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October 25, 2002

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

RE: Docket No. 020007-EI

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Office of Public Counsel's Prehearing Statement, together with a diskette containing the electronic version. The enclosed diskette is HD density, the operating system is Windows 2000, and the word processing software in which the document appears is Word 2000.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Robert Vandiver
Associate Public Counsel

RV/pd
Enclosures

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost)	DOCKET NO. 020007-EI
recovery clause)	FILED: October 25, 2002
_____)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Citizens First Set of Interrogatories has been furnished by U.S. Mail on this 25th day of October, 2002, to the following:

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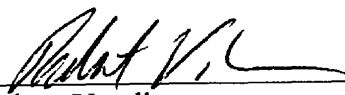
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost
recovery clause.

DOCKET NO. 020007-EI
DATED: OCTOBER 25, 2001

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-02-0336-PCO-GU, issued March 14, 2002, submit this Prehearing Statement.

Generic Environmental Cost Recovery Issues

ISSUE 1: What are the appropriate final environmental cost recovery true-up amounts for the period ending December 31, 2001?

POSITION: None at this time.

ISSUE 2: What are the estimated environmental cost recovery true-up amounts for the period January 2002 through December 2002?

POSITION: None at this time.

ISSUE 3: What are the total environmental cost recovery true-up amounts to be collected or refunded during the period January 2003 through December 2003?

POSITION: None at this time.

ISSUE 4: What are the appropriate projected environmental cost recovery amounts for the period January 2003 through December 2003?

POSITION: None at this time.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total

environmental cost recovery amounts for the period
January 2003 through December 2003?

POSITION: None at this time.

ISSUE 6: What are the appropriate jurisdictional separation
factors for the projected period January 2003 through
December 2003?

POSITION: None at this time.

ISSUE 7: What are the appropriate environmental cost recovery
factors for the period January 2003 through December
2003 for each rate group?

POSITION: None at this time.

ISSUE 8: What should be the effective date of the environmental
cost recovery factors for billing purposes?

POSITION: None at this time.

Company Specific Environmental Cost Recovery Issues

Florida Power & Light Company

ISSUE 9A: 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 2003?

POSITION: None at this time.

ISSUE 9B: How should the newly proposed environmental costs for
the St. Lucie Turtle Net project be allocated to the
rate classes?

POSITION: None at this time.

ISSUE 9C: Should the Commission approve Florida Power & Light Company's request for recovery of costs for Pipeline Integrity Management through the Environmental Cost Recovery Clause?

POSITION: None at this time.

ISSUE 9D: How should the newly proposed environmental costs for the Pipeline Integrity Management activity be allocated to the rate classes?

POSITION: None at this time.

ISSUE 9E: Should the Commission approve Florida Power & Light Company's request for recovery of costs for Oil Spill Prevention, Control & Countermeasures through the Environmental Cost Recovery Clause?

POSITION: None at this time.

ISSUE 9F: How should the newly proposed environmental costs for the Oil Spill Prevention, Control & Countermeasures activities be allocated to the rate classes?

POSITION: None at this time.

ISSUE 9G: Should the Commission approve FPL's request to recover costs for the Manatee Reburn NOx Control Technology Project through the Environmental Cost Recovery Clause?

POSITION: OPC reserves the right to object to recovery of these costs pending receipt of discovery.

ISSUE 9H: How should the newly proposed environmental costs for the Manatee NOx Control Technology Project be allocated to the rate classes?

POSITION: None at this time.

Gulf Power Company

ISSUE 10A:

Should the Commission approve Gulf Power Company's request for recovery of costs for implementing the Agreement between Gulf and the DEP through the Environmental Cost Recovery Clause?

POSITION: None at this time.

Tampa Electric Company

ISSUE 11A:

How should the newly proposed environmental costs for the Polk NOx Emissions Reduction project be allocated to the rate classes?

POSITION: None at this time.

Florida Power Corporation

ISSUE 12A:

Should the Commission approve Florida Power Corporation's request for recovery of costs for Substation Environmental Investigation, Remediation, and Pollution Prevention?

POSITION: OPC reserves the right to object to recovery of Florida Power Corporation's recovery of costs pending receipt of discovery.

ISSUE 12B:

How should the newly proposed environmental costs for the Substation Environmental Investigation, Remediation, and Pollution Prevention be allocated to the rate classes?

POSITION: OPC reserves the right to object to recovery of Florida Power Corporation's recovery of costs pending receipt of discovery.

ISSUE 12C:

Should the Commission approve Florida Power Corporation's request for recovery of costs for Distribution System Environmental Investigation, Remediation, and Pollution Prevention?

POSITION: OPC reserves the right to object to recovery of Florida Power Corporation's recovery of costs pending receipt of discovery.

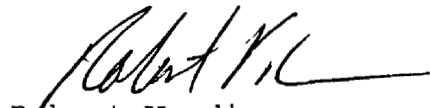
ISSUE 12D:

How should the newly proposed environmental costs for the Distribution System Environmental Investigation, Remediation, and Pollution Prevention be allocated to the rate classes?

POSITION: OPC reserves the right to object to recovery of Florida Power Corporation's recovery of costs pending receipt of discovery.

Dated this 25th day of October, 2002.

Respectfully submitted



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