

GREENBERG
ATTORNEYS AT LAW ORIGINAL
TRAURIG

March 7, 2002

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

Re: Docket No. 01148-EI

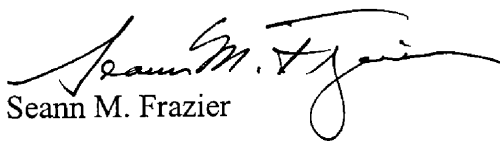
Dear Ms. Bayo:

Enclosed is an original and fifteen (15) copies of Florida Retail Federal's Petition to Intervene in the above docket.

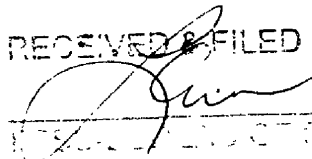
We have also enclosed a copy of the document on diskette, prepared in Microsoft Word 7.0 on a Windows 95 operating system. The diskette is a "2HD" density and 1.44 MB.

Thank you in advance for your assistance.

Sincerely yours,


Seann M. Frazier

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FPSC-COMMISSION CLERK

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SAO PAULO FORT LAUDERDALE BOCA RATON WEST PALM BEACH ORLANDO TALLAHASSEE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of the retail rates of) Docket No. 001148-EI
Florida Power & Light Company) Date Filed: March 7, 2002

FLORIDA RETAIL FEDERATION'S PETITION TO INTERVENE

FLORIDA RETAIL FEDERATION ("Federation") hereby petitions to intervene in Docket No. 001148-EI pursuant to Chapter 366, Florida Statutes and Rules 25-22.039 and 28-106.205, Florida Administrative Code. In support of this Petition, the Federation states:

1. The Federation is the Petitioner. The Federation is an association of retail operators, a substantial portion of which pay Florida Power & Light Corporation ("FPL" or "Company") for power at rates approved by the Florida Public Service Commission ("PSC"). The Federation is a "person" as defined by §1.01 and §120.52(13), Florida Statutes. The Federation is authorized to monitor the basis for earnings of electrical companies such as FPL and to challenge such components.

2. The Federation maintains offices at 100 E. Jefferson Street, Tallahassee, Florida 32301, telephone number (850) 222-3461. However, for the purposes of this Petition, the Federation may be contacted through its counsel, Ronald C. LaFace and Seann M. Frazier, Greenberg Traurig, P.A., 101 East College Avenue, Tallahassee, FL 32301, telephone number (850) 222-6891

3. The agency affected by this Petition is the State of Florida, Public Service Commission ("PSC"), located at 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, telephone number (850) 413-6248. However, this docket concerns FPL, whose earnings are subject to review.

4. In this docket, PSC staff have requested the Commission to review FPL's earnings and expenses.

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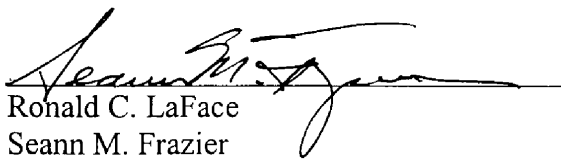
FPSC-COMMISSION CLERK

5. The Federation is an organization of large commercial consumers. A substantial portion of the Federation's members are FPL customers. As consumers of large amounts of electricity, the Federation and its members will be substantially affected by actions taken in this docket.

6. Disputed issues of fact include, but are not limited to, all facts related to the earnings and expenses of FPL.

7. As a matter of ultimate fact and law, the PSC should investigate FPL's earnings and expenses and appropriate rate relief should be afforded to retail consumers.

For the foregoing reasons, the Federation requests that the Commission grant the Federation's Petition to Intervene and accord it full party status in this docket.


Ronald C. LaFace
Seann M. Frazier
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101 East College Avenue
Post Office Drawer 1838
Tallahassee, FL 32302
Attorneys for Florida Retail Federation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and fifteen (15) copies of the foregoing has been furnished by Hand Delivery to Public Service Commission, Director, Division of Records and Reporting, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850; a copy has been furnished to the parties on the attached mailing list via Facsimile and U.S. Mail this 7th day of March, 2002.

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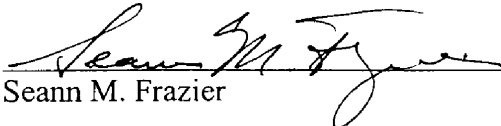
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