



ORIGINAL

Florida Cable Telecommunications Association

Steve Wilkerson, President

**VIA HAND DELIVERY**

January 24, 2002

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

RECEIVED FPSC  
02 JAN 24 PM 4:12  
COMMISSION  
CLERK

**RE: Docket No. 010949-EI**

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Prehearing Statement of the Florida Cable Telecommunications Association, and a diskette containing the Prehearing Statement in Word Perfect format.

Copies of the Prehearing Statement have been served on the parties of record. Please acknowledge receipt of filing of the above by stamping the duplicate copy of this letter and returning the same to me.

Thank you for your assistance in processing this filing. Please contact me with any questions.

Sincerely,

Michael A. Gross  
Vice President, Regulatory Affairs &  
Regulatory Counsel

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM 5
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC 1
- OTH \_\_\_\_\_

Enclosure  
cc: All Parties of Record

RECEIVED & FILED  
*RZM*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
00899 JAN 24 02  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement of the Florida Cable Telecommunications Association in Docket 010949-EI has been served upon the following parties by U.S. Mail this 24<sup>th</sup> day of January, 2002:

Douglas A. Shropshire, Lt. Col. USAFR  
AFCESA/Utility Litigation Team  
Douglas Shropshire/Al Erickson  
6608 War Admiral Trail  
Tallahassee, FL 32309

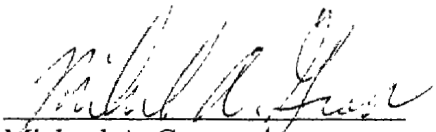
Major Al Erickson, USAF  
AFCESA/Utility Litigation Team  
139 Barnes Drive  
Tyndall AFB FL 32403

Florida Industrial Power Users Group  
c/o McWhirter Law Firm  
400 N. Tampa Street, Suite 2450  
Tampa, FL 33601-3350

McWhirter Law Firm  
Joseph A. McGlothlin  
117 S. Gadsden St.  
Tallahassee, FL 32301

Office of Public Counsel  
Charles Beck/Jack Shreve/Rob Vandiver  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400

Gulf Power Company  
Ms. Susan D. Ritenour  
One Energy Place  
Pensacola, FL 32520-0780

  
Michael A. Gross

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for rate increase )  
by Gulf Power Company. )  
\_\_\_\_\_ )

Docket No. 010949-EI

Filed: January 24, 2002

**PREHEARING STATEMENT OF THE FLORIDA  
CABLE TELECOMMUNICATIONS ASSOCIATION**

Florida Cable Telecommunications Association (FCTA), pursuant to Order No. PSC-01-2035-PCO-EI, issued on October 15, 2001, of the Florida Public Service Commission, files its Prehearing Statement and states:

**A. Witnesses**

The FCTA has not filed any testimony and does not intend to present any witnesses in this proceeding.

**B. Exhibits**

The FCTA does not intend to use any exhibits in this proceeding.

**C. Basic Position**

The FCTA intervened in this docket to represent the interests of its members both with respect to their interests relating to pole rents and access, as well as their interests as power users and retail customers of Gulf Power. In its initial July 6, 2001 letter, indicating Gulf Power's intent to file a Petition for a retail base rate increase, Gulf Power alleged that from 1990 through mid-2003, numerous factors will have increased its cost of providing electric service. Among those factors, Gulf Power noted the costs incurred in establishing new distribution lines and maintaining its infrastructure. Such factors implicate the network of

distribution poles that are essential for cable operators' pole attachments. Gulf Power's electricity rate case has involved a review of issues and accounts relevant to FCTA Members' pole attachment access rights pursuant to the Federal Telecommunications Act of 1996. However, as of the filing date for prehearing statements, the FCTA remains neutral as to the issues raised based upon the current record. The FCTA does not intend to raise any new issues not raised by the other parties or the Commission. Further, the FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a post-hearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**D.-F. Positions on the Issues**

**TEST PERIOD**

**ISSUE 1**

Is Gulf's projected test period of the 12 months ending May 31, 2003 (May 2003 projected test year) appropriate? (L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 2**

Are Gulf's forecasts of Customers, KWH, and KW by Rate Class, for the

May 2003 projected test year appropriate? (Stallcup)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**QUALITY OF SERVICE**

**ISSUE 3**

Should Gulf be required to establish a mechanism that would provide for a payment or credit to retail customers if frequent outages occur? (D. Lee, Matlock)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 4**

