

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 020233-EI
Filed: April 24, 2002

PETITION TO INTERVENE OF THE CITY OF TALLAHASSEE, FLORIDA

This Petition to Intervene is filed by the undersigned qualified representative pursuant to Rule 25-22.039 of the *Florida Administrative Code* on behalf of the City of Tallahassee, Florida (Tallahassee). In support of this Petition, Tallahassee states the following:

1. The name, address, and telephone number of the Petitioner is as follows:

City of Tallahassee
Energy Services
100 West Virginia Street
Fifth Floor
Tallahassee, Florida 32301
Telephone: (850) 891-6893

2. Copies of all correspondence, notices, pleadings, and orders in the above-referenced proceeding should be provided to the following:

Pete N. Koikos
Director, Energy Services
CITY OF TALLAHASSEE
100 West Virginia Street
Fifth Floor
Tallahassee, Florida 32301
Telephone: (850) 891-6893

Douglas F. John, Esq.
Matthew T. Rick, Esq.
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3013
Telephone: (202) 429-8801
E-mail: djohn@jhenergy.com
Email: mrick@jhenergy.com

DOCUMENT NUMBER-DATE

0055 APR 25 08

CLERK

3. Coincident with this Petition, Tallahassee is submitting a separate filing to designate Mr. John and Mr. Rick as its qualified representatives pursuant to Section 28.106.106(d) of the *Florida Administrative Code*.

4. Statement of Substantial Interests.

A. As the Commission is aware, Tallahassee is a municipal electric utility operating an integrated electric generation, transmission, and distribution system within the State of Florida. Tallahassee serves approximately 98,000 customers within the State of Florida.

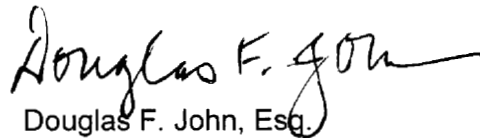
C. On March 20, 2002, Florida Power Corporation, Florida Power & Light Company, and Tampa Electric Company filed its GridFlorida RTO proposal in the above-referenced proceeding. Consistent with Order No. PSC-01-2489-FOF-EI, the proposal calls for the establishment of an Independent System Operator (ISO) to serve as the RTO and become the primary transmission provider within the state. All utilities within the Florida Reliability Coordinating Council (FRCC) – including Tallahassee – would be permitted to join and turn operational control of their transmission facilities over to the RTO. The RTO would also serve as the security coordinator for the FRCC.

D. The structure and formation of GridFlorida, which are at issue in this proceeding, will substantially impact Tallahassee in a number of key respects. First, as an owner of transmission facilities within the state, Tallahassee may ultimately elect to join GridFlorida, so the structure of the organization will influence its decision of whether to join the RTO, as well as the terms of such participation. Second, even Tallahassee does not join the RTO, it will be significantly impacted to the extent that it is required to contract with GridFlorida for transmission service. Finally, GridFlorida is designed to operate facilities that are interconnected to Tallahassee's system, so GridFlorida's operation of those system will impact Tallahassee.

E. In light of its potential membership in GridFlorida, reliance on GridFlorida for transmission service, and/or operation of interconnected facilities, Tallahassee submits that it has a substantial interest in this proceeding and should be granted full party status. Pursuant to the extended procedural schedule adopted by Order No. PSC-02-0548-PCO-EI, Tallahassee intends to file comments by May 8, 2002, as part of an *ad hoc* "Florida Municipal Group" consisting of Tallahassee, the City of Lakeland, Florida d/b/a Lakeland Electric, Kissimmee Utility Authority, and the City of Gainesville, Florida d/b/a Gainesville Regional Utilities.

WHEREFORE, Tallahassee respectfully requests that the Commission enter an order granting this Petition and according it full party status in the above-styled docket.

RESPECTFULLY SUBMITTED this 24th day of April 2002.



Douglas F. John, Esq.
Matthew T. Rick, Esq.
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036
Telephone: (202) 429-8801
E-mail: djohn@jhenergy.com

Counsel for the City of Tallahassee, Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Petition to Intervene of the City of Tallahassee, Florida, has been furnished by U.S. Mail to the following this 24th day of April, 2002.

Robert V. Elias, Esq.
William Cochran Keating, Esq.
Division of Legal Services
Florida Public Service Com.
2540 Shumard Oak Boulevard
Tallahassee, Florida
32399-0850

Mark Sundback, Esq.
Kenneth Wiseman, Esq.
Andrews & Kurth Law Firm
1701 Pennsylvania Ave., N.W.
Suite 300
Washington, DC 20006

Lee L. Willis, Esq.
James D. Beasley, Esq.
Ausley & McMullen Law Firm
227 South Calhoun Street
Tallahassee, Florida 32301

Myron Rollins
Black & Veatch
Post Office Box 8405
Kansas City, MO 64114

CPV Atlantic, Ltd
145 NW Central Park Plaza, Suite 101
Port Saint Lucie, FL 34986

Calpine Corporation
Thomas W. Kaslow
The Pilot House, 2nd Floor
Lewis Wharf
Boston, MA 02110

John W. McWhirter, Jr., Esq.
Attorney for FIPUG
McWhirter Reeves
400 North Tampa Street,
Suite 2450
Tampa, Florida 33601-3350

Jennifer May-Brust, Esq.
Colonial Pipeline Company
945 East Paces Ferry Road
Atlanta, GA 30326

G. Garfield
R. Knickerbocker/S. Myers
Day, Berry Law Firm
CityPlace I
Hartford, CT 06103-3499

Duke Energy North America
Lee E. Barrett
5400 Westheimer Court
Houston, TX 77056-5310

David L. Cruthirds, Esq.
Attorney for Dynegy, Inc.
1000 Louisiana Street,
Suite 5800
Houston, TX 77002-5050

Michelle Hershel
Florida Electric Cooperatives
Association, Inc.
2916 Apalachee Parkway
Tallahassee, FL 32301

Richard Zambo, Esq.
FICA
598 SW Hidden River Ave.
Palm City, FL 34990

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

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

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

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

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

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

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

<p>Mr. John Attaway Publix Super Markets, Inc. P.O. Box 32105 Lakeland, FL 33802-2018</p> <p>Marchris Robinson Manager, State Government Affairs Enron Corporation 1400 Smith Street Houston, Texas 77002-7361</p> <p>Florida Retail Federation 100 E. Jefferson Street Tallahassee, FL 32301</p> <p>Mr. Russell S. Kent Sutherland Asbill & Brennan 2282 Killearn Center Blvd. Tallahassee, FL 32308</p>	<p>Bill Bryant, Jr., Esq. Natalie Futch, Esq. Katz, Kutter 106 E. College Ave. 12th Floor Tallahassee, FL 32301</p> <p>Gary L Sasso/James M. Walls Carlton, Fields Law Firm Post Office Box 2861 St. Petersburg, FL 33731</p> <p>Daniel Frank Sutherland Asbill & Brennan 1275 Pennsylvania Ave. NW Washington, DC 20004-2415</p>
---	--

Respectfully submitted,



Douglas F. John
Matthew T. Rick
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3013

Counsel for the City of Tallahassee, Florida