

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Review of GridFlorida RTO Proposal

Docket No. 020233-EI

Submitted for filing:
June 21, 2002

POST-WORKSHOP COMMENTS OF TRANS-ELECT

Trans-Elect, Inc. ("Trans-Elect"), in accordance with Orders No. 02-0459 and 02-0548, submits its Post-Workshop Comments.

1. Trans-Elect reiterates and incorporates by reference its Pre-Workshop comments in support of the GridFlorida Companies' Compliance Filing. Trans-Elect supports maintaining the flexibility included in the GridFlorida formation documents to accommodate future revisions to the GridFlorida structure.

2. Trans-Elect believes the Commission should not preclude the possibility of independent ownership and operation of all or a portion of Peninsular Florida's transmission system. If the Commission does not maintain the flexibility included in the GridFlorida formation documents to accommodate future revisions to the GridFlorida structure, it could prevent Trans-Elect from entering the Florida market. The Commission should not foreclose the possibility of Trans-Elect owning and operating all or a portion of Peninsular Florida's transmission system. Trans-Elect has not formally presented this idea to the GridFlorida Companies, nor have they agreed to this idea. Trans-Elect would like to preserve the option for future consideration.

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3. A for-profit independent transmission company like Trans-Elect has incentives to invest capital and to efficiently manage transmission assets. While there is value from a RTO, a for-profit independent transmission company has incentives that the RTO does not have.

4. If given the opportunity to own and operate transmission facilities in Florida, Trans-Elect would be flexible as to design and would work with all interested persons to design a model that best suits the current transmission owners, transmission users, the Commission and the State. Trans-Elect is supportive of the proposed not-for-profit organization, recognizing that ownership and operation of the transmission system by Trans-Elect under the umbrella of a not-for-profit RTO would be consistent with the rationale for establishing a not-for-profit RTO. Trans-Elect's independent ownership under the umbrella of a RTO would alleviate discrimination concerns that may exist if, for example, the RTO owned some of the system. If the RTO owned some of the system, it could favor its own assets in a way that adversely affected the value of assets owned by other market participants. For example, a for-profit RTO may favor a transmission solution over a generation solution in the area in which it owns assets to help increase its value.

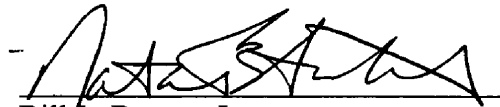
5. During the May 29 Workshop, the Commission asked Trans-Elect about the current debate regarding whether and what jurisdiction the state commissions retain over transmission assets [Transcript at 200]. Regardless of state jurisdictional control, Trans-Elect has demonstrated a willingness to work with state commissions to design a model that makes them comfortable in the areas of rates, terms and conditions. Should Trans-Elect's plan materialize in Florida, it pledges to work with the Commission to

design a model that best serves Florida and takes into account the Commission's concerns on an ongoing basis.

6. The Commission should maintain the flexibility included in the GridFlorida formation documents to accommodate future revisions to the GridFlorida structure.

DATED this 21st day of June, 2002.

Respectfully submitted,



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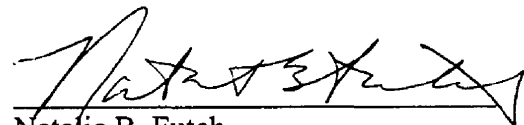
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Post-Workshop Comments of Trans-Elect, Inc., has been furnished by U.S. Mail to the following this 21st day of June, 2002.

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