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CLIENT/MATTER NUMBER
062012-0102

September 14, 2001

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket Nos. 001148-EI, 010577-EI and 000824-EI

Dear Ms. Bayo:

Enclosed for filing in the above referenced are the original and fifteen (15) copies of Seminole Electric Cooperative, Inc.'s Motion for Leave to File Prehearing Statement and Seminole Electric Cooperative, Inc.'s Prehearing Statement.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

N. Wes Strickland

APP
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cc: All Parties of Record (w/encl.)

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FPSC-BUREAU OF RECORDS

ESTABLISHED 1842

PH Statement
DOCUMENT NUMBER-DATE

11459 SEP 14 01

FPSC-COMMISSION CLERK

Motion
DOCUMENT NUMBER-DATE

11458 SEP 14 01

010.129614.1

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
)	
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
)	
In Re: Review of Tampa Electric Company and impact of its participation in GridFlorida, a Florida transmission company, on TECO's retail ratepayers.)	
)	Docket No. 010577-EI
)	Filed September 14, 2001

**SEMINOLE ELECTRIC COOPERATIVE, INC.'S
MOTION FOR LEAVE TO FILE PREHEARING STATEMENT**

Seminole Electric Cooperative, Inc. ("Seminole Electric"), pursuant Rule 28-106.204, *Florida Administrative Code*, hereby submits its Motion For Leave To File Prehearing Statement in the above-styled dockets, and in support hereof states as follows:

1. A prehearing conference in the above-styled dockets is scheduled for September 17, 2001 (the "Prehearing Conference").
2. The July 26, 2001 Order Establishing Procedure (Phase 1) and Granting Joint Motion To Partially Alter Dates for Filing Testimony (the "Order Establishing Procedure") set forth a deadline for all parties in the above-styled dockets to file prehearing statements no later than September 10, 2001.
3. Seminole Electric filed Petitions To Intervene in each of the above-styled dockets on September 4, 2001, alleging that its substantial interests are affected by the


GridFlorida phases of these proceedings. Seminole Electric has not obtained rulings on its Petitions To Intervene.

4. Although at this point Seminole Electric is not formally a party to these proceedings, Seminole Electric nevertheless seeks to submit a Prehearing Statement prior to the Prehearing Conference for the consideration of the Prehearing Officer and all parties involved in these proceedings. To that end, Seminole Electric has separately filed a Prehearing Statement, a copy of which is attached hereto as Exhibit A.

5. Seminole Electric has not had the opportunity to confer with all parties involved in these proceedings to determine whether there will be any objection to this Motion. Given, however, that Seminole Electric has not raised any new issues or submitted additional testimony or exhibits, but simply seeks to have its position on the issues heard, Seminole Electric would assert that no party to these proceedings will be prejudiced by the submission of its Prehearing Statement after the deadline of September 10, 2001. In further support, Seminole Electric would note that all parties to these proceedings will have received a copy of this Motion and its Prehearing Statement at least one day prior to the Prehearing Conference.

WHEREFORE, Seminole Electric respectfully requests that the Prehearing Officer grant this Motion and allow Seminole Electric to submit its Prehearing Statement for full consideration at the Prehearing Conference.

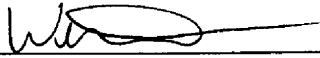
RESPECTFULLY SUBMITTED this 14th day of September 2001.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent by hand delivery (*), facsimile and U.S. Mail (**), or U.S. Mail, on this 14th day of September 2001, to the persons listed below:



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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

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

In Re: Review of Tampa Electric Company and impact of its participation in GridFlorida, a Florida transmission company, on TECO's retail ratepayers.) Docket No. 010577-EI

) Filed September 14, 2001

SEMINOLE ELECTRIC COOPERATIVE, INC.'S
PREHEARING STATEMENT

Seminole Electric Cooperative, Inc. ("Seminole Electric"), pursuant Rule 25-22.038, *Florida Administrative Code*, and the July 26, 2001 Order Establishing Procedure (Phase 1) and Granting Joint Motion To Partially Alter Dates for Filing Testimony, hereby submits its Prehearing Statement in the above-styled dockets as follows:

A. WITNESSES

None.

B. EXHIBITS

None.

