

JOHN & HENGERER
A LAW PARTNERSHIP
1200 17TH STREET, N.W.
SUITE 600
WASHINGTON, D.C. 20036-3013

DOUGLAS F. JOHN
EDWARD W. HENGERER
KEVIN M. SWEENEY
KIM M. CLARK
GORDON J. SMITH
MATTHEW T. RICK
ELIZABETH A. ZEMBRUSKI

May 12, 2004

TELEPHONE
(202) 429-8809

TELECOPIER
(202) 429-8805

Blanca S. Bayo, Director
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0870

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

Dear Ms. Bayo:

Enclosed, please find an original and twenty (20) copies of a Joint Response of Lakeland Electric, Kissimmee Utility Authority, Gainesville Regional Utilities, and the City of Tallahassee, Florida, which is being filed in the above-captioned proceeding. Please date-stamp and return the five (5) extra copies *via* the enclosed postage pre-paid return envelope. I have also included a diskette containing an electronic form of this filing.

Thank you very much for your assistance and please do not hesitate to contact me at (202) 429-8809 if you have any questions.

Sincerely,

Douglas F. John
John & Hengerer
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036-3013
Phone: (202) 429-8809

Enclosures
cc: Service List

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 020233-EI
Filed: May 13, 2004

**JOINT RESPONSE OF LAKELAND ELECTRIC,
KISSIMMEE UTILITY AUTHORITY, GAINESVILLE REGIONAL UTILITIES,
AND THE CITY OF TALLAHASSEE, FLORIDA**

Pursuant to the schedule adopted by Order No. PSC-03-1414-PCO-EI, the City of Lakeland, Florida d/b/a Lakeland Electric (Lakeland), the City of Tallahassee, Florida (Tallahassee), Kissimmee Utility Authority (KUA), and the City of Gainesville, Florida d/b/a Gainesville Regional Utilities (GRU) -- collectively referred to herein as the Florida Municipal Group (FMG)¹ -- hereby respond to the draft positions and issues circulated by the GridFlorida Applicants for discussion at the workshop scheduled for May 19-21, 2004.

GENERAL COMMENTS

The FMG members appreciate the opportunity to discuss energy market and congestion management concepts at the upcoming workshop, but submit that most of the issues listed by the Applicants need not be resolved in the near-term, and probably not for some time to come. The practice followed by other Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs) has been to focus efforts initially on transmission-only or "Day 1" functions -- e.g., providing transmission service, calculating transfer capacities, regionalizing transmission planning, coordinating maintenance schedules, etc. -- with energy market issues

¹ The FMG is an *ad hoc* advocacy group. Each member of the FMG has intervened independently in this proceeding and reserves the right to express individual views at any time.

not addressed until several years later, if at all.² The same approach should be followed in Florida.

Thus, while the FMG members look forward to learning more about the various market design components identified by the Applicants, they view this as largely an academic exercise at this stage in GridFlorida's development. Purporting to reach decisions now regarding specific market design elements is unnecessary and likely counterproductive.³ Doing so would deny Florida the opportunity to capitalize on lessons that are still being learned in other parts of the country. Moreover, the most immediate benefits to be gained from the formation of an RTO in Florida are likely to be derived from greater regional coordination of transmission-related functions, rather than comprehensive energy market implementation.

In short, the FMG members continue to support a go-slow, incremental approach with regard to GridFlorida's development. Initially, efforts should focus predominately on issues related to enhancing the coordination of grid operations. There is likely to be consensus that, at least with regard to certain transmission functions, greater cooperation and independent oversight would be beneficial and likely achievable in the foreseeable future. Eventually there may be opportunities for expanding the scope of such coordination, such as through the implementation of energy markets, but such discussions should remain conceptual for the time being.

SPECIFIC COMMENTS

In light of their general view that market design issues should be deferred, the FMG members are hesitant to state definitive positions regarding any of the market design components identified by the Applicants. The FMG members are also somewhat befuddled by

² SPP, ERCOT, and the Midwest ISO, for example, have performed ISO-type transmission functions for several years, but have not yet implemented energy markets.

