

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE 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

FILED: 04/17/95

ORANGE COGENERATION LIMITED PARTNERSHIP'S  
PREHEARING STATEMENT

Orange Cogeneration Limited Partnership (Orange Cogeneration) hereby files this prehearing statement pursuant to Rule 25-22.038(3), Florida Administrative Code.

A. Witnesses: None.

B. Exhibits: At this time, Orange Cogeneration does not plan to introduce exhibits, but reserves the right to introduce cross-examination exhibits if necessary.

C. Basic Position: No position at this time.

D. ISSUES

ISSUE 1: 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?

ORANGE COGENERATION'S POSITION: No position at this time.

ISSUE 2: 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?

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMT \_\_\_\_\_  
CT \_\_\_\_\_  
E \_\_\_\_\_  
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S \_\_\_\_\_  
W \_\_\_\_\_  
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

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FFSC-RECORDS/REPORTING

ORANGE COGENERATION'S 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?

ORANGE COGENERATION'S 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?

ORANGE COGENERATION'S 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?

ORANGE COGENERATION'S 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?

ORANGE COGENERATION'S 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?

ORANGE COGENERATION'S 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?

ORANGE COGENERATION'S POSITION: No position at this time.

LEGAL ISSUE

ISSUE 9: What is the permissible scope of Rule 25-17.086, Florida Administrative Code, as an implementation of section 210 of PURPA?

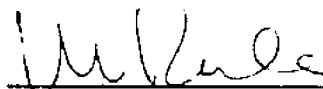
ORANGE COGENERATION'S POSITION: No position at this time.

ISSUE 10: Should the Commission approve Florida Power Corporation's curtailment plan as being in compliance with Rule 25-17.086?

ORANGE COGENERATION'S POSITION: No position at this time.

- E. QUESTIONS OF LAW: None.
- F. POLICY QUESTIONS: None.
- G. STIPULATED ISSUES: None.
- H. PENDING MOTIONS OR OTHER MATTERS: None.
- I. REQUIREMENTS THAT CANNOT BE COMPLIED WITH: None.

Respectfully submitted this 17<sup>th</sup> day of April, 1995.



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CERTIFICATE OF SERVICE

Docket No. 941101-EQ

I hereby certify that a copy of the foregoing has been furnished by U.S. Mail to the following persons on this 17th day of April, 1995:

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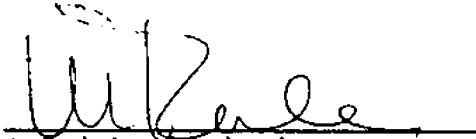
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