

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A ECENIA
RICHARD M ELLIS
KENNETH A. HOFFMAN
THOMAS W KONRAD
MICHAEL G MAIDA
MARTIN P McDONNELL
J STEPHEN MENTON

POST OFFICE BOX 551. 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

R. DAVID PRESCOTT
HAROLD F X PURNELL
MARSHA E. RULE
GARY R RUTLEDGE
GOVERNMENTAL CONSULTANTS
MARGARET A MENDUNI
M. LANE STEPHENS

ORIGINAL

September 25, 2002

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

VIA HAND DELIVERY

Re: Docket No. 020233-EI

Dear Ms. Bayo:

Enclosed herewith for filing on behalf of Florida Power & Light Company, Florida Power Corporation and Tampa Electric Company (the "GridFlorida Companies") are an original and fifteen copies of the following documents:

1. the GridFlorida Companies' Response to Office of Public Counsel's Motion for Stay of Proceedings and Motion for Reconsideration of Order No. PSC-02-1199-PAA-EI;
2. the GridFlorida Companies' Response to Motions for Reconsideration of Reedy Creek Improvement Trust and Lakeland Electric, Kissimmee Utility Authority, Gainesville Regional Utilities, and The City of Tallahassee, Florida; and
3. a disk in Word Perfect 6.0 containing a copy of the documents.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffman, Esq.

KAH/rl

Enclosures

F:\USERS\ROXANNE\FPL\Bayo925.ltr

RECEIVED - FPSC
2 SEP 25 PM 2:55
COMMISSION CLERK

AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
OTH

DOCUMENT NUMBER-DATE
10287 SEP 25 02
FPSC-COMMISSION CLERK

RECEIVED & FILED

DOCUMENT NUMBER-DATE

10286 SEP 25 02

FPSC-BUREAU OF RECORDS

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 020233-EI

Dated: September 25, 2002

**GRIDFLORIDA COMPANIES' RESPONSE TO
MOTIONS FOR RECONSIDERATION OF
REEDY CREEK IMPROVEMENT DISTRICT AND
LAKELAND ELECTRIC, KISSIMMEE UTILITY AUTHORITY,
GAINESVILLE REGIONAL UTILITIES, AND
THE CITY OF TALLAHASSEE, FLORIDA**

Florida Power and Light Company, Florida Power Corporation and Tampa Electric Company (collectively the "GridFlorida Companies"), by and through their undersigned counsel, and pursuant to Rules 25-22.060(1)(b) and 28-106.204(1), Florida Administrative Code, hereby file their Response to the Motions for Reconsideration of Order No. PSC-02-1199-PAA-EI issued September 3, 2002 (the "September 3 Order") filed by Reedy Creek Improvement District ("Reedy Creek") and the City of Lakeland, Florida d/b/a Lakeland Electric, the City of Tallahassee, Florida, Kissimmee Utility Authority, and the City of Gainesville, Florida d/b/a Gainesville Regional Utilities (collectively the "Florida Municipal Group" or "FMG") and state as follows:

1. The purpose of a motion for reconsideration is to identify a point of fact or law which was overlooked or which the Commission failed to consider in rendering its order. See Stewart Bonded Warehouse, Inc. v. Bevis, 294 So.2d 315 (Fla. 1974); Diamond Cab Co. v. King, 146 So.2d 889 (Fla. 1962); and Pingree v. Quaintance, 394 So.2d 162 (Fla. 1st DCA 1981). A motion for reconsideration is not an appropriate vehicle to reargue matters that have already been considered by the Commission. Sherwood v. State, 111 So.2d 96 (Fla. 3rd DCA 1959) citing State ex. rel. Jaytex Realty Co. v. Green, 105 So.2d 817 (Fla. 1st DCA 1958). Nor should a motion for reconsideration be granted "based upon an arbitrary feeling that a mistake may have been made, but should be based

DOCUMENT NUMBER 020233-EI

10287 SEP 25 02

FPSC-COMMISSION CLERK

upon specific factual matters set forth in the record and susceptible to review.” Stewart Bonded Warehouse, 294 So.2d at 317.

