

**Matilda Sanders**

**From:** Smith, Debbie N. [ds3504@att.com]  
**Sent:** Wednesday, May 30, 2007 2:59 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Meza, James; Kay, Jennifer; Woods, Vickie; Sims, Nancy H; Holland, Robyn P  
**Subject:** Florida Docket No. 070298-EI  
**Importance:** High  
**Attachments:** petition.pdf

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COM \_\_\_\_\_  
CTR \_\_\_\_\_  
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OPC \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SGA \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH RP

A. Debbie N. Smith  
Legal Secretary to James Meza III and Jennifer S. Kay  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(404) 335-0772  
debbie.n.smith@bellsouth.com

B. Docket No. 070298-EI

Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Progress Energy Florida, Inc.

C. BellSouth Telecommunications, Inc.  
on behalf of Jennifer S. Kay

D. 4 pages total (includes letter, pleading and certificate of service)

E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Petition for Leave to Intervene

<<petition.pdf>>

Debbie N. Smith  
BellSouth Telecommunications, Inc.  
d/b/a AT&T Southeast  
675 West Peachtree Street, N.E.  
Suite 4300  
Atlanta, Georgia 30375  
(404) 335-0772

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5/30/2007

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Legal Department

Jennifer S. Kay  
Senior Attorney

AT&T Florida  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5332

May 30, 2007

Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No.: 070298-EI  
Review of 2007 Electric Infrastructure Storm Hardening Plan  
filed pursuant to Rule 25-6.0342, F.A.C. submitted by Progress  
Energy Florida, Inc.**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's  
Petition for Leave to Intervene, which we ask that you file in the captioned  
docket.

Copies have been served to the parties shown on the attached Certificate  
of Service.

Sincerely,

*Jennifer S. Kay/d.s.*  
Jennifer S. Kay

cc: All Parties of Record  
Jerry D. Hendrix  
E. Earl Edenfield, Jr.  
James Meza III

DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE  
Docket No. 070298-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail and First Class U. S. Mail this 30<sup>th</sup> day of May, 2007 to the following:

Adam Teitzman  
H Mann  
Keino Young  
Lorena Holley  
Staff Counsels  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[rmann@psc.state.fl.us](mailto:rmann@psc.state.fl.us)  
[kyoung@psc.state.fl.us](mailto:kyoung@psc.state.fl.us)  
[lholley@psc.state.fl.us](mailto:lholley@psc.state.fl.us)

Progress Energy Florida, Inc.  
Mr. Paul Lewis, Jr.  
106 East College Avenue  
Suite 800  
Tallahassee, FL 32301-7740  
Tel. No. (850) 222-8738  
Fax. No. (850) 222-9768  
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Progress Energy Service Co., LLC  
John T. Burnett  
P.O. Box 14042  
Saint Petersburg, FL 33733-4042  
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Jennifer S. Kay /d.s.  
Jennifer S. Kay

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

Review of 2007 Electric Infrastructure Storm	)	Docket No. 070298-EI
Hardening Plan filed pursuant to Rule	)	
25-6.0342, FAC, submitted by Progress	)	
Energy Florida, Inc.	)	
<hr/>		Filed: May 30, 2007

**AT&T FLORIDA'S PETITION FOR LEAVE TO INTERVENE**

BellSouth Telecommunications, Inc. d/b/a ("AT&T Florida"), pursuant to Rule 25-22.039, Florida Administrative Code, hereby requests leave to intervene in this proceeding, and as grounds therefore states:

1. AT&T Florida is an Incumbent Local Exchange Company ("ILEC") lawfully doing business in the State of Florida whose regulated operations are subject to the jurisdiction of this Commission pursuant to Chapter 364, Florida Statutes.

2. AT&T Florida's principal place of business is 675 West Peachtree Street, Atlanta, Georgia 30375. Pleadings and process in this matter may be served upon:

James Meza III<sup>1</sup>  
 Jennifer S. Kay  
 c/o Nancy H. Sims  
 150 South Monroe Street, Ste. 400  
 Tallahassee, FL 32301  
[james.meza@att.com](mailto:james.meza@att.com)  
[nancy.sims@att.com](mailto:nancy.sims@att.com)  
 305.347.5558 (telephone)  
 850.222.8640 (fax)

3. Any decision made by the Commission in the context of this proceeding will necessarily affect the substantial interests of AT&T Florida and its business operations in the State of Florida.

<sup>1</sup> The undersigned is licensed in Louisiana only, is certified by the Florida Bar as Authorized House Counsel (No. 464260) per Rule 17 of the Rules Regulating the Florida Bar, and has been granted qualified representative status by the Commission in Order No. PSC-07-0211-FOF-OT.

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WHEREFORE, AT&T Florida respectfully requests that the Commission grant the Company leave to intervene for all legal purposes in this docket.

Respectfully submitted this 30<sup>th</sup> day of May, 2007.

AT&T FLORIDA

Jennifer S. Kay /d.s.

JAMES MEZA III  
AUTHORIZED HOUSE COUNSEL NO. 426260  
JENNIFER S. KAY  
c/o Nancy H. Sims  
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(305) 347-5558

E. Earl Edenfield, Jr. /d.s.

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