

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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: June 15, 1995

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**AUBURNDALE POWER PARTNERS, LIMITED PARTNERSHIP'S
POST-HEARING STATEMENT OF ISSUES AND POSITIONS**

Auburndale Power Partners, Limited Partnership ("APP"), by and through undersigned counsel, pursuant to Rule 25-22.056(3), Florida Administrative Code, and Order No. PSC-94-1523-PCO-EQ, hereby submits its Post-Hearing Statement of Issues and Positions in this proceeding.

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?

* * *

APP: No position.

ISSUE 2: Has Florida Power Corporation adequately demonstrated that its plan incorporates all appropriate measures to mitigate the need for curtailment during minimum load conditions?

* * *

APP: No position.

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FPSC-RECORDS/REPORTING

ISSUE 2a: 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?

* * *

APP: No position.

ISSUE 2b: 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?

* * *

APP: No position.

ISSUE 2c: 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?

* * *

APP: No position.

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

* * *

APP: No position.

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

* * *

APP: The curtailment priority schedule under FPC's plan is fair and not unduly discriminatory because the three NUG classifications: (1) are based on objective differences between Group A NUGs versus Group B and C NUGs; and (2) fairly recognize the benefits that Group A NUGs provide to Group B and C NUGs.

ISSUE 5: If the procedures set forth in Florida Power Corporation's curtailment plan are consistent with Rule 25-17.086, did Florida Power Corporation properly implement the procedures during the curtailments that occurred from October, 1994 through January, 1995?

* * *

APP: No position.

ISSUE 6: Has Florida Power Corporation adequately demonstrated that the curtailments that have occurred from October 1, 1994, through January 31, 1995, were necessary to avoid negative avoided costs?

* * *

APP: No position.

ISSUE 6a: In determining whether purchases of firm QFs' 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?

* * *

APP: No position.

ISSUE 6b: In determining whether purchases of firm QFs' 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?

* * *

APP: No position.

ISSUE 7: What is the permissible scope of Rule 25-17.086, Florida Administrative Code, in view of the federal standards implementing Section 210 of PURPA?

* * *

APP: No position.

ISSUE 8: Should the Commission approve Florida Power Corporation's curtailment plan as being in compliance with Rule 25-17.086?

* * *

APP: No position.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of APP's Post-Hearing Statement of Issues and Positions was furnished by U.S. Mail to the following on June 15, 1995:

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