

STEEL  
HECTOR  
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REGISTERED LIMITED LIABILITY PARTNERSHIP

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

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RECORDS AND  
REPORTING

August 9, 1999

Charles A. Guyton  
850.222.3423

**By Hand Delivery**

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

**Re: Adoption of Numeric Conservation Goals  
for Florida Power and Light Company  
Docket Number 971004-EG**

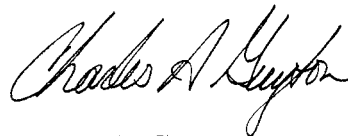
Dear Ms. Bayó:

Enclosed for filing on behalf of Florida Power & Light Company are the original and fifteen (15) copies of Florida Power & Light Company's Prehearing Statement.

Also enclosed is a diskette containing a copy of Florida Power & Light Company's Prehearing Statement. The diskette is a 3.5 inch high density diskette using Word Perfect 6.0 for Windows.

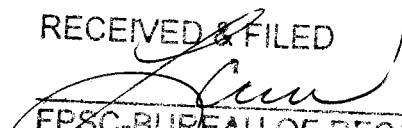
If you or your Staff have any questions regarding this filing, please contact me.

Very truly yours,



Charles A. Guyton

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMJ \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG Futrell
- LEG \_\_\_\_\_
- MAS 5 encs.
- OPC \_\_\_\_\_ cc: All Parties of Record
- RRR \_\_\_\_\_
- SEC \_\_\_\_\_
- WAW \_\_\_\_\_
- OTH ~~\_\_\_\_\_~~

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FPSC-BUREAU OF RECORDS

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Adoption of Numeric Conservation )  
Goals by Florida Power & Light Company )

Docket No. 971004-EG  
Filed: August 9, 1999

FLORIDA POWER & LIGHT COMPANY'S  
PREHEARING STATEMENT

Florida Power & Light Company ("FPL"), pursuant to Order Nos. PSC-98-0384-PCO-EG and PSC-99-1361-PCO-EG hereby files its Prehearing Statement in Docket No. 971004-EG.

(a) The name of all known witnesses that may be called by the party, and the subject matter of their testimony:

<u>Witness</u>	<u>Subject Matter</u>
C. Dennis Brandt	Presents FPL's DSM Goals, DSM potential projections, methodology for measure selection for evaluation, methodology for achievable potential projection, analyses of Code/Utility measures, categorization of gas measures as R&D, and treatment of renewables and cogeneration.
S. R. Sim	Explains the IRP process work performed to determine the cost-effective level of DSM proposed in FPL's goals.

(b) A description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each:

FPL has prefiled two exhibits that should be identified separately.

<u>Exhibit</u>	<u>Content</u>	<u>Sponsoring Witness</u>
Prefiled Exhibit of C. Dennis Brandt, Document Nos. 1-15	Presents FPL's DSM goals prior goals performance, achievable potential, measure identification process, cost-effectiveness screening, model inputs and sources, and final cost-effectiveness.	C. Dennis Brandt

Prefiled Exhibit of  
Dr. S. R. Sim,  
Document Nos. 1-13

Overview of IRP Process,  
load and energy forecast, fuel  
forecast, projected resource need,  
peak load shapes and effect of non-  
firm load, supply only resource plan,  
system average levelized rate for  
supply only plan, competing resource  
plan, comparison of reserve margins  
with supply and DSM resource plans,  
system average levelized rate with  
DSM plan, comparisons of 1994 and  
1998 projections for a CC unit.

S. R. Sim

**(c) A statement of basic position in the proceeding:**

FPL's proposed DSM goals should be approved as filed.

**d) A statement of each question of fact the party considers at issue, the party's position on each such issue, and which of the party's witnesses will address the issue:**

**971004-EG: Florida Power & Light Company**

**ISSUE 1:** What should be FPL's annual residential winter kW, summer kW, and kWh conservation goals for the period 2000-2009?

FPL Position: FPL's residential goals should be those filed with FPL's petition and shown in Mr. Brandt's prefiled testimony, Document No. 1. They are restated below:

**FPL's Residential Goals @ Meter**

Year	Summer MW		Winter MW		Energy GWH	
	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative
2000	75.5	75.5	91.6	91.6	91.9	91.9
2001	51.0	126.5	47.4	139.0	86.4	178.3
2002	42.9	169.4	31.0	170.0	88.8	267.1
2003	43.3	212.8	30.3	200.4	90.2	357.3
2004	43.8	256.6	29.8	230.1	91.6	448.9
2005	45.4	302.0	30.5	260.6	95.2	544.2
2006	45.0	347.0	28.5	289.0	96.7	640.9

2007	45.6	392.6	28.2	317.2	98.4	739.3
2008	46.7	439.4	28.4	345.7	101.0	840.3
2009	46.6	485.9	26.8	372.4	102.9	943.2

(Brandt, Sim)

**ISSUE 2:** What should be FPL's annual commercial/industrial winter kW, summer kW, and kWh conservation goals for the period 2000-2009?

