Corbett & Schreck, P.C.

ORIGINAL

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June 6, 2000

Matthew M. Schreck

Matthew M. Schreck

Email: matt@neosoft.com

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oaks Boulevard Tallahassee, FL 32399-0850

In Re: Fuel and Purchased Power Cost Recovery Clause and Generating Performance Incentive Factor, Docket No. 000001-EI

Dear Ms. Bayo:

Douglas Corbett

Email: dlcorbe@ibm.net

Enclosed please find for filing an original and fourteen copies of the "Petition to Intervene and Comments of Coronet Industries, Inc. in Support of FIPUG Motion" in the above-referenced proceeding. An extra copy of this document is enclosed to be time-stamped and returned to the undersigned in the enclosed self-addressed, stamped envelope.

As well, pursuant to Fl. Admin. Code Rule 25-22-008(2)(b), I am hereby respectfully requesting the authority to practice before the Commission as a Class A practitioner for the purpose of representing Coronet Industries, Inc. in the above-referenced proceeding. Attached hereto is a copy of a letter that Mr. Mitchell D. Franks (Fla. Bar No. 102824), the original of which is on file with the Commission in Docket No. 9900037-EI, in which Mr. Franks stated that he will sponsor the undersigned for the purpose of practicing law before the Commission. The undersigned has been authorized by Mr. Franks to state that Mr. Franks wishes to continue his sponsorship of the undersigned as set forth in his letter. In addition, the Commission certified me as a Class A practitioner in Docket No. 9900037-EI by order issued last year. Accordingly, I am requesting similar certification for the purpose of representing Coronet in the above-referenced proceeding.

Please call me if you have any questions or need additional information.

Thank your for your assistance with this matter.

Thank your for your assistance with this matter.

Thank your for your assistance with this matter.

Very truly yours,

Wery truly yours,

Matthew M. Schreck

Attorney for Coronet Industries Inc.

DOCUMENT

BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06873 JUN-68

FPSC-RECORDS/REPORTING



MITCHELL D. FRANKS
ATTORNET AT LAW
E-MAL: MITCH.FRANKS@LANETRONK.COM

ROBERT J. BERTHAND ROBERT M. BRUSH HANK G. CAPREN CONNIE C. DURBENCE HICKORD, S. FARRELL CHRISTOPHER M. FEAR MITCHELL D. PHANES STEPHOL B. FROMP DAYD D. HALLERS, UN. JACK P. JAMES, W. HARRER J. HUMPEY

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E. ALCHANDER PLUOL.
BARY S. RASH
MEN, A. ROSDENGERY
LOUNEE W. SPREY
KINGSWOOD SPROTT, J.
ROSDEY G. STORKS
JANET M. STARIT
JONATHAN B. TRONH
ROMEN L. TRONH
JOHN K. VMEDAND
TED W. WEEDIN, IN

February 8, 1999

TO WHOM IT MAY CONCERN:

This is to advise that I have been performing General Counsel duties for Coronet Industries, Inc. at 4082 Coronet Road, Plant City, Florida since October, 1993.

During that time, I have had several occasions to work with Matthew M. Schreck, Esquire, Texas Bar No. 17813340, 820 Gessner, Suite 1390, Houston, Texas 77024, telephone number 713/464-5759; fax number 713/461-9109. Mr. Schreck and his firm of Corbett & Schreck have been retained by Coronet for many years as the oil and gas counsel.

I will sponsor Mr. Schreck in his appearance before Florida courts and regulatory agencies such as the Florida Public Service Commission. If a Florida lawyer is required to be on the pleadings and other filings, I will be that lawyer. Based on the information available to me, Mr. Schreck is a member of the Texas Bar in good standing. I know he will abide by the rules and regulations of the Florida courts and of any state regulatory agency before which he may appear.

I trust this proves helpful. If additional information is required, do not hesitate to contact me.

Sincerely,

Mitchell D. Franks

Florida Bar No.: 102824

MDF/bp

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power)	
Cost Recovery Clause and Generating)	Docket No. 000001-EI
Performance Incentive Factor)	Filed : June 5, 2000

PETITION TO INTERVENE AND COMMENTS OF CORONET INDUSTRIES, INC. IN SUPPORT OF FIPUG MOTION

Pursuant to Fla. Admin. Code Rule 28-106-205, Coronet Industries, Inc. ("Coronet") hereby files this Petition to Intervene and Comments in Support of FIPUG Motion in the above-styled proceeding. As set forth more fully below, Coronet strongly supports the Florida Industrial Power Users Group's ("FIPUG") "Motion for Mid-Course Protection on Behalf of all Customers of Tampa Electric Company" (the "FIPUG Motion"), and urges the Florida Public Service Commission ("Commission") to expeditiously grant the relief requested therein. In support of this Petition and Comments, Coronet respectfully states as follows:

I.

