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May 8, 2002

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**VIA HAND DELIVERY**

Blanca S. Bayo  
 Director, Division of Commission Clerk and  
 Administrative Services  
 Florida Public Service Commission  
 4075 Esplanade Way  
 Room 110 Betty Easley Conference Center  
 Tallahassee, Florida 32399

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

Dear Ms. Bayo :

Please find enclosed for filing in the above-referenced docket the original and 15 copies of the following documents:

1. Petition to Intervene of the Seminole Member Systems **04994 MAY-8PM**
2. Seminole Member Systems' Request for Authorization of a Qualified Representative **04995 MAY-8PM**
3. Comments of Seminole Member Cooperatives Regarding GridFlorida Compliance Filing **04996 MAY-8PM**
4. Seminole Electric Cooperative, Inc.'s Request for Authorization of a Qualified Representative **04997 MAY-8PM**
5. Comments of Seminole Electric Cooperative, Inc. Regarding GridFlorida Compliance Filing. **04998 MAY-8PM**

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Blanca S. Bayo  
May 8, 2002  
Page 2

Please stamp the duplicate copy of this letter to acknowledge receipt of the attached.

Thank you for your assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'TJMA', with a long horizontal line extending to the right.

Thomas J. Maida

TJMA/lam  
Enclosures

cc: All Parties of Record in Docket 020233-EI

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Review of GridFlorida Regional Transmission ) Docket No. 020233-EI  
Organization (RTO) Proposal ) Filed May 8, 2002  
\_\_\_\_\_ )

**PETITION TO INTERVENE**  
**OF THE SEMINOLE MEMBER SYSTEMS**

Petitioners, Central Florida Electric Cooperative, Inc. ("Central Florida"), Clay Electric Cooperative, Inc. ("Clay"), Glades Electric Cooperative, Inc. ("Glades"), Lee County Electric Cooperative, Inc. ("Lee County"), Peace River Electric Cooperative, Inc. ("Peace River"), Sumter Electric Cooperative, Inc. ("Sumter"), Suwannee Valley Electric Cooperative, Inc. ("Suwannee"), Talquin Electric Cooperative, Inc. ("Talquin"), Tri-County Electric Cooperative, Inc. ("Tri-County"), and Withlacoochee River Electric Cooperative, Inc. ("Withlacoochee") (collectively, the "Seminole Member Systems"), through undersigned counsel and pursuant Rule 25-22.039, *Florida Administrative Code*, hereby petition to intervene, jointly and severally, in the above-styled docket, and in support hereof state as follows:

1. The names, addresses, and telephone numbers of the Petitioners are as follows:

Central Florida Electric Cooperative, Inc.  
1124 North Young Blvd.  
Chiefland, FL 32626  
(800) 227-1302

Clay Electric Cooperative, Inc.  
225 W. Walker Drive  
Keystone Heights, FL 32656  
(352) 473-8000

Glades Electric Cooperative, Inc.  
P. O. Box 519  
Moore Haven, FL 33471  
(800) 226-4024

Lee County Electric Cooperative, Inc.  
4980 Bayline Drive  
North Fort Myers, FL 33917  
(239) 995-2121

Peace River Electric Cooperative, Inc.  
1499 U.S. 17 North  
Wauchula, FL 33873  
(863) 773-4116

Sumter Electric Cooperative, Inc.  
293 South U.S. Highway 301  
Sumterville, FL 33585-0301  
(352) 793-3801

Suwannee Valley Electric Cooperative, Inc.  
11340 100<sup>th</sup> Street  
Live Oak, FL 32060  
(904) 362-2226

Talquin Electric Cooperative, Inc.  
1640 West Jefferson St.  
Quincy, FL 32353-1679  
(850) 627-7651

Tri-County Electric Cooperative, Inc.  
P. O. Box 208  
Madison, FL 32341  
(850) 973-2285

Withlacoochee River Electric Cooperative, Inc.  
14651 21<sup>st</sup> Street  
Dade City, FL 33523  
(352) 567-5133

