

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In Re: Petition for)	DOCKET NO. 941101-EQ
determination that its plan for)	
curtailing purchases from)	DATE: April 17, 1995
qualifying facilities in minimum)	
load conditions is consistent)	
with Rule 25-17.086, F.A.C., by)	
FLORIDA POWER CORPORATION.)	

STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-94-1523-PCO-EQ, the Staff of the Florida Public Service Commission files its Prehearing Statement.

- a. All Known Witnesses
None for staff.
- b. All Known Exhibits
None at this time.
- c. Staff's Statement of Basic Position
No. position at this time.
- d. Staff's Position on the Issues

ACK _____	<u>ISSUE 1:</u>	Has Florida Power Corporation adequately demonstrated that the minimum load conditions for curtailment outlined in its plan comply with Commission Rule 25-17.086, Florida Administrative Code?
AFA _____		
APP _____		
CAF _____		
CMU _____	<u>POSITION:</u>	No position at this time.
CTR _____	<u>ISSUE 2:</u>	Has Florida Power Corporation adequately demonstrated that it has attempted to mitigate any foreseeable imbalance between generation and load during minimum load conditions by committing the most appropriate combination of generation resources for the circumstances?
EAG _____		
LEG _____		
LIN _____		
OPC _____		
RCH _____		
SEC <u> / </u>		
WAS _____		
OTH _____		

DOCUMENT NUMBER-DATE

03786 APR 17 95

FPSC-RECORDS/REPORTING

STAFF'S PREHEARING STATEMENT
DOCKET NO. 941101-EQ

POSITION: No position at this time.

ISSUE 3: Does the proposed curtailment plan properly require Florida Power Corporation to take all appropriate measures to decrease other sources of generation to mitigate any imbalance between generation and load?

POSITION: No position at this time.

ISSUE 4: Does the proposed curtailment plan properly require Florida Power Corporation to take all appropriate measures to increase sales to mitigate any imbalance between generation and load?

POSITION: No position at this time.

ISSUE 5: Has Florida Power Corporation adequately demonstrated that the procedures for curtailment outlined in its plan are reasonable and appropriate?

POSITION: No position at this time.

ISSUE 6: Has Florida Power Corporation adequately demonstrated that its proposed plan allocates justifiable curtailments among QF's in a fair and not unduly discriminatory manner?

POSITION: No position at this time.

ISSUE 7: Has Florida Power Corporation properly implemented the procedures set forth in the plan during the curtailments that have occurred from October, 1994, to January 1, 1995?

POSITION: No position at this time.

ISSUE 8: Has Florida Power Corporation adequately demonstrated that the curtailments that have occurred from October 1, 1994, through January 1, 1995, were necessary to avoid negative avoided costs?

POSITION: No position at this time.

STAFF'S PREHEARING STATEMENT
DOCKET NO. 941101-EQ

ISSUE 9: Should the Commission approve Florida Power Corporation's curtailment plan as being in compliance with Rule 25-17.086?

Position: No position at this time.

e. Pending Motions

None from staff.

f. Compliance with Order No. PSC-94-1523-PCO-EQ

Staff has complied with the Order

Respectfully submitted this 17th day of April, 1995.



MARTHA CARTER BROWN
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
101 East Gaines Street
Fletcher Building - Room 226
Tallahassee, Florida 32399-0863
(904)487-2740

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for) DOCKET NO. 941101-EQ
determination that its plan for)
curtailing purchases from) FILED: April 17, 1995
qualifying facilities in minimum)
load conditions is consistent)
with Rule 25-17.086, F.A.C., by)
FLORIDA POWER CORPORATION.)
_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one true and correct copy of Staff's Prehearing Statement has been furnished by U.S. Mail this 17th day of April, 1995, to the following:

Akerman Senterfitt and
Eidson, P.A.
Gregory Presnell, Esquire
P.O. Box 231
Orlando, FL 32802-0231

Johnson & Associates
Barrett Johnson, Esquire
P.O. Box 1308
Tallahassee, FL 32302

Auburndale Power Partners
Robert Riley
12500 Fair Lakes Circle, #420
Fairfax, VA 22033-3808

Nancy Jones, Esquire
1125 U.S. 98 So., #100
Lakeland, FL 38801

Suzanne Brownless, Esquire
2546 Blairstone Pines Drive
Tallahassee, FL 32301

Lake Cogen, Lt.d
c/o Energy Initiatives, Inc.
Kelly Tomblin
One Upper Pond Road
Parsippany, NJ 07054

Florida Power Corporation
James McGee, Esquire
P.O. Box 14042
St. Petersburg, FL 33733-4042

Landers and Parsons
Scheffel Wright, Esquire
P.O. Box 271
Tallahassee, FL 32302

CERTIFICATE OF SERVICE
DOCKET NO. 941101-EQ

Holland and Knight
Bruce May, Esquire
P.O. Drawer 810
Tallahassee, FL 32302

Macfarlane Ferguson Allison
and Kelly
Ansley Watson, Esquire
P.O. Box 1531
Tampa, FL 33601-1531

McWhirter Reeves McGlothlin
Davidson and Bakas
Joseph McGlothlin, Esquire
315 South Calhoun street #716
Tallahassee, FL 32301

Panda Energy Corporation
Stephen Argenbright
4100 Spring Valley Road, #1001
Dallas, TX 75244

Metropolitan Dade County
Board of Commissioners
G. Fels, Asst. County Attorney
Aviation Department
P.O. Box 592075 AMF
Miami, FL 33159

Pasco Cogen, Ltd.
Elliott White
111 East Madison Street, #1700
Tampa, FL 33601-2562

Montenay-Dade, Ltd.
3225 Aviation Ave., 4th Floor
Miami, FL 33133

Pasco County
County Attorney
7530 Little Road
New Port Richey, FL 34654

Orange Cogen Limited
1901 Clear Springs Road
Bartow, FL 33830

Pinellas County
Director, Solid Waste Department
2800 114th Ave., North
St. Petersburg, FL 33716

Orlando Cogen Limited
c/o Air Products
7201 Hamilton Blvd.
Allentown, PA 18195

Polk Power Partners, Ltd.
1125 U.S. 98 S., #100
Lakeland, FL 33801

Ridge Generating Station, L.P.
Rodney Williams
3131 K-Ville Avenue
Auburndale, FL 33823

Tiger Bay, L.P.
c/o Destec Energy Co.
Barry Huddleston
2500 CityWest Blvd., #150
Houston, TX 77210-4411

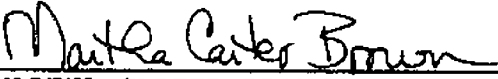
CERTIFICATE OF SERVICE
DOCKET NO. 941101-EQ

Verner Law Firm
Stuart Broom, Esquire
901 15th Street N.W., #700
Washington, D.C. 20005-2301

Wheelabrator Environmental
Services, Inc.
Michael O'Friel
Liberty Lane
Hampton, NH 03842

Wiggins and Villacorta
Patrick Wiggins, Esquire
Marsha Rule, Esquire
P.O. Drawer 1657
Tallahassee, FL 32302

Richard Zambo, Esquire
598 S.W. Hidden River Ave.
Palm City, FL 34990



MARTHA CARTER BROWN
Staff Counsel

Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399
(904) 487-2740