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OF COUNSEL  
CHRISTINE E. EARLE

December 29, 1994

HAND DELIVERED

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
101 East Gaines Street  
Tallahassee, Florida 32399

Re: Docket No. ~~841501-20~~ 20, FPC CURTAILMENT PLAN

Dear Ms. Bayo:

On December 21, 1994, Orlando CoGen Limited (OCL) filed its Motion for Continuance or, in the Alternative, Motion for Extension of Time to File Testimony, in the above docket. I am attaching an Appendix to the motion, consisting of OCL's discovery requests to date.

Yours truly,

*Joe A. McGlothlin*  
Joseph A. McGlothlin

RECEIVED & FILED  
*[Signature]*  
FPC DIVISION OF RECORDS

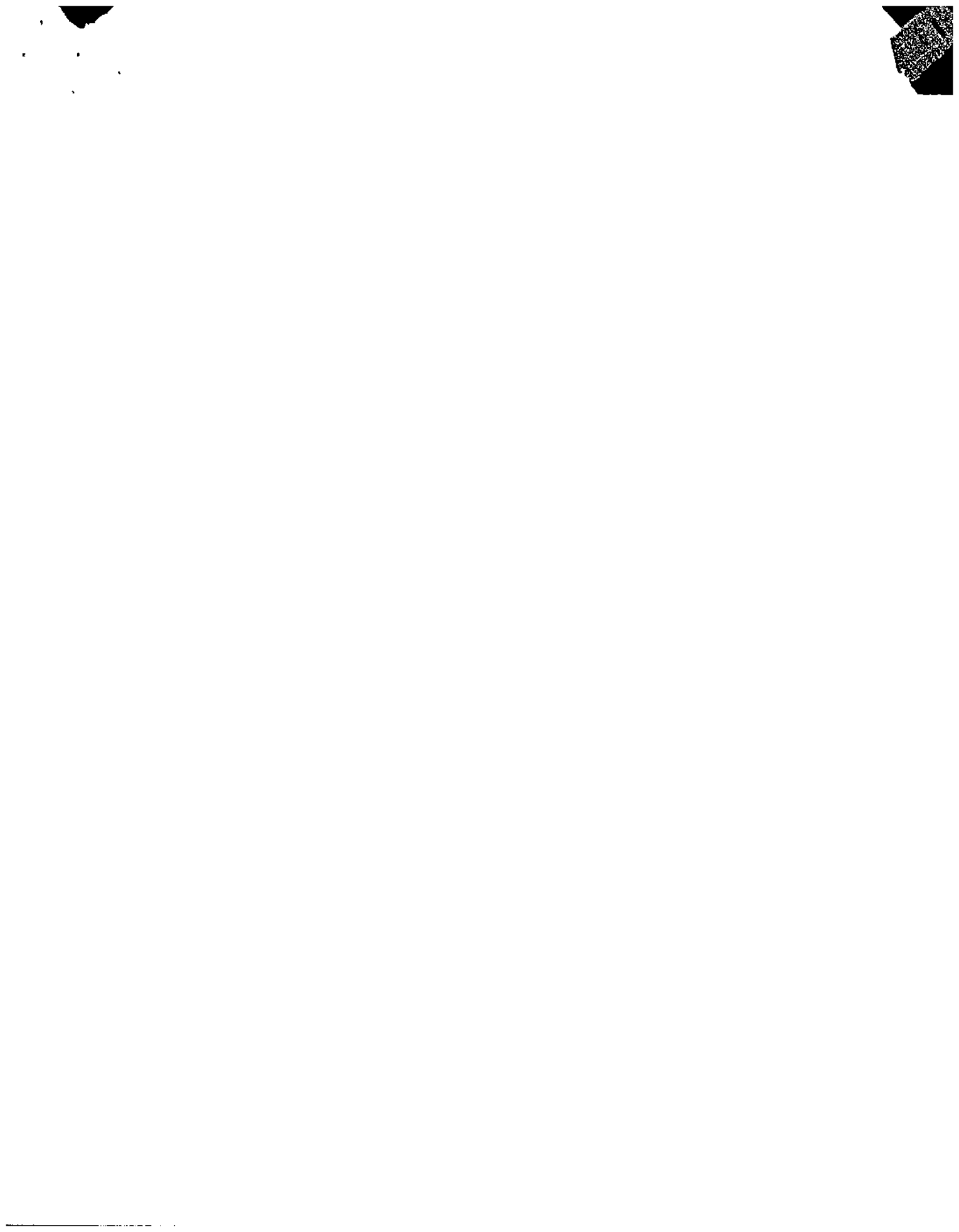
- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_ JAM/jfg
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_ Enclosure
- CTR \_\_\_\_\_ cc: Parties of Record
- FAC *Futrell*
- LEG *[Signature]*
- LIN *[Signature]*
- OPC \_\_\_\_\_
- RCR \_\_\_\_\_
- SE *[Signature]*
- W \_\_\_\_\_
- YLR \_\_\_\_\_

