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March 12, 2001

Ms. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 001521-EU

Dear Ms. Bayó:

Gainesville Regional Utilities (GRU) herein submits comments to proposed amendments to Rule 25-6.035, F.A.C., Adequacy of Resources. GRU is a member of the Florida Reliability Coordinating Council (FRCC), operates its own control area, and is a member of the FRCC's Operating Committee. The proposed changes to the above mentioned rule, especially in conjunction with changes contemplated in the formation of GridFlorida in the filings of Florida Power and Light, Florida Power Corporation and Tampa Electric Company to the Federal Energy Regulatory Commission in response to Order 2000, have a direct impact on GRU. Therefore, GRU submits the comments below.

GRU agrees with the comments and proposed changes to the rule submitted by JEA to the FPSC on February 21, 2001 in this docket and copied to the FRCC Operating Committee. The JEA proposed changes will align the rule with the changes anticipated under the GridFlorida filing and prevent an undue shift of the reserve requirements because of the changing structure of "control areas" in Florida. It may be argued that the FERC has not yet ruled in the GridFlorida filing. However, the rule changes proposed by JEA and supported by GRU would more appropriately align reserve obligations to the retail load serving entities within Florida irregardless of the eventual decisions by the FERC in the GridFlorida filing.

Further, GRU opposes the elimination of the 15% reserve criteria from the rule. The 15% criteria has served as guidance to the utilities in the state in regards to minimum reserve margins and should not be left out of the rule.

Respectively submitted,

Darrell R. DuBose
Assistant General Manager, Energy Supply

cc: FRCC Operating Committee
Richard Bellak, Esq., FPSC Staff
Mr. Tom Ballinger, FPSC Staff

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