FPL Position: FPL's commercial/industrial goals should be those filed with FPL's petition and shown in Mr. Brandt's prefiled testimony, Document No. 1. They are restated below:

**FPL's Commercial/Industrial Goals @ Meter**

Year	Summer MW		Winter MW		Energy GWH	
	Annual	Cumulative	Annual	Cumulative	Annual	Cumulative
2000	46.2	46.2	20.5	20.5	68.5	68.5
2001	27.1	73.3	11.6	32.2	29.1	97.6
2002	26.3	99.6	11.9	44.1	28.8	126.4
2003	27.0	126.6	12.7	56.8	30.7	157.1
2004	27.3	153.8	13.3	70.1	31.7	188.8
2005	27.8	181.6	14.1	84.2	33.8	222.6
2006	25.6	207.2	12.9	97.1	32.2	254.9
2007	25.2	232.4	12.7	109.8	30.9	285.7
2008	24.8	257.2	12.4	122.2	29.6	315.3
2009	21.7	278.8	10.8	133.0	28.1	343.4

(Brandt, Sim)

**971005-EG: Florida Power Corporation**

**Issue 3:** What should be FPC's annual residential winter kW, summer kW, and kWh conservation goals for the period 2000-2009?

FPL Position: No position.

**ISSUE 4:** What should be FPC's annual commercial/industrial winter kW, summer kW, and kWh conservation goals for the period 2000-2009?

FPL Position: No position.

**971006-EG:** **Gulf Power Company**

**Issue 5:** What should be Gulf's annual residential winter kW, summer kW, and kWh conservation goals for the period 2000-2009?

FPL Position: No position.

**ISSUE 6:** What should be Gulf's annual commercial/industrial winter kW, summer kW, and kWh conservation goals for the period 2000-2009?

FPL Position: No position.

**971007-EG:** **Tampa Electric Company**

**Issue 7:** What should be TECO's annual residential winter kW, summer kW, and kWh conservation goals for the period 2000-2009?

FPL Position: No position.

**ISSUE 8:** What should be TECO's annual commercial/industrial winter kW, summer kW, and kWh conservation goals for the period 2000-2009?

FPL Position: No position.

**(e) A statement of each question of law the party considers at issue and the party's position on each such issue:**

FPL is not aware of any questions of law at issue.

**(f) A statement of each policy question the party considers at issue, the party's position on each such issue, and which of the party's witnesses will address the issue:**

FPL is not aware of any policy issues which are contested.

**(g) A statement of issues that have been stipulated to by the parties:**

FPL believes its proposed goals are either stipulated or uncontested by the parties.

**(h) A statement of all pending motions or other matters the party seeks action upon:**

FPL has no pending motions or other matters upon which it seeks action other than its pending petition for approval its proposed goals.

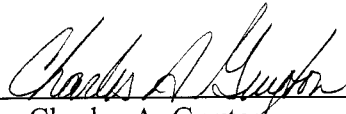
**(i) A statement as to any requirement set forth in the Order On Prehearing Procedure that cannot be complied with, and the reasons therefor.**

FPL believes it has complied with all requirements for orders regarding prehearing procedures.

Respectfully submitted,

STEEL HECTOR & DAVIS LLP  
215 S. Monroe St., Suite 601  
Tallahassee, Florida 32301  
(850) 222-2300

Attorneys for Florida Power  
& Light Company

By:   
Charles A. Guyton

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Prehearing Statement was served by Hand Delivery (when indicated with an \*) or mailed this 9th day of August, 1999 to the following:

Robert V. Elias, Esquire \*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Gunter Building, Room 370  
Tallahassee, Florida 32399-0850

Executive Office of the Governor  
Office of Planning and Budget  
General Government Unit - Stuart Pollins  
The Capitol, Room 1501  
Tallahassee, Florida 32399

Lee L. Willis, Esquire  
James D. Beasley, Esquire  
Ausley Law Firm  
227 South Calhoun Street  
Tallahassee, Florida 32302

James A. McGee, Esquire  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

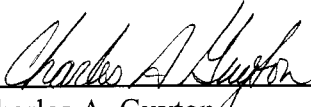
Jeffrey A. Stone, Esquire  
G. Edison Holland, Esquire  
Beggs & Lane  
Post Office Box 12950  
Pensacola, Florida 32576-2950

Legal Environmental Assistance  
Foundation, Inc.  
Debra Swim, Esquire  
1114-E Thomasville Road  
Tallahassee, Florida 32303-6290

Vicki Gordon Kaufman, Esquire  
McWhirter, Reeves, et al.  
117 South Gadsden Street  
Tallahassee, Florida 32301

John W. McWhirter, Jr., Esquire  
McWhirter, Reeves, et al.  
Post Office Box 3350  
Tampa, Florida 33601

Jack Shreve, Esquire  
Office of Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399

  
\_\_\_\_\_  
Charles A. Guyton