2. In the September 3 Order, the Commission reiterated its determination in Order No. PSC-01-2489-FOF-EI issued December 20, 2001 (the “December 20 Order”) that the GridFlorida Companies’ use of a uniform demarcation point of 69kv for the identification of transmission facilities subject to GridFlorida planning and operations was appropriate. The Commission held:

A uniform demarcation point is necessary to ensure equal access for all participating companies and to ensure that subsidies resulting from different demarcation points do not occur. There is no evidence in the record suggesting that the demarcation point should be something other than 69kv. In addition, this demarcation point has been consistently used by this Commission when determining appropriate cost allocations to distribution, transmission, and generation facilities.¹

Further, the December 20 Order was clear in its warning that the determinations of the Commission reflected therein would not be relitigated.²

3. In the compliance filing, the GridFlorida Companies revised certain language in Section 2.5 of the Participating Owners Management Agreement (“POMA”) for the purpose of compliance with the December 20 Order’s requirement to adopt an independent system operator (“ISO”) structure. The language changes included the deletion of the word “transmission” in the description of the 69kv and above electric facilities that would be “Controlled Facilities” under the POMA.

¹December 20 Order, at 17.

²December 20 Order, at 24.

4. In its Motion, the FMG requests the Commission to reverse its determination in its December 20 Order that the use of a 69kv demarcation point for defining Controlled Facilities under the POMA is appropriate.³ This request should be denied. As previously indicated, the purpose of a motion for reconsideration is not to reargue matters that have already been considered by the Commission. By their own admission, the FMG's Motion for Reconsideration reminds the Commission of its repeated participation and comments on the 69kv issue during the workshop process.⁴ The FMG's disagreement with the Commission's determination provides no basis for reconsideration.

5. Further, the Florida Municipal Group had the opportunity to intervene and present testimony on this issue in the initial GridFlorida proceedings. They chose not to do so. Contrary to the contentions in their Motion,⁵ the due process rights of the FMG were not abridged - - they simply were not exercised. The FMG's request for reconsideration of the Commission's determination on this issue in the December 20 Order, as well as their alternative request to present testimony on this issue in the hearing scheduled in the instant docket, should be denied.⁶

6. Reedy Creek similarly reargues points addressed by Reedy Creek concerning the 69kv demarcation point issue in Pre-Workshop Comments, at the May 29, 2002 workshop, and its

³FMG Motion for Reconsideration, at ¶¶3, 6.

⁴Florida Municipal Group Motion for Reconsideration, at pp. 3-4 and footnote 8.

⁵Florida Municipal Group Motion for Reconsideration, at p. 5.

⁶In its Motion for Reconsideration, FMG also requests that the Commission postpone the final hearing on market design issues pending the completion by the Federal Energy Regulatory Commission of its Notice of Proposed Rulemaking on Standard Market Design. The GridFlorida Companies take no position on FMG's request for a postponement.

Post-Workshop Comments. In its motion, Reedy Creek specifically requests that the Commission modify the September 3 Order on the 69kv issue to: a) allow Florida utilities the option of demonstrating that any particular facility serves a distribution function rather than a transmission function, regardless of nominal voltage levels; and b) require the Applicants to reinsert the reference to “transmission” in Section 2.5 of the POMA. Reedy Creek’s requests should be denied.

