

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 020233-EI
Filed: April 24, 2002

PETITION TO INTERVENE
OF THE CITY OF LAKELAND, FLORIDA d/b/a/ LAKELAND ELECTRIC

This Petition to Intervene is filed by the undersigned qualified representative pursuant to Rule 25-22.039 of the *Florida Administrative Code* on behalf of the City of Lakeland, Florida, d/b/a Lakeland Electric (Lakeland). In support of this Petition, Lakeland states the following:

1. The name, address, and telephone number of the Petitioner is as follows:

Lakeland Electric
Legislative & Regulatory Affairs
501 East Lemon Street
Lakeland, Florida 33801
Telephone: (863) 834-6344

2. Copies of all correspondence, notices, pleadings, and orders in the above-referenced proceeding should be provided to the following:

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DOCUMENT NUMBER-DATE

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FPSC-COM. REG. ON CLERK

3. Coincident with this Petition, Lakeland is submitting a separate filing to designate Mr. John and Mr. Rick as its qualified representatives pursuant to Section 28.106.106(d) of the *Florida Administrative Code*.

4. Statement of Substantial Interests.

A. As the Commission is aware, Lakeland is a municipal electric utility operating an integrated electric generation, transmission, and distribution system within the State of Florida. Lakeland serves approximately 110,000 customers within the State of Florida.

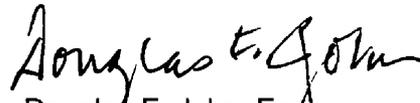
C. On March 20, 2002, Florida Power Corporation, Florida Power & Light Company, and Tampa Electric Company filed its GridFlorida RTO proposal in the above-referenced proceeding. Consistent with Order No. PSC-01-2489-FOF-EI, the proposal calls for the establishment of an Independent System Operator (ISO) to serve as the RTO and become the primary transmission provider within the state. All utilities within the Florida Reliability Coordinating Council (FRCC) – including Lakeland – would be permitted to join and turn operational control of their transmission facilities over to the RTO. The RTO would also serve as the security coordinator for the FRCC.

D. The structure and formation of GridFlorida, which are at issue in this proceeding, will substantially impact Lakeland in a number of key respects. First, as an owner of transmission facilities within the state, Lakeland may ultimately elect to join GridFlorida, so the structure of the organization will influence its decision of whether to join the RTO, as well as the terms of such participation. Second, even Lakeland does not join the RTO, it will be significantly impacted to the extent that it is required to contract with GridFlorida for transmission service. Finally, GridFlorida is designed to operate facilities that are interconnected to Lakeland's system, so GridFlorida's operation of those system will impact Lakeland.

E. In light of its potential membership in GridFlorida, reliance on GridFlorida for transmission service, and/or operation of interconnected facilities, Lakeland submits that it has a substantial interest in this proceeding and should be granted full party status. Pursuant to the extended procedural schedule adopted by Order No. PSC-02-0548-PCO-EI, Lakeland intends to file comments by May 8, 2002, as part of an *ad hoc* "Florida Municipal Group" consisting of Lakeland, the City of Tallahassee, Kissimmee Utility Authority, and the City of Gainesville, Florida d/b/a Gainesville Regional Utilities.

WHEREFORE, Lakeland respectfully requests that the Commission enter an order granting this Petition and according it full party status in the above-styled docket.

RESPECTFULLY SUBMITTED this 24th day of April 2002.



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Counsel for the City of Lakeland, Florida
d/b/a Lakeland Electric

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Petition to Intervene of the City of Lakeland, Florida d/b/a Lakeland Electric, has been furnished by U.S. Mail to the following this 24th day of April, 2002.