DOCUMENT NUMBER DATE

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FPC-RECORDS/REPORTING





BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Power ) DOCKET NO. 941101-EQ  
Corporation for determination that )  
its plan for curtailing purchases ) FILED: December 15, 1994  
from Qualifying Facilities in )  
minimum load conditions is )  
consistent with Rule 25-17.086, )  
F.A.C. )  
\_\_\_\_\_ )

ORLANDO COGEN LIMITED'S FIRST SET OF  
INTERROGATORIES TO FLORIDA POWER CORPORATION

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, and Commission Rule 25-22.034, Florida Administrative Code, Orlando CoGen Limited (OCL), through its undersigned attorneys, propounds the following interrogatories to Florida Power Corporation (FPC). These interrogatories are to be answered under oath within the time period prescribed by Rule 1.340, Florida Rules of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

A. As used herein, the following words shall have the meanings indicated:

- (i) "FPC" shall refer to Florida Power Corporation;
- (ii) "you" or "your" shall refer to Florida Power Corporation, its agents, employees, servants, and/or representatives;
- (iii) "person" or "persons" shall mean and include natural persons, corporations, partnerships, associations, joint venturers, proprietorships, entities and all other forms of organizations or association;

(iv) "employee" shall include any individual employed by Florida Power Corporation, its operators or owners;

(v) "document" or "report" shall mean any kind of written, typed, recorded, or graphic matter, however produced or reproduced, of any kind or description, whether sent or received, including originals, non-identical copies and drafts and both sides thereof; and including but not limited to: papers, books, letters, correspondence, telegrams, bulletins, notices, announcements, instructions, charts, manuals, brochures, schedules, cables, telex messages, memoranda, notes, notations, accountants' working papers, transcripts, minutes, agendas, reports and recordings of telephone or other conversations, of interviews, of conferences, or of other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, computer print-outs, data processing input and output, microfilms, and all other records kept by electronic, photographic, or mechanical means and things similar to any of the foregoing, however denominated by you, and any other documents as defined in Rule 1.340, Florida Rules of Civil Procedure;

(vi) "identify" shall mean, with respect to any document or report: set forth in the title, if any, describe the relevant page or pages and line or lines thereof (or annex a copy to the answer to these interrogatories, with appropriate designations of such page or pages and line or lines), and state

the present location and custodian of the original and all copies of the document, who prepared the document, and when it was prepared;

(vii) documents or reports to be identified shall include all documents in your possession, custody and control and all other documents of which you have knowledge;

(viii) "identify" shall mean, with respect to any natural person: set forth the full name, residence address, business address, business affiliation and job title both at present and at the time to which the interrogatory answer refers.

(ix) To the extent an Interrogatory calls for information which cannot now be precisely and completely furnished, such information as can be furnished should be included in the answer, together with a statement that further information cannot be furnished, and a statement as to the reasons therefor. If you expect to obtain further information between the time answers are served and the time of hearing, you are requested to state this fact in each answer. If the information which cannot now be furnished is believed to be available to another person, identify such other person and the reasons for believing such person has the described information.

(x) In the event any Interrogatory herein calls for information or for the identification of a document which you deem to be privileged, in whole or in part, the information should be given or the document identified to the fullest extent possible consistent with such claim of privilege and specify the grounds

relied upon for the claim of privilege.

