



CARLTON FIELDS
ATTORNEYS AT LAW

ONE PROGRESS PLAZA
200 CENTRAL AVENUE, SUITE 2300
ST. PETERSBURG, FLORIDA 33701-4352

MAILING ADDRESS:
PO. BOX 2861, ST. PETERSBURG, FL 33731-2861
TEL (727) 821-7000 FAX (727) 822-3768

July 24, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

VIA FEDERAL EXPRESS

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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:

Florida Power Corporation ("FPC" or the "Company") is filing herewith are the originals, disc and fifteen (15) copies of the following:

1. Florida Power Corporation's Response to the Petition to Intervene of Florida Municipal Power Agency; and 09047-01
2. Florida Power Corporation's Response to the Petition to Intervene of Walt Disney World Company. 09048-01

We request you acknowledge receipt and filing of the above by stamping the additional copy of this letter and returning it to me in the self-addressed, stamped envelope provided.

If you or your Staff have any questions regarding this filing, please contact me at (727) 821-7000.

Very truly yours,

Gary L. Sasso
Gary L. Sasso

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Enclosure
Parties and Counsel of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Submitted for Filing:
July 25, 2001

FLORIDA POWER CORPORATION'S RESPONSE TO THE PETITION TO INTERVENE OF THE FLORIDA MUNICIPAL POWER AGENCY

Florida Power Corporation ("FPC" or the "Company"), respectfully responds to the petition to intervene of the Florida Municipal Power Agency ("FMPA") and states:

1. FMPA is interested in this proceeding because the Florida Public Service Commission (the "Commission"), has made the Company's involvement with the Regional Transmission Organization ("RTO") known as GridFlorida an issue in it. In claiming a substantial interest in this proceeding, FMPA alleges with specificity only that "GridFlorida will substantially impact FMPA's wholesale power and transmission costs" because its "members have transmission facilities that are interconnected with FPC transmission facilities," "FMPA utilizes FPC transmission facilities to supply wholesale power to its member systems," and "FMPA is a transmission owner in the State of Florida with transmission facilities interconnecting with FPC." Petition to Intervene, ¶ 3. (emphasis supplied). FMPA further claims with some specificity a substantial interest that will be impacted by this proceeding because FMPA "is a party in [Federal Energy Regulatory Commission (FERC)] Docket ER01-2205" and the Commission's stated purpose of assisting FERC in that Docket will affect FMPA's interests in FERC Docket ER01-2205. Petition to Intervene, ¶ 5. As a result, FMPA specifically claims a substantial interest in this proceeding only with respect to the issues concerning GridFlorida.

DOCUMENT NUMBER-DATE
09047 JUL 25 01
FPSC-COMMISSION CLERK

2. The Commission's potential pairing in this docket of the disparate issues of the prudence of FPC's involvement with GridFlorida and the review of FPC's retail rates puts FPC in a difficult position with respect to the petitions to intervene of entities specifically claiming an interest in the proceeding only to the extent that it concerns GridFlorida, like FMPA. On the one hand, in view of the allegations about their involvement in the Florida wholesale electric market and the Commission's decision to consider GridFlorida issues here, FPC does not object to their intervention to protect their alleged interests in the GridFlorida issues. On the other hand, if the Commission uses the same docket for reviewing FPC's retail rates, FPC does not believe that the standing of parties, such as FMPA, that in reality is predicated on involvement in Florida's wholesale electric market should automatically confer standing to participate in issues associated with the retail rate review.

3. As a result, FPC has reached an agreement with certain entities claiming standing predicated on their alleged involvement in Florida's wholesale electric market, e.g. Calpine Corporation and Duke Energy North America, that it will not object to their intervention on the GridFlorida issues subject to the reservation of FPC's right to object to their standing on other issues. Calpine Corporation and Duke Energy North America have agreed that FPC's position is reasonable and have consented to this limitation on their right to intervene.

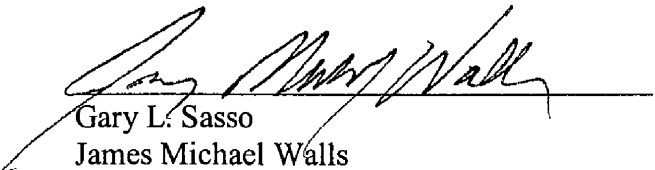
4. FPC likewise believes that the best way to minimize its interference with the GridFlorida aspect of this docket, while at the same time protecting its rights concerning intervention in any retail rate review that is conducted herein, is to acquiesce in FMPA's intervention on the GridFlorida issues while reserving its rights to object to FMPA's standing to participate in other issues which FPC believes do not involve FMPA's substantial interests. As noted, FMPA has alleged with specificity only that its substantial interests will be affected by the

Commission's determinations with respect to GridFlorida. Accordingly, FPC acquiesces in FMPA's intervention in this docket with respect to the separate, disparate issues with respect to GridFlorida with the understanding that FPC is reserving its rights to object to FMPA's standing with respect to any other issue at the time that the Commission or FMPA specifically identifies a non-GridFlorida-related issue that FMPA regards as affecting its substantial interests.

WHEREFORE, if FMPA is permitted to intervene in this docket in order to protect its alleged interests in the GridFlorida issues in this docket, if any, FPC respectfully reserves its rights to object to FMPA's standing to participate with respect to any non-GridFlorida-related issues.

