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PLEASE REPLY TO:
TALLAHASSEE

COGENERATION
ALTERNATIVE ENERGY
ENERGY REGULATORY LAW
PUBLIC UTILITY LAW
ADMINISTRATIVE LAW
APPELLATE LAW

March 20, 1992

Mr. Steve Tribble
Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

**ORIGINAL
FILE COPY**

Re: Docket No. 920198-EQ - Petition of Monsanto Company for
a Declaratory Statement Concerning the Provision of
Electric Power to Facilities at its Pensacola Chemical
Complex.

Dear Mr. Tribble:

Enclosed for filing in the above Docket please find an
original and fifteen copies of the Clarification of Monsanto's
Petition for Declaratory Statement.

ACK ✓

AFA _____

APP 1

CAF _____

CMU _____

CTR PS:ses

EAG enclosures

LEG _____

LIN 6 cc: All parties

OPC _____

RCH _____

SEC 1

WAS _____

OTH _____

Sincerely,



Paul Sexton

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02800 MAR 20 1992

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Monsanto) Docket No. 920198-EQ
Company for a Declaratory)
Statement Concerning the) Dated:
Provision of Electric Power to)
Facilities at its Pensacola) March 20, 1992
Chemical Complex.)
_____)

CLARIFICATION OF PETITION FOR DECLARATORY STATEMENT

Monsanto Company (Monsanto), by and through its undersigned attorneys, files this Clarification of its March 2, 1992 Petition for Declaratory Statement. Monsanto hereby clarifies that its Petition for Declaratory Statement regarding the provision of electric power to certain facilities at its Pensacola Chemical Complex is intended to apply only to the Niject Services Company (Niject) and Union Carbide Industrial Gases, Inc. (Union Carbide) facilities as more fully described in the Petition.

1. Monsanto's Petition initiating this proceeding was filed for purposes of obtaining a Commission statement regarding the provision of electric power to facilities located within Monsanto's Pensacola Chemical complex specifically focusing on two facilities not owned by Monsanto. One facility is owned by Niject and one facility is owned by Union Carbide. Monsanto omitted reference to an additional facility not owned by Monsanto, but owned by Advanced Elastomer Systems (AES), a joint venture of Monsanto and Exxon with Monsanto currently being the majority interest holder.

2. To avoid any confusion or misunderstanding regarding the AES facility, and in an abundance of caution, Monsanto through its attorneys notified Commission Staff subsequent to the March 2, 1992

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FPSC-RECORDS/REPORTING

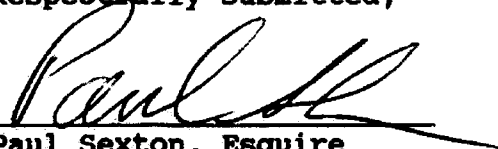
filing of the existence of the AES facility. Monsanto was concerned that the Petition could be construed to address the provision of electric power by Monsanto to all facilities on site, including the AES facility, which was not and is not the intent. (With the exception of the AES, Niject and Union Carbide facilities, all other electric power consuming facilities at the site are owned by Monsanto.) AES is presently served with approximately 1.2MW of electricity provided by Gulf Power Company (Gulf), but through Monsanto's electric distribution system. Prior to the start-up of the planned cogeneration expansion at Monsanto's Pensacola chemical complex: (a) Monsanto or AES will petition this Commission for a Declaratory Statement specifically addressing the provision of electric power to the AES facility from the planned cogeneration facilities, or, (b) AES will become a direct service customer of Gulf and will not be provided with any electric power from the planned cogeneration facilities.

WHEREFORE Monsanto hereby clarifies that its March 2, 1992 Petition for Declaratory Statement regarding the provision of electric power to certain facilities at its Pensacola Chemical Complex is intended to apply only to the Niject and Union Carbide facilities, as more fully described in the Petition.

Dated: March 20, 1992

Respectfully submitted,

Richard A. Zambo, Esquire
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Attorneys for Monsanto Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been provided to the following persons by U.S. Mail (hand-delivery*), this 20th day of March, 1992.

Richard Bellack*
Associate General Counsel
Division of Legal Services
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0850


Paul Sexton