

FOLEY & LARDNER

ORIGINAL

BRUSSELS
CHICAGO
DEL MAR
DENVER
DETROIT
JACKSONVILLE
LOS ANGELES
MADISON
MILWAUKEE

ATTORNEYS AT LAW
106 EAST COLLEGE AVENUE, SUITE 900
TALLAHASSEE, FLORIDA 32301-1514
TELEPHONE: (850) 222-6100
FACSIMILE: (850) 224-3101
WWW.FOLEYLARDNER.COM

ORLANDO
SACRAMENTO
SAN DIEGO
SAN FRANCISCO
TALLAHASSEE
TAMPA
WASHINGTON, D. C.
WEST PALM BEACH

WRITER'S DIRECT LINE
(850) 513-3369

EMAIL ADDRESS
nstrickland@foleylaw.com

CLIENT/MATTER NUMBER
062012-0102

September 4, 2001

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED-FPSC
01 SEP -4 PM 4:14
COMMISSION
CLERK

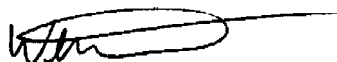
Re: Review of Florida Power Corporation's Earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power & Light
Docket No. 000824-EI

Dear Ms. Bayo :

Foley & Lardner is filing herewith an original and fifteen (15) copies of Seminole Electric Cooperative, Inc.'s motion to intervene in the above-referenced docket.

If you or your Staff has any questions regarding this filing, please contact Thomas J. Maida or N. Wes Strickland at (850) 222-6100.

Sincerely,



N. Wes Strickland

PP _____
AF _____
MP _____
OM 5 NAWS/lam
TR _____ Enclosures (15)
CR _____ cc: Parties of Record
EG 1 Interested Parties
PC _____
AT _____
SO _____
EC 1
ER _____
FH orig to Nong

010.129410.1

RECEIVED & FILED
RJM
FPSC-BUREAU OF RECORDS

ESTABLISHED 1842

DOCUMENT NUMBER - DATE
10945 SEP -4 01
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Review of Florida Power Corporation's)
earnings, including effects of proposed acquisition of) Docket No. 000824-EI
Florida Power Corporation by Carolina Power & Light.) Filed September 4, 2001
_____)

SEMINOLE ELECTRIC COOPERATIVE, INC.'S
PETITION TO INTERVENE

Petitioner, SEMINOLE ELECTRIC COOPERATIVE, INC. ("Seminole Electric"), through undersigned counsel and pursuant Rule 25-22.039, *Florida Administrative Code*, hereby petitions to intervene in the above-styled docket, and in support hereof states the following:

- 1. The name, address, and telephone number of the Petitioner are as follows:

Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, Florida 33688-2000
(813) 963-0994

- 2. Copies of all correspondence, notices, pleadings, and orders in the above-referenced docket should be provided to representatives of Seminole Electric as follows:

Thomas J. Maida, Esq.
Foley & Lardner
106 East College Avenue, Suite 900
Tallahassee, Florida 32301
(850) 222-6100 (telephone)
(850) 224-3101 (facsimile)

Timothy S. Woodbury
Vice President - Strategic Services
Seminole Electric Cooperative, Inc.
16313 North Dale Mabry Highway
Tampa, Florida 33688-2000
(813) 963-0994 (telephone)
(813) 264-7906 (facsimile)

DOCUMENT NUMBER-DATE

10945 SEP -4 01

FPSC-COMMISSION CLERK

3. Seminole Electric is a generation and transmission cooperative organized under Chapter 425, Florida Statutes. Seminole Electric provides wholesale electricity to its member distribution cooperatives located throughout peninsular Florida. Seminole Electric's member cooperatives provide retail electric service to more than 700,000 customers in 45 counties located in peninsular Florida.

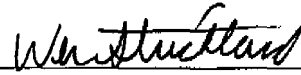
4. Seminole Electric is a wholesale power and transmission customer of Florida Power Corporation ("FPC"). Seminole Electric substantially relies upon FPC's transmission facilities to supply wholesale power to its member cooperatives.

5. The prudence of the formation of and FPC's participation in GridFlorida are at issue in the above-styled docket. The issues regarding prudence of the formation of and FPC's participation in GridFlorida directly and substantially affect Seminole Electric's interests in access to transmission facilities necessary to supply power to its member cooperatives, as well as the reliability, efficiency, and cost of such transmission facilities.

6. In addition, Seminole Electric has been and continues to be an active participant in the development of GridFlorida, including proceedings before the Federal Energy Regulatory Commission ("FERC"). The proceedings in the above-styled docket will substantially affect the formation of and FPC's participation in GridFlorida. Consequently, Seminole Electric's interests in the development of GridFlorida, including Seminole Electric's involvement in the proceedings before FERC, will be substantially and materially affected by the proceedings in the above-styled docket.

WHEREFORE, Seminole Electric respectfully requests the Commission to enter an order granting this Petition and according Seminole Electric full party status in the above-styled docket.

RESPECTFULLY SUBMITTED this 4th day of September 2001.



