

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 KISSIMMEE UTILITY AUTHORITY

This Petition to Intervene is filed by the undersigned qualified representative pursuant to Rule 25-22.039 of *Florida Administrative Code* on behalf of Kissimmee Utility Authority (KUA).

In support of this Petition, KUA states the following:

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

Kissimmee Utility Authority
1701 West Carroll Street
Kissimmee, Florida 34741
Telephone: (407) 933-7777

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

Robert Miller
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3. Coincident with this Petition, KUA 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, KUA is a municipal electric utility operating an integrated electric generation, transmission, and distribution system within the State of Florida. KUA serves approximately 49,332 customers within the State of Florida.

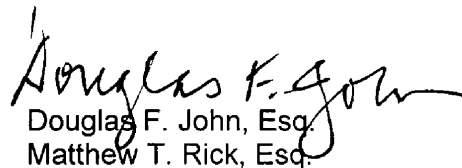
C. On March 20, 2002, Florida Power Corporation, Florida Power & Light Company, and Tampa Electric Company filed its GridFlorida RTO proposal in the above-referenced proceeding. Consistent with Order No. PSC-01-2489-FOF-EI, the proposal calls for the establishment of an Independent System Operator (ISO) to serve as the RTO and become the primary transmission provider within the state. All utilities within the Florida Reliability Coordinating Council (FRCC) – including KUA – 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 KUA in a number of key respects. First, as an owner of transmission facilities within the state, KUA 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 KUA 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 KUA's system, so GridFlorida's operation of those system will impact KUA.

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

WHEREFORE, KUA 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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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Petition to Intervene of Kissimmee Utility Authority 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 Dynegey, 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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