

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 GAINESVILLE, FLORIDA d/b/a/ GAINESVILLE REGIONAL UTILITIES

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 Gainesville, Florida d/b/a Gainesville Regional Utilities (GRU). In support of this Petition, Lakeland states the following:

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

Gainesville Regional Utilities
P.O. Box 147117, Station A136
301 SE 4th Avenue
Gainesville, Florida 32614-7117
Telephone: (352) 334-1272

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

Ed Regan
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DOCUMENT NUMBER-DATE

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3. Coincident with this Petition, GRU 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, GRU is a municipal electric utility operating an integrated electric generation, transmission, and distribution system within the State of Florida. Lakeland serves approximately 78,720 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 GRU – 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 GRU in a number of key respects. First, as an owner of transmission facilities within the state, GRU 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 GRU 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 GRU's system, so GridFlorida's operation of those system will impact GRU.

E. In light of its potential membership in GridFlorida, reliance on GridFlorida for transmission service, and/or operation of interconnected facilities, GRU 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, GRU intends to file comments by May 8, 2002, as part of an *ad hoc* "Florida Municipal Group" consisting of GRU, the City of Lakeland, Florida d/b/a Lakeland Electric, the City of Tallahassee, and Kissimmee Utility Authority.

WHEREFORE, GRU 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.



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d/b/a Gainesville Regional Utilities

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a copy of the foregoing Petition to Intervene of the City of Gainesville, Florida d/b/a Gainesville Regional Utilities, has been furnished by U.S. Mail to the following this 24th 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>John W. McWhirter, Jr., Esq. Attorney for FIPUG McWhirter Reeves 400 North Tampa Street, Suite 2450 Tampa, Florida 33601-3350</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 I 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> <p>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</p>
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