### MCWHIRTER REEVES

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TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

June 3, 1999

#### VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Records and Reporting 4075 Esplanade Way Tallahassee, Florida 32399-0870

Re:

Docket No. 990692-EI

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and seven copies of the Florida Industrial Power Users Group's Petition to Intervene and Objection to Request for Confidential Classification in the above docket.

Please acknowledge receipt of the above on the extra copies enclosed herein and return them to me. Thank you for your assistance.

Sincerely,

Uilli Hordon Kaufman
Vicki Gordon Kaufman

VGK/bb **Enclosures** 

RRR

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# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION OF THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Request for Confidential	)	
Classification of FERC Form 1: Annual	)	
Report of Major Electric Utilities for	)	Docket No. 990692-El
the year ended 1998, as supplemented	)	
by Analysis of Diversification	)	Filed: June 3, 1999
Activities report, submitted pursuant	)	
to Rules 25-6.135 and 25-6.1351,	)	
Florida Administrative Code, by Florida	)	
Power & Light Company.	)	
	_)	

## THE FLORIDA INDUSTRIAL POWER USERS GROUP'S PETITION TO INTERVENE

Pursuant to rule 28-106.205, Florida Administrative Code, the Florida Industrial Power Users Group (FIPUG), through its undersigned counsel, files this petition to intervene in this docket. As grounds therefor, FIPUG states:

1. All notices, orders and correspondence should be sent to the following on behalf of FIPUG:

John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
Post Office Box 3350
Tampa, Florida 33601

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

- 2. In this docket, the Commission will determine whether information on Florida Power & Light Company's (FPL) FERC Form 1 should be shielded from the public view.
- 3. FIPUG is an ad hoc group of industrial users of electricity. FIPUG members use millions of kilowatt hours of electricity per year.

- 4. As consumers of large amounts of electricity, FIPUG has a substantial interest in this docket as they have a right to review and analyze the information FPL files at FERC.
  - 5. Further, any such request by FPL is premature pending action at FERC.
- 6. FIPUG's interests will be substantially affected by the Commission's decision in this docket.

**WHEREFORE**, FIPUG requests that the Commission grant FIPUG's petition to intervene and accord it full party status in this docket.

John W. McWhirter, Jr.

Joseph A. McGlothlin Vicki Gordon Kaufman

McWhirter, Reeves, McGlothlin, Davidson,

Decker, Kaufman, Arnold & Steen, P.A.

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Attorneys for The Florida Industrial Power Users Group

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of FIPUG's foregoing Petition to Intervene has been furnished by Hand Delivery (\*) or by United States Mail to the following this 3rd day of June, 1999:

Mary Anne Helton\*
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Gerald L. Gunter Building, Room 301C
Tallahassee, Florida 32399-0850

John Roger Howe Office of the Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400

R. Wade Litchfield Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420

Vicki Gordon Kaufman

Vicki Gordon Kaufman