

MCWHIRTER REEVES
ATTORNEYS AT LAW

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

October 7, 1999

ORIGINAL

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 Number 981890-EU

Dear Ms. Bayo:

I am enclosing for filing and distribution in the above-referenced matter the original and 15 copies of the following:

- ▶ Request for Representation by a Qualified Representative;]
- ▶ Affidavit of Alice Adam; * 12178-99
- ▶ Reliant Energy Power Generation, Inc.'s Prehearing Statement; and 12177-99
- ▶ IBM-Formatted Floppy Disk containing same (in WP8 format).

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me in the envelope provided.

A 2
 P _____
 AF _____
 WU _____
 TR _____
 SO ACTB
 EG 1
 IAS 5
 IPC _____
 AI 2
 REC 1
 VAW _____
 JTH _____

Thank you for your assistance.

Yours truly,

Joe McGlothlin

Joseph A. McGlothlin

RECEIVED & FILED
 [Signature]
 FPSC-BUREAU OF RECORDS

IAM/jk
enc.

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

*NOTE: THE AFFIDAVIT OF ALICE ADAM IS ATTACHED TO THE REQUEST FOR REPRESENTATION BY QUALIFIED REP

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Generic investigation into the)
aggregate electric utility reserve margins)
planned for Peninsular Florida)
_____)

DOCKET NO. 981890
Filed: October 7, 1999

ORIGINAL
RECEIVED-FPSC
OCT - 7 AM 11:20
RECORDS AND REPORTING

REQUEST FOR REPRESENTATION
BY A QUALIFIED REPRESENTATIVE

Reliant Energy Power Generation, Inc. ("REPGI"), through its undersigned counsel, submits its Request for Representation by a Qualified Representative pursuant to Rule 28-106.106, Florida Administrative Code, in the above-referenced proceeding, and states as follows:

1. REPGI is diversified international energy services company. REPGI's general offices are located at 1111 Louisiana Street, Houston, Texas 77208-1867.

2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party relative to this Request for Representation should be served upon the following individuals:

Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden
Tallahassee, Florida 32301
(850)222-2525
(850)222-5606

3. This petition is filed pursuant to Rule 28-106.106, Florida Administrative Code. Rule 28-106.106(2)(a) requires that REPGI submit a written request to the presiding officer in the event that REPGI elects to be represented before the Commission by a qualified representative. REPGI hereby submits such a request.

4. REPGI seeks leave of the presiding officer for the individual identified below to appear as a qualified representative on behalf of REPGI for any purpose and in all matters or proceedings conducted before the Commission in connection with Docket No. 981890-EU.

Alice Adam, Principal Attorney
Reliant Energy, Incorporated
P.O. Box 61867
Houston, Texas 77208-1867
Phone: (713) 207-7469
Fax: (713) 207-0141

5. Consistent with Rule 25-106.106(2)(b), REPGI hereby affirms that it is aware of the services Ms. Adam can provide and, further, that REPGI can elect to be represented solely by "counsel," as that term is defined by Rule 28-106.106(1). Indeed, REPGI has elected to be represented in this matter by other attorneys in addition to Ms. Adam.

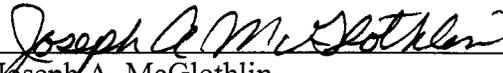
6. REPGI submits that Ms. Adam possesses the necessary qualifications to responsibly represent REPGI's interests in this matter. In this regard, Ms. Adam's qualifications are set forth in the attached affidavit.

7. As reflected in Ms. Adam's affidavit, she: (i) is an attorney admitted to practice in the State of Texas; (ii) has reviewed those portions of the Florida Statutes relative to the Commission's jurisdiction, (iii) has reviewed the Florida Rules of Civil Procedure relating to discovery in an administrative proceeding; and (iv) has reviewed those portions of the Florida Administrative Code and Florida Statutes related to the rules of evidence, including the concept of hearsay in an administrative proceeding.

8. Consistent with the standard set forth in Rule 28-106.107, Ms. Adam has acquired or will acquire actual knowledge of the factual and legal issues involved insofar as her representation

of REPGI is concerned in the above-referenced proceeding.

WHEREFORE, for the above and foregoing reasons, Reliant Energy Power Generation, Inc. requests that Ms. Adam be permitted to appear as a qualified representative on behalf of Reliant Energy Power Generation, Inc.