C. STATEMENT OF BASIC POSITION

Seminole Electric supports the participation by Florida Power Corporation ("FPC"), Florida Power and Light Company ("FPL"), and Tampa Electric Company ("TECO") in a regional transmission organization ("RTO"). An appropriately structured RTO

EXHIBIT
A

could benefit all market participants by providing centralized and coordinated grid planning, maintenance and expansion; improving grid reliability; eliminating discriminatory practices; improving access for wholesale market participants; and eliminating “pancaked” rates. While Seminole Electric takes exception to certain aspects of GridFlorida, nevertheless, as a general matter, Seminole Electric supports the formation of and participation by FPC, FPL, and TECO in the GridFlorida RTO. In addition, Seminole Electric would underscore the fact that the formation of GridFlorida, and participation by FPC, FPL and TECO therein, affect not only the retail customers of those entities, but also the retail customers of Seminole’s member systems (and other similarly situated entities)., Accordingly, Seminole Electric submits that the Commission should give the interests of *all* users and potential users of the GridFlorida transmission system equal consideration in judging the issues before it.

D. STATEMENT OF ISSUES AND POSITIONS

Issue 1: Is participation in a regional transmission organization (RTO) pursuant to FERC Order No. 2000 voluntary?

Seminole Electric’s Position:

Yes.

Issue 2: What are the benefits to Peninsular Florida associated with the utility’s (FPC, FPL, or TECO) participation in GridFlorida?

Seminole Electric’s Position:

GridFlorida has the potential to benefit all market participants by providing centralized and coordinated grid planning, maintenance and expansion; improving grid reliability; eliminating discriminatory practices; improving access for wholesale market participants; and eliminating “pancaked” rates.

Issue 3: What are the benefits to the utility's ratepayers of its participation in GridFlorida?

Seminole Electric's Position:

No position at this time.

Issue 4: What are the estimated costs to the utility's ratepayers of its participation in GridFlorida?

Seminole Electric's Position:

No position at this time.

**Issue 5: Is TECO's/FPL's decision to transfer ownership and control of its transmission facilities of 69kV and above to GridFlorida appropriate?
and**

Is FPC's decision to transfer operational control of its transmission facilities of 69 kV and above to GridFlorida while retaining ownership appropriate?

Seminole Electric's Position:

No position at this time.

Issue 6: Is the utility's decision to participate in GridFlorida prudent?

Seminole Electric's Position:

Yes. As a general matter, Seminole Electric believes that participation in GridFlorida by FPC, FPL and TECO is prudent. Seminole Electric does, however, take exception to certain aspects of GridFlorida, as set forth in Seminole Electric's pleadings in the proceedings before the Federal Energy Regulatory Commission ("FERC").

Issue 7: What policy position should the Commission adopt regarding the formation of GridFlorida?

Seminole Electric's Position:

The Commission should adopt a policy position generally supportive of participation by FPC, FPL and TECO in GridFlorida.

Issue 8: Is Commission authorization required before the utility can unbundle its retail electric service?

Seminole Electric's Position:

No position at this time.

Issue 9: Is Commission authorization required before the utility can stop providing retail transmission service?

Seminole Electric's Position:

No position at this time.

**Issue 10: Is Commission authorization required before the FPC can transfer operational control of its retail transmission assets?
and**

Is Commission authorization required before FPL/TECO can sell its retail transmission assets?

Seminole Electric's Position:

No position at this time.

Issue 11: Is a Regional Transmission Organization for the Southeast region of the United States a better alternative for Florida than the GridFlorida RTO?

Seminole Electric's Position:

No position at this time.

E. PENDING MOTIONS

Seminole Electric Cooperative Inc.'s Petitions To Intervene in each of the above-styled dockets, all of which were filed September 4, 2001.

Seminole Electric Cooperative Inc.'s Motion for Leave to File Prehearing Statement, filed September 14, 2001.

F. REQUESTS OR CLAIMS FOR CONFIDENTIALITY

None.

G. COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

Seminole Electric is seeking leave to file this Prehearing Statement past the September 10, 2001 deadline set forth in the Order Establishing Procedure.

RESPECTFULLY SUBMITTED this 14th day of September 2001.

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