(xi) A separate answer shall be furnished for each Interrogatory, although where the context permits, an Interrogatory may be answered by reference to the answer furnished to another Interrogatory.

(xii) For each interrogatory, identify the name, address, telephone number and position of the person responsible for providing the answer.

#### INTERROGATORIES

1. Prior to its decision to curtail purchases from QFs on October 19, 1994, did FPC explicitly analyze, (through quantification and comparison of relative costs), whether purchases from QFs during the period would result in costs greater than those which FPC would incur if it did not make such purchases, but instead generated an equivalent amount of energy itself? If the answer is yes, please provide the following information:

a. Please identify the date each such comparison of costs was prepared and the name of the person who prepared each.

b. Please provide a detailed description of the methodology employed in any such comparison.

c. Please list all assumptions and calculations made and identify all data reviewed or used in performing any such comparison. Please include all information which FPC reviewed concerning the availability and price of purchased power that FPC could have bought in lieu of operating its own units during the period immediately following the operating episode that led FPC to curtail purchases from QFs.



d. Please summarize the results of any such comparison.

2. Since the curtailment episode of October 19, 1994 has FPC performed any comparison (such as described in No. 1 above) of the relative costs of curtailing QF purchases and of accepting QF purchases in lieu of the ordered curtailment in order to measure whether purchases from QFs would have resulted in costs greater than those which FPC incurred as a result of curtailing purchases from QFs, and instead generating an equivalent amount of energy itself? If the answer is yes, please provide for each such comparison the same information that is requested in conjunction with pre-episode analyses in interrogatory no. 1 above.

3. Please describe in full all efforts FPC took to avoid the curtailment by entering into additional off-system sales. Specifically state whether FPC sought to sell additional energy through the Florida Energy Broker system or to its industrial customers, identify all contacts made, and describe the nature of FPC's offer to sell and the results of any such efforts.

4. Please delineate the steps FPC took to avoid curtailing its purchases of QF power by reducing the total amount of generation from its own units. Was there sufficient generation from FPC's own units to have enabled it to balance generation and load without curtailing QFs, either by lowering output of its own units or by removing certain of its units from service?

5. Prior to the curtailment episode of October 19, 1994, did FPC assess whether reducing its own generation or removing its own units from service in lieu of suspending its contractual obligation to purchase QF power would have constituted a threat to the reliability or safety of its system? If the answer is yes:

a. Identify the date each such analysis was performed and the name of the person who performed it.

b. Describe in detail the methodology employed in each such analysis.

c. Identify the data reviewed or employed and list all assumptions made in the course of performing each such analysis.

d. Summarize the results of each such analysis.

6. Prior to the curtailment episode of October 19, 1994, did FPC assess whether reducing its own generation or removing its own units from service in lieu of suspending its contractual obligation to purchase power from QFs would have impaired its ability to provide continuous, reliable service to its customers? If so:

a. State when each such analysis was performed and identify the person who performed it.

b. Describe in detail the methodology that was employed in performing each such analysis.

c. Identify all data that was reviewed or used, and list all assumptions made by FPC in performing each such analysis.

d. Summarize the results of each such analysis.

7. Please provide FPC's integrated hourly loads for the following periods of time:

a. the 24 hour period prior to the day of the operating condition that led FPC to curtail QF purchases.

b. the 24 hours of the day on which the condition occurred.

c. the 48 hour period immediately following the day on which the condition occurred.

8. During each hour for the period beginning 24 hours prior to the day the condition occurred and continuing through 48 hours after the day on which the condition occurred, please provide the following:

a. The total kilowatt hours generated by each FPC generating resource.



b. The minimum operating level for each FPC generating resource.

c. The maximum normal operating level for each FPC generating resource.

d. The automatic generation control (AGC) status of each FPC generating resource.

e. The ramp rate in MW/minute for each FPC generating resource on AGC.

f. The operating reserve requirement.

g. The FPC resources that were providing the required operating reserve (and the amount in MW).

h. The FPC generating resources that were on-line for system integrity (e.g., voltage support).

i. The total kilowatt hours sold to other utilities.

j. For each purchase transaction during the period, provide the kilowatt hours and price.

k. The price and amount of additional purchased power available to FPC during the period.

