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ADMINISTRATIVE LAW
GOVERNMENTAL LAW
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September 17, 2002

VIA HAND DELIVERY

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COMMISSION
CLERK

Blanca S. Bayo, Director
Division of Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0800

Re: Docket No. 020233-EI - Review of GridFlorida Regional Transmission
Organization (RTO) Proposal.

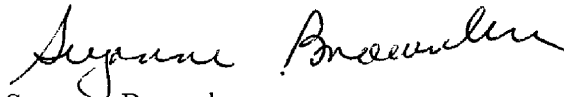
Dear Ms. Bayo:

Attached please find the original and fifteen copies of JEA's Motion for Additional Hearing
Dates to be filed in the above-styled docket. Also attached is a copy to be stamped and returned to
our office.

Should you have questions or need any additional information, please contact me.

Thank you for your assistance in this matter.

Very truly yours,



Suzanne Brownless
Attorney for JEA

AUS _____
CAF _____
CMP _____
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CTR _____
ECR _____ SB:smh
GCL _____ Bayo-ltr(g).wpd
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of GridFlorida Regional)
Transmission Organization (RTO) proposal.)
_____)

DOCKET NO. 020233-EI
Filed: September 17, 2002

MOTION FOR ADDITIONAL HEARING DATES

Pursuant to Rule 28-106.204, Florida Administrative Code, JEA, through its undersigned attorney, requests that additional time be set for the hearing in this docket and in support thereof states as follows:

1. Order PSC-02-1177-PCO-EI (Order PSC- 02-1177) , issued on August 29, 2002, set a one-day hearing date for the market design issues in this docket on Thursday, October 31, 2002. [Order PSC-02-1177 at 7.] By Order PSC-02-1251-PCO-EI (Order PSC-02-1251) , issued on September 11, 2002, issues identified as Proposed Agency Action Issues (PAA Issues 2C, 2 F, 3B, 4A, 4B) in Order PSC-02-1199-PAA-EI (Order PSC-02-1199), issued on September 3, 2002, were also set for hearing on October 31, 2002. [Order PSC-02-1199 at 5; Order PSC-02-1251 at 1, 7.]

2. As of this date there are seventeen (17) active parties in this docket representing twenty-five (25) separate entities, e.g., the Florida Municipal Group represents four municipal utilities: Gainesville Regional Utilities, Kissimmee Utility Authority, the City of Tallahassee and Lakeland Electric; the Joint Commenters represents Mirant Americas Development, Inc. and Calpine Corporation; etc.

3. At the Staff's preliminary issue meeting held on September 4, 2002, the Applicants (Florida Power & Light Company, Florida Power Corporation and Tampa Electric Company) identified six market design areas that would be addressed in their petition and

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testimony to be filed on September 19, 2002. To this list Staff added an issue on sharing gains on real-time energy sales. Further, parties to the docket proposed a multitude of other issues¹ which were in addition to the five PAA issues identified in Order PSC-02-1199 discussed above. A protest has been filed on Issue 4B (cost shifts due to short term wheeling revenue losses) by JEA, however, the time to file a protest of the PAA issues identified in Order PSC-02-1199 does not expire until Tuesday, September 24, 2002. Based upon the representations made by parties at the workshop held on May 29th, the August 20th agenda conference and the Staff issue identification meeting on September 4th, at least two other PAA Issues, Issue 2F (calculation of ATC to include CBM) and Issue 3B (Attachment T cut off date) will be protested.²

4. All of the market design and pricing issues presently identified as issues to be heard in this docket are complicated and multifaceted, i.e., each have several aspects which impact other policy, pricing and design issues. JEA fully supports the Commission's desire to act expeditiously in this docket, in part to provide thoughtful and meaningful response to the Federal Energy Commission's (FERC) pending Standard Market Design rule proposal³.

¹ Florida Phosphate Council and FICA - 17 issues; City of Tampa - 16 issues; Solid Waste Authority of Palm Beach County - 16 issues; Joint Commenters - 61 issues; Reedy Creek Improvement District - 3 issues; FMPA - identified Issue 3B, reserved the right to raise other issues in the areas of market design and other areas; FIPUG - 19 issues; JEA - 2 issues; Reliant - 6 issues.

² Both Reliant and the Joint Commenters disagree with the Commission's approval of Issue 2F, the calculation of Available Transmission Capability (ATC) to include designated Capacity Benefit Margin (CBM). The Applicants disagree with the Commission's approval of the retention of the Attachment T cut off date of December 15, 2000.

³ In re: Remedying Undue Discrimination through Open Access Transmission Service and Standard Electricity Market Design, Docket No. RM01-12-000, 18 CFR Part 35.

However, it is obvious that even with pre-filed testimony and diligent effort on the part of all parties to reach agreement on the proper treatment of the market design and pricing issues which are to be considered in this docket, one day of hearing will not be enough time to adequately cross-examine the Applicants' and other parties' witnesses.

5. JEA notes that FERC has extended the comment period in the Standard Market Design docket until November 14, 2002 and will likely extend its date for final action beyond the February 15, 2003 date currently scheduled.

6. Given the complexity of the issues in this docket and the fact that FERC has extended its comment time and will likely extend its date for final decision on its Standard Market Design NOPR, JEA requests that the Commission set one additional day for hearing in this docket as close as possible to the currently scheduled October 31, 2002 date so that the dates for the filing of briefs, etc. can be retained or slipped by only one or two days. If securing an extra hearing day within close proximity to October 31st requires conducting the second day of hearing on Saturday, November 2nd or November 9th, JEA is willing to do so.

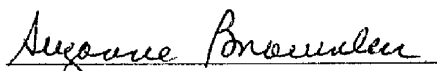
7. The issues decided by the Commission in this docket are not routine but represent a significant departure from the status quo regarding the delivery of electric power in the State of Florida. In short, the Commission is deciding issues which will define the structure of the electric industry in Florida for the future. It is crucial that the Commission and the parties, all of whom have invested enormous amounts of time and energy on these issues, be given the opportunity to adequately and meaningfully participate in this hearing.

8. JEA has contacted the seventeen active parties of record in this docket regarding

their position on this motion. FPL, FPC, TECO, CPV, PGE and Office of Public Counsel take no position on the motion. FIPUG, Reedy Creek, FMG, FMPA, FICA, Palm Beach Solid Waste Authority, Florida Phosphate Council, City of Tampa, Sugar Mill Homeowners Association, the Twomeys and Joint Commenters have authorized JEA to represent that they have no objection to the motion but several of these parties were not agreeable to having the second day of hearing set on a Saturday or other holiday. Additionally, FIPUG agreed with the motion for a second day of hearing with the caveat that the second day of hearing would be set this calendar year. OUC, SEC, Reliant, Trans-Elect and Dynegy, Inc. did not respond.

WHEREFORE, JEA respectfully requests that a second day of hearing be set in this docket as soon after the currently scheduled hearing date of October 31, 2002 as possible.

Submitted this 17th day of September, 2002 by:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all parties listed below and also by (*) Hand-Delivery, (**) E-mail or (***)Overnight courier as indicated on this 17th day of September, 2002.

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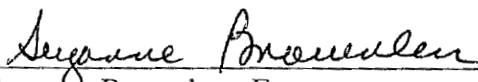
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