Should adjustments be made to Gulf's projected test year due to customer complaints? (Lowery)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 5**

Is the quality of electric service provided by Gulf adequate? (D. Lee, Matlock, Lowery)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**RATE BASE**

**ISSUE 6**

Should an adjustment be made to production related additions included in Plant in Service? (Haff)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the

evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 7**

Should an adjustment be made to transmission and distribution related additions included in Plant in Service? (Haff, D. Lee)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 8**

Should an adjustment be made to general plant related additions included in Plant in Service? (Meeks)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 9**

Should the deferral of the return on the third floor of the corporate offices be allowed in rate base? (L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 10**

Should an adjustment be made to Smith Unit 3? (Haff)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 11**

Is Gulf's decision to include Smith Unit 3 in rate base consistent with Gulf's proposal in Docket No. 010827-EI to transfer ownership of Smith Unit 3 to Southern Company and purchase the plant's output? (Haff)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to



file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 12**

What are the appropriate adjustments, if any, that should be made to Gulf's test year rate base to account for the additional security measures implemented in response to the increased threat of terrorist attacks since September 11, 2001? (McNulty, Mills)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 13**

Should the capitalized items currently approved for recovery through the Environmental Cost Recovery Clause be included in rate base for Gulf? (D. Lee, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the

evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 14**

Should adjustments be made for the rate base effects of transactions with affiliated companies for Gulf? (L. Romig, Merta)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 15**

Are Gulf's forecasts of Customers, KWH, and KW by Rate Class, for the May 2003 projected test year appropriate? (Stallcup)

Has the Company removed all non-utility activities from rate base? (Meeks, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other

party.

**ISSUE 16**

Is Gulf's requested level of Plant in Service in the amount of \$1,966,492,000 (\$2,015,013,000 system) for the May 2003 projected test year appropriate? (Meeks, Haff, Green, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 17**

What adjustments should be made to Accumulated Depreciation to reflect the Commission's decision in Docket No. 010789-EI? (Meeks)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 18**

Is Gulf's requested level of Accumulated Depreciation in the amount of \$854,099,000 (\$876,236,000 system) for the May 2003 projected test year

appropriate? (Meeks, Green, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 19**

Is Gulf's requested level of Construction Work in Progress in the amount of \$15,850,000 (\$16,361,000 system) for the May 2003 projected test year appropriate? (Haff, Meeks, Green, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 20**

Should an adjustment be made to Plant Held for Future Use for Gulf's inclusion of the Caryville site in rate base? (Haff)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 21:**

Is Gulf's requested level of Property Held for Future Use in the amount of \$3,065,000 (\$3,164,000 system) for the May 2003 projected test year appropriate? (Haff, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 22:**

Should an adjustment be made to prepaid pension expense in its calculation of working capital? (Kaproth, Kyle)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to

continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 23:** Should an adjustment be made to rate base for unfunded Other Post-retirement Employee Benefit (OPEB) liability? (Kaproth, Kyle)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 24:** Should any adjustments be made to Gulf's fuel inventories? (Bohrmann, Matlock)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the

Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 25:**

Is Gulf's requested level of Working Capital in the amount of \$67,194,000 (\$69,342,000 system) for the May 2003 projected test year appropriate? (Kaproth, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 26:**

What is the appropriate regulatory treatment for the balance sheet impacts from FAS 133 for Gulf? (Brinkley)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 27:** Is Gulf's requested rate base in the amount of \$1,198,502,000 (\$1,227,644,000 system) for the May 2003 projected test year appropriate? (L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**COST OF CAPITAL**

**ISSUE 28:** Has Gulf appropriately reflected Internal Revenue Service Notice 2001-82 in its projected May 2003 test year? (C. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 29:** What is the appropriate amount of accumulated deferred taxes to include in the capital structure? (C. Romig, Vendetti, McCaskill)



**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 30:**

What is the appropriate amount and cost rate of the unamortized investment tax credits to include in the capital structure? (C. Romig, Vendetti, McCaskill)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 31:**

Have rate base and capital structure been reconciled appropriately? (D. Draper, Lester, C. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the

evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 32:**

What is the appropriate cost rate for short-term debt for the May 2003 projected test year? (Lester)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 33:**

What is the appropriate cost rate for long-term debt for the may 2003 projected test year? (Lester)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 34:**

In setting Gulf's ROE for use in establishing Gulf's revenue requirements and Gulf's authorized range, should the Commission make an adjustment to reject Gulf's performance?

