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# MCWHIRTER REEVES

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TAMPA OFFICE:  
400 NORTH TAMPA STREET, SUITE 2450  
TAMPA, FLORIDA 33602  
P. O. BOX 3350 TAMPA, FL 33601-3350  
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:  
  
TALLAHASSEE

TALLAHASSEE OFFICE:  
100 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 FAX

RECORDS AND  
REPORTING

October 27, 2000

## VIA HAND DELIVERY

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

Re: Docket No.: 000007-EI

Dear Ms. Bayo:

On behalf of the Florida Industrial Power users Group (FIPUG), enclosed for filing and distribution are the original, 15 copies and disk containing the following:

- ▶ The Florida Industrial Power Users Group's Prehearing Statement.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me in the envelope provided. Thank you for your assistance.

- APP \_\_\_\_\_
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Enclosure

Sincerely,

*Vicki Gordon Kaufman*

Vicki Gordon Kaufman

FILED  
*[Signature]*

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost  
Recovery Clause  
\_\_\_\_\_ /

Docket No. 000007-EI

Filed: October 27, 2000

**The Florida Industrial Power Users Group's Prehearing Statement**

Pursuant to the Case Assignment and Scheduling Record (CASR), The Florida Industrial Power Users Group (FIPUG) hereby files its Prehearing Statement.

**A. APPEARANCES:**

**JOHN W. MCWHIRTER, JR.**, McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A., 400 North Tampa Street, Suite 2450, Tampa, Florida 33601-3350 and **JOSEPH A. MCGLOTHLIN and 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.

**C. EXHIBITS:**

None.

**D. STATEMENT OF BASIC POSITION:**

None necessary.

**E. STATEMENTS OF ISSUES AND POSITIONS**

**A. Generic Environmental Cost Recovery Issues**

**ISSUE 1:** What are the appropriate final environmental cost recovery true-up amounts for the period ending December 31, 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.
- ISSUE 2:** What are the estimated environmental cost recovery true-up amounts for the period January 2000 through December 2000?
- 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.
- ISSUE 3:** What are the total environmental cost recovery true-up amounts to be collected or refunded during the period January 2001 through December 2001?
- 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.
- ISSUE 4:** What are the appropriate projected environmental cost recovery amounts for the period January 2001 through December 2001?
- 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.
- ISSUE 5:** What should be the effective date of the environmental cost recovery factors for billing purposes?
- FIPUG:** The factors should be effective beginning with the specified environmental cost recovery cycle and thereafter for the period January, 2001, through December, 2001. Billing cycles may start before January 1, 2001, and the last cycle may be read after December 31, 2001, so that each customer is billing for twelve months regardless of when the adjustment factor became effective.
- ISSUE 6:** What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2001 through December 2001?
- 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.
- ISSUE 7:** What are the appropriate jurisdictional separation factors for the projected period January 2001 through December 2001?

**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.

**ISSUE 8:** What are the appropriate Environmental Cost Recovery Factors for the period January, 2001, through December, 2001, for each rate group?

**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.

**B. Company Specific Environmental Cost Recovery Issues**

**Florida Power & Light Company**

**ISSUE 9:** What effect does Florida Power & Light Company's stipulation have on the ECRC?

**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.

**Gulf Power Company**

**ISSUE 10:** Should the Commission approve Gulf Power Company's request for recovery costs of the Generic NO<sub>x</sub> Control Intelligent System to Plant Smith Unit 1 project through the Environmental Cost Recovery Clause?

**FIPUG:** Agree with Staff.

**ISSUE 10A:** How should the newly proposed environmental costs for Generic No<sub>x</sub> Control Intelligent System to Plant Smith Unit 1 project be allocated to the rate classes?

**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.

**ISSUE 10B:** Should the Commission approve Gulf Power Company's request for recovery of costs for the Consumptive Water Use Monitoring Activity through the Environmental Cost Recovery Clause?

**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.

**ISSUE 10C:** How should the newly proposed environmental costs for the Consumptive Water Use Monitoring Activity be allocated to the rate classes?

**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.

**ISSUE 10D:** Should the Commission approve Gulf Power Company's request for recovery of costs for Gulf Coast Ozone Study through the Environmental Cost Recovery Clause?

**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.

**Tampa Electric Company**

**ISSUE 11:** Should the Commission approve Tampa Electric Company's request for recovery of costs of the Big Bend Units 1, 2, and 3 Flue Gas Desulfurization System Optimization and Utilization Program through the Environmental Cost recovery Clause?

**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.

**ISSUE 11A:** How should the newly proposed environmental costs for the Big Bend Units 1, 2, and 3 Flue Gas Desulfurization System Optimization and Utilization program be allocated to the rate classes?

**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.

**ISSUE 11B:** Should the Commission approve Tampa Electric Company's request for recovery of costs of the Particulate Emission Minimization and Monitoring Program through the Environmental Cost recovery Clause?

**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.

**ISSUE 11C:** How should the newly proposed environmental costs for the Particulate Emission Minimization and Monitoring Program be allocated to the rate classes?

**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.

**ISSUE 11D:** Should the Commission approve Tampa Electric Company's request for the recovery of costs of the Reduction of Nitrogen Oxide Emission Program through the Environmental Cost recovery Clause?

**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.

**ISSUE 11E:** How should the newly proposed environmental costs for the Reduction of Nitrogen Oxide Emission Program be allocated to the rate of classes?

**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.

**ISSUE 11F:** Should the Commission approve Tampa Electric Company's request for the recovery of costs of the Big Bend Unit 4 Particulate Matter Continuous Emission Monitor through the Environmental Cost recovery Clause?

**ISSUE 11G:** How should the newly proposed environmental costs for the Big Bend Unit 4 Particulate Matter Continuous Emission Monitor be allocated to the rate classes?

**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.

**F. STIPULATED ISSUES:**

None at this time.

**G. PENDING MOTIONS:**

FIPUG has no pending motions.

**H. OTHER MATTERS:**

None at this time.



John W. McWhirter, Jr.  
McWhirter Reeves McGlothlin Davidson  
Decker Kaufman Arnold & Steen, P.A.  
400 North Tampa Street, Suite 2450  
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

Attorneys for the Florida Industrial  
Power Users Group

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing FIPUG Prehearing Statement has been furnished by hand delivery(\*) or by U.S. Mail this 27<sup>th</sup> day of October, 2000 to the following:

(\*) Marlene K. Stern  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

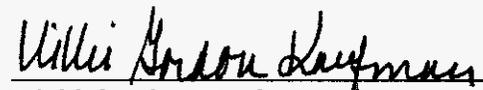
John Roger Howe  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400

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

Lee L. Willis  
James Beasley  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32302

Matthew M. Childs  
Steel Hector & Davis  
215 South Monroe Street  
Suite 601  
Tallahassee, Florida 32301-1804

Jeffery A. Stone  
Beggs and Lane  
Post Office Box 12950  
Pensacola, Florida 32576-2950

  
Vicki Gordon Kaufman