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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-BQ

FILED: 5/05/95

RECEIVED  
MAY 5 1995

POLK POWER PARTNERS, L.P.'s  
POSITIONS ON REVISED PREHEARING ISSUES  
FPC-RECORDS/REPORTING

Polk Power Partners, L.P., hereby files its positions on prehearing issues as revised at the prehearing conference in this docket.

ACF \_\_\_\_\_ STATEMENT OF BASIC POSITION: Polk Power Partners has no objection to FPC's proposed curtailment plan, given Polk's understanding that the plan requires FPC to take its peaking and intermediate generating units off-line before curtailing QF purchases, unless a particular unit is required for system stability. Polk believes that the plan allocates justifiable curtailments among QF's in a fair and not unduly discriminatory manner.

EAG *Dutell*

ISSUES

- LEC 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?
- LIN 5
- QF
- RCH
- SEC 1 POLK POWER PARTNERS: Polk does not object to FPC's curtailment plan.
- WAS
- OTH 2 Has Florida Power Corporation adequately demonstrated that its plan incorporates all appropriate measures to mitigate the need for curtailment during minimum load conditions?

POLK POWER PARTNERS: Given Polk's position in Issue 2B, Polk does not object to FPC's curtailment plan.

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*Mrs*  
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPC-RECORDS/REPORTING

- A. 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?

POLK POWER PARTNERS: Polk does not object to FPC's curtailment plan.

- B. 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?

POLK POWER PARTNERS: Polk understands that FPC's curtailment plan requires FPC to take its peaking and intermediate generating units off-line before curtailing QF purchases, unless a particular unit is required for system stability. Therefore, Polk does not object to FPC's curtailment plan.

- C. 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?

POLK POWER PARTNERS: Polk does not object to FPC's curtailment plan.

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

POLK POWER PARTNERS: Polk does not object to FPC's curtailment plan.

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?

POLK POWER PARTNERS: Yes.

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

POLK POWER PARTNERS: Polk does not object to FPC's implementation of its curtailment plan during the

curtailments that occurred from October, 1994 through January, 1995.

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?

POLK POWER PARTNERS: Polk does not object to FPC's curtailments from October, 1994 through January, 1995.

- 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?

POLK POWER PARTNERS: No position at this time.

- 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?

POLK POWER PARTNERS: No position at this time.

#### LEGAL ISSUE

7. What is the permissible scope of Rule 25-17.086, Florida Administrative Code, in view of the federal standards of 18 CFR Sec. 292.304 implementing Section 210 of PURPA?

POLK POWER PARTNERS: No position at this time.

8. Should the Commission approve Florida Power Corporation's curtailment plan as being in compliance with Rule 25-17.086, Florida Administrative Code?

POLK POWER PARTNERS: Yes, with the proviso that FPC must take its peaking and intermediate generating units off-line before curtailing QF purchases, unless a particular unit is required for system stability.

Respectfully submitted this 5th day of March, 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 5th day of May, 1995:

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