Respectfully submitted,

James A. McGee
FLORIDA POWER CORPORATION
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (727) 820-5184
Facsimile: (727) 820-5519



Gary L. Sasso
James Michael Walls
CARLTON FIELDS
Post Office Box 2861
St. Petersburg, FL 33731
Telephone: (727) 821-7000
Facsimile: (727) 822-3768
Attorneys for Florida Power Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via U.S. Mail to the following this 24TH day of July, 2001.

Ronald V. Elias, Esquire
Bureau Chief, Electric and Gas
Division of Legal Services
Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Phone: (850) 413-6199
Fax:

Jack Shreve, Esquire
Public Counsel
John Roger Howe, Esquire
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
Attorneys for the Citizens of the State of
Florida

John W. McWhirter, Jr., Esquire
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
400 North Tampa Street, Suite 2450
Tampa, FL 33601-3350
Telephone: (813) 224-0866
Fax: (813) 221-1854
Counsel for Florida Industrial Power Users
Group

Ronald C. LaFace, Esquire
Seann M. Frazier, Esquire
Greenberg Traurig, P.A.
101 East College Avenue
Post Office Drawer 1838
Tallahassee, FL 32302
Telephone: (850) 222-6891
Fax:
Counsel for Florida Retail Federation

Joseph A. McGlothlin, Esquire
Vicki Gordon Kaufman, Esquire
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden
Tallahassee, FL 32301
Telephone: (850) 222-2525
Fax: (85) 222-5606
Counsel for Florida Industrial Power Users
Group and Reliant Energy Power Generation,
Inc.

James D. Beasley, Esquire
Lee L. Willis, Esquire
Ausley & Macmillan
Post Office Box 391
Tallahassee, FL 32302
Phone: (850) 224-9115
Fax: (850) 222-7952
Counsel for Tampa Electric Company

Michael G. Briggs, Senior Counsel
Reliant Energy Power Generation, Inc.
801 Pennsylvania Avenue, Suite 620
Washington, D.C. 20004
Telephone:
Fax:

Diane K. Kiesling, Esquire
Landers & Parsons, P.A.
310 West College Avenue (32301)
Post Office Box 271
Tallahassee, FL 32302
Telephone: (850) 681-0311
Fax: (850) 224-5595
Counsel for Calpine Corporation, Duke Energy
North America and Mirant Americas
Development, Inc.

Michael B. Twomey, Esquire
Post Office Box 5256
Tallahassee, FL 32314-5256
Phone: (85) 421-9530
Fax: (850) 421-8543
Counsel for Sugarmill Woods Civic
Association, Inc.

Thomas W. Kaslow
Director, Market Policy & Regulatory Affairs
Calpine Eastern
The Pilot House, 2nd Floor
Lewis Wharf
Boston, Massachusetts 02110
Phone: (617) 723-7200 (ext 393)
Fax: (617) 557-5353

Jon C. Moyle, Jr., Esq.
Cathy M. Sellers, Esq.
Moyle, Flanigan, Katz, Raymond &
Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Telephone: (850) 681-3828
Fax: (850) 681-8788
Counsel for CPV Atlantic, Ltd. and PG&E
National Energy Group Company

Lee E. Barrett, Director
Regulatory Policy
Duke Energy North America
5400 Westheimer Court
Houston, TX 77056-5310
Telephone: (713) 627-6519
Fax: (713) 627-6566

Melissa Lavinson
PG&E National Energy Group Company
7500 Old Georgetown Road
Bethesda, MD 20814

John G. Trawick
Director Planning and Market Structure
Mirant Americas Development, Inc.
1155 Perimeter Center West
Atlanta, GA 30338-5416
Telephone: (678) 579-7219
Fax: (678) 579-5293

Frederick M. Bryant, Esq.
General Counsel
Florida Municipal Power Agency
2061-2 Delta Way
Tallahassee, FL 32303
Telephone: (850) 297-2011
Fax: (850) 297-2014

Robert C. Williams, P.E.
Director of Engineering
Florida Municipal Power Agency
8553 Commodity Circle
Orlando, FL 32819-9002
Telephone: (407) 355-7767

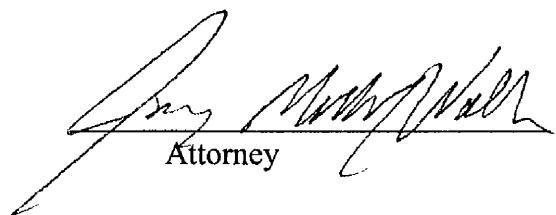
Bill L. Bryant, Jr., Esq.
Natalie B. Futch
Katz, Kutter, Haigler, Alderman, Bryant &
Yon, P.A.
106 East College Avenue, 12th Floor
Tallahassee, FL 32301
Telephone: (850) 224-9634
Fax: (850) 222-0103
Counsel for Enron Corporation

Marchris Robinson
Manager, State Government Affairs
Enron Corporation
1400 Smith Street
Houston, TX 77002-7361
Telephone: (713) 853-3342
Fax: (713) 646-8160

Russell S. Kent, Esq.
Sutherland Asbill & Brennan LLP
2282 Killearn Center Blvd.
Tallahassee, FL 32308-3561
Telephone: (850) 894-0015
Counsel for Walt Disney World Co.

Daniel E. Frank
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2415
Telephone: (202) 383-0838
Counsel for Walt Disney World Co.

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



Attorney