

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Gulf Power Company to determine need for proposed electrical power plant in Bay County.

DOCKET NO. 990325-EI

FILED: MAY 6, 1999

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-99-0586-PCO-EI, issued March 30, 1999, the Staff of the Florida Public Service Commission files its Prehearing Statement.

a. All Known Witnesses

Staff has no witnesses at this time.

b. All Known Exhibits

Staff has no exhibits at this time.

c. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

d. Staff's Position on the Issues

ISSUE 1: Has Gulf Power Company demonstrated a need for the proposed Smith Unit 3, taking into account the need for electric system reliability and integrity, as this criterion is used in Section 403.519, Florida Statutes?

POSITION: No position at this time pending the evidence adduced at hearing.

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC \_\_\_\_\_
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

**ISSUE 2:** Has Gulf Power Company demonstrated a need for the proposed Smith Unit 3, taking into account the need for adequate electricity at a reasonable cost, as this criterion is used in Section 403.519, Florida Statutes?

**POSITION:** No position at this time pending the evidence adduced at hearing.

**ISSUE 3:** Did Gulf Power Company's Request for Proposals, and the subsequent analysis of responses, result in Gulf selecting the most cost-effective alternative available?

**POSITION:** No position at this time pending the evidence adduced at hearing.

**ISSUE 4:** Did Gulf Power Company adequately evaluate and include the cost of gas transmission system interconnection for each of the self-build options and respondents to Gulf's Request for Proposals?

**POSITION:** No position at this time pending the evidence adduced at hearing.

**ISSUE 5:** Did Gulf Power Company adequately evaluate and include the cost of electric transmission system interconnection for each of the self-build options and respondents to Gulf's Request for Proposals?

**POSITION:** No position at this time pending the evidence adduced at hearing.

**ISSUE 6:** Has Gulf Power Company demonstrated that the proposed Smith Unit 3 is the most cost-effective alternative available, as this criterion is used in Section 403.519, Florida Statutes?

**POSITION:** No position at this time pending the evidence adduced at hearing.

**ISSUE 7:** Are there any conservation measures taken by or reasonably available to Gulf Power Company which might mitigate the need for the proposed Smith Unit 3?

**POSITION:** No position at this time pending the evidence adduced at hearing.

**ISSUE 8:** Should the Commission grant Gulf Power Company's petition to determine the need for the proposed Smith Unit 3?

**POSITION:** No position at this time pending the evidence adduced at hearing.

**ISSUE 9:** Should this docket be closed?

**POSITION:** No position at this time pending the evidence adduced at hearing.

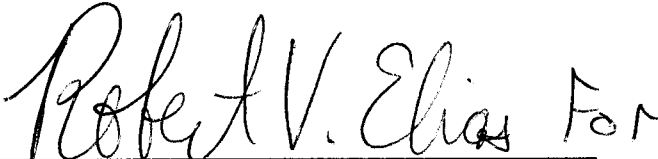
e. Pending Motions

Staff is not aware of any pending motions at this time.

f. Compliance with Order No. PSC-99-0586-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 7th day of May, 1999.



GRACE A. JAYE  
Staff Counsel  
Florida Bar No. 0847143

FLORIDA PUBLIC SERVICE COMMISSION  
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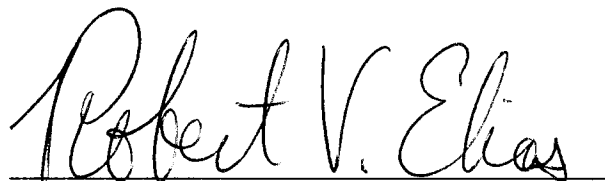
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of Staff's  
Prehearing Statement has been furnished this 6th day of May, 1999,  
by U.S. Mail to the following:

Beggs & Lane  
Jeffrey Stone, Esquire  
P.O. Box 12950  
Pensacola, FL 32576

Hopping Green Sams & Smith  
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Susan D. Ritenour  
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 For

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