

Matilda Sanders

From: Keating, Beth [beth.keating@akerman.com]
Sent: Thursday, June 14, 2007 9:52 AM
To: Filings@psc.state.fl.us
Subject: Docket NO. 070299-EI
Attachments: 20070614100920984.pdf

ORIGINAL

Good morning. Please accept the attached for filing in the referenced Docket. If you have any questions at all, please don't hesitate to contact me.

Sincerely,

Beth Keating

A. Beth Keating
Akerman Senterfitt
106 East College Ave., Suite 1200
Tallahassee, FL 32301
Tel: (850) 521-8002
Fax:(850) 222-0103
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B. Docket No. 070299-EI - Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Gulf Power Company.

C. Filed on behalf of: Florida Cable Telecommunications Association, Inc. (FCTA)

D. Number of page: 4

E. Petition to Intervene



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June 14, 2007

VIA ELECTRONIC FILING

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

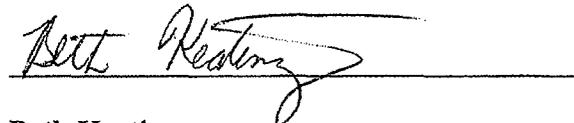
Re: Docket No. 070299-EI –Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Gulf Power Company.

Dear Ms. Cole:

Enclosed for filing on behalf of the Florida Cable Telecommunications Association (FCTA), please find FCTA's Petition to Intervene in the above-referenced Docket.

Your assistance in this matter is greatly appreciated. Should you have any questions, please don't hesitate to contact me.

Sincerely,



Beth Keating
AKERMAN SENTERFITT
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877
Phone: (850) 224-9634
Fax: (850) 222-0103

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

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

Docket No. 070299-EI

Filed: June 14, 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.

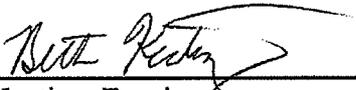
2. The names and addresses of the persons authorized to receive all notices, pleadings and other communications in this Docket are:

Maria T. Browne, Esquire Davis, Wright, Tremaine, LLP 1919 Pennsylvania Ave., NW, Suite 200 Washington, D.C. 20006 Tel: (202) 973-4281 Fax: (202) 973-4499 E-mail: mariabrowne@dwt.com	Beth Keating, Esquire Akerman Senterfitt 106 East College Ave., Suite 1200 Tallahassee, FL 32301 Tel. (850) 521-8002 Fax: (850) 222-0103 E-mail: beth.keating@akerman.com
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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 Gulf Power Company (Gulf), and have existing agreements with Gulf 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 Gulf'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 14th day of June, 2007.

By: 
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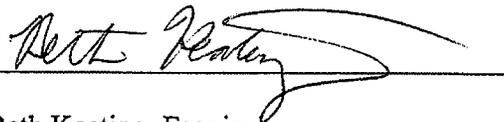
Attorneys for FCTA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Telecommunications Association's Petition to Intervene has been served upon Jeffrey A. Stone, Esquire, Russell A. Badders, Esquire, and Steven R. Griffin, Esquire, Beggs & Lane Law Firm, P.O. Box 12950, Pensacola, FL 32591, and that a copy has also been provided via Hand Delivery or US Mail to the persons listed below this 14th day of June, 2007:

<p>Ms. Susan Ritenour Gulf Power Company One Energy Place Pensacola, FL 32520-0780</p> <p>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</p> <p>Susan S. Masterton Mailstop: FLTLHO0102 1313 Blair Stone Rd. Tallahassee, FL 32301</p> <p>Mr. David Christian 106 East College Avenue, Suite 710 Tallahassee, FL 32301-7721</p> <p>Lorena Holley, Staff Counsel Florida Public Service Commission, Office of the General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850</p>	<p>J.Meza/E.Edenfield/J.Kay/T.Hatch c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556</p> <p>Howard E. Adams/Peter M. Dunbar c/o Pennington Law Firm P.O. Box 10095 Tallahassee, FL 32302-2095</p> <p>Dulaney L. O'Roark III Six Concourse Parkway, Suite 800 Atlanta, GA 30328</p> <p>Adam Teitzman, Staff Counsel Florida Public Service Commission, Office of the General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850</p>
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By:



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