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**RICHARD A. ZAMBO, P.A.**  
ATTORNEYS AND COUNSELLORS  
598 S.W. HIDDEN RIVER AVENUE  
PALM CITY, FLORIDA 34990  
(407) 220-8163

REGISTERED PROFESSIONAL ENGINEER  
REGISTERED PATENT ATTORNEY

COGENERATION & ALTERNATIVE ENERGY  
ENERGY REGULATORY LAW

May 3, 1995

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0850

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.  
FPSC Docket No. ~~04101-EO~~

Dear Ms. Bayó:

Enclosed for filing in the referenced Docket please find an original and 15 copies of the Second Amended Prehearing Statement of Ridge Generating Station, L.P. A double-sided high density 3.5 inch floppy disk containing this document in WordPerfect 6.0 format as prepared on a Windows-based computer is also enclosed. If you have any questions regarding this filing, please do not hesitate to call.

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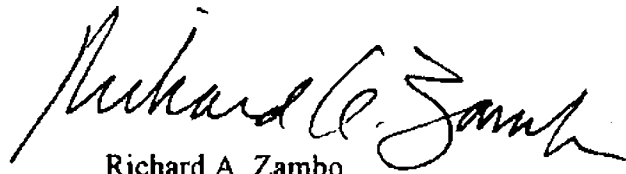
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RAZ/jnh  
Enclosures

Sincerely,



Richard A. Zambo

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FLORIDA BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04470 MAY-8 1995

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Power Corporation )  
for determination that its plan for curtailing ) Docket No. 941101-EQ  
purchases from Qualifying Facilities in )  
minimum load conditions is consistent with )  
Rule 25-17.086, F.A.C. ) May 3, 1995  
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**SECOND AMENDED**  
**PREHEARING STATEMENT OF RIDGE GENERATING STATION, L.P.**  
(Amended to include issues identified at the April 26, 1995 Prehearing Conference)

**A. WITNESSES:**

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Direct: None	n/a	n/a
Rebuttal: None	n/a	n/a

**B. EXHIBITS:**

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>
n/a	n/a	n/a

**C. STATEMENT OF BASIC POSITION:**

Ridge Generating Station, L.P.'s Statement of Basic Position.

The need for *low load period* generation curtailments on the FPC system appears to have resulted from a variety of factors, none of which are directly attributable to Ridge. In a spirit of cooperation, Ridge has entered into a *curtailment agreement* with FPC (which is now pending Commission approval in Docket No. 950797-EQ) which, along with similar agreements between FPC and other QF's, should contribute significantly to the alleviation of the low load *problems* anticipated by FPC. Indeed, the curtailment agreements negotiated by FPC form an integral part of FPC's curtailment plan. So long as the referenced curtailment agreements are approved by the Commission, it is Ridge's position that FPC's curtailment plan as submitted, offers a reasonable solution to what appears to be a temporary problem. Ridge reserves the right to modify, amend or otherwise revise its basic position as may be appropriate as the case proceeds.

DOCUMENT NUMBER-DATE

04470 MAY-8 1995

**STATEMENT OF ISSUES AND POSITIONS:**

**ISSUE 1:** Has FPC adequately demonstrated that the minimum load conditions for curtailment outlined in its plan comply with Commission Rule 25-17.086, Florida Administrative Code?

**Ridge's Position:** No position

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**ISSUE 2:** Has FPC adequately demonstrated that its Plan incorporates all appropriate measures to mitigate the need for curtailment during minimum load conditions?

A. Has FPC 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?

**Ridge's Position:** No Position

B. Does the proposed curtailment plan properly require FPC to take all appropriate measures to decrease other sources of generation to mitigate any imbalance between generation and load?

**Ridge's Position:** No Position

C. Does the proposed curtailment plan properly require FPC to take all appropriate measures to increase sales to mitigate any imbalance between generation and load?

**Ridge's Position:** No

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**ISSUE 3:** Has FPC adequately demonstrated that the procedures for curtailment outlined in its plan are reasonable and appropriate?

**Ridge's Position:** Yes

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**ISSUE 4:** Has FPC adequately demonstrated that its proposed plan allocates justifiable curtailments among QF's in a fair and not unduly discriminatory manner?

**Ridge's Position:** Yes

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**ISSUE 5:** If the procedures set forth in FPC's curtailment plan are consistent with Rule 25-17.086, F.A.C., did FPC properly implemented the procedures during the curtailments that occurred from October, 1994 through January, 1995?

**Ridges's Position:** No position

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**ISSUE 6:** Has FPC adequately demonstrated that the curtailments that have occurred from October 1, 1994 through January 1, 1995, were necessary to avoid negative avoided costs?

A. In determining whether purchases of firm QF's generation during an operational circumstance that satisfies rule 25-17.086 would cause FPC to incur costs greater than the costs FPC would incur if FPC supplied the energy, what costs are appropriate to consider?

**Ridge's Position:** No Position

B: In determining whether purchases of firm QF's generation during an operational circumstance that satisfies rule 25-17.086 would cause FPC to incur costs greater than FPC would incur if FPC supplied the energy, what is the appropriate time frame to measure?

Ridge's Position: No Position

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ISSUE 7: What is the permissible scope of Rule 25-17.086, F.A.C., in view of the federal standards of 18 CFR 292.304 implementing Section 210 of PURPA?

Ridge's Position: No Position

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ISSUE 8: Should the Commission approve FPC's curtailment plan as being in compliance with Rule 25-17.086, Florida Administrative Code?

Ridge's Position: Yes

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**E. STIPULATED ISSUES:**

There are no stipulated issues of which Ridge is aware.

**F. MOTIONS**

There are no pending motions on Ridge's behalf.

**G. COMPLIANCE WITH ORDER ON PROCEDURE**

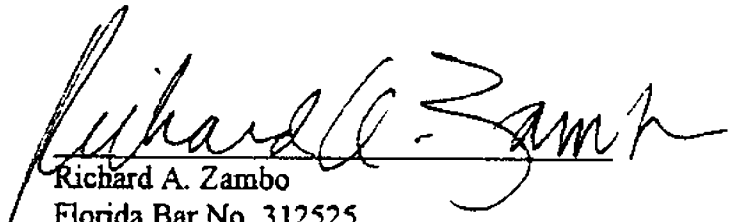
Ridge is unaware at this time of any requirements of Order 941523 with which it cannot substantially comply. Ridge will advise the Commission should the situation so warrant.

**H. OTHER MATTERS**

There are no other matters pending at this time, to the knowledge of Ridge. However, Ridge reserves the right to raise other matters, as may be appropriate.

Dated: May 3, 1995

Respectfully submitted,



Richard A. Zambo  
Florida Bar No. 312525  
RICHARD A. ZAMBO, P.A.  
598 S.W. Hidden River Avenue  
Palm City, FL 34990  
(407) 220-9163

Attorney for Ridge Generating Station, L.P.