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October 24, 2001

**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.: 010007-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. Thank you for your assistance.

Sincerely,



Vicki Gordon Kaufman

APP \_\_\_\_\_  
 CAF \_\_\_\_\_ VGK/bae  
 CMP \_\_\_\_\_ Enclosure  
 COM \_\_\_\_\_ 5  
 CTR \_\_\_\_\_  
 ECR \_\_\_\_\_  
 LEG \_\_\_\_\_ 1  
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 PAI \_\_\_\_\_  
 RGO \_\_\_\_\_  
 SEC \_\_\_\_\_ 1  
 SER \_\_\_\_\_  
 OTH \_\_\_\_\_

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 FPSC-BUREAU OF RECORDS

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

DOCUMENT NUMBER-DATE

13500 OCT 24 01

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost  
recovery clause.

Docket No.010007-EI  
Filed: October 24, 2001

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

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-01-0658-PCO-EI, 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, VICKI GORDON KAUFMAN and TIMOTHY J. PERRY**, 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. STATEMENT OF ISSUES AND POSITIONS:**

**GENERIC ENVIRONMENTAL COST RECOVERY ISSUES**

**ISSUE 1:** What are the appropriate final environmental cost recovery true-up amounts for the period ending December 31, 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 2:** What are the estimated environmental cost recovery true-up 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 3:** What are the total environmental cost recovery true-up amounts to be collected or refunded during the period January 2002 through December 2002?
- 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 2002 through December 2002?
- 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 new factors should be effective beginning with the first billing cycle for January 2002 and thereafter through the last billing cycle for December 2002. The first billing cycle may start before January 1, 2002, and the last billing cycle may end after December 31, 2002, so long as each customer is billed for twelve months regardless of when the factors become 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 2002 through December 2002?
- 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 2002 through December 2002?
- 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 2002 through December 2002, 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.

## **COMPANY SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES**

### **Florida Power & Light**

**ISSUE 9:** What effect does Florida Power & Light Company's stipulation approved by Order No. PSC-99-0519-AS-EI have on the company's level of recovery for 2002?

**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 10A:** Should the Commission approve Gulf Power Company's request for recovery of costs for Generic Nox Control Intelligent System (GNOCIS) 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 10B:** Should the Commission approve Gulf Power Company's request for recovery of costs for Consumptive Use-Shield Water Substitution Project 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 Use-Shield Water Substitution 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.

## **F. STIPULATED ISSUES:**

None.

## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of FIPUG's Prehearing Statement has been furnished by (\*) hand delivery, or U.S. Mail this 24<sup>th</sup> day of October 2001, to the following parties of record:

(\*)Wm. Cochran Keating IV  
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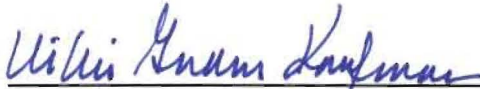
  
Vicki Gordon Kaufman

**G. PENDING MOTIONS:**

FIPUG has no pending motions.

**H. OTHER MATTERS:**

None.

  
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