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 35:**

What is the appropriate return on equity (ROE) to use in establishing Gulf's revenue requirement? (Lester)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 36:**

What is the appropriate weighted average cost of capital including the proper components, amounts and cost rates associated with the capital

structure? (Lester)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 37:**

What is the appropriate authorized range on ROE to be used by Gulf for regulatory purposes on a prospective basis? (D. Draper, Lester, Vendetti, McCaskill)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**NET OPERATING INCOME**

**ISSUE 38:**

Is Gulf's projected level of Total Operating Revenues in the amount of \$372,714,000 (\$379,009,000 system) for the May 2003 projected test year appropriate? (Wheeler, Stallcup, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 39:**

What are the appropriate inflation factors for use in forecasting the test year budget? (Stallcup, Lester, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 40:**

Should the commission accept Gulf Power's modified zero based budget as support for the requested increase? (L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the

Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 41:** Is Gulf's requested level of O&M Expense in the amount of \$182,419,000 (\$186,354,000 system) for the May 2003 projected test year appropriate?  
(L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 42:** Should wholesale energy costs to Gulf Power be adjusted? (Wheeler)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 43:** Has Gulf made the appropriate test year adjustments to remove fuel

revenues and fuel expenses recoverable through the Fuel Adjustment Clause? (Bohrmann, L. Romig, C. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 44:**

Has Gulf made the appropriate test year adjustments to remove conservation revenues and conservation expenses recoverable through the Conservation Cost Recovery Clause? (Haff, L. Romig, C. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 45:**

Has Gulf made the appropriate test year adjustments to remove capacity revenues and capacity expenses recoverable through the Capacity Cost Recovery Clause? (D. Lee, L. Romig, C. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to

continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 46:**

Has Gulf made the appropriate test year adjustments to remove environmental revenues and environmental expenses recoverable through the Environmental Cost Recovery Clause? (D. Lee L. Romig, C. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 47:**

What are the appropriate adjustments, if any, to Gulf's test year operating expenses to account for the additional security measures implemented in response to the increased threat of terrorist attacks since September 11, 2001? (McNulty, Mills)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to



file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 48:**

Should an adjustment be made to advertising expenses for the May 2003 projected test year? (Kaproth, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 49:**

Has Gulf made the appropriate adjustments to remove lobbying expenses from the May 2003 projected test year? (L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 50:** Should an accrual for incentive compensation be allowed? (Kaproth, L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 51:** Should an adjustment be made to Gulf's requested level of Salaries and Employee Benefits for the May 2003 projected test year? (Kaproth, L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 52:** Should an adjustment be made to Other Post Employment Benefits Expense for the May 2003 projected test year? (Kyle, Kaproth, L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to

continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 53:**

Should an adjustment be made to Pension Expense for the May 2003 projected test year? (Kyle, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 54:**

Should adjustments be made for the net operating income effects of transactions with affiliated companies for Gulf? (L. Romig, Merta)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the

Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 55:** Should an adjustment be made to the accrual for storm damage for the May 2003 projected test year? (L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 56:** Should an adjustment be made to the accrual for the Injuries & Damages reserve for the May 2003 projected test year? (L. Romig, Kaproth, Stern)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 57:** Should interest on tax deficiencies for the May 2003 projected test year be

included above-the-line? (C. Romig, Vendetti, McCaskill)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 58:**

Should an adjustment be made to Rate Case Expense for the May 2003 projected test year? (Kaproth, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 59:**

Should an adjustment be made to marketing expenses for Gulf's marketing of high efficiency electric technologies for heating and water heating? (Haff)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to

file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 60:**

What is the appropriate amount of expense to include for planned outages?  
(Haff, Merta)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 61:**

What is the appropriate amount of expense to include for special projects?  
(Haff, Merta)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 62:** Should an adjustment be made to Production Expenses for the May 2003 projected test year? (Haff, Merta)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 63:** Should an adjustment be made to Transmission Expenses for the May 2003 projected test year? (Haff, Merta)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 64:** Should an adjustment be made to cable inspection expense? (Matlock, D. Lee, Merta)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to

file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 65:** Should an adjustment be made to substation maintenance expense?  
(Matlock, D. Lee, Merta)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 66:** Should adjustments be made to tree trimming expense? (Matlock, D. Lee, Merta)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.



