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 Subject: Docket No. 060001-EI - Preliminary Issues and Positions  
 Attachments: FIPUG's Preliminary List of Issues and Positions - 9-22-06.doc

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2. The filing is to be made in Docket 060001-EI, *In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor*;
3. The filing is made on behalf of the Florida Industrial Power Users Group;
4. The total number of pages is 7; and
5. The attached document is the Florida Industrial Power Users Group's Preliminary List of Issues and Positions.

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power  
Cost Recovery Clause with Generating  
Performance Incentive Factor.

Docket No. 060001-EI  
Filed: September 22, 2006

THE FLORIDA INDUSTRIAL POWER USERS GROUP'S  
PRELIMINARY LIST OF ISSUES AND POSITIONS

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-06-0207-PCO-EI and the CSAR in this docket, hereby files its preliminary list of issues and positions. FIPUG reserves the right to amend these issues and positions:

**GENERIC FUEL ADJUSTMENT ISSUES**

**ISSUE 1:** What are the appropriate fuel adjustment true-up amounts for the period January 2005 through December 2005?

**FIPUG:** No position at this time.

**ISSUE 2:** What are the appropriate fuel adjustment true-up amounts for the period January 2006 through December 2006?

**FIPUG:** No position at this time.

**ISSUE 3:** What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2007 to December 2007?

**FIPUG:** No position at this time.

**ISSUE 4:** What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2007 through December 2007?

**FIPUG:** No position at this time.

**ISSUE 5:** What are the appropriate projected net fuel and purchased power cost recovery amounts to be included in the recovery factor for the period January 2007 through December 2007?

**FIPUG:** No position at this time.

**ISSUE 6:** What are the appropriate levelized fuel cost recovery factors for the period

January 2007 through December 2007?

**FIPUG:** No position at this time.

**ISSUE 7:** What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

**FIPUG:** No position at this time.

**ISSUE 8:** What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

**FIPUG:** No position at this time.

**ISSUE 9:** What should be the effective date of the fuel adjustment charge and capacity cost recovery charge for billing purposes?

**FIPUG:** No position at this time.

**ISSUE 10:** What are the appropriate actual benchmark levels for calendar year 2006 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**FIPUG:** No position at this time.

**ISSUE 11:** What are the appropriate estimated benchmark levels for calendar year 2007 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

**FIPUG:** No position at this time.

## **COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES**

### **Progress Energy Florida**

**ISSUE 12A:** Were the prices that PEF paid to Progress Energy Fuels Corporation for coal reasonable in amount? If not, what adjustment should be made?

**FIPUG:** No. PEF should be required to refund \$143 million consistent with the petition of the Office of Public Counsel.

### **Florida Power & Light Company**

**ISSUE 13A:** Should FPL be allowed to recover the costs for accessing and using the MoBay Gas Storage Facility?

**FIPUG:** The rate case settlement agreement between Florida Power & Light Company and consumer parties prohibits FPL from petitioning the Commission for any new surcharges to recover costs that are of a type that traditionally and historically would be, or are presently, recovered through base rates. The carrying cost for fuel inventory, both traditionally and historically, is a cost recovered through base rates, and FPL will recover the carrying costs for stored natural gas through its base rates. Allowing these carrying charges to be flowed through the fuel clause would go against the traditional and historical treatment of these costs as well as the provisions of the rate case settlement. Further, the hedging order does not authorize the recovery of fuel storage costs or fuel carrying costs.

**Florida Public Utilities Company**

None.

**Gulf Power Company**

None at this time.

**Tampa Electric Company**

None at this time pending discovery.

**GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

**ISSUE 17:** What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2005 through December 2005 for each investor-owned electric utility subject to the GPIF?

**FIPUG:** No position at this time.

**ISSUE 18:** What should the GPIF targets/ranges be for the period January 2007 through December 2007 for each investor-owned electric utility subject to the GPIF?

**FIPUG:** No position at this time.

**COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES**

**Progress Energy Florida**

None at this time.

**Florida Power & Light Company**

None at this time.

**Gulf Power Company**

None at this time.

**Tampa Electric Company**

None at this time.

**GENERIC CAPACITY COST RECOVERY FACTOR ISSUES**

**ISSUE 23:** What are the appropriate capacity cost recovery true-up amounts for the period January 2005 through December 2005?

**FIPUG:** No position at this time.

**ISSUE 24:** What are the appropriate capacity cost recovery true-up amounts for the period January 2006 through December 2006?

**FIPUG:** No position at this time.

**ISSUE 25:** What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2007 through December 2007?

**FIPUG:** No position at this time.

**ISSUE 26:** What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2007 through December 2007?

**FIPUG:** No position at this time.

**ISSUE 27:** What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2007 through December 2007?

**FIPUG:** No position at this time.

**ISSUE 28:** What are the appropriate capacity cost recovery factors for the period January 2007 through December 2007?

**FIPUG:** No position at this time.

**COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES**

**Progress Energy Florida**

None at this time.

**Florida Power & Light Company**

None at this time.

**Gulf Power Company**

None at this time.

**Tampa Electric Company**

None at this time.

s/ Timothy J. Perry

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing the Florida Industrial Power Users Group's Preliminary List of Issues and Positions has been furnished by e-mail and U.S. Mail, or e-mail and hand delivery(\*), this 22nd day of September 2006, to the following:

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