ORIGINAL

MCWHIRTER REEVES

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PLEASE REPLY TO:

TALLAHASSEE

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

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January 6, 2000

VIA HAND DELIVERY

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

Re: Docket Nos.: 991837-EI & 991779-EI

Dear Ms. Bayo:

On behalf of the Florida Industrial Power Users Group, enclosed for filing and distribution are the original and 15 copies of the following:

Docket No.: 991837 PETITION TO INTERVENE 00243-00

► Docket No.: 991779 PETITION TO INTERVENE OO 244-00

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Yours truly,

Wicki Gordon Kaufman

VGK/chk

enc.

AFA APP

CAF CMU

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION ORIGINAL

In Re: Review of the appropriate application)	Docket No. 991779-EI
of incentives to wholesale power sales by)	
investor-owed electric utilities)	Filed: January 6, 2000

THE FLORIDA INDUSTRIAL POWER USERS GROUP'S PETITION TO INTERVENE

The Florida Industrial Power Users Group (FIPUG) hereby petitions to intervene in the above docket. As grounds therefor, FIPUG states:

1. The name and address of Petitioner is:

The Florida Industrial Power Users Group c/o John W. McWhirter, Jr. McWhirter Reeves 400 North Tampa Street, Suite 2450 (33602-5126) Post Office Box 3350 Tampa, Florida 33601-3350

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter Reeves 117 South Gadsden Street Tallahassee, Florida 32301

2. All pleadings, orders and correspondence should be directed to:

The Florida Industrial Power Users Group c/o John W. McWhirter, Jr. McWhirter Reeves 400 North Tampa Street, Suite 2450 (33602-5126) Post Office Box 3350 Tampa, Florida 33601-3350

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter Reeves 117 South Gadsden Street Tallahassee, Florida 32301

Done 1/06/00

DOCUMENT NUMBER - DATE

00244 JAN-68

- 3. In this docket, the Commission will examine the necessity of giving incentives for wholesale sales.
- 4. FIPUG is an organization of large industrial consumers. The cost of electricity constitutes one of FIPUG's members' largest variable costs. Because FIPUG members will bear the cost of any incentives permitted, they have a substantial interest in the Commission's actions in this docket.

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

> an Languay Joseph A. McGlothlin

Vicki Gordon Kaufman

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(813) 221-1854 TeleFax

Attorneys for the Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of The Florida Industrial Power Users Group's Petition to Intervene in Docket No. 991779-EI has been furnished by (*) hand delivery, or U.S. Mail this 6h day of January, 2000, to the following:

(*)Wm. Cochran Keating IV Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Harold McLean Office of Public Counsel 111 W. Madison St., #812 Tallahassee, FL 32399-1400

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James A. McGee, Esquire Florida Power Corporation P.O. Box 14042 (BT15) St. Petersburg, FL 33733-4042

Matthew M. Childs Steel Hector & Davis LLP 215 South Monroe Street Suite 601 Tallahassee, Florida 32301

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