

October 1, 2003

Ms. Blanco S. Bayo Director Division of Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

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Re: Fuel and Purchased Power Cost Recovery and Capacity Cost Recovery Projections January 2004 Through December 2004; Docket No. 030001-EI

Dear Ms. Bayo:

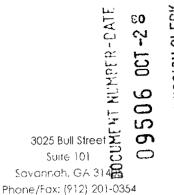
Please file the following enclosed items: the original and eleven (11) copies of Southern Alliance for Clean Energy's Motion to Intervene; the original and eleven (11) copies of Direct Testimony of Dr. Stephen A. Smith on behalf of Southern Alliance for Clean Energy.

Please send me a file-stamped copy of the motion and direct testimony in the enclosed self-addressed envelope.

RECEIVED & FILED FPSC-BUREAU OF RECORDS

Sincerely,

James J. Presswood, Jr. Staff Attorney



Enclosures

cc: All Parties of Record

F.O. Box 1842 Knoxville, TN 37901 Phone. (865) 637-6055 Toll-tree: (866) 522-SACE Fax. (865) 524-4479

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427 Moreland Avenue, NE Suite 100 Atlanta GA 30307 Phone (404) 659 5675 Fox. (770) 234-3909 29 North Market Street Suite 604 Asheville, NC 28801 Phorie (828) 254-6776 Fax (704) 973-7876

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor.

DOCKET NO. 030001-EI FILED:

SOUTHERN ALLIANCE FOR CLEAN ENERGY'S MOTION FOR LEAVE TO INTERVENE

Southern Alliance for Clean Energy, pursuant to Rule 25-22.039, Florida Administrative Code, hereby moves the Commission for leave to intervene in the above proceeding. The grounds for the motion are:

1. The name, address and telephone number of the proposed Intervenor are as follows: Southern Alliance for Clean Energy; 427 Moreland Ave., NE; Suite 100; Atlanta, Georgia 30307.

2. All notices, orders, pleadings, correspondence and other legal papers to be served on the proposed Intervenor should be served on James J. Presswood, Jr. at the address specified in Paragraph 1.

3. The proposed Intervenor is a nonprofit Tennessee corporation that has members who reside in the State of Florida. SACE's purposes include the performance of educational research and programs concerning the environment, public health, and economic impacts of energy use and policy in the Southeast. SACE's purposes also include advocacy for energy plans, policies and systems that best serve the environmental, public health and economic interests of the communities in the Southeast.

4. SACE's substantial interests may be affected by the manner in which issues regarding the shutdown of Tampa Electric's Gannon Station units are resolved.

DOCUMENT NUMBER-DATE

09506 OCT -2 8 FPSC-COMMISSION CLERK 5. SACE desires to present brief testimony on the issue of the appropriate timing of the shutdown of Tampa Electric's remaining coal fired generating units at its Gannon Station.

6. SACE's intervention as a party to this proceeding will ensure that its due process rights are protected, and at the same time provide the Commission with valuable input on the environmental effects of shutting down Tampa Electric's coal fired Gannon Station units at the earliest practicable date.

WHEREFORE, SACE moves the Commission for leave to intervene as a party in the above-entitled complaint proceeding.

This 1st day of October, 2003.

Respectfully submitted,

James J. Presswood, Jr. Staff Attorney Southern Alliance for Clean Energy Fla. Bar No. 0229120

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this Motion to Intervene has been served upon all persons below by United States Postal Service First Class Mail with postage prepaid.

This 2nd day of October, 2003.

James J. Presswood, Jr.

Mr. Wm. Cochran Keating, IV* Senior Attorney Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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Mr. James A. McGee Associate General Counsel Progress Energy Florida, Inc. Post Office Box 14042 St. Petersburg, FL 33733

Mr. Joseph A. McGlothlin Ms. Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold, P.A. 117 S. Gadsden Street Tallahassee, FL 32301

Mr. Robert Vandiver Associate Public Counsel Office of Public Counsel 111 West Madison Street – Suite 812 Tallahassee, FL 32399-1400

Mr. Norman Horton Messer Caparello & Self Post Office Box 1876 Tallahassee, FL 32302

Mr. John T. Butler Steel Hector & Davis LLP 200 South Biscayne Boulevard Suite 4000 Miami, FL 33131-2398 Mr. William Walker Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1859

Mr. R. Wade Litchfield Florida Power & Light Company 700 Universe Blvd. Juno Beach, FL 33408

Mr. John W. McWhirter, Jr. McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold, P.A. 400 North Tampa Street, Suite 2450 Tampa, FL 33601-5126

Ms. Susan Ritenour Gulf Power Company One Energy Place Pensacola, FL 32520

Mr. Jeffrey A. Stone Mr. Russell A. Badders Beggs & Lane Post Office Box 12950 Pensacola, FL 32591-2950