2. Copies of all correspondence, notices, pleadings, and orders in the above-styled docket should be provided to representatives of the Seminole Member Systems 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)

William T. Miller, Esq.  
Miller, Balis & O'Neil, P.C.  
1140 Nineteenth Street, N.W., Suite 700  
Washington, D.C. 20036-6600  
(202) 296-2960 (telephone)  
(202) 296-0166 (facsimile)

3. The Seminole Member Systems are non-profit electric cooperatives organized under Chapter 425, *Florida Statutes*. Their corporate purpose is to supply retail electric power and energy on a reliable and economic basis to their consumer-owners spread throughout the State of Florida. The Seminole Member Systems provide retail electric service to over 700,000 consumers in 45 Florida counties. Each of the ten Seminole Member Systems is a member of Seminole Electric Cooperative, Inc. ("Seminole"), which is a generation and transmission cooperative organized under Chapter 425, *Florida Statutes*. Seminole provides wholesale electricity to the Seminole Member Systems.

4. In 2001, the Seminole Member Systems' retail sales were in excess of 12 billion kWh. Five of the Seminole Member Systems have load located in the transmission area of Florida Power & Light ("FPL"), and Seminole purchases network service from FPL under its open access tariff in order to serve these member systems. The Seminole Member Systems' winter peak load in the FPL area in 2001 was 1,042 MW. This is approximately 30% of the Seminole Member Systems' load.

5. Nine of the ten Seminole Member Systems have load located in the transmission

area of Florida Power Corporation (“FPC”), and Seminole purchases a form of network transmission service, as well as partial requirements service, from FPC under a 1983 bilateral agreement. Seminole also has a 1995 power purchase agreement with FPC. The Seminole Member System’s winter peak load in the FPC area in 2001 was 2,069 MW. This is approximately 60% of the Seminole Member System load.

6. Seminole also operates its own control area in which it serves some of the load of one of the Seminole Member Systems – Clay. Seminole’s winter peak load in its own control area in 2001 was 336 MW. This is approximately 10% of the Seminole Member System load. The Seminole Member Systems are full requirements customers of Seminole, which provides their power supply requirements from resources located throughout peninsular Florida. With the exception of a portion of the load of Clay, the entire load of the Seminole Member Systems is served through the transmission systems of FPC and/or FPL.

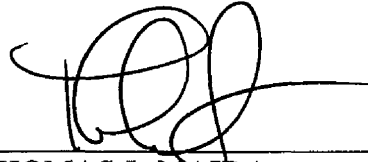
7. The Seminole Member Systems are intervening in the above-styled docket to ensure that GridFlorida from the outset of its operations provides reliable, comparable, and reasonably priced transmission service to all of the load serving entities in peninsular Florida, regardless of size or affiliation. The issues in the above-styled docket directly and substantially affect the Seminole Member Systems’ interests in ensuring that access to transmission facilities necessary to supply power to its consumers will be reliable, efficient, non-discriminatory, and reasonably priced.

8. In addition, the Seminole Member Systems have been and continue to be active participants 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 GridFlorida. Consequently, the Seminole Member Systems' interests in the development of GridFlorida, including their involvement in the proceedings before FERC, will be substantially and materially affected by the proceedings in the above-styled docket.

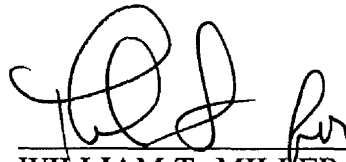
WHEREFORE, the Seminole Member Systems, jointly and severally, respectfully request the Commission to enter an order granting this Petition and according the Seminole Member Systems full party status in the above-styled docket.

RESPECTFULLY SUBMITTED this 8th day of May 2002.



---

THOMAS J. MAIDA  
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N. WES STRICKLAND  
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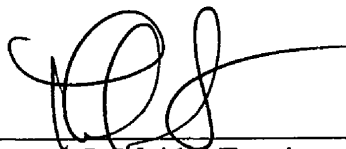
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Attorneys for Seminole Member Systems

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent by hand delivery (\*) or U.S. Mail, on this 8th day of May, 2002, to the persons listed below:



---

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