1. The startup cost (in total dollars and Btus) for each FPC generating resource.

m. The minimum down times for each FPC generating resource.

n. The time needed to return a resource to minimum operating levels after the resource has been off line for a period of 8 hours or less.

o. The time required to return a resource to minimum operating levels after the resource has been off line for a period of 4 hours or less.

p. The fuel cost for each FPC generating resource.

q. The heat rate equation (including current coefficients) for each FPC generating resource.



9. Since the October 19, 1994, curtailment episode, has FPC attempted to avoid the need to curtail QF purchases by choosing to keep certain of its own fossil-fired generating units that were down for maintenance off-line rather than returning them to service as originally scheduled, and then buying from the broker in lieu of replacing the energy from those units from other FPC generators? If the answer is yes, please provide the following information for each such instance:

a. The dates on which such units were kept off-line rather than being returned to service:

b. The specific units involved, and the minimum start-up time and minimum operating level associated with each;

c. The quantity and price of economy transactions through the broker or other power purchases associated with each such decision to keep the units off line.

10. With respect to the decisions to keep FPC's own generators off-line identified in 9 above, did FPC compare, either before or after the decision, the operating costs incurred by purchasing power rather than by generating with these units? If the answer is yes, please provide the following:

a. The date of each such comparison and the name of the person who performed each;

b. A detailed description of the methodology employed in performing the comparison;

c. Identify all data reviewed and used, and list all assumptions made in performing each such comparison.

d. Summarize the results of each such comparison.

11. With respect to the curtailment episode of October 19, 1994, please provide the following information:

a. Identify each QF whom FPC contacted for the purpose of requesting curtailment.

b. Describe the method FPC employed to contact each QF;

c. Identify the amount of curtailment sought from each;

d. Quantify the generation levels of each QF contacted before and after the request for curtailment was delivered.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Orlando CoGen Limited, L.P.'s First Set of Interrogatories to Florida Power Corporation has been furnished by hand delivery\* or by U.S. Mail to the following parties of record, this 15th day of December, 1994.

Martha Brown\*  
Division of Legal Services  
Florida Public Service  
Commission  
101 East Gaines Street  
Fletcher Building, Rm. 212  
Tallahassee, FL 32399

James A. McGee  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, FL 33733

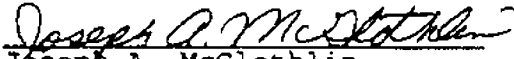
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MacFarlane, Ausley, Ferguson  
& McMullen  
111 Madison Street, Suite 2300  
First Florida Tower, 23rd Floor  
P. O. Box 1531  
Tampa, FL 33601

Gail Fels  
Dade County Attorneys Office  
111 NW 1st Street, Suite 2810  
Miami, FL 33128

Schef Wright  
Landers & Parsons  
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Third Floor  
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Richard Zambo, P.A.  
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Palm City, FL 34990

Suzanne Brownless  
Suzanne Brownless, P.A.  
2546 Blairstone Pines Drive  
Tallahassee, FL 32301

  
Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson & Bakas  
315 S. Calhoun Street  
Suite 716  
Tallahassee, Florida 32301  
904/222-2525

Attorneys for Orlando CoGen  
Limited, L.P.





BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Power ) DOCKET NO. 941101-EQ  
Corporation for determination that )  
its plan for curtailing purchases ) FILED: December 15, 1994  
from Qualifying Facilities in )  
minimum load conditions is )  
consistent with Rule 25-17.086, )  
F.A.C. )  
\_\_\_\_\_ )

ORLANDO COGEN LIMITED'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO FLORIDA POWER CORPORATION

Pursuant to Rule 1.350, Florida Rules of Civil Procedure, and Commission Rule 25-22.034, Florida Administrative Code, Orlando Cogen Limited (OCL), through its attorneys, requests Florida Power Corporation (FPC) to produce for inspection and copying all documents described below in the custody, control, possession, constructive possession of, or otherwise accessible to FPC. Said documents shall be produced at the offices of McWhirter, Reeves, McGlothlin, Davidson & Bakas, 315 South Calhoun Street, Suite 716, Tallahassee, Florida, 32301 or at a location mutually agreed upon.

