

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Tampa Electric Company's :
Petition for Approval of its Plan to :
bring its Generating Units into :
Compliance with the Clean Air Act. :
_____ :

DOCKET NO. 992014-EI

Filed on January 18, 2000

RELIANT ENERGY POWER GENERATION, INC.'S
PETITION TO INTERVENE

Pursuant to Rules 25-22.039 and 28-106.205, Florida Administrative Code, Reliant Energy Power Generation, Inc., through its undersigned counsel, submits its Petition to Intervene, and in support thereof states:

1. The name and address of the Petitioner is:

Reliant Energy Power Generation, Inc.
P.O. Box 61867 (77208-1867)
1111 Louisiana Street-43rd Fl.
Houston, Texas 77002
Telephone: 713-207-7234
Telecopier: 713-207-0141

2. Copies of all pleadings, notices, and orders in this Docket should be provided to:

Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

Michael G. Briggs, Senior Counsel
Reliant Energy Power Generation, Inc.
P.O. Box 61867 (77208-1867)
1111 Louisiana Street-43rd Fl.
Houston, Texas 77002

AFA _____
APP _____
CAF _____
CMU _____
CTR _____
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LEG 2
MAS 5
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RRR _____
SEC I
WAW _____
OTH Greg Hong

3. Statement of Substantial Interests. Reliant Energy Power Generation, Inc. ("Reliant

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Energy”) is a developer of independent power projects throughout the United States. Reliant Energy has acquired certain generation assets in Florida that were formerly owned by the Orlando Utilities Commission, which it will employ in the wholesale market for generation. Reliant Energy is also developing a 500 MW combustion turbine project in Osceola County, and is otherwise exploring opportunities to participate in the wholesale generation market in Florida. As a participant in the competitive wholesale generation market, Reliant Energy will provide resources with which load-serving utilities will satisfy a portion of the energy and reliability requirements of the retail customers they serve. In this docket, the Commission will consider, among other things, whether the proposal of Tampa Electric Company to spend \$673 Million to repower certain of its Gannon units represents the most desirable and cost-effective way of supplying the capacity and energy needs of TECO’s system while complying with applicable environmental requirements. Any decision that would allow Tampa Electric Company to proceed with its plan would adversely affect Reliant Energy’s substantial interests by precluding Reliant Energy from having an opportunity to provide the needed capacity and energy through its participation in the wholesale market.

4. Statement of Disputed Issues of Material Fact: While the disputed issues of material fact cannot be identified with certainty at this point, Reliant Energy anticipates they will include the following:

A. Has TECO fully identified and properly evaluated all available alternatives to its proposal?

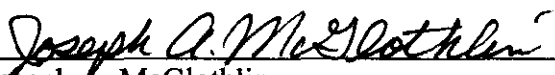
B. Does TECO’s proposal to repower its Gannon units constitute the most desirable and cost-effective means to meet its capacity and energy requirements?

Reliant reserves the right to address these and other issues as its interests may require.

5. Ultimate Facts Alleged: To ensure that the competitive wholesale market is afforded an

opportunity to present alternatives superior to TECO's proposal, the Commission should require TECO to issue an RFP before concluding that TECO's plan should be approved.

WHEREFORE, Reliant Energy Power Generation, Inc. requests the Commission to enter an Order authorizing it to intervene with full-party status.



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
e-mail: jmcglothlin@mac-law.com

Michael G. Briggs, Senior Counsel
Reliant Energy Power Generation, Inc.
P.O. Box 61867 (77208-1867)
1111 Louisiana Street-43rd Fl.
Houston, Texas 77002
Telephone: (713) 207-7234
Telecopier: (713) 207-0141
e-mail: michael-briggs@reliantenergy.com

Attorneys for Reliant Energy Power Generation, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing, filed on behalf of Reliant Energy Power Generation, Inc., has been furnished by U.S. mail and by hand-delivery* on this 18th day of January, 2000 to the following:

*Robert Elias
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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



Joseph A. McGlothlin