## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION L. L.

filk Copy

In re: 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.

Docket No. 941101-EQ

January 6, 1995

## LAKE COGEN'S JOINDER IN MOTION FOR CONTINUANCE OR, IN THE ALTERNATIVE, FOR EXTENSION OF TIME TO FILE TESTIMONY

Lake Cogen, Ltd. ("Lake"), by its undersigned attorneys, joins in the Motion For Continuance Or, In The Alternative, Motion For Extension Of Time To File Testimony, filed in this proceeding by Orlando CoGen, Limited. Lake joins Orlando CoGen, Limited in moving the Commission for an order continuing the hearing in this docket and rescheduling the procedural dates governing the proceeding. In the alternative, if the Commission

ACK declines to continue the hearing, Lake moves for an order extending, by at least 30 days, the time for the filing of arr. intervenors' testimony in the proceeding.

? As grounds for these alternative motions, Lake agrees with the grounds set forth in the Motion For Continuance Or, In The Dutself Balternative, Motion For Extension Of Time To File Testimony, filed herein on December 21, 1994 by Orlando CoGen Limited. L **(** : Specifically, Lake agrees that the issues raised in this P / docket are complex, in that their accurate resolution will

W - require detailed analysis of Florida Power Corporation's electric generation system and operations. The requisite analyses will therefore require extensive discovery relating to FPC's load data, unit constraints, and system cost characteristics, and DOCUMENT भाभक्षा स्थान RECEIVED & FILED

FPSC-BUREAU OF RECORDS

OTH L

00214 JAN-68

analyses utilizing data obtained thereby to evaluate FPC's operating conditions and constraints with and without purchases of QF power.

Lake further agrees that all parties to the proceeding, including the Commission and the Staff, will benefit from the additional time afforded by the requested continuance. Benefits to the parties will include having sufficient time to obtain and analyze necessary data and having sufficient time to prepare their cases. Even with the requested continuance, the Commission would have adequate time to conduct hearings, consider the evidence, and make its decision before significant minimum load conditions recur in the fall of 1995.

WHEREFORE, Lake Cogen joins Orlando CoGen, Limited, in moving the Commission for an order continuing the hearing in this docket and rescheduling the procedural dates governing this docket. In the alternative, if the Commission declines to grant the requested continuance, Lake joins Orlando CoGen in moving the Commission for an order extending the deadline for filing intervenors' testimony by at least 30 days.

Robert Scheffel Wr

Florida Bar No. 966721

Landers & Parsons

310 West College Avenue

Post Office Box 271

Tallahassee, Florida 32302 Telephone: (904) 681-0311

Attorneys for Lake Cogen, Ltd.

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by hand delivery (\*) or by United States Mail, postage prepaid, on the following individuals this 65 day of January, 1995:

Mr. Tom Ballinger\* Division of Electric & Gas Florida Public Service Commission 101 East Gaines Street Fletcher Building, Room 326 Tallahassee, Florida 32399-0860

Joseph A. McGlothlin McWhirter, Reeves, McGlothlin, Davidson & Bakas 315 South Calhoun St., Ste. 716 Tallahassee, Florida 32301

Martha Carter Brown, Esquire\* Division of Legal Services Florida Public Service Commission Tallahassee, Florida 32301 101 East Gaines Street Fletcher Building, Room 223 Tallahassee, Florida 32399-0860

Suzanne Brownless, Esquire 2546 Blair Stone Pines Drive

Barrett G. Johnson, Esquire Johnson & Associates 315 S. Calhoun Street Barnett Bank Bldg. Suite 760 Tallahassee, FL 32301

Orange Cogen Limited c/o Ark/CSW Development Partnership, Ste. 400 23046 Avenida de la Carlota Laguna Hills, CA 92663-1519

Ansley Watson, Jr., Esquire MacFarlane, Ausley, Ferguson & McMullen 111 East Madison St., Ste. 2300 Tampa, FL 33602

Polk Power Partners, L.P. c/o Polk Power CP, Inc. 1027 South Rainbow Blvd. Suite 360 Las Vegas, NV 89128

Elliott White Pasco Cogen, Ltd. 111 East Madison St., Ste. 1700 Tampa, FL 33602

Mr. Dennis Carter Assistant City Manager Metro-Dade Center 111 NW 1st Street, 29th Floor Miami, FL 33128

Gregory Presnell, Esquire Akerman, Senterfitt & Eidson 255 S. Orange Avenue Orlando, FL 32802-0231

Mr. Juan Portuondo, President Montenay International 3225 Aviation Avenue, 4th Floor Coconut Grove, FL 33133

Mr. Jerome Glazer Auburndale Power Partners 12500 Fair Lakes Circle, Ste. 420 Fairfax, VA 22033

Mr. Don Fields
Executive Director
Auburndale Power Partners
1501 Derby Avenue
Auburndale, FL 33823

Keith Trostle Lake Cogen, Ltd. 1551 N. Tusdin Avenue Suite 900 Santa Ana, CA 92701

ROBERT SCHEFFEL