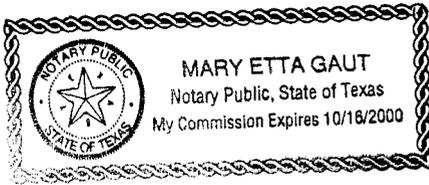
Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 222-2525
Telecopy: (850) 222-5606

Attorneys for Reliant Energy Power Generation, Inc.

STATE OF TEXAS)
)
COUNTY OF HARRIS)

BEFORE ME, the undersigned Notary Public, on this day personally appeared Alice Adam, who, being by me duly sworn on her oath, deposed and said that she has executed the foregoing instrument and that the statements contained therein are true and correct to the best of her knowledge, information and belief.

SUBSCRIBED AND SWORN TO BEFORE ME on this the 4th day of October, 1999, to certify which, witness my hand and official seal of office.



Mary Etta Gaut
Notary Public in and for the
State of Texas

My Commission expires: October 16, 2000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Affidavit of Alice Adam and Request for Representation by a Qualified Representation have been furnished by hand delivery* or U.S. Mail this 7th day of October, 1999 to the following:

(*)Robert V. Elias
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Robert Scheffel Wright
Landers & Parsons, P.A.
310 West College Avenue
Post Office Box 271
Tallahassee, FL 32302

Paul Sexton
Thornton J. Williams
Thornton Williams & Associates
Post Office Box 10109
Tallahassee, FL 32302

Charles Guyton
Steel Hector & Davis
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1804

Jeffrey A. Stone
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32756-2950

James A. McGee
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733

Michelle Hershel
Florida Electric Cooperative Assoc.
Post Office Box 590
Tallahassee, FL 32302

Thomas J. Maida
Foley & Lardner
30 East Park Avenue
Tallahassee, FL 32301

Ken Wiley
Florida Reliability Coordinating Council
405 Reo Street, Suite 100
Tampa, FL 33609

John Roger Howe
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399

Richard A. Zambo
598 SW Hidden River Avenue
Palm City, FL 34990

Jon Moyle
Moyle, Flannigan, Katz, Kolins, Et Al
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

Tracy E. Danese
Jacksonville Electric Authority
21 West Church Street, T-16
Jacksonville, FL 32202

Frederick M. Bryant
Florida Municipal Power Agency
2010 Delta Boulevard
Tallahassee, FL 32315

James Swartz
City of Homestead
675 North Flagler Street
Homestead, FL 33030

Gary Lawrence
City of Lakeland
501 East Lemon Street
Lakeland, FL 33801

Rex Taylor
City of Vero Beach
Post Office Box 1389
Vero Beach, FL 32961

Ben Sharma
Kissimmee Utility Authority
P.O. Box 423219
Kissimmee, FL 34742

Harvey Wildschuetz
City of Lake Worth Utilities
1900 Second Avenue North
Lake Worth, FL 33461

Charles A. Russell
Florida Keys Electric Cooperative
Post Office box 377
Tavernier, FL 33070

Roy C. Young
Young, van Assenderp et al
225 South Adams Street, #200
Tallahassee, FL 32301

Lee L. Willis
James D. Beasley
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302

Gary Sasso,
Carlton Fields
Post Office Box 2861
St. Petersburg, FL 33731

J. Paul Wetzel
City of St. Cloud
1300 Ninth Street
St. Cloud, FL 34769

Thomas W. Richards
Fort Pierce Utilities
Post Office Box 3191
Ft. Pierce, FL 34948

Dean Shaw
City of Ocala
Post Office Box 1270
Ocala, FL 34478

Timothy Woodbury
Seminole Electric Cooperative
Post Office Box 272000
Tampa, FL 33688

Richard G. Feldman
City of Tallahassee
300 South Adams Street
Tallahassee, FL 32301

T. B. Tart
Orlando Utilities Commission
Post Office Box 3193
Orlando, FL 32802

Larry J. Thompson
Utility Board of the City of Key West
Post Office Drawer 6100
Key West, FL 33041

Florida Public Utilities Co.
Mr. Jack English
401 South Dixie Highway
West Palm Beach, FL 32402

Myron Rollins
Black & Veatch
P.O. Box 8405
Kansas City, MO 64114

Raymond O. Manasco, Jr.
Gainesville Regional Utilities
Post Office Box 147117
Station A-138
Gainesville, FL 32614

Gail Kamaras
Debra Swim
Legal Environmental Assistance
Foundation, Inc.
1114 Thomasville Road, Suite E
Tallahassee, FL 32303


Joseph A. McGlothlin