INSTRUCTIONS AND DEFINITIONS

a. As used herein, the term "document" or "documentation" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order, form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, cable, report, record, contract,

agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing tape or disk or any other written, recorded, transcribed, punched tape, filmed or graphic matter, however produced or reproduced, which is in your possession, custody, control or otherwise accessible to you or which was, but is no longer, in your possession, custody or control.

b. If production is withheld pursuant to a claim of privilege, please provide the following identifying information:

1. date;
2. author;
3. addressee;
4. brief description of the subject matter and form of the document and attachments, including number of pages;
5. statement of the basis upon which the privilege is claimed; and
6. the numbers of each specific request to which the document or thing would be responsive.

c. Words in the past tense include the present, and words in the present tense include the past. Use of the singular shall be deemed to include the plural, and use of the masculine shall be deemed to include the feminine where appropriate, and vice versa.

d. If there is any document or other tangible item described by this request which is no longer in your possession, custody or

control, or is no longer in existence or accessible to you, please indicate:

1. the date and nature of the disposition of such document or other tangible item, including, but not limited to, whether such: (a) is missing or lost, (b) has been destroyed or (c) has been transferred to another person;

2. the circumstances surrounding such disposition, including any authorization therefor; and

3. where applicable, the person currently in possession, custody or control of such document or item.


#### REQUESTS FOR PRODUCTION

1. Please provide all documents which your answers to OCL's First Set of Interrogatories, consisting of Interrogatories Nos. 1 - 11, inclusive, identify or describe, or to which such answers refer, or on which such answers rely. Include all workpapers and calculations which support any of FPC's answers to OCL's First Set of Interrogatories, and all data reviewed or used by FPC in the course of preparing the analyses which are the subjects of OCL's First Set.

2. Please provide copies of all contracts between FPC and other utilities under which FPC is obligated to purchase capacity and energy.

3. Please provide a copy of the contract between FPC and the University of Florida under which FPC supplies the University with steam from FPC's cogeneration unit.
  
4. Please provide copies of the Energy Control Center dispatch logs for all of the time periods designated in OCL's 1st Set of Interrogatories Nos. 7, 8, 9, and 10.
  
5. Please provide copies of all communications between FPC and other utilities regarding:
  - a. Sales or attempts to sell in order to mitigate the operating condition which led to FPC to curtail its purchases of QF power.
  - b. Status of other utilities' system load conditions.
  - c. Other utilities' plans to curtail purchases of QF power due to operating conditions on their systems similar to those FPC faced.
  
6. Please provide copies of all communications between FPC and the Commission Staff, including all information requested by the Staff or provided by Florida Power Corporation, regarding the curtailment episode of October 19, 1994 from that date to the present date. (If the information is already contained in

FPC's document entitled "Curtailement Summary Documentation" which was provided to the PSC staff after the episode, there is no need to duplicate the information contained therein).

  
Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson & Bakas  
315 S. Calhoun Street  
Suite 716  
Tallahassee, Florida 32301  
904/222-2525

Attorneys for Orlando CoGen  
Limited, L.P.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Orlando CoGen Limited, L.P.'s First Request for Production of Documents to Florida Power Corporation has been furnished by hand delivery\* or by U.S. Mail to the following parties of record, this 15th day of December, 1994.

Martha Brown\*  
Division of Legal Services  
Florida Public Service  
Commission  
101 East Gaines Street  
Fletcher Building, Rm. 212  
Tallahassee, FL 32399

Richard Zambo, Esquire  
Richard Zambo, P.A.  
598 S.W. Hidden River Avenue  
Palm City, FL 34990

James A. McGee  
Florida Power Corporation  
Post Office Box 14042  
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Suzanne Brownless  
Suzanne Brownless, P.A.  
2546 Blairstone Pines Drive  
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Landers & Parsons  
310 West College Avenue  
Third Floor  
P. O. Box 271  
Tallahassee, FL 32302

  
\_\_\_\_\_  
Joseph A. McGlothlin







agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing tape or disk or any other written, recorded, transcribed, punched tape, filmed or graphic matter, however produced or reproduced, which is in your possession, custody, control or otherwise accessible to you or which was, but is no longer, in your possession, custody or control.

b. If production is withheld pursuant to a claim of privilege, please provide the following identifying information:

