

ORIGINAL

**Florida Power**  
CORPORATION

DIVISION OF  
ADMINISTRATION  
1999 NOV 4  
AM 9:59  
JAMES A. MCGEE  
SENIOR COUNSEL  
PUBLIC SERVICE COMMISSION

November 2, 1999

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 980643-EI

Dear Ms. Bayó:

Enclosed for filing in the subject docket are an original and fifteen copies of Florida Power Corporation's Additional Comments.

Please acknowledge your receipt of the above filing on the enclosed copy of this letter and return to the undersigned. Also enclosed is a 3.5 inch diskette containing the above-referenced document in WordPerfect format. Thank you for your assistance in this matter.

Very truly yours,

James A. McGee

- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- MAS
- OPC
- PAI
- SEC
- WAW
- OTH

JAM/ams

Enclosure

cc: Parties of record

DOCUMENT NUMBER - DATE  
13593 NOV -4 99  
FPSC-RECORDS/REPORTING

FLORIDA POWER CORPORATION  
DOCKET NO. 980643-EI

ADDITIONAL COMMENTS

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In accordance with Ms. Helton's memorandum dated October 12, 1999, Florida Power Corporation (FPC) offers the following additional comments on Staff's latest proposed revisions to Rule 25-6.1351, F.A.C.

Rule 25-6.1351(2)(h) – Definition of Prevailing Price Valuation

FPC supports this addition and suggests the following changes to place it in more of a definitional context:

(h) Prevailing Price Valuation – Refers to the price an affiliate may charge a regulated utility for products and services, which equates to that charged by the affiliate to third parties. To qualify for this treatment, The occurrence of sales of a particular asset or service to third parties must encompass more than 50 percent of the total quantity of the product or service sold by the affiliate. The 50 percent threshold is applied on an asset-by-asset and service-by-service basis, rather than on a product line or service line basis. This excludes services received by a utility from its affiliate that exists solely to provide services to members of the utility's corporate family, which shall be recorded at fully allocated cost.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

Docket No. 980643-EI

I HEREBY CERTIFY that a true copy of Florida Power Corporation's Additional Comments has been furnished to the following individuals by U.S. Mail this 2nd day of November, 1999:

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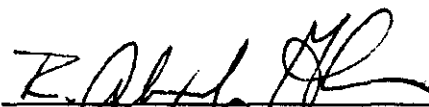
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