**ISSUE 67:** Should an adjustment be made to pole line inspection expense? (Matlock, D. Lee, Merta)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 68:** Should an adjustment be made to street and outdoor light maintenance expense? (Matlock, D. Lee, Merta)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 69:** Should an adjustment be made to Distribution Expenses for the May 2003 projected test year? (Matlock, D. Lee, Marta)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to

file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 70:**

Should an adjustment be made to Bad Debt Expense for the May 2003 projected test year? (L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 71:**

Should an adjustment be made to Customer Accounts Expense for the May 2003 projected test year? (L. Romig, Kaproth)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 72:**

If the deferral of the return on the third floor of the corporate offices is allowed in rate base, what amortization period should be used? (L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 73:**

What adjustments, if any, should be made to the depreciation expense and the fossil dismantlement accrual to reflect the Commission's decision in Docket No. 010789-EI? (Meeks)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 74:**

What is the appropriate depreciation rate and dismantlement provision for Smith Unit 3? (Meeks)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 75:**

Should an adjustment be made to Depreciation Expense for the May 2003 projected test year? (Meeks)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 76:**

What adjustments, if any, should be made to the projected test year expenses to recognize implementation of FAS 143? (Meeks)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the

Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 77:**

What adjustments, if any, should be made to the projected test year expenses to recognize implementation of the AcSEC Statement of Position regarding accounting for certain costs and activities related to property, plant, and equipment? (Meeks)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 78:**

Should the total amount of Gross Receipts tax be removed from base rates and shown as a separate line item on the bill? (C. Romig, Vendetti, McCaskill)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other

party.

**ISSUE 79:** Should an adjustment be made to Taxes Other Than Income Taxes for the May 2003 projected test year? (C. Romig, Vendetti, McCaskill)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 80:** Should an adjustment be made to the consolidating tax adjustments for the May 2003 projected test year? (C. Romig, Vendetti, McCaskill)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 81:** Should an adjustment be made to Income Tax expense for the May 2003 projected test year? (C. Romig, Vendetti, McCaskill)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 82:**

Is Gulf's projected Net Operating Income in the amount of \$61,378,000 (\$61,658,000 system) for the May 2003 projected test year appropriate? (L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**REVENUE REQUIREMENTS**

**ISSUE 83:**

What is the appropriate revenue expansion factor and the appropriate net operating income multiplier, including the appropriate elements and rates for Gulf? (C. Romig, L. Romig)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to

continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 84:** Is Gulf's requested annual operating revenue increase of \$69,867,000 for the May 2003 projected test year appropriate? (L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

#### **COST OF SERVICE AND RATE DESIGN**

**ISSUE 85:** Is Gulf's proposed separation of costs and revenues between the wholesale and retail jurisdictions appropriate? (Wheeler)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the



Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 86:**

Are Gulf's estimated revenues from sales of electricity by rate class at present rates for the projected 2003 test year appropriate? (E. Draper)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 87:**

Is the method used by Gulf to develop its estimates by rate class of the 12 monthly coincident peak hour demands and the class non-coincident peak hour demands appropriate? (Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 88:** What is the appropriate cost of service methodology to be used in designing Gulf's rates? (Wheeler)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 89:** What is the appropriate treatment of distribution costs within the cost of service study? (Wheeler)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 90:** If a revenue increase is granted, how should it be allocated among the customer classes? (Wheeler)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to

file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 91:**

What are the appropriate demand charges? (E. Draper, Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 92:**

What are the appropriate energy charges? (Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 93:**

What are the appropriate customer charges? (Hudson)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 94:**

What are the appropriate service charges? (Hudson)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 95:**

What are the appropriate Street (OS-I) and Outdoor (OS-II) lighting rate schedule charges? (Springer)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other

party.

**ISSUE 96:**

How should Gulf's time-of-use rates be designed? (E. Draper)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 97:**

What are the appropriate charges under the Interruptible Standby Service (ISS) rate schedule? (E. Draper)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 98:**

What are the appropriate charges under the Standby and Supplementary Service (SBS) rate schedule? (E. Draper)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to

continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 99:**

What is the appropriate rate design for Gulf's Real Time Pricing (RTP) rate schedule? (E. Draper, Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 100:**

What is the appropriate monthly charge under Gulf's Goodcents Surge Protection (GCSP) rate schedule? (Hudson)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other

party.

**ISSUE 101:**

What are the appropriate transformer ownership discounts? (Springer)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 102:**

What is the appropriate minimum monthly bill demand charge under the PX rate schedule? (Hudson)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 103:**

What is the appropriate minimum monthly bill demand charge under the PXT rate schedule? (Hudson)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to

file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 104:**

If the Commission decides to recognize migrations between rate classes, how should the revenue shortfall, if any, be recovered? (Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 105:**

Should Gulf's GST and RST rate schedules be eliminated? (Hudson)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.