<p>Robert V. Elias, Esq. William Cochran Keating, Esq. Division of Legal Services Florida Public Service Com. 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850</p> <p>Mark Sundback, Esq. Kenneth Wiseman, Esq. Andrews & Kurth Law Firm 1701 Pennsylvania Ave., N.W. Suite 300 Washington, DC 20006</p> <p>Lee L. Willis, Esq. James D. Beasley, Esq. Ausley & McMullen Law Firm 227 South Calhoun Street Tallahassee, Florida 32301</p> <p>Myron Rollins Black & Veatch Post Office Box 8405 Kansas City, MO 64114</p> <p>CPV Atlantic, Ltd 145 NW Central Park Plaza, Suite 101 Port Saint Lucie, FL 34986</p> <p>Calpine Corporation Thomas W. Kaslow The Pilot House, 2nd Floor Lewis Wharf Boston, MA 02110</p> <p>John W. McWhirter, Jr., Esq. Attorney for FIPUG McWhirter Reeves 400 North Tampa Street, Suite 2450 Tampa, Florida 33601-3350</p>	<p>Jennifer May-Brust, Esq. Colonial Pipeline Company 945 East Paces Ferry Road Atlanta, GA 30326</p> <p>G. Garfield R. Knickerbocker/S. Myers Day, Berry Law Firm CityPlace I Hartford, CT 06103-3499</p> <p>Duke Energy North America Lee E. Barrett 5400 Westheimer Court Houston, TX 77056-5310</p> <p>David L. Cruthirds, Esq. Attorney for Dynegy, Inc. 1000 Louisiana Street, Suite 5800 Houston, TX 77002-5050</p> <p>Michelle Hershel Florida Electric Cooperatives Association, Inc. 2916 Apalachee Parkway Tallahassee, FL 32301</p> <p>Richard Zambo, Esq. FICA 598 SW Hidden River Ave. Palm City, FL 34990</p> <p>Peter Antonacci, Esq. Gordon H. Harris, Esq. Tracy A. Marshall, Esq. Gray, Harris & Robinson, P.A. 301 S. Bronough St., Ste. 600 Tallahassee, FL 32302-3189</p>
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<p>Frederick M. Bryant FMPA 2061-2 Delta Way Tallahassee, FL 32303</p> <p>Robert C. Williams, P.E. FMPA 8553 Commodity Circle Orlando, FL 32819-9002</p> <p>William G. Walker III Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1859</p> <p>R. Wade Litchfield, Esq. Office of General Counsel Florida Power & Light Co. 700 Universe Boulevard Juno Beach, FL 33408-0420</p> <p>Paul Lewis, Jr. Florida Power Corporation 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740</p> <p>Thomas J. Maida N. Wes Strickland Foley & Lardner Law Firm 106 E. College Avenue, Suite 900 Tallahassee, FL 32301</p> <p>Thomas A. Cloud, Esq. W. Christopher Browder, Esq. Gray, Harris & Robinson, P.A. Post Office Box 3068 Orlando, Florida 32802-3068</p>	<p>Bruce May, Esq. Holland & Knight Law Firm Bank of America 315 South Calhoun Street Tallahassee, FL 32302-0810</p> <p>Homer O. Bryant 3740 Ocean Beach Boulevard Unit 704 Cocoa Beach, FL 32931</p> <p>David Owen, Esq. Assistant County Attorney Lee County, Florida Post Office Box 398 Ft. Myers, FL 33902</p> <p>Joseph A. McGlothlin, Esq. Vicki Gordon Kaufman, Esq. McWhirter Reeves 117 S. Gadsden Street Tallahassee, Florida 32301</p> <p>Michael B. Twomey, Esq. Post Office Box 5256 Tallahassee, FL 32314-5256</p> <p>Mirant Americas Development, Inc. Beth Bradley 1155 Perimeter Center West Atlanta, GA 30338-5416</p> <p>Jon C. Moyle, Esq. Cathy M. Sellers, Esq. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301</p> <p>Mr. Lee Schmudde Walt Disney World Co. 1375 Lake Buena Drive Fourth Floor North Lake Buena Vista, FL 32830</p>
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Respectfully submitted,



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