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April 6, 1995

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FILE COPY

HAND DELIVERED

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
101 East Gaines Street  
Tallahassee, Florida 32399

Re: Docket No. ~~941101~~ <sup>941101-EO</sup>, Petition of Florida Power Corporation for determination that its plan for curtailing purchases from Qualifying Facilities in minimum load conditions is consistent with Rule 25-17.086, F.A.C.

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and 15 copies of Orlando CoGen Limited's Motion to Extend Deadline for Testimony from April 7, 1995 to April 10, 1995.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG Estrell
- LED 1
- LE 5
- CR \_\_\_\_\_
- R \_\_\_\_\_
- SEL 1
- WES \_\_\_\_\_
- OTH \_\_\_\_\_

Yours truly,

*Joe McGlothlin*  
Joseph A. McGlothlin

JAM/jfg

Enclosures

RECEIVED & FILED

DOCUMENT NUMBER-DATE  
FPSC BUREAU OF RECORDS

03566 APR-6 1995

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Power ) DOCKET NO. 941101-EQ  
Corporation for determination that )  
its plan for curtailing purchases ) FILED: April 6, 1995  
from Qualifying Facilities in )  
minimum load conditions is )  
consistent with Rule 25-17.086, )  
F.A.C. )

ORIGINAL  
FILE COPY

ORLANDO COGEN LIMITED'S MOTION TO EXTEND DEADLINE  
FOR TESTIMONY FROM APRIL 7, 1995 TO APRIL 10, 1995

Orlando CoGen Limited (OCL), through its undersigned counsel, moves for an order extending the existing deadline for its prefiled testimony from April 7, 1995 until April 10, 1995, and in support states:

1. In a motion filed on March 29, 1995, OCL described delays that its consultant, Ken Slater, had experienced to that point in his efforts to run FPC's Unit Commit computer program. As stated in the motion, Mr. Slater and FPC established that Mr. Slater's copy of FPC's Unit Commit did not contain all of the program's source codes. Later, Mr. Slater determined that the problem arose when the IBM main frame tape delivered by FPC was translated to a format Mr. Slater could use on his personal computer. FPC agreed to provide the program again, this time on a floppy disk that Mr. Slater could employ on his computer directly.

2. FPC sent the program by overnight delivery, and Mr. Slater promptly set to work on it when it arrived at his office.

DOCUMENT NUMBER-DATE

03566 APR-6 95

FPSC-RECORDS/REPORTING

3. On April 4, following the lengthy technical preliminaries that are necessary when preparing to run a large program like Unit Commit even when it is delivered in a compatible format, Mr. Slater discovered that he received "error messages" when he tried to replicate FPC's runs. Further, he discovered a discrepancy between the Unit Commit program version number that appeared on the output from the program he was given and the program version number that is printed on the output reports that underlie Mr. Southwick's testimony.

4. On the afternoon of April 4, OCL and FPC arranged a second telephone conference between Mr. Slater and FPC's technical personnel. They determined that FPC does possess two different versions of the Unit Commit program, and ascertained that the program sent to Mr. Slater is not the same version used for Mr. Southwick's testimony. FPC personnel located a copy of the program that bears the same program version number as the program that was used to generate the analyses that Mr. Southwick employs. FPC communicated this different version of Unit Commit to Mr. Slater by modem at the end of the business day on April 4.


5. While FPC responded promptly to resolve the discrepancy between the programs, the fact that he received the program that corresponds to FPC testimony on April 4 presented a serious setback to Mr. Slater's attempts to perform his analysis and prepare testimony. As stated earlier, even when a large program is delivered in a format that is compatible with the computer that will run it, the analyst must work through many time-consuming

steps before he reaches the point at which he can manipulate the program and analyze alternative scenarios. For instance, in order to run the "Unit Commit" program on his computer equipment, Mr. Slater must separate the source code into a number of segments, which when linked into a "load module" which actually runs on the computer, sequentially overlay one another in order that the program can execute within the addressable memory space provided by the computer and its fortran compiler. Because the correct version of the "Unit Commit" program requires a larger total amount of memory than the incorrect version supplied earlier, this segmentation and overlaying procedure must be completely redone. Mr. Slater is now in the process of incorporating the new program in the manner that most efficiently allows him to salvage some of the preparatory work that he has already accomplished, but that work is not yet complete.

6. Under the circumstances, OCL cannot complete its prefiled testimony by the existing deadline of April 7. OCL is prepared to work over the weekend so as to meet a revised deadline of April 10, 1995. OCL would point out that it earlier stipulated to an extension of time for FPC's rebuttal that was designed at the time to give FPC the opportunity to work over an extra weekend.

OCL has contacted FPC and is authorized to represent that FPC does not object to the requested extension. In addition, Pasco Cogen, Dade County and Montenay-Dade, Lake Cogen, Pasco County, Polk Power and Tiger Bay have no objection to the extension. OCL has been unable to contact Auburndale, Ridge and Pinellas County.

WHEREFORE, OCL moves for an order extending the deadline for  
Intervenors' prefiled testimony from April 7 to and including  
April 10, 1995.

  
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Attorneys for Orlando CoGen  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Orlando CoGen Limited's Motion to Extend Time for Filing of Prefiled Testimony has been furnished by hand delivery\* or by U.S. Mail to the following parties of record, this 6th day of April, 1995.

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