³ The FMG suspects that the Applicants feel similarly, as suggested by their decision to list issues without taking positions.

the approach taken by the Applicants in the "draft documents" they circulated on April 29, 2004, looking toward the May 19-21, 2004 Market Design Workshop. In the materials they circulated before the March 17-18, 2004 Pricing Workshop, the Applicants stated specific positions on most of the issues identified by the FPSC Staff. That led to a focused set of stakeholder responses and efficient discourse during the March 17-18 Workshop. By contrast, in the materials circulated on April 29th, no positions are stated. Instead, the Applicants have elected only to identify issues and suggest considerations, and to invite us, the stakeholders, to provide the preferred solutions. It is not clear why this tactic is being employed. As recently as September 2002, when they filed their "Petition of the GridFlorida Companies Regarding Prudence of GridFlorida Market Design," the Applicants appeared to be in lock-step with one another over the design and timing of a Florida RTO-based energy market. Does the current invitation to go back and revisit old issues (e.g., physical rights vs. financial rights, flowgate vs. nodal-based congestion management, balanced vs. unbalanced schedules) indicate a difference of opinion among the Applicants, reconsideration on each of the Applicant's parts on the earlier model, or perhaps a desire to be more inclusive regarding the development of the RTO? Whatever the reason, this approach seems ill-conceived, if the objective of the FPSC and the Applicants is actually to reach consensus on these issues and especially if meaningful dialog is to be had during the upcoming workshop.

Having said that, rest assured the FMG members planning to attend and participate in the May 19-21 Workshop will come prepared to do their part to make the session constructive. To this end, below the FMG has offered its current thinking regarding several of these issues. The viewpoints are offered for discussion purposes only, with each FMG member reserving the right to take other positions as more experience is gained.

- Bidding Requirements - The Applicants identify several alternatives to govern bidding behavior in energy markets, such as a requirement that all resources be bid into the market, cost-based versus market-based bidding, and limits on the use of real-time markets to encourage forward contracting. The FMG is of the view that fairly

prescriptive bidding rules will likely be required in Florida when and if energy markets are implemented. The lack of import capability means the state essentially functions as a large load pocket within which there exists a heightened potential for market power. The Applicants' individual and collective dominance in the generation market within the FRCC virtually assures that this market power in fact exists and that it would be exploited were the opportunity to do so presented. Thus, unconstrained bidding is likely to invite anticompetitive behavior and periodic spikes in prices above acceptable levels. In the past, the FMG has supported balanced schedule requirements in order to protect against such outcomes. Other measures, such as the imposition of cost-based bidding requirements on certain sellers and must-offer obligations, will likely be required as well.

- Transmission Rights - The FMG's view of transmission rights has evolved over time, from one strongly supporting the use of traditional physical reservation concepts to tacit acceptance that appropriately structured financial rights may produce certain benefits. It is obvious, however, that a single perfect solution for pricing transmission service and managing congestion has not yet emerged. The data coming out of energy markets in other parts of the country has ranged from inconclusive to discouraging, with congestion costs in some areas increasing far more rapidly than the infrastructure investments needed to alleviate such congestion. The ultimate goal must be to minimize the costs that are passed through to consumers and encourage the appropriate investment in transmission infrastructure to alleviate constraints. At this point, there is simply no commonly accepted "best practice" for how to accomplish these objectives. Until one emerges, the FMG favors the *status quo* of reserving capacity on a physical basis. This is a particular concern for Tallahassee to the extent that unscheduled parallel power flows over its system may be converted into financial transmission rights that benefit other users, but would not compensate Tallahassee for the burden placed on its facilities or the constraints placed on the use of such facilities.
- Control Areas - The Applicants identify several options for how to configure Control Area operations in an RTO (e.g., consolidation, multiple Control Areas with independent operation of a bilateral market, hierarchal Control Areas, etc.). The FMG members are opposed to any forced Control Area consolidation. At least for the foreseeable future, consolidation (other than that which has occurred through bilateral negotiations) could jeopardize reliability while likely having few, if any, tangible benefits. Nevertheless, greater coordination and communication between Control Areas is likely to be beneficial and this may be an area where an RTO could be useful.
- Market Monitor - There is little question that energy markets must be monitored, although the entity performing such monitoring and the authority entrusted to it are subject to debate. The FMG members believe that the FPSC and FERC should ultimately retain their full authority without any delegation to a third party market monitor.

Thus, while the FMG members would not oppose the designation of a third party to perform data collection, review, and analysis functions, and to recommend market reforms, they would presently object to shifting any enforcement authority away from the FPSC or FERC, either to the RTO or to a third party market monitor.

