

JACK SHREVE PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison St. Room 812 Tallahassee, Florida 32399-1400 850-488-9330



November 9, 2001

Ms. Blanca S. Bayó, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0870

RE: Docket No. 010492-WS

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Citizens' Notice of Intervention for filing in the above-referenced docket.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Stephen C. Burgess Deputy Public Counsel

SCB/dsb Enclosures

APP CAF CMP CON CTH ECR F OP RGO SEC SER

RECEIVED & FILED

DOCUMENT NUMBER-DATE

14288 NOV-93

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Application for rate increase in Orange County by Zellwood Station Co-Op, Inc.

Docket No. 010492-WS Date Filed: November 9, 2001

CITIZENS' NOTICE OF INTERVENTION

The Citizens of the State of Florida, through their attorney, the Public Counsel, pursuant to Section 350.0611, Florida Statutes, and Rule 25-22.039, Florida Administrative Code, hereby give notice of intervention in the above-referenced docket. The Citizens submit:

1. The docket number is 010492-WS and the name of the agency is the Florida Public Service Commission.

2. The Intervenor is the Office of Public Counsel, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, and is entitled to participate as a matter of statutory right under Section 350.0611(1), which authorizes the Public Counsel "to appear in the name of the state or its citizens, in any proceeding or action before the commission...."

3. The disputed issues of material fact are those which bear on the adequacy of rates charged by Zellwood Station Co-Op., Inc. (Zellwood).

4. The Citizens allege that Zellwood is not entitled to the rate relief that it is seeking.

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5. The Citizens seek to participate in the proceedings of this Docket for the purpose of

examining all considerations that bear on the proper rates to be charged by Zellwood.

Respectfully submitted,

JACK SHREVE Public Counsel

Stephen C. Burgess /) Deputy Public Counsel

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

(850) 488-9330

Attorneys for the Citizens of the State of Florida

CERTIFICATE OF SERVICE DOCKET NO. 010492-WS

I HEREBY CERTIFY that a true and exact copy of the above and foregoing CITIZENS'

NOTICE OF INTERVENTION has been furnished by hand-delivery* or U.S. Mail to the following

parties of record this 9th day of November, 2001.

Thomas A. Cloud, Esquire Gray, Harris & Robinson, P.A. Post Office Box 3068 Orlando, Florida 32802-3068 Zellwood Station Co-Op, Inc. 2126 Spillman Drive Zellwood, Florida 32798-9797

Stephen C. Burgess ² Deputy Public Counsel