7. Reedy Creek argues, as it did at length in its Pre-Workshop Comments, that FERC has applied a multi-factor “functional” test in determining whether a facility is a “transmission” or “distribution” facility. However, as acknowledged by Reedy Creek in its Motion, and as indicated by the Commission in the September 3 Order, the question concerning the appropriateness of the use of 69kv as a bright line demarcation point remains pending before FERC in the pending FERC GridFlorida Docket No. RTO1-67.⁷ Accordingly, the Commission correctly concluded in both the December 20 Order and the September 3 Order that the use of the 69kv voltage level as a bright line demarcation, without reference to the FERC’s multi-factor test, is not inconsistent with federal law. Reedy Creek’s attempt to relitigate the Commission’s establishment of 69kv and above as a bright line demarcation point in the December 20 Order violates the Commission’s admonition that it would not relitigate the determinations in the December 20 Order. Further, Reedy Creek’s request on reconsideration that the Commission modify the September 3 Order to allow the option of demonstrating that any particular facility serves a distribution function rather than a transmission function defeats the purpose of establishing a uniform demarcation point outlined by the Commission in the December 20 Order.

⁷September 3 Order, at 42.

8. Further, Reedy Creek's renewed opposition to the deletion of the word "transmission" from Section 2.5 of the POMA is similarly unavailing. The changes to the language in Section 2.5 of the POMA, including the deletion of the word "transmission," are consistent with the underlying rationale in the December 20 Order that all facilities with a voltage level of 69kv and above be defined as Controlled Facilities under Section 2.5 of the POMA. Reedy Creek's Motion fails to provide a justifiable basis for reconsideration of the Commission's conclusion that the changes in the language in Section 2.5 are consistent with the adoption of an ISO structure.⁸

WHEREFORE, for the foregoing reasons, the GridFlorida Companies respectfully request that the Commission deny the Motions for Reconsideration filed by Reedy Creek and the Florida Municipal Group.

Respectfully submitted,

R. WADE LITCHFIELD, ESQ.
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 32408-0420
Tel: (561) 691-7101
Fax: (561) 691-7135

KENNETH A. HOFFMAN, ESQ.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
Post Office Box 551
Tallahassee, FL 32302
Tel: (850) 681-6788
Fax: (850) 681-6515
On behalf of Florida Power & Light Company

HARRY W. LONG, JR., ESQ.
Tampa Electric Company
Post Office Box 111
Tampa, FL 33601
Tel: (813) 228-1702
Fax: (813) 228-1770

LEE L. WILLIS, ESQ.
JAMES D. BEASLEY, ESQ.
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
Tel: (850) 224-9115
Fax: (850) 222-7952
On behalf of Tampa Electric Company

⁸September 3 Order, at 42.

JAMES A. MCGEE, ESQ.
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733
Tel: (727) 820-5185
Fax: (727) 820-5519
On behalf of Florida Power Corporation

By: 
Kenneth A. Hoffman, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of GridFlorida Companies' Response to Motions for Reconsideration of Reedy Creek Improvement District and Lakeland Electric, Kissimmee Utility Authority, Gainesville Regional Utilities, and The City of Tallahassee, Florida has been furnished by Electronic Mail, this 25th day of September, 2002, to the following:

FLORIDA PUBLIC SERVICE COMMISSION

William Cochran Keating, IV
Jennifer S. Brubaker
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Ph: 850-413-6193
Fax: 850-413-6194
e-mail: wkeating@psc.state.fl.us
jbrubake@psc.state.fl.us

OFFICE OF PUBLIC COUNSEL

Office of Public Counsel
Jack Shreve/J. Roger Howe
111 W. Madison Street, #812
Tallahassee, FL 32399-1400
Ph: 850-488-9330
Fax: 850-488-4491
e-mail: howe.roger@leg.state.fl.us

TAMPA ELECTRIC COMPANY

Lee L. Willis
James D. Beasley
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
Ph: 850-224-9115
Fax: 850-222-7952
e-mail: lwillis@ausley.com
jbeasley@ausley.com
Attorneys for Tampa Electric Company

Harry W. Long, Jr.
Assistant General Counsel
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601
Ph: 813-228-7102
Fax: 813-228-1770
e-mail: hwl@tecoenergy.com