- Market Mitigation - As suggested above, cost-based bidding requirements are likely to be required in Florida due to the lack of import capacity and the high probability of market power. The same factors suggest that market mitigation measures will also be required. Price mitigation concepts continue to evolve in other parts of the country. For example, on May 6, 2004, FERC issued an order in a PJM proceeding and attempted to provide guidance as to how "must-run" generators should be compensated.⁴ The order identifies certain locational and auction-based alternatives to traditional market-wide price caps. If and when Florida implements energy markets, there will likely be a variety of market mitigation alternatives to consider.
- Resource Adequacy - An RTO is not needed to set or enforce resource adequacy requirements, and the FMG would oppose the delegation of such authority to an RTO. At some point in the future, there may be support for a short-term installed capacity market of some kind, even though such mechanisms have not fared particularly well elsewhere. If an RTO is formed in Florida, its most immediate role with regard to long-term resource planning is likely to come in the form of data collection and analysis, for example, forecasting load growth.
- Capacity Benefit Margins (CBM) - The FMG would oppose any proposal to eliminate CBM in the near-term. Until markets have proven themselves, eliminating transmission and generation set-asides would potentially jeopardize reliability. This is particularly true across the Florida-Georgia interface, and particularly important for Tallahassee, where substantial loop flows and a weak regional transmission grid have combined to require the use of CBM to protect the system's ability to import power during contingency events.

⁴ See *PJM Interconnection, L.L.C.*, Order on Tariff Filing, issued on May 6, 2004, in FERC Docket No. EL03-236-000.

CONCLUSION

The FMG requests that the responses set forth above be taken under consideration in Staff's planning for, and in discussion at, the workshop scheduled for May 19-21, 2004.

Respectfully submitted,

Douglas F. John
Matthew T. Rick
JOHN & HENGERER
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036
(202) 429-8801

Counsel for the Florida Municipal Group

Dated at Washington, D.C. this 12th day of May, 2004.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing letter has been furnished by U.S. Mail, this 13th day of May, 2004, to the following:

FLORIDA PUBLIC SERVICE COMMISSION

William Cochran Keating, IV
Jennifer S. Brubaker
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Ph: 850-413-6193
Fax: 850-413-6194
e-mail: wkeating@psc.state.fl.us
jbrubake@psc.state.fl.us

OFFICE OF PUBLIC COUNSEL

Office of Public Counsel
Jack Shreve/J. Roger Howe
111 W. Madison Street, #812
Tallahassee, FL 32399-1400
Ph: 850-488-9330
Fax: 850-488-4491
e-mail: howe.roger@leg.state.fl.us

TAMPA ELECTRIC COMPANY

Lee L. Willis
James D. Beasley
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
Ph: 850-224-9115
Fax: 850-222-7952
e-mail: lwillis@ausley.com
jbeasley@ausley.com
Attorneys for Tampa Electric Company

Assistant General Counsel
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601
Ph: 813-228-7102
Fax: 813-228-1770
e-mail: hwloug@tecoenergy.com

Tampa Electric Company
Angela Llewellyn
Regulatory Affairs
Post Office Box 111
Tampa, FL 33601-0111
Ph: 813-228-1752
Fax: 813-228-1770
e-mail: allewellyn@tecoenergy.com

Michael J. Rustum
Dickstein Shapiro Morin & Oshinsky
2101 L Street N.W.
Washington, DC 20037-1526
Ph: 202-861-9178
Fax: 202-887-0689
e-mail: rustumm@dsmo.com

FLORIDA POWER CORPORATION

Progress Energy Florida, Inc.
James A. McGee, Esquire
Post Office Box 14042
St. Petersburg, FL 33733
Ph: 727-820-5184
Fax: 727-820-5519
e-mail: jmcgee@tampabay.rr.com
Attorney for Florida Power Corporation

Harry W. Long, Jr.

David Goroff
Peter K. Matt

Bruder, Gentile & Marcoux, L.L.P.
1100 New York Avenue, N.W.
Suite 510-East
Washington, D.C. 20005-3934
Ph: 202-783-1350
Fax: 202-737-9117
e-mail: degoroff@brudergentile.com
Attorneys for Florida Power Corporation

Florida Power Corporation
Paul Lewis, Jr.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740
Ph: 850-222-8738, 727-820-5184
Fax: 850-222-9768
e-mail: paul.lewisjr@pgnmail.com

FLORIDA POWER & LIGHT CO.

