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COMMISSION
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July 6, 2001

VIA HAND DELIVERY

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

Re: *In Re: Review of Florida Power Corporation's Earnings,
Including effects of proposed Acquisition of Florida Power
Corporation by Carolina Power & Light
Docket No. 000824-EI*

Dear Ms. Bayo:

I am enclosing for filing and distribution in the above-referenced matter the original and 15 copies of the Petition to Intervene of Walt Disney World Co. in that matter. Walt Disney World Co. intends to file under separate cover requests for the Commission to authorize attorneys from my firm's office in Washington, D.C. to serve as its qualified representatives.

Please acknowledge receipt of this filing on the enclosed extra copy for return to my office. Thank you for your assistance.

Yours truly,



Russell S. Kent

RSK/slk

Enclosures

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power Corporation's) Docket No. 000824-EI
Earnings, Including effects of proposed) Filed July 6, 2001
Acquisition of Florida Power Corporation by)
Carolina Power & Light.)
_____)

Petition to Intervene of Walt Disney World Co.

Walt Disney World Co. ("Walt Disney World"), pursuant to Rules 25-22.039 and 28-106.205 of the Florida Administrative Code, hereby files its Petition to Intervene in this proceeding. As grounds therefor, Walt Disney World states:

1. The name, address and telephone number of Petitioner is:

Walt Disney World Co.
1375 Lake Buena Drive
Fourth Floor North
Lake Buena Vista, Florida 32830
407-828-1723

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

Russell S. Kent
Sutherland Asbill & Brennan LLP
2282 Killearn Center Boulevard
Tallahassee, Florida 32308-3561
850-894-0015

Lee Schmudde
Vice President, Legal
Walt Disney World Co.
1375 Lake Buena Drive
Fourth Floor North
Lake Buena Vista, Florida 32830
407-828-1723

In addition to having Mr. Kent serve as its outside Counsel as provided in Rule 28-106.106 of the Florida Administrative Code, Petitioner intends to file a request that William H.

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FPSC-RECORDS/REPORTING

Penniman and Daniel E. Frank, attorneys in the Washington, D.C. office of Sutherland Asbill & Brennan LLP, be named as its qualified representatives.

3. Walt Disney World is a retail customer of Florida Power Corporation (“FPC”).

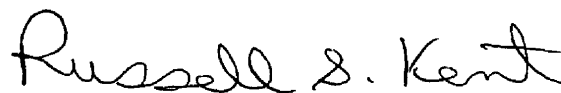
4. The Commission has initiated this rate proceeding, among other things, “to address the level of FPC’s earnings and to assure appropriate retail rates are implemented on a going forward basis so that appropriate benefits of the formation of [GridFlorida, the regional transmission organization proposed for peninsular Florida,] and any future restructuring of the electric market are captured for the retail ratepayer.” *In re: Review of Florida Power Corporation’s earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power & Light*, Docket No. 000824-EI, Slip. Op. at 2 (June 20, 2001).

5. Because Walt Disney World is a retail consumer of electricity provided by FPC, and because this proceeding is designed to consider the impact that the formation of GridFlorida and any future restructuring efforts by FPC will have for its retail customers, Walt Disney World will be substantially affected by any action the Commission takes in this docket. *See, e.g., In re: Review of Florida Power & Light Company’s proposed merger with Entergy Corporation, the formation of a Florida transmission company (“Florida Transco”) and their effect on FPL’s retail rates*, Docket No. 001148-EI (Mar. 14, 2001) (allowing Dynegy Midstream to intervene because, as a retail customer of FPL, “(a) it [would] suffer injury in fact as a result of the agency action contemplated in the proceeding that is of sufficient immediacy to entitle it to a hearing; and (b) the injury suffered is a type against which the proceeding is designed to protect”); *In re: Review of Florida Power Corporation’s earnings, Including effects of proposed acquisition of Florida Power Corporation by Carolina Power & Light*, Docket No. 000824-EI (Aug. 25, 2000) (allowing Florida Retail Federation to intervene).

6. The affected agency is the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

WHEREFORE, Walt Disney World Co. respectfully requests that the Commission grant its Petition to Intervene and that it be accorded full party status in this docket.

Respectfully submitted,



Russell S. Kent
Sutherland Asbill & Brennan LLP
2282 Killearn Center Boulevard
Tallahassee, Florida 32308-3561
850-894-0015
Florida Bar No. 20257

*Attorneys for
Walt Disney World Co.*

July 6, 2001

**CERTIFICATE OF SERVICE
DOCKET NO. 000824**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or *Hand-delivery to the following parties on this 6th day of July, 2001.

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

Florida Retail Federation
100 E. Jefferson Street
Tallahassee, Florida 32301

Ron LaFace/Seann M. Frazier
Greenberg & Traurig
101 E. College Avenue
Tallahassee, Florida 32301

Joseph A. McGlothlin, Esquire
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John Roger Howe
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400

Paul Lewis, Jr.
Florida Power Corporation
106 East College Avenue, Suite 800
Tallahassee, Florida 32301-7740

James A. McGree
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St. Petersburg, Florida 33733-4042

INTERESTED PARTIES:

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26 Hibiscus Court
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Moyle Flanigan
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Richard Zambo, Esquire
Florida Industrial Cogeneration Association
598 SW Hidden River Avenue
Palm City, Florida 34990

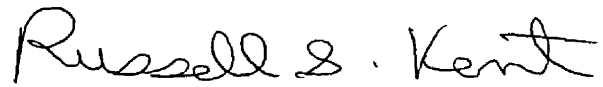
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