1. date;
2. author;
3. addressee;
4. brief description of the subject matter and form of the document and attachments, including number of pages;
5. statement of the basis upon which the privilege is claimed; and
6. the numbers of each specific request to which the document or thing would be responsive.

c. Words in the past tense include the present, and words in the present tense include the past. Use of the singular shall be deemed to include the plural, and use of the masculine shall be deemed to include the feminine where appropriate, and vice versa.

d. If there is any document or other tangible item described by this request which is no longer in your possession, custody or

control, or is no longer in existence or accessible to you, please indicate:

1. the date and nature of the disposition of such document or other tangible item, including, but not limited to, whether such: (a) is missing or lost, (b) has been destroyed or (c) has been transferred to another person;

2. the circumstances surrounding such disposition, including any authorization therefor; and

3. where applicable, the person currently in possession, custody or control of such document or item.

e. If FPC believes that any of the following requests involve information that FPC regards as confidential, please contact the undersigned immediately so that claims of confidentiality can be resolved and/or confidentiality agreements can be entered into without delaying OCL's receipt of the requested information.

REQUESTS FOR PRODUCTION

7. FPC's hourly loads, in EE format, from January 1, 1990 to present date (on 3.5" diskette in machine-readable form).

8. With respect to all PROMOD analyses performed by FPC during the period January 1, 1993 to date, please provide the following:

a. A copy of the PROMOD User's Manual;

- b. A card image copy (on 3.5" diskette in machine-readable form) of the PROMOD input data;
- c. A copy of all PROMOD output reports including, but not limited to:
  - i. All input summary reports generated by the PROMOD model;
  - ii. System Summary Report;
  - iii. Generating Unit Operations Report;
  - iv. System Transaction/Interchange Report;
  - v. Energy Cost Subperiod Report;
  - vi. Surplus Energy Report;
  - vii. Surplus Hours Report; and
  - viii. Annual Budget Capacity Factor Report;
- d. A copy (in hard copy and on 3.5" diskettes) of all data, spreadsheet models, computer models, workpapers or other information supporting the PROMOD input data.

9. With respect to all PROMOD analyses performed by FPC during the period January 1, 1993 to date, which specifically regard any analysis of the possible need for curtailment of QF purchases based on operational circumstances; FPC's plans to implement specific curtailment episodes; or FPC's plans to implement its curtailment plan, please provide the following:

- a. A card image copy (on 3.5" diskette in machine-readable form) of the PROMOD input data;
- b. A copy of all PROMOD output reports including, but not limited to:
  - i. All input summary reports generated by the PROMOD model;
  - ii. System Summary Report;
  - iii. Generating Unit Operations Report;
  - iv. System Transaction/Interchange Report;
  - v. Energy Cost Subperiod Report;
  - vi. Surplus Energy Report;
  - vii. Surplus Hours Report; and
  - viii. Annual Budget Capacity Factor Report;
- c. A copy (in hard copy and on 3.5" diskettes) of all data, spreadsheet models, computer models, workpapers or other information supporting the PROMOD input data;
- d. all analyses used to estimate and/or evaluate negative avoided costs;
- e. all analyses and/or studies related to curtailment issues.

10. With respect to all Unit Commitment Computer Model analyses performed by FPC during the period 1993 to date, please provide the following:

- a. A copy of the Unit Commitment Computer Model User's Manual;
  - b. A card image copy (on 3.5" diskette in machine-readable form of the Unit Commitment Computer Model input data;
  - c. A copy of all Unit Commitment Computer Model output reports; and
  - d. A copy (in hard copy and on 3.5" diskettes) of all data, spreadsheet models, computer models, workpapers or other information supporting the Unit Commitment Computer Model input data.
- 
11. All documents, correspondence and/or memoranda related to procedures, orders, or other written documentation which FPC's personnel used to dispatch units on FPC's system during the period January 1, 1991 to date.
  
  12. All documents, correspondence and/or memoranda related to procedures, orders, or other written documentation which relate to FPC's procedures for dispatch and curtailment for the period January 1, 1991 to date.

13. All documents related to FPC's procedures to commit and dispatch resources to satisfy its real-time load requirements for the period January 1, 1992 to date.
  