Rutledge Law Firm
Kenneth Hoffman
Post Office Box 551
Tallahassee, FL 32301
Ph: 850-681-6788
Fax: 850-681-6515
e-mail: ken@reuphlaw.com
Attorneys for Florida Power & Light Co.

Bill Walker
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1859
Ph: 850-521-3900
Fax: 850-521-3939
e-mail: bill_walker@fpl.com

R. Wade Litchfield, Esq.
Law Department
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0429
Ph: 561-691-7101
Fax: 561-691-7135
e-mail: wade_litchfield@fpl.com

**CALPINE CORPORATION
DUKE ENERGY NORTH AMERICA**

MIRANT AMERICAS DEVELOPMENT INC.

Leslie J. Paugh, P.A.
Post Office Box 16069
Tallahassee, FL 32317-6069
Ph: 850-656-3411
Fax: 850-656-7040
e-mail: lpaugh@paugh-law.com
Attorneys for Calpine Corporation,
Mirant Americas Development, Inc.
Duke Energy North America

Calpine Corporation
Thomas W. Kaslow
The Pilot House, 2nd Floor
Lewis Wharf
Boston, MA 02110
Ph: 617-723-7200, ex. 393
Fax: 617-557-5353
e-mail: tkaslow@calpine.com

Duke Energy North America
Lee E. Barrett
5400 Westheimer Court
Houston, TX 77056-5310
Ph: 713-627-6519
Fax: 713-627-6566
e-mail: lebarrett@duke-energy.com

Mirant Americas Development, Inc.
Beth Bradley
1155 Perimeter Center West
Atlanta, GA 30338-5416
Ph: 678-579-3055
Fax: 678-579-5819
e-mail: beth.bradley@mirant.com

DYNEGY INC., PUBLIX,

ORLANDO UTILITIES COMMISSION

Gray, Harris & Robinson, P.A. (Orl)
Thomas Cloud/W.C. Browder/P. Antonacci
301 East Pine Street, Suite 1400
Orlando, FL 32801
Ph:407-244-5624, 407-843-8880
Fax: 407-244-5690
e-mail: tcloud@grayharris.com
cbrowder@grayharris.com
Attorneys for Dynegy, Publix and OUC

Orlando Utilities Commission
Wayne Morris/Thomas Washburn
Post Office Box 3193
Orlando, FL 32802-3193
Ph: 407-423-9100, 407-384-4066
Fax: 407-423-9198
e-mail: twashburn@ouc.com

Dynegy Inc.
David L. Cruthirds
1000 Louisiana Street, Suite 5800
Houston, TX 77002-5050
Ph: 713-507-6785
Fax: 713-507-6834
e-mail: david.cruthirds@dynegy.com

Publix Super Markets, Inc.
John Attaway
Post Office Box 32015
Lakeland, FL 33802-2018
Ph: 863-686-8754
Fax: 863-616-5704
e-mail: johnattaway@mail.publix.com

**SEMINOLE ELECTRIC
COOPERATIVE, INC.
SEMINOLE MEMBER SYSTEMS**

Foley & Lardner Law Firm
Thomas J. Maida/N. Wes Strickland
106 East College Ave., Suite 900
Tallahassee, FL 32301-3369
Ph: 850-222-6100, 850-513-3369
Fax: 850-224-3101
e-mail: tmaida@foleylaw.com
nstrickland@foleylaw.com
Attorneys for Seminole Electric Coop.

William T. Miller
Miller Law Firm
1140 19th St., NW, Suite 700
Washington, DC 20036
Ph: 202-296-2960
Fax: 202-296-0166
e-mail: wmiller@mbolaw.com
Attorneys for Seminole Electric
Cooperative, Inc.

Seminole Electric Cooperative, Inc.
Timothy Woodbury
16313 North Dale Mabry Highway
Tampa, FL 33688-2000
Ph: 813-963-0994
Fax: 813-264-7906
e-mail: twoodbury@seminole-electric.com

**FLORIDA ELECTRIC
COOPERATIVES ASSOC., INC.**

Michelle Hershel
2916 Apalachee Parkway
Tallahassee, FL 32301
Ph: 850-877-6166
Fax: 850-656-5485
e-mail: mhershel@feca.com

**CPV ATLANTIC, LTD., PG&E
NATIONAL ENERGY GROUP CO.**

Jon Moyle/Cathy Sellers/Dan Doorakian
Moyle Law Firm
The Perkins House, 118 N Gadsden St.
Tallahassee, FL 32301
Ph: 850-681-3828
Fax: 850-681-8788
e-mail: jmoylejr@moylelaw.com
Attorneys for CPV Atlantic, Inc.
PG&E National Energy Group Co.

