

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of GridFlorida Regional	)	Docket No. 020233-EI
Transmission Organization (RTO) Proposal	)	Filed April 19, 2002
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**Petition to Intervene of Reedy Creek Improvement District**

Reedy Creek Improvement District (“RCID”), pursuant to Rules 25-22.039 and 28-106.205 of the Florida Administrative Code, hereby files its Petition to Intervene in this proceeding. As grounds therefor, RCID states:

- 1. The name, address and telephone number of Petitioner is:

Reedy Creek Improvement District  
5300 Center Drive  
P.O. Box 10,000  
Lake Buena Vista, FL 32830  
Tel.: 407.824.4892  
Fax: 407.824.5396

- 2. Copies of all pleadings, notices and orders in this docket should be provided to:

Daniel E. Frank, Esq.  
Sutherland Asbill & Brennan LLP  
1275 Pennsylvania Avenue, N.W.  
Washington, DC 20004-2415  
Tel.: 202.383.0838  
Fax: 202.637.3593

Petitioner is filing on or about today a request that Mr. Frank, an attorney in the Washington, DC office of Sutherland Asbill & Brennan LLP, be named as its qualified representative in this proceeding.

- 3. RCID is a wholesale customer of Florida Power Corporation (“FPC”) and Tampa Electric Company (“Tampa Electric”), two of the GridFlorida applicants. RCID has been an active participant in the stakeholder processes on the development of GridFlorida.

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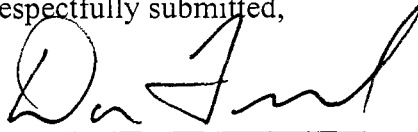
4. The Commission initiated this proceeding to evaluate the “modified RTO proposal” of the GridFlorida applicants (FPC, Tampa Electric, and Florida Power & Light Company). *In re: Review of Florida Power Corporation’s earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power & Light, et al.*, Docket Nos. 000824-EI, *et al.*, *slip. op.* at 24 (Dec. 20, 2001). The Commission directed the applicants to file an RTO proposal that “uses an ISO structure in which each utility maintains ownership of its transmission facilities,” that “specifically identify[ies] the costs, the benefits, and the allocation of costs to each participating utility,” that “address[es] whether the proposed ISO would be a for-profit or not-for-profit entity,” and that “include[s] any specific performance incentives proposed by the utilities.” *Id.*

5. Because RCID is a wholesale customer of FPC and Tampa Electric located in peninsular Florida and is an active participant in the GridFlorida stakeholder processes, RCID may be substantially affected by any action the Commission takes in this proceeding and therefore seeks to intervene as a party to this proceeding. *See, e.g., In re: Review of Florida Power Corporation’s earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power & Light, et al.*, Docket Nos. 000824-EI, *et al.* (Oct. 1, 2001) (pre-hearing order allowing wholesale customers to intervene with full rights as parties with respect to RTO phase of proceeding); *In re: Review of Florida Power Corporation’s earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power & Light, et al.*, Docket Nos. 000824-EI, *et al.*, *slip op.* at 6 (Dec. 20, 2001) (noting intervention of wholesale customers in RTO phase of proceedings).

6. The affected agency is the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

**Wherefore,** Reedy Creek Improvement District respectfully requests that the Commission grant its Petition to Intervene and that it be accorded full party status in this proceeding.

Respectfully submitted,



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Daniel E. Frank, Esq.  
Sutherland Asbill & Brennan LLP  
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Tel.: 202.383.0838  
Fax: 202.637.3593

*Attorneys for  
Reedy Creek Improvement District*

April 19, 2002

**CERTIFICATE OF SERVICE  
DOCKET NO. 020233-EI**

I hereby certify that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following parties on this 19th day of April, 2002.

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A handwritten signature in black ink, appearing to read "Dan Frank", written over a horizontal line.

Daniel E. Frank