THOMAS J. MAIDA
Florida Bar No. 275212
N. WES STRICKLAND
Florida Bar No. 165859
FOLEY & LARDNER
106 East College Avenue, Suite 900
Tallahassee, Florida 32301
(850) 222-6100 (tel)
(850) 224-3101 (fax)
Attorneys for Seminole Electric

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent by U.S. Mail, First Class, this 4th day of September 2001, to:



ATTORNEY

Calpine Eastern
Mr. Thomas W. Kaslow
The Pilot House, 2nd Floor
Lewis Wharf
Boston, MA 02110

Ausley Law Firm
Mr. James Beasley
Post Office Box 391
Tallahassee, FL 32302

Florida Electric Cooperatives
Association, Inc.
Ms. Michelle Hershel
2916 Apalachee Parkway
Tallahassee, Florida 32301

Florida Industrial Cogeneration
Association
Mr. Richard Zambo
598 SW Hidden River Ave.
Palm City, Florida 34990

Foley & Lardner Law Firm
Mr. Thomas J. Maida
Mr. N. Wes Strickland
106 East College Avenue
Tallahassee, Florida 32301

Landers Law Firm
Ms. Diane K. Kiesling
Post Office Box 271
Tallahassee, Florida 32302

Moyle Law Firm
Mr. John C. Moyle
Ms. Cathy M. Sellers
The Perkins House
118 North Gadsden Street
Tallahassee, Florida 32301

Walt Disney World Co.
Lee Schmudde
1375 Lake Buena Drive
Lake Buena Vista, FL 32830

Tampa Electric Co
Ms. Angela Llewellyn
Regulatory Affairs
Tampa, Florida 33601-0111

Sutherland Asbill & Brennan
LLP (DC)
Mr. Daniel Frank
1275 Pennsylvania Ave. NW,
Washington, DC 20004-2415

Duke Energy North America
Mr. Lee E. Barrett
5400 Westheimer Court
Houston, Texas 77056-5310

Greenberg, Traurig Law Firm
Mr. Ron LaFace
Mr. Seann M. Frazier
101 East College Avenue
Tallahassee, Florida 32301

Florida Industrial Power Users
Group
Mr. John McWhirter, Jr.
400 N. Tampa Street, # 2450
Tampa, Florida 33601-3350

PG&E National Energy Group
Company
Ms. Melissa Lavinson
7500 Old Georgetown Road
Bethesda, MD 20814

Sugarmill Woods Civic Assoc.,
Inc.
Mr. Paul E. Christensen
26 Hibiscus Court
Homosassa, FL 34446

Office of Public Counsel
Mr. Jack Shreve
Mr. John R. Howe
The Florida Legislature
111 W. Madison Street, #812
Tallahassee, FL 32399-1400

Steel Law Firm
Mr. Matt Childs
215 S. Monroe Street, St. 601
Tallahassee, FL 32301-1804

Florida Retail Federation
100 E. Jefferson Street
Tallahassee, FL 32301

CPV Atlantic, Ltd
145 NW Central Park Plaza
Suite 101
Port Saint Lucie, FL 34986

Florida Power & Light
Company
Mr. Bill Walker
215 S. Monroe Street, # 810
Tallahassee, Florida 32301

Holland & Knight Law Firm
Mr. Bruce May
Post Office Drawer 810
Tallahassee, Florida 32302-
0810

McWhirter Law Firm
Mr. Joseph McGlothlin
Ms. Vicki Kaufman
117 South Gadsden Street
Tallahassee, FL 32301

Mr. Michael Twomey
Post Office Box 5256
Tallahassee, FL 32314-5256

Florida Municipal Power
Agency
Frederick M. Bryant
General Counsel for FMPA
2061 Delta Boulevard, #2
Tallahassee, FL 32303

John G. Trawick
1155 Perimeter Center West
Atlanta, GA 30338-5416

Reliant Energy Power
Generation, Inc.
Mr. Michael Briggs
801 Pennsylvania Ave # 620
Washington, DC 20004

Carlton Fields Law Firm
Mr. Gary L. Sasso
Mr. James M. Walls
Post Office Box 2861
Saint Petersburg, FL 33731

Enron Corporation
Mr. Marchris Robinson
1400 Smith Street
Houston, Texas 77002-7361

Florida Power Corporation
Mr. James McGee
PO Box 14042
St. Petersburg, FL 33733-4042

LeBoeuf Law Firm
Mr. James Fama
1875 Connecticut Avenue NW
Suite 1200
Washington, DC 20009

Katz, Kutter Law Firm
Mr. Bill Bryant, Jr.
Ms. Natalie Futch
12th Floor
Tallahassee, Florida 32301

Buddy L. Hansen
13 Wild Olive Court
Homosassa, FL 34446

Sutherland Asbill & Brennan
LLP
Mr. Russell S. Kent
2282 Killearn Center Boulevard
Tallahassee, FL 32308-3561

Mirant Americas Development,
Inc.
John G. Trawick
1155 Perimeter Center West
Atlanta, GA 30338-5416