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

PG&E National Energy Group Co.
Melissa Lavinson
7500 Old Georgetown Road
Bethesda, MD 20814
Ph: 301-280-6887
Fax: 301-280-6379
e-mail: melissa.lavinson@neg.pge.com

**RELIANT ENERGY POWER
GENERATION, INC.**

McWhirter Law Firm
Vicki Kaufman/Joseph McGlothlin
117 S. Gadsden Street
Tallahassee, FL 32301
Ph: 850-222-2525
Fax: 850-222-5606
e-mail: jmcglothlin@mac-law.com
vkaufman@mac-law.com
Attorneys for Reliant Energy Power
Generation, Inc.

Reliant Energy Power Generation, Inc.
Michael Briggs
801 Pennsylvania Ave., Suite 620
Washington, DC 20004
Ph: 202-783-7220
Fax: 202-783-8127
e-mail: mbriggs@reliant.com

**FLORIDA INDUSTRIAL POWER
USERS GROUP**

McWhirter Law Firm
John McWhirter
Post Office Box 3350
Tampa, FL 33601-3350
Ph: 813-224-0866
Fax: 813-221-1854
e-mail: jmcwhirter@mac-law.com
Attorneys for Florida Industrial Power
Users Group

**REEDY CREEK IMPROVEMENT
DISTRICT
WALT DISNEY WORLD**

Sutherland Asbill & Brennan LLP
Daniel Frank
1275 Pennsylvania Ave., NW
Washington, DC 20004-2415
Ph: 202-383-0838, 202-383-0100
Fax: 202-637-3593
e-mail: dfrank@sablaw.com
Attorneys for Reedy Creek and
Walt Disney World

John Giddens
Reedy Creek Improvement District
Post Office Box 10000
Lake Buena Vista, FL 32830
Ph: 407-824-4892
Fax: 407-824-5396
e-mail: john.giddens@disney.com

Lee Schmudde
1375 Lake Buena Drive
Fourth Floor North
Lake Buena Vista, FL 32830

**FLORIDA MUNICIPAL POWER
AGENCY**

Frederick M. Bryant/Jody Lamar Finklea
2061-2 Delta Way
Tallahassee, FL 32303
Ph: 850-297-2011
Fax: 850-297-2014
e-mail: fred.bryant@fmpa.com
jody.lamar.finklea@fmpa.com
Attorneys for Florida Municipal Power
Agency

Spiegel & McDiarmid
Cynthia Bogorad/David Pomper/J. Schwarz
1350 New York Ave., NW, Suite 1100
Washington, DC 20005-4798
Ph: 202-879-4000
Fax: 202-393-2866
e-mail:
cynthia.bogorad@spiegelmc.com
Co-counsel for Florida Municipal Power
Agency

Florida Municipal Power Agency
Robert C. Williams
8553 Commodity Circle
Orlando, FL 32819-9002
Ph: 407-355-7767
Fax: 407-355-5794
e-mail: bob.williams@fmpa.com

**CITY OF TALLAHASSEE
LAKELAND ELECTRIC
GAINESVILLE/KISSIMMEE**

John & Hengerer Law Firm
Douglas John/Matthew Rick
1200 17th Street, NW
Suite 600
Washington, DC 20036-3013
Ph: 202-429-8801, 202-429-8809
Fax: 202-429-8805
e-mail: djohn@jhenergy.com
mrick@jhenergy.com
Attorneys for City of Tallahassee, Lakeland
Electric, Gainesville and Kissimmee

City of Tallahassee
Paul Clark
400 East Van Buren Street
Tallahassee, FL 32301
Ph: 850-891-3130
Fax: 850-891-3138
e-mail: clarkp@talgov.com

Gainesville Regional Utilities/
City of Gainesville
Ed Regan
Post Office Box 147117, Station A136
Gainesville, FL 32614-7117
Ph: 352-334-1272, 352-334-3400x1260
Fax: 352-334-3151
e-mail: reganej@gru.com

Kissimmee Utility Authority
Robert Miller
1701 West Carroll Street
Kissimmee, FL 32746
Ph: 407-933-7777
Fax: 407-847-0787
e-mail: rmiller@kua.com

