

JOHN & HENGERER

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April 24, 2002

DOUGLAS F. JOHN
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KIM M. CLARK
GORDON J. SMITH
MATTHEW T. RICK
ELIZABETH A. ZEMBRUSKI

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RECEIVED FPSC
APR 25 AM 11:25
COMMISSION
CLERK

Blanca S. Bayo, Director
Division of Commission Clerk and Administrative Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32301

**Re: In re: Review of GridFlorida Regional Transmission Organization (RTO) Proposal,
Docket No. 020233-EI**

Dear Ms. Bayo:

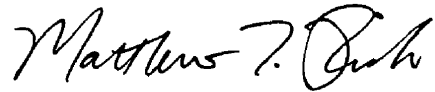
Enclosed, please find an original and seventeen (17) copies of the eight (8) filings listed below, which are being submitted in the above-captioned proceeding. Please date-stamp and return the two (2) extra copies of each *via* the enclosed postage pre-paid return envelope. I have also included a diskette containing WordPerfect versions of the four (4) Petitions to Intervene.

- i. Letter from the City of Tallahassee, Florida, requesting Qualified Representative status for Douglas F. John, Esq. and Matthew T. Rick, Esq. **04554-02**
- ii. Petition to Intervene of the City of Tallahassee, Florida **04555-02**
- iii. Letter from the City of Lakeland, Florida d/b/a Lakeland Electric requesting Qualified Representative status for Douglas F. John, Esq. and Matthew T. Rick, Esq. **04556-02**
- iv. Petition to Intervene of the City of Lakeland, Florida d/b/a Lakeland Electric **4557-02**
- v. Letter from the City of Gainesville, Florida d/b/a Gainesville Regional Utilities requesting Qualified Representative status for Douglas F. John, Esq. and Matthew T. Rick, Esq. **04558-02**
- vi. Petition to Intervene of the City of Gainesville, Florida d/b/a Gainesville Regional Utilities. **04559-02**
- vii. Letter from Kissimmee Utility Authority requesting Qualified Representative status for Douglas F. John, Esq. and Matthew T. Rick, Esq. **04560-02**
- viii. Petition to Intervene of Kissimmee Utility Authority **04561-02**

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Thank you very much for your assistance regarding these filings and please do not hesitate to contact me at (202) 429-8809 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Matthew T. Rick". The signature is written in a cursive style with a large, stylized initial 'M'.

Matthew T. Rick
John & Hengerer
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3013
Phone: (202) 429-8809
E-mail: mricks@jhenergy.com

Enclosures
cc: Service List



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TALLAHASSEE, FL
32301-1731
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SCOTT MADDOX
Mayor
DEBBIE LIGHTSEY
Mayor Pro Tem

JOHN PAUL BAILEY
Commissioner
CHARLES E. BILLINGS
Commissioner
STEVE MEISBURG
Commissioner

ANITA R. FAVORS
City Manager
GARY HERNDON
City Treasurer-Clerk

JAMES R. ENGLISH
City Attorney
SAM M. McCALL
City Auditor

April 18, 2002

Blanca S. Bayo, Director
Division of Commission Clerk and Administrative Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32301

Re: *In re: Review of GridFlorida Regional Transmission Organization (RTO) Proposal, Docket No. 020233-EI*

Dear Ms. Bayo:

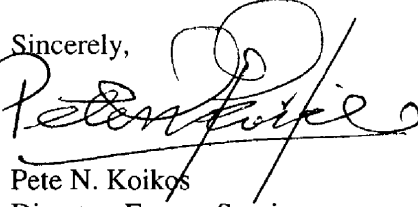
Pursuant to Section 28-106.106(2) of the Florida Administrative Code, the City of Tallahassee, Florida ("Tallahassee") respectfully requests that the following attorneys be named as its qualified representatives *In re: Review of GridFlorida Regional Transmission Organization (RTO) Proposal, Docket No. 020233-EI*:

Douglas F. John, Esq.
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036
Telephone: (202) 429-8801
E-mail: djohn@jhenergy.com

Matthew T. Rick, Esq.
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036
Telephone: 202-429-8809
Email: mrick@jhenergy.com

The affidavits of Mr. John and Mr. Rick attesting to their qualifications to serve as the qualified representatives of Tallahassee are attached hereto. Tallahassee is aware that it can be represented by Counsel, as defined by Section 28-106.106 of the Florida Administrative Code, and has chosen instead to be represented in this matter by attorneys that are not licensed to practice law in Florida. Mr. John and Mr. Rick represent Tallahassee in RTO-related proceedings before the Federal Energy Regulatory Commission, and they are familiar with and fully qualified to represent Tallahassee's interests in this proceeding.

