

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Power ) DOCKET NO. 900796-EI  
and Light Company for Inclusion ) Filed: November 13, 1990  
of the Scherer Unit No. 4 Purchase )  
in Rate Base, Including an )  
Acquisition Adjustment )  
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**NASSAU POWER CORPORATION'S JOINDER IN  
PUBLIC COUNSEL'S MOTION TO POSTPONE  
HEARING AND RESCHEDULE CASR DATES**

Nassau Power Corporation ("Nassau"), through its undersigned counsel, joins in the motion of the Office of Public Counsel, filed on November 9, 1990, to postpone the hearing and reschedule the CASR dates in this docket. As grounds therefor, Nassau states:

1. On November 9, 1990, the Office of Public Counsel filed a motion in this docket requesting that the Commission revise the expedited schedule which it is currently following. Public Counsel noted that the schedule is unnecessary because even under the current schedule a decision will not be rendered by December 31 (the date requested by Florida Power and Light). Further, the current schedule is prejudicial to the interests of the parties in this docket. Nassau concurs and joins in Public Counsel's motion.

2. On November 7, 1990, the parties to this case attended a pre-prehearing conference to identify and delineate the issues which the Commission will address. Some 22 issues were identified encompassing questions about Florida Power and Light's assessment of its capacity needs, the impact of the proposed Scherer purchase on the reliability and integrity of the grid, alternative supply

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side sources of capacity, which project is the most cost-effective means of meeting Florida Power and Light's capacity needs, what effect the proposed purchase will have on transmission capacity and on the southern/Florida interface, the appropriateness of the "acquisition adjustment", the Commission's authority to authorize the inclusion of the proposed purchase in rate base, the effect of the purchase on other power supplies which have already been contracted for, as well as the reasonableness and prudence of the proposed transaction.

3. A review of the numerous issues which the parties have identified and the complexity of such issues makes it clear that these issues cannot be adequately developed, analyzed and incorporated in testimony which is currently due on November 21, 1990.

4. The relief that Florida Power and Light is seeking is extraordinary and unprecedented. In order for the Commission to fully evaluate Florida Power and Light's request, it should have the benefit of the analysis of the many parties who have expressed an interest in this docket. Such parties cannot adequately conduct the necessary discovery and provide their analysis under the current schedule nor can they adequately prepare to protect their own interests which will be affected by this docket.

5. As pointed out in the motion of Public Counsel, there is no need to rush toward a December hearing when the next critical contract date for Florida Power and Light does not occur until June 30, 1991.

6. Nassau submits that the interests of the affected parties to this docket as well as the ratepayers of Florida would be better served by a hearing schedule which will allow all aspects of the proposed Scherer 4 purchase to be fully analyzed and evaluated.

WHEREFORE, Nassau Power Corporation joins with the Office of Public Counsel in its request for the rescheduling of this hearing and requests that the Commission extend the hearing dates and all related activities.

*Vicki Gordon Kaufman*

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Attorneys for Nassau Power  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Nassau Power Corporation's Joinder in Public Counsel's Motion to Postpone Hearing and Reschedule CASR Dates has been furnished by hand delivery\* or by U.S. Mail to the following parties of record this 13th day of November, 1990:

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