Lakeland Electric
Paul Elwing
501 E. Lemon Street
Lakeland, FL 33801-5079
Ph: 863-834-6531
Fax: 863-834-6362
e-mail: paul.elwing@lakelandgov.net

**JACKSONVILLE ELECTRIC
AUTHORITY**

Suzanne Brownless, P.A.
1975 Buford Blvd.
Tallahassee, FL 32308-4466
Ph: 850-877-5200
Fax: 850-878-0090
e-mail: sbrownless@comcast.net
Attorney for JEA

P. G. Para
21 West Church Street
Jacksonville, FL 32202-3139
Ph: 904-665-6208
Fax: 904-665-4238
e-mail: parapg@jea.com

Dick Basford & Associates, Inc.
5616 Fort Sumter Road
Jacksonville, FL 32210
Ph: 904-771-3575
Fax: 573-7971
e-mail: dbasford@attbi.com

Michael Wedner
117 West Duval Street, Suite 480
Jacksonville, FL 32202
Ph: 904-630-1834
Fax: 904-630-1316
e-mail: mwedner@coj.net

SOUTH FLORIDA HOSPITAL and HEALTHCARE ASSOCIATION

Mark Sundback/Kenneth Wiseman
Andrews & Kurth Law Firm
1701 Pennsylvania Ave., NW, Suite 300
Washington, DC 20006
Ph: 202-662-2700
Fax: 202-662-2739
e-mail: msundback@andrews-kurth.com

Attorneys for South Florida Hospital and
Healthcare Association

South Florida Hospital and Healthcare
Association
Linda Quick
6363 Taft Street
Hollywood, FL 33024
Ph: 954-964-1660
Fax: 954-962-1260
e-mail: lquick@sfhha.com

FLORIDA RETAIL FEDERATION

Greenberg, Traurig Law Firm
Ron LaFace/Seann M. Frazier
101 E. College Ave.
Tallahassee, FL 32301
Ph: 850-222-6891
Fax: 850-681-0207
e-mail: lafacer@gtlaw.com
fraziers@gtlaw.com
Attorneys for Florida Retail Federation

Florida Retail Federation
100 E. Jefferson Street
Tallahassee, FL 32301
Ph: 850-222-3461
Fax: none
e-mail: bkelly@scholarship.org

TRANS-ELECT, INC.

Katz, Kutter Law firm
Bill Bryant, Jr./Natalie Futch
12th Floor
106 East College Avenue
Tallahassee, FL 32301
Ph: 850-224-9634
Fax: 850-222-0103
e-mail: natalief@katzlaw.com
Attorneys for Trans-Elect, Inc.

Trans-Elect, Inc.
Alan J. Statman, General Counsel
1200 G Street NW, Suite 600
Washington, DC 20005
Ph: 202-393-1200
Fax: 202-393-1240
e-mail: statman@wrightlaw.com

**SOLID WASTE AUTHORITY OF
PALM BEACH COUNTY
FLORIDA PHOSPHATE COUNCIL
FLORIDA INDUSTRIAL
COGENERATION ASSOC.**

Richard Zambo
598 SW Hidden River Ave.
Palm City, FL 34990
Ph: 772-220-9163
Fax: 772-220-9402
e-mail: richzambo@aol.com
Attorney for Solid Waste Authority
Florida Phosphate Council
Florida Industrial Cogeneration Assoc.

Solid Waste Authority
Dr. Marc C. Bruner
7501 North Jog Road
West Palm Beach, FL 33412
Ph: 561-640-4000, ex. 5607
Fax: 561-640-3400
e-mail: mcbruner@swa.org

Florida Phosphate Council
Susan Barfield
1435 East Piedmont Drive, Suite 211
Tallahassee, FL 32308
Ph: 850-224-8238
Fax: 850-224-8061
e-mail: susan@flaphos.org

LEE COUNTY

Landers Law Firm
Wright/LaVia
310 West College Avenue
Tallahassee, FL 32301
Ph: 850-681-0311
Fax: 850-224-5595
e-mail:
swright@landersandparsons.com
jlavia@landersandparsons.com
Attorneys for Lee County

SUGARMILL WOODS CIVIC ASSOC.

Michael Twomey
Post Office Box 5256
Tallahassee, FL 32314-5256
Ph: 850-421-9530
Fax: 850-421-8543
e-mail: miketwomey@talstar.com
Attorney for Sugarmill Woods Civic Assoc.

By: _____
Douglas F. John