Tampa Electric Company
Angela Llewellyn
Regulatory Affairs
Post Office Box 111
Tampa, FL 33601-0111
Ph: 813-228-1752
Fax: 813-228-1770
e-mail: al@tecoenergy.com

Michael J. Rustum
Dickstein Shapiro Morin & Oshinsky
2101 L Street N.W.
Washington, DC 20037-1526
Ph: 202-861-9178
Fax: 202-887-0689
e-mail: rustumm@dsmo.com

FLORIDA POWER CORPORATION

Florida Power Corporation
James A. McGee, Esquire
Post Office Box 14042
St. Petersburg, FL 33733
Ph: 727-820-5184
Fax: 727-820-5519
e-mail: jmcgee@tampabay.rr.com
Attorney for Florida Power Corporation

Gary L. Sasso
James M. Walls
Carlton Fields Law Firm
Post Office Box 2861
St. Petersburg, FL 33731
Ph: 727-821-7000
Fax: 727-822-3768
e-mail: gsasso@carltonfields.com

David Goroff
Peter K. Matt
Bruder, Gentile & Marcoux, L.L.P.
1100 New York Avenue, N.W.
Suite 510-East
Washington, D.C. 20005-3934
Ph: 202-783-1350
Fax: 202-737-9117
e-mail: degoroff@brudergentile.com
Attorneys for Florida Power Corporation

Florida Power Corporation
Paul Lewis, Jr.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740
Ph: 850-222-8738, 727-820-5184
Fax: 850-222-9768
e-mail: paul.lewisjr@pgnmail.com

FLORIDA POWER & LIGHT CO.

Rutledge Law Firm
Kenneth Hoffman
Post Office Box 551
Tallahassee, FL 32301
Ph: 850-681-6788
Fax: 850-681-6515
e-mail: ken@reuphlaw.com
Attorneys for Florida Power & Light Co.

Bill Walker
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1859
Ph: 850-521-3900
Fax: 850-521-3939
e-mail: bill_walker@fpl.com

R. Wade Litchfield, Esq.
Law Department
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0429
Ph: 561-691-7101
Fax: 561-691-7135
e-mail: wade_litchfield@fpl.com

**CALPINE CORPORATION
DUKE ENERGY NORTH AMERICA
MIRANT AMERICAS DEVELOPMENT
INC.**

Leslie J. Paugh, P.A.
Post Office Box 16069
Tallahassee, FL 32317-6069
Ph: 850-656-3411
Fax: 850-656-7040
e-mail: lpaugh@paugh-law.com
Attorneys for Calpine Corporation,
Mirant Americas Development, Inc.
Duke Energy North America
Calpine Corporation
Thomas W. Kaslow
The Pilot House, 2nd Floor
Lewis Wharf
Boston, MA 02110
Ph: 617-723-7200, ex. 393
Fax: 617-557-5353
e-mail: tkaslow@calpine.com

Duke Energy North America
Lee E. Barrett
5400 Westheimer Court
Houston, TX 77056-5310
Ph: 713-627-6519
Fax: 713-627-6566
e-mail: lebarrett@duke-energy.com

Mirant Americas Development, Inc.
Beth Bradley
1155 Perimeter Center West
Atlanta, GA 30338-5416
Ph: 678-579-3055
Fax: 678-579-5819
e-mail: beth.bradley@mirant.com

**DYNEGY INC., PUBLIX,
ORLANDO UTILITIES COMMISSION**

Gray, Harris & Robinson, P.A. (Orl)
Thomas Cloud/W.C. Browder/P. Antonacci
301 East Pine Street, Suite 1400
Orlando, FL 32801
Ph: 407-244-5624, 407-843-8880
Fax: 407-244-5690
e-mail: tcloud@grayharris.com
cbrowder@grayharris.com
Attorneys for Dynegy, Publix and OUC

