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October 25, 1999

ORIGINAL

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

**Re: Conservation Cost Recovery Clause
Docket No. 990002-EG**

Dear Ms. Bayó:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") in Docket No. 990002-EG please find the original and fifteen (15) copies of Florida Power & Light Company's Prehearing Statement.

Also enclosed is a 3.5 inch double sided, high density diskette containing Florida Power & Light Company's Prehearing Statement in WordPerfect 6.1.

If you or your staff have any questions regarding this transmittal, please contact me at 222-2300.

- AFA 1
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1
- VAS 3
- JPC _____
- PAI _____
- SEC 1
- MAW _____
- JTH _____

Enclosure
cc: Counsel for all parties of record

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Monte H.
FPSC-BUREAU OF RECORDS

Very truly yours,
Charles A. Guyton
Charles A. Guyton

DOCUMENT NUMBER-DATE
13099 OCT 25 99

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Energy Conservation Cost Recovery)
Clause)

Docket No. 990002-EG
Filed: October 25, 1999

FLORIDA POWER & LIGHT COMPANY'S
PREHEARING STATEMENT

Florida Power & Light Company ("FPL"), pursuant to Order No. PSC-99-0699-PCO-EG, hereby files its Prehearing Statement in Docket No. 990002-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>
Leonor Busto	Projection for January 2000 - December 2000 the Actual/Estimated True-Up for January 1999 - December 1999, and the Final True-Up for April 1998 - December 1998.

(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>
LMB-1	Schedules CT-1 through CT-6, Appendix A	L. M. Busto
LMB-2	Schedules C-1 through C-5	L. M. Busto

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

FPL's proposed Conservation Cost Recovery Factors for the January 2000 through December 2000 recovery period and true-up amounts for prior periods should be approved.

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13099 OCT 25 1999
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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:

General Issues

ISSUE 1: What is the final end-of-the-period true-up amount for the period April 1, 1998 through December 31, 1998:

FPL: \$5,093,496 overrecovery, final adjusted net true-up
 \$3,068,391 overrecovery, actual net true-up (Busto)

ISSUE 2: What are the appropriate conservation cost recovery factors for the period January 1, 2000 through December 31, 2000?

FPL:	<u>Rate Class</u>	<u>ECCR Factor</u>	<u>Rate Class</u>	<u>ECCR Factor</u>
	RS1	.00189 \$/kWh	SST1T	.00129 \$/kWh
	GS1	.00184 \$/kWh	SST1D	.00166 \$/kWh
	GSD1	.00168 \$/kWh	CILCD/CILCG	.00155 \$/kWh
	OS2	.00118 \$/kWh	CILCT	.00141 \$/kWh
	GSLD1/CS1	.00168 \$/kWh	MET	.00180 \$/kWh
	GSLD2/CS2	.00159 \$/kWh	OL1/SL1	.00112 \$/kWh
	GSLD3/CS3	.00150 \$/kWh	SL2	.00147 \$/kWh
	ISST1D	.00176 \$/kWh		

(Busto)

Issue 3: What is the final end-of period true-up amount for the period April 1, 1998, through March 31, 1999?

FPL: No position.

Company Specific Issues

FPL:

ISSUE 4: Should Florida Power & Light be allowed to recover \$2,423,945 of litigation expenses that were charged to the Cogeneration and Small Power Production Program through the Energy Conservation Cost Recovery Clause for the period ending December 31, 1998?

FPL: Yes. The \$2,423,945 of litigation expenses associated with cogeneration

contract administration in 1998 should be recovered through the ECCR clause because they are reasonable and prudent expenses for a Commission-approved program that were expended to save FPL's customers hundreds of millions of dollars, and FPL is not otherwise recovering these expenses.

GULF:

ISSUE 5: What is GPC's appropriate end of period over(under) recovery for the previous Conservation filing for October 1997 to March 1998?

FPL: No position.

ISSUE 6: What adjustments should be made to GPC's April 1998 to December 1998 over(under) recovery and 1999 actual/estimated true-up period in the 2000 projections for errors GPC made in the 1999 Projections Filing (Docket No. 990002-EG)?

FPL: No position.

ISSUE 7: Should GPC be allowed to recover fees paid for conversion of gas to electric hot water heaters through ECCR?

FPL: No position.

ISSUE 8: What are the appropriate legal fees that GPC should be allowed to charge to ECCR?

FPL: 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 true-ups and ECCR factors are uncontested and may be stipulated. FPL also believes Issue 4 may be stipulated.

(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 petitions for approval of a final true-up and conservation cost recovery factors.

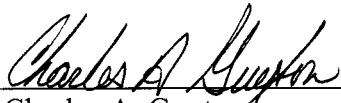
(I) A statement as to any requirement set forth in the Order On Prehearing Procedure that cannot be complied with, and the reasons therefor.

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

Respectfully submitted,

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(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 25th day of October, 1999 to the following:

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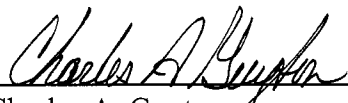
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