

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of GridFlorida Regional)
Transmission Organization (RTO) Proposal)
_____)

Docket No. 020233-EI
Filed April 17, 2002

JOINT MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

COME NOW Mirant Americas Development Inc., Calpine Corporation, Duke Energy North America, LLC, and Reliant Energy Power Generation, Inc. (Joint Movants) pursuant to Rule 28-106.204 Florida Administrative Code, and hereby file this Motion For Extension of Time to File Comments in this proceeding and as grounds therefore state:

1. Pursuant to the Order Establishing Procedure, Order No. PSC-02-0459-PCO-EI, issued April 3, 2002, parties are to file pre-workshop comments on the modified GridFlorida proposal on or before April 26, 2002. A Commission workshop is scheduled for May 29, 2002.
2. On April 12, 2002, Commission Staff forwarded a Preliminary List of Workshop Subjects for the parties to address in their pre-workshop written comments.
3. Joint Movants are concerned that there is insufficient time in which to respond in a meaningful manner to the extensive GridFlorida filing as well as Staff's additional List of Workshop Subjects pursuant to the timetable set forth in the Order Establishing Procedure.

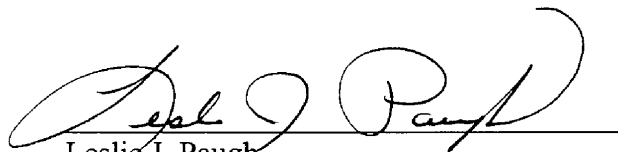
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4. Joint Movants request an extension of time to be applicable to all parties to file their pre-workshop comments, including responses to Staff's List of Workshop Subjects, from April 26 to May 8, 2002 – an extension of 12 days. Joint Movants submit that their request for an extension is limited to the pre-workshop comments and that it is not necessary to alter or extend the date set for the scheduled Commission workshop. Joint Movants also request that the page limitation be increased from 40 to 60 pages in order to accommodate responses to Staff's List of Workshop Subjects.

Joint Movants have attempted to contact all parties in this proceeding and are authorized to represent the following: Thomas P. and Genevieve E. Twomey, Sugarmill Woods Civic Association, Inc., and Buddy L. Hansen support this motion; Florida Municipal Power Agency, Publix Supermarkets, Inc. and Dynegy, Inc. do not oppose this motion; Tampa Electric Company and Florida Power & Light Company oppose the motion; and the Florida Retail Federation, Seminole Electric Cooperative, CPV Atlantic, Ltd. and PG&E National Energy Group take no position on this motion.


WHEREFORE, Joint Movants respectfully request that the Florida Public Service Commission extend the time for filing comments in this proceeding for 12 days to May 8, 2002 and increase the comment page limitation from 40 pages to 60 pages.

Dated this 17th day of April, 2002.



Leslie J. Paugh
Leslie J. Paugh, P.A.
1311-B Paul Russell Road, Suite 201, 32301
Post Office Box 16069, 32317-6069
Tallahassee, Florida
Telephone (850) 877-5200
Telecopier (850) 878-0090
lpaugh@paugh-law.com

Attorney for Mirant Americas Development,
Inc., Calpine Corporation, Duke Energy
North America, LLC



Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 222-2525
Telecopier: (850) 222-5606
jmcglothlin@mac-law.com

Michael G. Briggs
Reliant Energy, Inc.
801 Pennsylvania Avenue, Suite 620
Washington, DC 20004
Telephone: (202) 783-7220
Telecopier: (202) 783-8127
mbriggs@reliant.com

Attorneys for Reliant Energy Power
Generation, Inc.

CERTIFICATE OF SERVICE
DOCKET 020233

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand-delivery(*), or U.S. Mail, to the following parties on this 17th day of April, 2002.

<p>Robert V. Elias, Esq.* William Cochran Keating, Esq. Division of Legal Services Florida Public Service Com. 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850</p> <p>Mark Sundback, Esq. Kenneth Wiseman, Esq. Andrews & Kurth Law Firm 1701 Pennsylvania Ave., N.W. Suite 300 Washington, DC 20006</p> <p>Lee L. Willis, Esq. James D. Beasley, Esq. Ausley & McMullen Law Firm 227 South Calhoun Street Tallahassee, Florida 32301</p> <p>Myron Rollins Black & Veatch Post Office Box 8405 Kansas City, MO 64114</p> <p>CPV Atlantic, Ltd 145 NW Central Park Plaza, Suite 101 Port Saint Lucie, FL 34986</p> <p>Calpine Corporation Thomas W. Kaslow The Pilot House, 2nd Floor Lewis Wharf Boston, MA 02110</p>	<p>Jennifer May-Brust, Esq. Colonial Pipeline Company 945 East Paces Ferry Road Atlanta, GA 30326</p> <p>G. Garfield R. Knickerbocker/S. Myers Day, Berry Law Firm CityPlace 1 Hartford, CT 06103-3499</p> <p>Duke Energy North America Lee E. Barrett 5400 Westheimer Court Houston, TX 77056-5310</p> <p>David L. Cruthirds, Esq. Attorney for Dynegy, Inc. 1000 Louisiana Street, Suite 5800 Houston, TX 77002-5050</p> <p>Michelle Hershel Florida Electric Cooperatives Association, Inc. 2916 Apalachee Parkway Tallahassee, FL 32301</p> <p>Richard Zambo, Esq. FICA 598 SW Hidden River Ave. Palm City, FL 34990</p>
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John W. McWhirter, Jr., Esq.
Attorney for FIPUG
McWhirter Reeves
400 North Tampa Street,
Suite 2450
Tampa, Florida 33601-3350