Orlando Utilities Commission
Wayne Morris/Thomas Washburn
Post Office Box 3193
Orlando, FL 32802-3193
Ph: 407-423-9100, 407-384-4066
Fax: 407-423-9198
e-mail: twashburn@ouc.com

Dynegy Inc.
David L. Cruthirds
1000 Louisiana Street, Suite 5800
Houston, TX 77002-5050
Ph: 713-507-6785
Fax: 713-507-6834
e-mail: david.cruthirds@dynegy.com

Publix Super Markets, Inc.
John Attaway
Post Office Box 32015
Lakeland, FL 33802-2018
Ph: 863-686-8754
Fax: 863-616-5704
e-mail: johnattaway@mail.publix.com

**SEMINOLE ELECTRIC
COOPERATIVE, INC.
SEMINOLE MEMBER SYSTEMS**

Foley & Lardner Law Firm
Thomas J. Maida/N. Wes Strickland
106 East College Ave., Suite 900
Tallahassee, FL 32301-3369
Ph: 850-222-6100, 850-513-3369
Fax: 850-224-3101
e-mail: tmaida@foleylaw.com
nstrickland@foleylaw.com
Attorneys for Seminole Electric Coop.

William T. Miller
Miller Law Firm
1140 19th St., NW, Suite 700
Washington, DC 20036
Ph: 202-296-2960
Fax: 202-296-0166
e-mail: wmiller@mbolaw.com
Attorneys for Seminole Electric
Cooperative, Inc.

Seminole Electric Cooperative, Inc.
Timothy Woodbury
16313 North Dale Mabry Highway
Tampa, FL 33688-2000
Ph: 813-963-0994
Fax: 813-264-7906
e-mail: twoodbury@seminole-electric.com

**FLORIDA ELECTRIC
COOPERATIVES ASSOC., INC.**

Michelle Hershel
2916 Apalachee Parkway
Tallahassee, FL 32301
Ph: 850-877-6166
Fax: 850-656-5485
e-mail: mhershel@fecac.com

**CPV ATLANTIC, LTD.
PG&E NATIONAL ENERGY GROUP
CO.**

Jon Moyle/Cathy Sellers/Dan Doorakian
Moyle Law Firm
The Perkins House, 118 N Gadsden St.
Tallahassee, FL 32301
Ph: 850-681-3828
Fax: 850-681-8788
e-mail: jmoylejr@moylelaw.com
Attorneys for CPV Atlantic, Inc.
PG&E National Energy Group Co.

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

PG&E National Energy Group Co.
Melissa Lavinson
7500 Old Georgetown Road
Bethesda, MD 20814
Ph: 301-280-6887
Fax: 301-280-6379
e-mail: melissa.lavinson@neg.pge.com

**RELIANT ENERGY POWER
GENERATION, INC.**

McWhirter Law Firm
Vicki Kaufman/Joseph McGlothlin
117 S. Gadsden Street
Tallahassee, FL 32301
Ph: 850-222-2525
Fax: 850-222-5606
e-mail: jmclglothlin@mac-law.com
vkaufman@mac-law.com
Attorneys for Reliant Energy Power
Generation, Inc.

Reliant Energy Power Generation, Inc.
Michael Briggs
801 Pennsylvania Ave., Suite 620
Washington, DC 20004
Ph: 202-783-7220
Fax: 202-783-8127
e-mail: mbriggs@reliant.com

**FLORIDA INDUSTRIAL POWER
USERS GROUP**

McWhirter Law Firm
John McWhirter
Post Office Box 3350
Tampa, FL 33601-3350
Ph: 813-224-0866
Fax: 813-221-1854
e-mail: jmcwhirter@mac-law.com
Attorneys for Florida Industrial Power
Users Group

**REEDY CREEK IMPROVEMENT
DISTRICT, WALT DISNEY WORLD**

Sutherland Asbill & Brennan LLP
Daniel Frank
1275 Pennsylvania Ave., NW
Washington, DC 20004-2415
Ph: 202-383-0838, 202-383-0100
Fax: 202-637-3593
e-mail: dfrank@sablaw.com
Attorneys for Reedy Creek and
Walt Disney World

