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Timolyn Henry

From: Browne, Maria [MariaBrowne@dwt.com]
Sent: Wednesday, June 13, 2007 4:31 PM
To: Filings@psc.state.fl.us
Subject: Petition to Intervene Docket No. 070301-EI
Attachments: Petition to Intervene (Docket No. 070301-EI).pdf

Office of Commission Clerk,

Please see the attached Petition to Intervene being filed on behalf of the Florida Cable Telecommunication Association, Inc. in Docket No. 070301-EI. The total number of pages is three (3). Please do not hesitate to contact me with any questions you may have concerning this filing.

Sincerely,

Maria Browne | Davis Wright Tremaine LLP

1919 Pennsylvania Avenue NW, Suite 200 | Washington, DC 20006
Tel: (202) 973-4281 | Fax: (202) 973-4499 | Mobile: (202) 412-5150
Email: maria.browne@dwt.com | Website: www.dwt.com

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Florida Power and Light Company.

Docket No. 070301-EI

Filed: June 13, 2007

Petition to Intervene

Pursuant to Rule 25-22.039, Florida Administrative Code, the Florida Cable Telecommunications Association, Inc. ("FCTA") respectfully asks that the Commission allow FCTA to intervene in this proceeding, and in support thereof, states as follows:

1. The FCTA is a non-profit trade association representing the cable telecommunications industry in the State of Florida, cable companies providing cable services and information services in the State of Florida, as well as certificated competitive local exchange carriers ("CLECs") providing voice communications services in the State of Florida ("FCTA members"). The FCTA's business address is 246 E. 6th Avenue, Tallahassee, FL 32303.

2. The name and address of the person authorized to receive all notices, pleadings and other communications in this Docket is:

Maria T. Browne, Esquire
Davis Wright Tremaine LLP
1919 Pennsylvania Ave., NW, Suite 200
Washington, D.C. 20006
Tel: (202) 973-4200
Fax: (202) 973-4499
E-mail: mariabrowne@dwt.com

3. Cable systems, including those of FCTA members, distribute service through a community along lines and cables that extend either above ground attached to utility poles or below ground through conduits and trenches. FCTA members attach their facilities to poles owned by Florida IOUs, including Florida Power and Light Company ("FPL"), and have existing

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agreements with FPL for attachments to such poles. As such, FCTA members are "third party attachers" as contemplated by Rule 25-6.0342, Florida Administrative Code, and their substantial interests will necessarily be directly and profoundly impacted by the Commission's decision with regard to FPL's Storm Hardening Plan in this Docket. Furthermore, FCTA has associational standing to participate in this proceeding representing the interests of its members, a substantial number of whom would otherwise have the right to participate individually in this matter. See Hunt v. Washington State Apple Advertising Commission, 432 U.S. 333 (1977); and Florida Home Builders Ass'n. v. Dept. of Labor, 412 So. 2d 351 (Fla. 1982).

Respectfully submitted this 13th day of June, 2007.

By: /s/ Maria T. Browne
Maria T. Browne, Esquire
Davis Wright Tremaine LLP
1919 Pennsylvania Ave., NW, Suite 200
Washington, D.C. 20006
Tel: (202) 973-4281

Attorney for FCTA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Cable Telecommunication Association, Inc.'s Petition to Intervene has been served upon John T. Butler, Esquire, Florida Power and Light Company, 700 Universe Boulevard, Juno Beach, FL 33408-0420, and that a copy has also been provided via Hand Delivery or US Mail to the persons listed below this 13th day of June, 2007:

Mr. Bill Walker
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1859

Susan S. Masterton
Mailstop: FLTLHO0102
1313 Blair Stone Rd.
Tallahassee, FL 32301

Mr. David Christian
106 East College Avenue, Suite 710
Tallahassee, FL 32301-7721

Robert Scheffel Wright, Attorney at Law
John T. LaVia, III, Attorney at Law
Young van Assenderp, P.A.
225 South Adams Street, Suite 200
Tallahassee, Florida 32301

Lorena Holley, Staff Counsel
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

J.Meza/E.Edenfield/J.Kay/T.Hatch
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Howard E. Adams/Peter M. Dunbar
c/o Pennington Law Firm
P.O. Box 10095
Tallahassee, FL 32302-2095

Dulaney L. O'Roark III
Six Concourse Parkway, Suite 800
Atlanta, GA 30328

Adam Teitzman, Staff Counsel
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

By: /s/ Maria T. Browne
Maria T. Browne, Esquire
Davis Wright Tremaine LLP
1919 Pennsylvania Ave., NW, Suite 200
Washington, D.C. 20006
Tel: (202) 973-4200
Fax: (202) 973-4499
E-mail: mariabrowne@dwt.com