

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

**POLK POWER PARTNERS, L.P.'s
PREHEARING STATEMENT**

Polk Power Partners, L.P. (Polk Power) hereby files this prehearing statement pursuant to Rule 25-22.038(3), Florida Administrative Code.

A. Witnesses: None.

B. Exhibits: At this time, Polk Power 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.

ACK _____

AFA _____

APP _____

CAF _____

CMR _____

CRS _____

EW *Reutrell*

L 1 _____

L 5 _____

C _____

F _____

S 1 _____

W _____

OTH _____

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?

POLK POWER'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?

POLK POWER'S POSITION: No position at this time.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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?

POLK POWER'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?

POLK POWER'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?

POLK POWER'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?

POLK POWER'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?

POLK POWER'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?

POLK POWER'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?

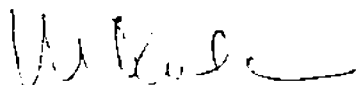
POLK POWER's POSITION: No position at this time.

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

POLK POWER'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 14TH 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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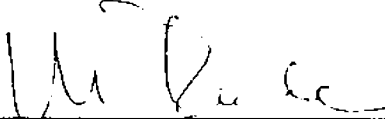
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