John Giddens
Reedy Creek Improvement District
Post Office Box 10000
Lake Buena Vista, FL 32830
Ph: 407-824-4892
Fax: 407-824-5396
e-mail: john.giddens@disney.com

Lee Schmudde
1375 Lake Buena Drive
Fourth Floor North
Lake Buena Vista, FL 32830

**FLORIDA MUNICIPAL POWER
AGENCY**

Frederick M. Bryant/Jody Lamar Finklea
2061-2 Delta Way
Tallahassee, FL 32303
Ph: 850-297-2011
Fax: 850-297-2014
e-mail: fred.bryant@fmpa.com
jody.lamar.finklea@fmpa.com
Attorneys for Florida Municipal Power
Agency

Spiegel & McDiarmid
Cynthia Bogorad/David Pomper/J. Schwarz
1350 New York Ave., NW, Suite 1100
Washington, DC 20005-4798
Ph: 202-879-4000
Fax: 202-393-2866
e-mail: cynthia.bogorad@spiegelmc.com
Co-counsel for Florida Municipal Power
Agency

Florida Municipal Power Agency
Robert C. Williams
8553 Commodity Circle
Orlando, FL 32819-9002
Ph: 407-355-7767
Fax: 407-355-5794
e-mail: bob.williams@fmpa.com

**CITY OF TALLAHASSEE
LAKELAND ELECTRIC
GAINESVILLE/KISSIMMEE**

John & Hengerer Law Firm
Douglas John/Matthew Rick
1200 17th Street, NW
Suite 600
Washington, DC 20036-3013
Ph: 202-429-8801, 202-429-8809
Fax: 202-429-8805
e-mail: djohn@jhenergy.com
mrick@jhenergy.com
Attorneys for City of Tallahassee
Lakeland Electric, Gainesville and
Kissimmee

City of Tallahassee
Pete Koikos
100 West Virginia Street
Fifth Floor
Tallahassee, FL 32301
Ph: 850-891-6893
Fax: 850-891-6890
e-mail: koikosp@talgov.com

City of Tallahassee
Paul Clark
400 East Van Buren Street
Fifth Floor
Tallahassee, FL 32301
Ph: 850-891-3130
Fax: 850-891-3138
e-mail: clarkp@talgov.com

Gainesville Regional Utilities/
City of Gainesville
Ed Regan
Post Office Box 147117, Station A136
Gainesville, FL 32614-7117
Ph: 352-334-1272, 352-334-3400x1260
Fax: 352-334-3151
e-mail: reganej@gru.com

Kissimmee Utility Authority
Robert Miller
1701 West Carroll Street
Kissimmee, FL 32746
Ph: 407-933-7777
Fax: 407-847-0787
e-mail: rmiller@kua.com

Lakeland Electric
Paul Elwing
501 E. Lemon Street
Lakeland, FL 33801-5079
Ph: 863-834-6531
Fax: 863-834-6362
e-mail: paul.elwing@lakelandgov.net

**JACKSONVILLE ELECTRIC
AUTHORITY**
Suzanne Brownless, P.A.
1975 Buford Blvd.
Tallahassee, FL 32308-4466
Ph: 850-877-5200
Fax: 850-878-0090
e-mail: sbrownless@comcast.net
Attorney for JEA

P. G. Para
21 West Church Street
Jacksonville, FL 32202-3139
Ph: 904-665-6208
Fax: 904-665-4238
e-mail: parapg@jea.com

Dick Basford & Associates, Inc.
5616 Fort Sumter Road
Jacksonville, FL 32210
Ph: 904-771-3575
Fax: 573-7971
e-mail: dbasford@attbi.com