14. All documents, correspondence, and/or memoranda used to evaluate and/or estimate:
  - a. Negative avoided cost; or
  
  - b. The need to curtail QFs; or
  
  - c. The existence of "operational circumstances"; or
  
  - d. The existence of low load conditions.
  
15. All documents related to the manner in which OCL and/or other QFs were integrated into FPC's dispatching procedures.
  
16. If not provided in response to an earlier request, please provide in hard copy (and on 3.5" diskette in machine-readable form) a copy of the following information which supports the assertions of FPC in FPC's Petition for approval of its

proposed curtailment plan that operational circumstances exist or will exist that entitle it to curtail purchases from QFs:

- a. A copy of all computer model user's manuals relied upon by FPC;
- b. A copy of all input data to computer models relied upon by FPC (in card image format);
- c. A copy of all input and output reports generated by the computer models relied upon by FPC;
- d. A copy of all supporting documentation underlying the assumptions relied upon by FPC; and
- e. All other information underlying the analyses.

17. Provide all documents, studies and/or analyses used or relied upon by FPC to support the curtailment plan and/or petition which FPC has filed in this docket.

18. Provide all studies and/or analyses used on relied upon by FPC in its support of its decision to seek Commission approval of the curtailment plan filed in this docket.

19. Provide any models (to the extent they are not identified in previous responses) which FPC plans to use to evaluate, analyze or implement curtailment action in the future.

20. To the extent not provided in previous responses, provide all documents, memoranda, correspondence, studies and/or analyses which FPC utilized to evaluate the alleged necessity for curtailment.
  
21. Any documents discussing or relating to QF light load analyses.
  
22. Any studies, analyses and/or documents related to FPC's avoided unit and/or avoided cost calculations.
  
23. With respect to all PROSCREEN analyses performed by FPC during the period January 1, 1993 to date, please provide the following:
  - a. A copy of the PROSCREEN User's Manual;
  - b. A card image copy (on 3.5" diskette in machine-readable form) of the PROSCREEN input data;
  - c. A copy of the PROSCREEN generated reports for each resource plan scenario including, but not limited to, the following summary reports:
    - i. Generation and Fuel Module System Summary Report;



- ii. Generation and Fuel Module Seasonal Summary Report;
- iii. Generation and Fuel Module Hydro Unit Report;
- iv. Generation and Fuel Module Fuel Type Report;
- v. Generation and Fuel Module Fuel Class Report;
- vi. Capital Expenditure and Recovery Module System Report;
- vii. Capital Expenditure and Recovery Module Project Class Summary;
- viii. Capital Expenditure and Recovery Module Project Report;
- ix. Capital Expenditure and Recovery Module Project Financial Cash Flows;
- x. Capital Expenditure and Recovery Module Aggregation of Project Cash Flows;
- xi. Capital Expenditure and Recovery Module of System Nominal Costs;
- xii. Capital Expenditure and Recovery Module of System Present Worth Values;
- xiv. Capital Expenditure and Recovery Module Project Revenue Requirements;
- xv. Capital Expenditure and Recovery Module of System Revenue Requirements; and
- xvi. Capital Expenditure and Recovery Module Project Busbar Cost Report.

- d. A copy (in hard copy and on 3.5" diskettes) of all data, spreadsheet models, computer models or other information supporting the PROSCREEN input data.
24. Any documents, studies and/or analyses from January 1, 1993 to date relating to the cost of cycling FPC's units.
25. Any benchmark studies of FPC's system for the EMA models from January 1, 1993 to date.

Vicki Gordon Kaufman  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing has been furnished by U.S. Mail to James A. McGee and a copy has been furnished by hand delivery\* or by U.S. Mail to the following parties of record, this 22nd day of December, 1994.

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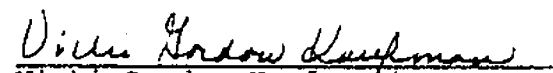
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I HEREBY CERTIFY that a true and correct copy of the Appendix to OCL's Motion for Continuance or, in the Alternative, Motion for Extension of Time to File Testimony has been furnished by hand delivery\* or by U.S. Mail to the following parties of record, this 29th day of December, 1994.

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