Frederick M. Bryant
FMPA
2061-2 Delta Way
Tallahassee, FL 32303

Robert C. Williams, P.E.
FMPA
8553 Commodity Circle
Orlando, FL 32819-9002

William G. Walker III
Florida Power & Light Company
215 South Monroe Street,
Suite 810
Tallahassee, FL 32301-1859

R. Wade Litchfield, Esq.
Office of General Counsel
Florida Power & Light Co.
700 Universe Boulevard
Juno Beach, FL 33408-0420

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

Thomas J. Maida
N. Wes Strickland
Foley & Lardner Law Firm
106 E. College Avenue,
Suite 900
Tallahassee, FL 32301

Thomas A. Cloud, Esq.
W. Christopher Browder, Esq.
Gray, Harris & Robinson, P.A.
Post Office Box 3068
Orlando, Florida 32802-3068

Peter Antonacci, Esq.
Gordon H. Harris, Esq.
Tracy A. Marshall, Esq.
Gray, Harris & Robinson, P.A.
301 S. Bronough St., Ste. 600
Tallahassee, FL 32302-3189

Bruce May, Esq.
Holland & Knight Law Firm
Bank of America
315 South Calhoun Street
Tallahassee, FL 32302-0810

Homer O. Bryant
3740 Ocean Beach Boulevard
Unit 704
Cocoa Beach, FL 32931

David Owen, Esq.
Assistant County Attorney
Lee County, Florida
Post Office Box 398
Ft. Myers, FL 33902

Joseph A. McGlothlin, Esq.
Vicki Gordon Kaufman, Esq.
McWhirter Reeves
117 S. Gadsden Street
Tallahassee, Florida 32301

Michael B. Twomey, Esq.
Post Office Box 5256
Tallahassee, FL 32314-5256

Mirant Americas Development,
Inc.
Beth Bradley
1155 Perimeter Center West
Atlanta, GA 30338-5416

Jon C. Moyle, Esq.
Cathy M. Sellers, Esq.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

Mr. Paul J. Chymiy
NUI Energy, Inc.
550 Route 202-206
Bedminister, NJ 07921-0760

Jack Shreve
John Roger Howe
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, #812
Tallahassee, FL 32399-1400

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

Michael Briggs
Reliant Energy Power
Generation, Inc.
801 Pennsylvania Ave.
Suite 620
Washington, DC 20004

Timothy Woodbury
Seminole Electric
Cooperative, Inc.
16313 North Dale Mabry Hwy.
Tampa, FL 33688-2000

Sofia Solernou
401 South MacArthur Avenue
Panama City, FL 32401

Linda Quick
South Florida Hospital
and Healthcare
6363 Taft Street
Hollywood, FL 33024

John T. Butler, P.A.
Steel Hector & Davis, LLP
200 South Biscayne Boulevard
Suite 4000
Miami, Florida 33131-2398

Ms. Angela Llewellyn
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601

Dawson Glover, III
Town of Sewall's Point
One South Sewall's Point Road
Sewall's Point, FL 34996

Harry W. Long, Jr., Esq.
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601

James A. McGee, Esq.
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733-4042

James P. Fama, Esq.
LeBoeuf, Lamb, Greene &
MacRae, LLP
1875 Connecticut Ave., N.W.
Suite 1200
Washington, DC 20009

Matthew M. Childs, Esq.
Steel Hector & Davis
215 South Monroe Street
Suite 601
Tallahassee, FL 32301

Kenneth Hoffman
Rutledge Law Firm
215 S. Monroe Street
Tallahassee, Florida 32302

Mr. Edward Kee
PA Management Group
1750 Pennsylvania Ave., NW
Suite 1000
Washington, DC 20006-4506

Steven H. McElhaney
2448 Tommy's Turn
Oviedo, FL 32766

Mr. John Attaway
Publix Super Markets, Inc.
P.O. Box 32105
Lakeland, FL 33802-2018

Marchris Robinson
Manager, State Government
Affairs
Enron Corporation
1400 Smith Street
Houston, Texas 77002-7361

Gary L Sasso/James M. Walls
Carlton, Fields Law Firm
Post Office Box 2861
St. Petersburg, FL 33731

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

Mr. Russell S. Kent
Sutherland Asbill & Brennan
2282 Killearn Center Blvd.
Tallahassee, FL 32308

Daniel Frank
Sutherland Asbill & Brennan
1275 Pennsylvania Ave. NW
Washington, DC 20004-2415

Mr. Lee Schmudde
Walt Disney World Co.
1375 Lake Buena Drive
Fourth Floor North
Lake Buena Vista, FL 32830

Mr. Ron Seel
RS Sales, Inc.
1449 Court Street
Clearwater, FL 33756

Bill Bryant, Jr., Esq.
Natalie Futch, Esq.
Katz, Kutter
106 E. College Ave.
12th Floor
Tallahassee, FL 32301


Leslie J. Paugh, Esq.