ml
3 cc: All Parties of Record

DOCUMENT NUMBER-DATE

11815 OCT 22 98

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental) DOCKET NO. 980007-EI
Recovery Clause) FILED: OCTOBER 22, 1998

FLORIDA POWER & LIGHT COMPANY'S
ISSUES AND POSITIONS

1. What is the appropriate final environmental cost recovery true-up amount for the twelve month period ending September 30, 1997?

FPL: In Order No. PSC-98-1131-PHO-EI this Commission approved a \$2,157,919 overrecovery for the period including interest.

2. What is the estimated/actual environmental cost recovery true-up amount for the period October, 1997 through September, 1998?

FPL: \$1,126,518 underrecovery for the period including interest.

3. What is the estimated environmental cost recovery true-up amount for the period October, 1998 through December, 1998?

FPL: \$505,659 net overrecovery for the period including interest.

4. What is the appropriate projected environmental cost recovery amount for the period January, 1999 through December, 1999?

FPL: The total environmental cost recovery amount, adjusted for revenue taxes is \$19,389,953. This amount consists of \$20,619,969 of projected environmental cost for the period net of the prior period overrecovery and taxes.

5. What should be the effective date of the new environmental cost recovery factors for billing purposes?

FPL: The new environmental cost recovery factors should become effective with customer bills for January 1999 through December 1999. This will provide 12 months of billing on the environmental cost recovery factors for all customers

6. 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 January, 1999 through December, 1999?

FPL: The depreciation rates used to calculate the depreciation expense should be the rates that are in effect during the period the allowed capital investment is in service.

7. What are the appropriate environmental cost recovery factors for the period January, 1999 through December, 1999 for each rate group?

FPL:	Rate Class	Environmental Recovery Factor (\$/KWH)
	RS1	0.00024
	GS1	0.00023
	GSD1	0.00023
	OS2	0.00022
	GSLD1/CS1	0.00023
	GSLD2/CS2	0.00022
	GSLD3/CS3	0.00021
	ISST1D	0.00023
	SST1T	0.00021
	SST1D	0.00022
	CILC D/CILC G	0.00022
	CILC T	0.00021
	MET	0.00022
	OL1/SL1	0.00021
	SL2	0.00022

Company-Specific Environmental Cost Recovery Issues

8. Should the Commission approve FPL's proposal to recover the costs of the Wastewater and Stormwater Discharge Elimination Project through the Environmental Cost Recovery Clause?

FPL: Yes. The Wastewater and Stormwater Discharge Elimination Project is designed to eliminate the release of contaminants to the environment by eliminating discharges of wastewater and stormwater in plant operations. Completion of this project will ensure that FPL is in compliance with the new environmental requirements related to wastewater and stormwater. FPL's preliminary cost estimate totals approximately \$13 million and these costs are not otherwise being recovered by FPL.

WITNESSES AND SUBJECT MATTER

<u>WITNESS</u>	<u>SPONSOR</u>	<u>SUBJECT MATTER</u>	<u>EXHIBIT TITLES</u>
K.M. DUBIN	FPL	ECRC Projections for January through December 1999	Appendix I, Forms 42-1P through 42-7P
K.M. DUBIN	FPL	ECRC Estimated/ Actual True-Up for October 1997 through December 1998	Appendix II, Forms 42-1E through 42-8E
R.R. LABAUVE	FPL	New Environmental Compliance Activities	Exhibits

Respectfully submitted,

STEEL HECTOR & DAVIS LLP
215 South Monroe Street #601
Tallahassee, FL 32301
Attorneys for Florida Power
& Light Company

By: 

Matthew M. Childs, P.A.

**CERTIFICATE OF SERVICE
DOCKET NO. 980007-EI**

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Issues and Positions has been furnished by Hand Delivery (*), or U.S. Mail this 22nd day of October, 1998, to the following:

Leslie J. Paugh, Esq.*
Legal Division
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gunter Building, Room 370
Tallahassee, FL 32399-0872


John Roger Howe, Esq.
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399

John W. McWhirter, Jr., Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
P. O. Box 3350
Tampa, FL 33601-3350

Joseph A. McGlothlin, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

Jeffrey A. Stone, Esq.
Beggs and Lane
P. O. Box 12950
Pensacola, FL 32576

James D. Beasley, Esq.
Ausley & McMullen
227 Calhoun Street
P. O. Box 391
Tallahassee, FL 32302


Matthew M. Childs, P.A.