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**Florida
Power**
CORPORATION

James P. Fama
CORPORATE COUNSEL

October 24, 1990

Mr. Steve C. Tribble
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

900004-EU

Re: Filing Of Generation Plan, Standard Offer
Contract And Accompanying Tariffs

Dear Mr. Tribble:

Florida Power Corporation is writing this letter to inform the Commission that Florida Power will not be able to file on October 30, 1990 all of the documents called for in Order No. 23625 in Docket No. 891049-EU. Florida Power will file its Generation Plan on the 30th. However, the standard offer contract and the accompanying qualifying facility tariffs will not be filed until November 15th, for the following reasons.

The recent changes to the Commission's new cogeneration rules are expansive. The conversion from a statewide approach to an individual utility approach involves making many changes to the existing contract and tariffs. For example, unlike the existing contracts and tariffs, the new standard offer contract and tariffs will encompass multiple avoided units and multiple pricing options.

There are other changes to the standard offer contract that Florida Power believes are necessary. For example, the current contract has no termination provision. This must be fixed. In addition, the availability and pricing of transmission transfer capacity from northern to central Florida must be reflected.

As we deal with these many complex issues, we are seeking to keep the standard offer relatively short, simple and easy to administer. Meeting all of these goals takes a significant amount of time, and that is why Florida Power needs an additional 15 days to file these documents. We feel that taking this extra time up front will save much more time later down the road as these documents are used again and again.

DOCUMENT NUMBER-DATE

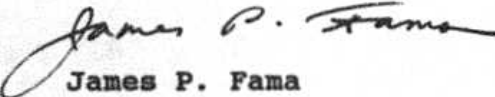
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Florida Power has received a tentative opinion from the Staff that given projected hearing dates, a 15-day delay in filing of the standard offer contract and tariffs ultimately will not cause delay should these matters be set for hearing.

Very truly yours,


James P. Fama

JPF/emh

cc: James Dean
Jennifer Harvey