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November 4, 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. 980002-EG

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.

Sincerely,

Handwritten signature: Vicki Gordon Kaufman
Vicki Gordon Kaufman

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG 1 *Ballinger*
- LEG 1
- LIN 3
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McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery)
Clause.)
_____)

Docket No. 980002-EG

Filed: November 4, 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., 400 North Tampa Street, Suite 2450 (33602-5126), 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 Energy Conservation Cost Recovery Issues

1. **ISSUE:** What are the appropriate end-of-period final true-up amounts for the period October 1, 1997 through March 31, 1998?

FORM 10-1-98 FILE DATE

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FLORIDA PUBLIC SERVICE COMMISSION

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 conservation cost recovery factors for the period of January 1999 through December 1999?

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 Conservation Cost Recovery Issues

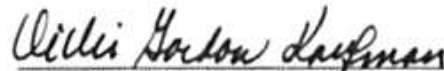
Florida Power & Light Company

3. **ISSUE:** Has FPL accurately measured the savings that are attributed to the customers that are eligible for FPL's Commercial and Industrial Load Control (CILC) Program?

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:** Should FPL customers who entered into agreements to participate in FPL's CILC program but have not taken service under the CILC program continue to be eligible for service under the CILC rate?

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.



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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 **4th day of November, 1998:**

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