



**Southern Alliance for
Clean Energy**
www.cleanenergy.org

ORIGINAL

October 1, 2003

RECEIVED-FPSC
03 OCT -2 AM 10:57
COMMISSION
CLERK

Ms. Blanco S. Bayo
Director
Division of Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Fuel and Purchased Power Cost Recovery and Capacity Cost
Recovery Projections January 2004 Through December 2004;
Docket No. 030001-EI

Dear Ms. Bayo:

Please file the following enclosed items: the original and eleven (11)
copies of Southern Alliance for Clean Energy's Motion to Intervene; the original
and eleven (11) copies of Direct Testimony of Dr. Stephen A. Smith on behalf of
Southern Alliance for Clean Energy.

Please send me a file-stamped copy of the motion and direct testimony in
the enclosed self-addressed envelope.

RECEIVED & FILED
JH
FPSC-BUREAU OF RECORDS

Sincerely,
James J. Presswood, Jr.
James J. Presswood, Jr.
Staff Attorney

Enclosures

cc: All Parties of Record

AUS
CAF
CMP
COM
STR
ICR
ICL
IPC
IMS
EC
TH

F.O. Box 1842
Knoxville, TN 37901
Phone: (865) 637-6055
Toll-free: (866) 522-SACE
Fax: (865) 524-4479

427 Moreland Avenue, NE
Suite 100
Atlanta, GA 30307
Phone: (404) 659 5675
Fax: (770) 234-3909

29 North Market Street
Suite 604
Asheville, NC 28801
Phone: (828) 254-6776
Fax: (704) 973-7876

3025 Bull Street
Suite 101
Savannah, GA 31404
Phone/Fax: (912) 201-0354

DOCUMENT NUMBER - DATE
09506 OCT-28
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery)
Clause with Generating Performance Incentive)
Factor.)
_____)

DOCKET NO. 030001-EI
FILED:

**SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
MOTION FOR LEAVE TO INTERVENE**

Southern Alliance for Clean Energy, pursuant to Rule 25-22.039, Florida Administrative Code, hereby moves the Commission for leave to intervene in the above proceeding. The grounds for the motion are:

1. The name, address and telephone number of the proposed Intervenor are as follows: Southern Alliance for Clean Energy; 427 Moreland Ave., NE; Suite 100; Atlanta, Georgia 30307.

2. All notices, orders, pleadings, correspondence and other legal papers to be served on the proposed Intervenor should be served on James J. Presswood, Jr. at the address specified in Paragraph 1.

3. The proposed Intervenor is a nonprofit Tennessee corporation that has members who reside in the State of Florida. SACE's purposes include the performance of educational research and programs concerning the environment, public health, and economic impacts of energy use and policy in the Southeast. SACE's purposes also include advocacy for energy plans, policies and systems that best serve the environmental, public health and economic interests of the communities in the Southeast.

4. SACE's substantial interests may be affected by the manner in which issues regarding the shutdown of Tampa Electric's Gannon Station units are resolved.

DOCUMENT NUMBER-DATE

09506 OCT-28

FPSC-COMMISSION CLERK

5. SACE desires to present brief testimony on the issue of the appropriate timing of the shutdown of Tampa Electric's remaining coal fired generating units at its Gannon Station.

6. SACE's intervention as a party to this proceeding will ensure that its due process rights are protected, and at the same time provide the Commission with valuable input on the environmental effects of shutting down Tampa Electric's coal fired Gannon Station units at the earliest practicable date.

WHEREFORE, SACE moves the Commission for leave to intervene as a party in the above-entitled complaint proceeding.

This 1st day of October, 2003.

Respectfully submitted,




James J. Presswood, Jr.
Staff Attorney
Southern Alliance for Clean Energy
Fla. Bar No. 0229120

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this Motion to Intervene has been served upon all persons below by United States Postal Service First Class Mail with postage prepaid.

This 2nd day of October, 2003.



James J. Presswood, Jr.

Mr. Wm. Cochran Keating, IV*
Senior Attorney
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. James A. McGee
Associate General Counsel
Progress Energy Florida, Inc.
Post Office Box 14042
St. Petersburg, FL 33733

Mr. Joseph A. McGlothlin
Ms. Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Kaufman & Arnold, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

Mr. Robert Vandiver
Associate Public Counsel
Office of Public Counsel
111 West Madison Street – Suite 812
Tallahassee, FL 32399-1400

Mr. Norman Horton
Messer Caparello & Self
Post Office Box 1876
Tallahassee, FL 32302

Mr. John T. Butler
Steel Hector & Davis LLP
200 South Biscayne Boulevard
Suite 4000
Miami, FL 33131-2398

Mr. William Walker
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1859

Mr. R. Wade Litchfield
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408

Mr. John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin,
Davidson, Kaufman & Arnold, P.A.
400 North Tampa Street, Suite 2450
Tampa, FL 33601-5126

Ms. Susan Ritenour
Gulf Power Company
One Energy Place
Pensacola, FL 32520

Mr. Jeffrey A. Stone
Mr. Russell A. Badders
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32591-2950