

Matthew M. Childs, P.A.

May 11, 2001

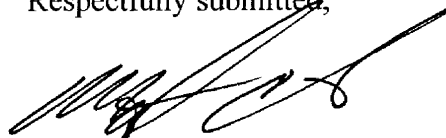
Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, FL 32399

RE: DOCKET NOS. 001148-EI; 000824-EI; and 010577-EI

Dear Ms. Bayó:

Enclosed for filing are the original and fifteen (15) copies of the Joint Motion to Establish a Separate Generic Docket to Determine an Expedited Basis the Prudence of Formation of and Participation in GridFlorida, Inc.

Respectfully submitted,



Matthew M. Childs, P.A.

MMC:acw
Enclosures

DOCUMENT NUMBER-DATE

05949 MAY 11 01

Miami

West Palm Beach

Tallahassee

Key West

London

Caracas

São Paulo

Rio de Janeiro

Santo Domingo

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Motion to Establish Docket as to the) Docket Nos. 001148-EI; 000824-EI;
Prudence of the Formation of Grid Florida, Inc.) and 010577-EI
_____) Filed: May 11, 2001

**JOINT MOTION TO ESTABLISH A SEPARATE GENERIC DOCKET TO
DETERMINE ON AN EXPEDITED BASIS THE PRUDENCE
OF FORMATION OF AND PARTICIPATION IN GRID FLORIDA, INC.**

Florida Power & Light Company ("FPL"), Tampa Electric Company ("TEC") and Florida Power Corporation ("FPC") (hereinafter referred to as "Joint Movants") file this Motion with the Commission for an order establishing a separate generic docket to determine whether Joint Movants are prudent in forming and participating in GridFlorida, Inc. By this Motion, it is also requested that the Commission establish an expedited schedule for this separate docket and consolidate and move into that docket the matters concerning GridFlorida, Inc. that are presently identified for consideration elsewhere. In support of this Motion, the Joint Movants state:

1. Each of the Joint Movants is an electric utility subject to the jurisdiction of the Florida Public Service Commission ("FPSC") and the FERC.
2. On May 3, 2001, the staff of the FPSC issued recommendations in Docket Nos. 001148-EI and 000824-EI, recommending, in relevant part, that the Commission undertake reviews of the prudence of participation by FPL and FPC, respectively, in GridFlorida. On May 8, 2001, this Commission opened Docket No. 010577-EI, *Review of Tampa Electric Company and impact of its participation in GridFlorida, a Florida Transmission Company, on TECO's retail ratepayers*. In addition, the reviews would apparently be separately conducted in the respective dockets. The recommendations are scheduled to be considered by the Commission at

Agenda on May 15, 2001. Thus, there could be three separate reviews of participation in GridFlorida.

3. On October 16, 2000, and supplemented on December 15, 2000, pursuant to §§ 203 and 205 of the Federal Power Act and FERC Order 2000, the Joint Movants submitted their response in compliance with Order No. 2000 requesting authorization from the FERC to create GridFlorida LLC, a for-profit RTO.

4. On March 28, 2001, the FERC issued its order in RTO Docket 1-67-000 provisionally granting RTO status to Grid Florida LLC. This FERC order found that the October 16, 2000 compliance filing by the Joint Movants, as modified, complied with the minimum characteristics and functions of an RTO described in Order No. 2000, accepted various proposals, made various revisions and directed the applicants to make additional compliance filings reflecting ordered revisions within sixty days of March 28, 2001. The intended commercial operations date is December 15, 2001, as required by Order No. 2000. The original plan called for all transmission service over GridFlorida owned and operated facilities must be taken under GridFlorida's open access transmission tariff. On April 26, 2001, in its capacity as an intervenor in Docket No. RTO1-67-000, the FPSC filed a request for clarification and expedited rehearing of FERC's March 28, 2001 order provisionally granting RTO status to GridFlorida.

5. As noted above, on May 3, 2001, the FPSC staff filed recommendations in Docket No. 000824-EI with respect to FPC and Docket No. 001148-EI with respect to FPL which raise issues concerning: . . . "the prudence of subjecting its retail and wholesale load to GridFlorida." Staff also raised issues with respect to costs and rates of GridFlorida. These issues are generic in nature and equally applicable to each of the Joint Movants. Staff contends that it must ". . .

ensure that the decision to join the RTO was prudent and costs are properly assigned and recovered.” Because there is question as to the prudence of forming and participating in GridFlorida, Inc. it is necessary for the issues to be joined and addressed on an expedited and consolidated basis. This would permit consideration of the matter by the Commission and minimize the period, during which there was uncertainty as to the future development of GridFlorida, Inc.

6. The Joint Movants respectfully suggest that it is inefficient and redundant for the Commission to consider the prudence of the formation and operation of Grid Florida in three separate proceedings. Stated differently, the establishment of a separate docket as herein requested is the most appropriate and efficient way to address the identified issues concerning GridFlorida.

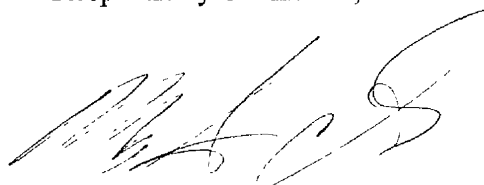
7. Florida Power & Light Company represents that is undertaking to contact each of the parties to its Docket No. 001148-EI and that it will supplement this motion on Monday, May 14, 2001.

8. Florida Power Corporation represents that is has contacted or attempted to contact each of the parties to its Docket No. 000824-EI and that that it will supplement this motion on Monday, May 14, 2001.

9. Tampa Electric Company represents that is has contacted or attempted to contact each of the parties to its Docket No. 010577-EI and that that it will supplement this motion on Monday, May 14, 2001.

WHEREFORE the Joint Movants each respectfully request that this Commission establish a separate generic docket and consolidate therein for purposes of review the issue of the prudence of Joint Movants' participation in GridFlorida and establish that the issues will be addressed on an expedited basis.

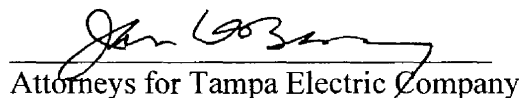
Respectfully Submitted,



Matthew M. Childs, P.A.
Attorney for Florida Power & Light Co.



For: James W. Pickens
Attorneys for Florida Power Corporation



Attorneys for Tampa Electric Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of FPL's Joint Motion To Establish A Separate Generic Docket To Determine On An Expedited Basis The Prudence Of Information Of And Participation In Grid Florida, Inc. was served by Hand Delivery (*) or mailed this 11th day of May, 2001 to the following:

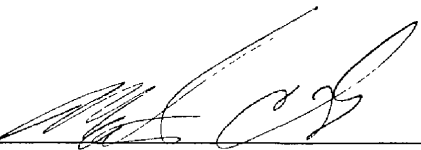
Robert V. Elias, Esquire*
Legal Division
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, FL 32399

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

John McWhirter, Jr.
Florida Industrial Power Users Group
McWhirter, Reeves, McGlothlin, Davidson, Decker
Kaufman, Arnold & Steen, P.A.
400 North Tampa Street, Suite 2450
Tampa, FL 33601-3350

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

By: _____


Matthew M. Childs, P.A.