Coincident with this request, Tallahassee is filing a Joint Petition to Intervene in the above-captioned proceeding (along with Gainesville Regional Utilities, Lakeland Electric, and the Kissimmee Utility Authority). Thank you for your assistance.

Sincerely,

Pete N. Koikos
Director, Energy Services
CITY OF TALLAHASSEE
100 West Virginia Street
Tallahassee, Florida 32301
Telephone: (850) 891-6893

Enclosure

DOCUMENT NUMBER 020233-EI
04554 APR 25 02
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An All-America City

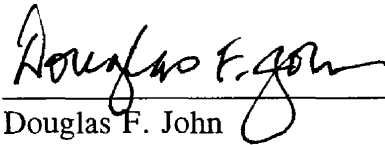
AFFIDAVIT

Undersigned counsel, being first duly sworn, states that:

Undersigned counsel is a Partner and Attorney at the law offices of John & Hengerer at the address and telephone number below.

Undersigned counsel possesses the necessary qualifications to responsibly represent the interests of the City of Tallahassee, Florida, in connection with Florida Public Service Commission Docket No. 020233-EI, and has been retained by the City of Tallahassee, Florida, for such representation.

Undersigned counsel is an attorney admitted to practice in, and a member in good standing of the bars of, the State of Texas and the District of Columbia; has practiced regularly before other agencies or authorities, including participation in Federal Energy Regulatory Commission proceedings involving many of the same issues under review in Florida Public Service Commission Docket No. 020233-EI; has general knowledge of Florida Rules of Civil Procedure relating to discovery in administrative proceedings; has general knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; has acquired or will acquire knowledge of the factual and legal issues in this matter; and has knowledge of and will comply with the Standards of Conduct for Qualified Representatives as listed in Rule 28-106.107 of the Florida Administrative Code.



Douglas F. John
Attorney
John & Hengerer
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3006
(202)429-8801

District of Columbia

Affirmed and subscribed before me this 24th day of April, 2002

My Commission Expires:
April 30, 2004
Kathleen Quinn, Notary Public
District of Columbia



Notary Public

AFFIDAVIT

Undersigned counsel, being first duly sworn, states that:

Undersigned counsel is currently employed by the law offices of John & Hengerer, as an Attorney, at the address and telephone number below.

Undersigned counsel possesses the necessary qualifications to responsibly represent the interests of the City of Tallahassee, Florida, in connection with Florida Public Service Commission Docket No. 020233-EI, and has been retained by the City of Tallahassee, Florida, for such representation.

Undersigned counsel is an attorney admitted to practice in, and a member in good standing of the bars of, the States of Virginia (Bar No. 44476) and Maryland; has practiced regularly before other agencies or authorities, including participation in Federal Energy Regulatory Commission proceedings involving many of the same issues under review in Florida Public Service Commission Docket No. 020233-EI; has general knowledge of Florida Rules of Civil Procedure relating to discovery in administrative proceedings; has general knowledge of the Florida Administrative Code and Florida Statutes relative to the rules of evidence, including the concept of hearsay in an administrative proceeding; has acquired or will acquire knowledge of the factual and legal issues in this matter; and has knowledge of and will comply with the Standards of Conduct for Qualified Representatives as listed in Rule 28-106.107 of the Florida Administrative Code.




Matthew T. Rick
Attorney
John & Hengerer
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3006
(202)429-8809

District of Columbia

Affirmed and subscribed before me this 24th day of April, 2002

My Commission Expires:
April 30, 2004
Kathleen Quinn, Notary Public
District of Columbia


Notary Public