**ISSUE 106:** Should Gulf’s Supplemental Energy (SE) Rate Rider be eliminated? (E. Draper)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 107:** Gulf proposes to eliminate the Optional Method of Meter Payment provision in its GSDT rate schedule that allows customers to make an initial payment as a contribution-in-aid-of-construction to offset a portion of the additional cost of time-of-use metering. Is this appropriate? (Hudson)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 108:** Should Gulf eliminate its OS-IV rate schedule and transfer the customers served under the rate to their otherwise applicable rate schedules, as

required by order No. 23573 in Docket No. 891345-EI? (Springer)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 109:**

Should the proposed changes to Gulf's Standby and Supplementary Service Rate (SBS) be approved? (E. Draper)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 110:**

What is the appropriate monthly fixed charge carrying rate to be applied to the installed cost of OS-I and OS-II additional lighting facilities for which there is no tariffed monthly charge? (E. Draper)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to

file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 111:**

Are the proposed revisions to the estimated kilowatt hour consumption of Gulf's high pressure sodium and metal halide lighting fixtures appropriate? (Springer)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 112:**

Gulf has proposed to add a provision to its OS-I and OS-II lighting schedules that allows customers to change to different fixtures prior to the expiration of the initial lighting contract term. Is this provision appropriate? (Springer)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the

evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 113:** Should the Street Lighting (OS-I) and Outdoor Lighting (OS-II) subparts of Gulf's Outdoor Service rate schedule be merged? (Springer)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 114:** Should Gulf's proposed methodology for determining the price of new street and outdoor lighting offerings be approved? (Springer)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 115:** Should Gulf's proposed new FlatBill pilot program be approved?  
(Springer)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 116:** Should Gulf's proposed new Rate Schedule GSTOU be approved? (E. Draper)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 117:** Is Gulf's proposed reduction in the contract term required under its Real Time Pricing (RTP) rate schedule from five years to one year appropriate?  
(Wheeler)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to

continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 118:**

Is Gulf's GoodCents Select Program cost effective? (Haff)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 119:**

What is the appropriate design and level of charges for the Residential Service Variable Pricing (RSVP) rate schedule? (Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 120:**

Are Gulf's proposed changes to the P2 and P3 pricing periods under its RSVP rate schedule appropriate? (Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 121:**

Are Gulf's proposed changes to the Participation Charge and Reinstallation Fee charged under Rate RSVP appropriate? (Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 122:**

Should Gulf's proposed changes to the applicability section of its Budget Billing optional rider be approved? (Wheeler)

**POSITION**

The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to

file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**OTHER ISSUES**

**ISSUE 123:** How will this docket be affected if the provisions in the Stipulation approved in Order No. PSC-99-2131-S-EI are not achieved? (L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**ISSUE 124:** Should Gulf be required to file, within 60 days after the date of the final order in this docket, a description of all entries or adjustments to its annual report, rate of return reports, and books and records which will be required as a result of the Commission's findings in this rate case? (L. Romig)

**POSITION** The FCTA does not have a position on this issue. The FCTA seeks to continue to monitor this docket to its conclusion and to reserve its right to file a posthearing brief (1) to respond to any new issues generated by the



evidence during the hearing and/or properly raised by other parties or the Commission, and (2) to adopt any position properly stated by any other party.

**G. Stipulated Issues**

The FCTA has not stipulated to any issues with any party to the proceeding.

**H. Pending Motions**

The FCTA has no pending motions or other matters it seeks action upon.

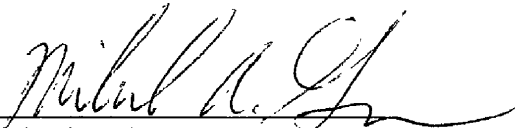
**I. Pending Requests for Confidentiality**

The FCTA does not have any pending requests or claims for confidentiality .

**J. Requirements of Order No. PSC-01-2035-PCO-EI**

There are no requirements of Order No. PSC-01-2035-PCO-EI with which FCTA cannot comply.

Respectfully submitted this 29<sup>th</sup> day of January, 2002.

  
Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecommunications Association  
246 E. 6<sup>th</sup> Avenue  
Tallahassee, FL 32303  
Tel: 850/681-1990  
Fax: 850/681-9676  
  
Attorney for FCTA