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June 21, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 020233-EI

Dear Ms. Bayo:

On behalf of Reliant Energy Power Generation, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Reliant Energy Power Generation, Inc. 's Response to Motion for Extension.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,



Joseph A. McGlothlin

JAM/mls
Enclosure

DOCUMENT NUMBER-DATE

06442 JUN 21 2002

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of GridFlorida Regional
Transmission Organization (RTO) Proposal

Docket No.: 020233-EI
Filed: June 21, 2002

**RELIANT ENERGY POWER GENERATION, INC.'S
RESPONSE TO MOTION FOR EXTENSION**

Reliant Energy Power Generation, Inc. ("Reliant"), through its undersigned counsel, files this memorandum in response to the motion of GridFlorida Applicants for an extension of two weeks within which to submit comments addressing market design, and states:

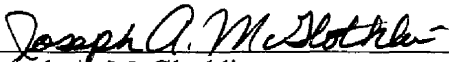
1. Counsel for Reliant received the motion by facsimile at approximately 6:00 p.m. on Thursday, June 20, the day prior to the existing June 21 deadline.

2. In the motion, the applicants offer to permit a party who files comments on market design on June 21 to supplement those comments two weeks later. Applicants assert this would prevent prejudice to such Intervenors. Applicants are mistaken. Their "offer" overlooks that the Applicants, and any other party who may support their market design, would have a chance to study the comments of parties who file on June 21 before they submit their own. Because the applicants intend to withhold comments on market design on June 21, Intervenors would have no similar opportunity. This procedure of non-simultaneous filings would be grossly one-sided and unfair.

3. The undersigned has spoken to counsel for FPL, who has confirmed that the GridFlorida Applicants will not file comments on market design today even if their pending motion for an extension has not been ruled upon.

4. To protect its interests and to avoid the unfairness that would be associated with non-simultaneous filings of comments, Reliant, which has prepared and intends to file comments relating solely to market design, has decided to withhold those comments pending the Prehearing

Officer's ruling. Reliant respectfully submits that in the event the motion for extension is denied, under the circumstances Reliant should be permitted to submit its comments on market design one day following the ruling.


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Attorneys for Reliant Energy Power Generation, Inc.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Reliant Energy Power Generation, Inc.'s Response to Motion for Extension has been furnished by (*) hand delivery and U.S. Mail to the following this 21st day of June, 2002:

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