

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Environmental Cost
Recovery Clause
_____ /

Docket No. 080007-EI

Filed: September 15, 2008

OFFICE OF PUBLIC COUNSEL
PRELIMINARY LIST OF ISSUES AND POSITIONS

Pursuant to Order No. PSC-08-0149-PCO-EI, issued March 11, 2008, establishing the prehearing procedure in this docket, the Office of Public Counsel hereby files its Preliminary List of Issues and Positions.

1. **What are the final environmental cost recovery true-up amounts for the period ending December 31, 2007?**

OPC: No position at this time.

2. **What are the estimated environmental cost recovery true-up amounts for the period January 2008 through December 2008?**

OPC: No position at this time.

3. **What are the projected environmental cost recovery amounts for the period January 2009 through December 2009?**

OPC: No position at this time.

4. **What are the environmental cost recovery amounts, including true-up amounts, for the period January 2009 through December 2009?**

OPC: No position at this time.

5. **What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2009 through December 2009?**

6. OPC: No position at this time.

7. **What are the appropriate jurisdictional separation factors for the projected period January 2009 through December 2009?**

OPC: No position at this time.

8. **What are the appropriate environmental cost recovery factors for the period January 2009 through December 2009 for each rate group?**

OPC: No position at this time.

9. **What should be the effective date of the new environmental cost recovery factors for billing purposes?**

OPC: No position at this time.

COMPANY-SPECIFIC ISSUES

Florida Power & Light (FPL)

1. Should the Commission grant FPL's petition to modify the scope of its CWA 316(b) Phase II Rule Project?

OPC: No position at this time.

2. What are the environmental cost recovery amounts of FPL's three Next Generation Solar Energy Centers for the period January 2008 through December 31, 2008?

OPC: No position at this time.

3. What are the environmental cost recovery amounts of FPL's three Next Generation Solar Energy Centers for the period January 2009 through December, 2009?

OPC: No position at this time.

4. How should the costs associated with the three Next Generation Solar Energy Centers be allocated to the rate classes?

OPC: No position at this time.

5. Should FPL be allowed to recover the costs associated with its proposed Greenhouse Gas Reduction Program?

OPC: No position at this time.

6. How should the costs associated with the Greenhouse Gas Reduction Program be allocated to the rate classes?

OPC: No position at this time.

7. Should the Commission approve FPL's proposed Updated Integrated Clean Air Compliance Plan to address the vacated Clean Air Interstate Rule (CAIR)?

OPC: No position at this time.

Progress Energy Florida (PEF)

1. Should PEF be allowed to recover the costs associated with its proposed Crystal River Thermal Discharge Compliance Project?

OPC: No position at this time.

2. How should the newly proposed environmental costs for the Crystal River Thermal Discharge Compliance Project be allocated to the rate classes?

OPC: No position at this time.

3. Should PEF be allowed to recover costs associated with its proposed Greenhouse Gas Inventory and Reporting Project?

OPC: No position at this time.

4. How should the costs associated with the Greenhouse Gas Inventory and Reporting Project be allocated to the rate classes?

OPC: No position at this time.

5. Should the Commission approve PEF's proposed Updated Integrated Clean Air Compliance Plan to address the vacated Clean Air Interstate Rule (CAIR)?

OPC: No position at this time.

Gulf Power Company (Gulf)

1. Should Gulf be allowed to recover the costs associated with its proposed Plan Smith SPCC Compliance Project?

OPC: No position at this time.

2. How should the costs associated with the Plant Smith SPCC Compliance Project be allocated to the rate classes?

OPC: No position at this time.

3. Should Gulf be allowed to recover the costs associated with its proposed Plant Crist Water Conservation Project?

OPC: No position at this time.

4. How should the costs associated with the Plant Crist Water Conservation Project be allocated to the rate classes?

OPC: No position at this time.

5. Should Gulf be allowed to recover the costs associated with its proposed Impaired Waters Rule (IWR) Project?

OPC: No position at this time.

6. How should the costs associated with the IWR Project be allocated to the rate classes?

OPC: No position at this time.

7. Should Gulf be allowed to recover the costs associated with its proposed Annual Climate Registry Project?

OPC: No position at this time.

8. How should the costs associated with the Annual Climate Registry Project be allocated to the rate classes?

OPC: No position at this time.

9. Should the Commission approve Gulf's proposed Updated Integrated Clean Air Compliance Plan to address the vacated Clean Air Interstate Rule (CAIR)?

OPC: No position at this time.

Tampa Electric Company (TECO)

1. Should TECO be allowed to recover the costs associated with its proposed Greenhouse Gas Reduction Program?

OPC: No position at this time.

2. How should the costs associated with the Greenhouse Gas Reduction Program be allocated to the rate classes?

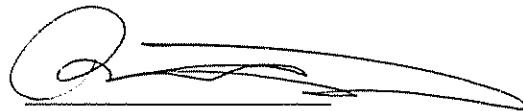
OPC: No position at this time.

3. Should the Commission approve TECO's proposed Updated Integrated Clean Air Compliance Plan to address the vacated Clean Air Interstate Rule (CAIR)?

OPC: No position at this time.

Sincerely,

J. R. Kelly
Public Counsel



Patricia A. Christensen
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of CITIZEN'S PRELIMINARY LIST OF ISSUES AND POSITIONS was furnished to the following, by electronic and U.S. Mail, on this 15th day of September, 2008:

John T. Burnett/R. Alexander Glenn
Progress Energy Service Company, LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042

Paula K. Brown
Tampa Electric Company
P. O. Box 111
Tampa, FL 33601-0111

Paul Lewis, Jr.
Progress Energy Florida, Inc.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740

Gary V. Perko
Hopping Law Firm
Post Office Box 6526
Tallahassee, FL 32314

Martha C. Brown
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

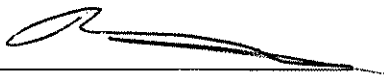
R. Wade Litchfield & John T. Butler
Florida Power & Light Company
700 Universe Boulevard
Juno Beach FL 33408-0420

John W. McWhirter, Jr.
Florida Industrial Power Users Group
400 North Tampa Street, Suite 2450
Tampa, FL 33602

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

Beggs & Lane Law Firm
J. Stone/R. Badders/S.Griffin
P.O. Box 12950
Pensacola, FL 32591

Lee L. Willis/James D. Beasley
Ausley Law Firm
Post Office Box 391
Tallahassee, FL 32302


Patricia A. Christensen
Associate Public Counsel