Michael Wedner
117 West Duval Street, Suite 480
Jacksonville, FL 32202
Ph: 904-630-1834
Fax: 904-630-1316
e-mail: mwedner@coj.net

**SOUTH FLORIDA HOSPITAL and
HEALTHCARE ASSOCIATION**

Mark Sundback/Kenneth Wiseman
Andrews & Kurth Law Firm
1701 Pennsylvania Ave., NW, Suite 300
Washington, DC 20006
Ph: 202-662-2700
Fax: 202-662-2739
e-mail: msundback@andrews-kurth.com
Attorneys for South Florida Hospital and
Healthcare Association

South Florida Hospital and Healthcare
Association
Linda Quick
6363 Taft Street
Hollywood, FL 33024
Ph: 954-964-1660
Fax: 954-962-1260
e-mail: lquick@sfhha.com

FLORIDA RETAIL FEDERATION

Greenberg, Traurig Law Firm
Ron LaFace/Seann M. Frazier
101 E. College Ave.
Tallahassee, FL 32301
Ph: 850-222-6891
Fax: 850-681-0207
e-mail: lafacer@gtlaw.com
fraziers@gtlaw.com
Attorneys for Florida Retail Federation

Florida Retail Federation
100 E. Jefferson Street
Tallahassee, FL 32301
Ph: 850-222-3461
Fax: none
e-mail: bkelly@scholarship.org

TRANS-ELECT, INC.

Katz, Kutter Law firm
Bill Bryant, Jr./Natalie Futch
12th Floor
106 East College Avenue
Tallahassee, FL 32301
Ph: 850-224-9634
Fax: 850-222-0103
e-mail: natalief@katzlaw.com
Attorneys for Trans-Elect, Inc.

Trans-Elect, Inc.
Alan J. Statman, General Counsel
1200 G Street NW, Suite 600
Washington, DC 20005
Ph: 202-393-1200
Fax: 202-393-1240
e-mail: statman@wrightlaw.com

SOLID WASTE AUTHORITY OF PALM BEACH COUNTY FLORIDA PHOSPHATE COUNCIL FLORIDA INDUSTRIAL COGENERATION ASSOC.

Richard Zambo
598 SW Hidden River Ave.
Palm City, FL 34990
Ph: 772-220-9163
Fax: 772-220-9402
e-mail: richzambo@aol.com
Attorney for Solid Waste Authority
Florida Phosphate Council
Florida Industrial Cogeneration Assoc.

Solid Waste Authority
Dr. Marc C. Bruner
7501 North Jog Road
West Palm Beach, FL 33412
Ph: 561-640-4000, ex. 5607
Fax: 561-640-3400
e-mail: mcbruner@swa.org

Florida Phosphate Council
Susan Barfield
1435 East Piedmont Drive, Suite 211
Tallahassee, FL 32308
Ph: 850-224-8238
Fax: 850-224-8061
e-mail: susan@flaphos.org

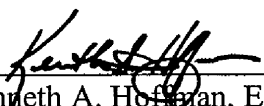
LEE COUNTY

Landers Law Firm
Wright/LaVia
310 West College Avenue
Tallahassee, FL 32301
Ph: 850-681-0311
Fax: 850-224-5595
e-mail: swright@landersandparsons.com
jlavia@landersandparsons.com
Attorneys for Lee County

David Owen, Esq.
Assistant County Attorney
Lee County
Post Office Box 398
Ft. Myers, FL 33902
Ph: 941-333-2236
Fax: 941-335-2606
e-mail: owend@leegov.com

SUGARMILL WOODS CIVIC ASSOC.

Michael Twomey
Post Office Box 5256
Tallahassee, FL 32314-5256
Ph: 850-421-9530
Fax: 850-421-8543
e-mail: miketwomey@talstar.com
Attorney for Sugarmill Woods Civic Assoc.

By: 
Kenneth A. Horgan, Esq.

F:\USERS\ROXANNE\FPL\gridfloridReedyResponse