The name, address, telephone number, and facsimile number of the Petitioner are:

Coronet Industries, Inc. 4082 Coronet Road Plant City, Florida 33564-0760 (813) 752-1161 (813) 754-8558 (FAX)

II.

The name, address, telephone number, and facsimile number of the attorney and qualified representative of the Petitioner are:

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DOCUMENT NUMBER-DATE
06873 JUN-68

Dave Hines
Vice President — General Affairs
Coronet Industries, Inc.
4082 Coronet Road
Plant City, Florida 33564-0760
(813) 752-1161
(813) 754-8558 (FAX)

Matthew M. Schreck Corbett & Schreck, P.C. 9525 Katy Freeway, Suite 420 Houston, Texas 77024 (713) 464-5759 (713) 461-9109 (FAX)

III.

On May 18, 2000, FIPUG filed its aforementioned FIPUG Motion in the above-styled proceeding, in which it requested the Commission to grant certain emergency relief from Tampa Electric Company ("TECo") with respect to its continuing and ongoing power supply interruptions and excessive costs for electric power. Among other things, FIPUG pointed out that:

- Wholesale power supply agreements into which TECo has entered are "detrimental to its retail customers in general and economically devastating to its nonfirm industrial customers" (FIPUG Motion at 1)
- TECo's practice of diverting its own power from on-system customers to offsystem customers at less than market prices results in either exorbitant power prices to its non-firm customers or interruptions, and that "[t]hese interruptions and high cost replacement power substitutions affect the ability of nonfirm customers to deliver their products in a timely and competitive manner." (FIPUG Motion at 1)
- TECo's actions were brought to the Commission's attentions earlier this year in workshop sessions the Commission held in February and March to address

concerns raised by FIPUG members and other interruptible sales customers of TECo.

FIPUG requested that the Commission grant it emergency relief for mid-course protection, including, among other things, that TECo be required to curtail any wholesale sale if it would occur during the same hour in which TECo plans to interrupt interruptible customers. FIPUG also requested that the Commission permit TECo to expand customer-choice options with respect to the manner in which they can access third-party power in times of emergency and/or shortages, including entering into contracts with other Florida utilities and suppliers.

IV.

Coronet is an existing customer of TECo under Rate Schedule IS-3. Accordingly, Coronet has a direct and substantial interest in this proceeding that cannot be adequately represented by any other party. Accordingly, Coronet requests leave to intervene in this proceeding with the full rights conferred upon those with party status.

V.

The FIPUG Motion addresses several issues that directly impact Coronet as an interruptible industrial power customer of TECo.¹ In particular, Coronet has been both interrupted as well as invoiced excessive charges for power purchases in the past. Such interruptions and excessive power purchase costs appear to be the result of the same facts of which FIPUG now complains and seeks emergency relief — the lack of sufficient generating

¹ Coronet hereby adopts and incorporates herein by reference the arguments and requests for relief set forth in the FIPUG Motion.

capacity of TECo to satisfy peak demand on its system and TECo's purchase of interruptible

power from third parties at exorbitant costs.

Coronet respectfully notes that the Commission workshops held earlier this year (at

which Coronet testified as part of the FIPUG presentation) showed a strong consensus among

interruptible industrial customers on TECo's system that the business practices of TECo in this

area were and are causing significant damages to customers, which must be addressed and

remedied as soon as possible. Coronet urges the Commission to act expeditiously on the FIPUG

Motion and grant the relief requested therein.

VI.

WHEREFORE, Coronet respectfully requests that it be granted leave to intervene in this

proceeding, and that the Commission act expeditiously on the FIPUG Motion and grant the relief

requested therein.

Respectfully submitted,

CORONET INDUSTRIES, INC.

Matthew M. Schreck

Corbett & Schreck, P.C.

9525 Katy Freeway, Suite 420

Houston, Texas 77024

(713) 464-5759

Attorney for Coronet Industries, Inc.

Dated: June 6, 2000

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Certificate of Service

I hereby certify that I have this day served the foregoing document upon the following parties by first-class U.S. Mail, on this the 6th day of June, 2000:

Ausley Law Firm James Beasley/Lee Willis P.O. Box 391 Tallahassee, FL 32302

Beggs & Lane Law Firm Jeffery Stone/Russell Badders P.O. Box 12950 700 Blount Bldg. Pensacola, FL 32576-2950

Black & Veatch Myron Rollins Kansas City, MO 64114

Florida Industrial Power Users Group John McWhirter, Jr. McWhirter Reeves P.O. Box 3350 Tampa, FL 33601-3350

Florida Public Utilities Company George Bachman P.O. Box 3395 West Palm Beach, FL 33402-3395

Gulf Power Company Susan D. Ritenour One Energy Place Pensacola, FL 32520-0780 Messer Law Firm Norman Horton P.O. Box 1876 Tallahassee, FL 32302-1876

McWhirter Law Firm Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301

Office of Public Counsel Stephen Burgess c/o The Florida Legislature 111 W. Madison St. #812 Tallahassee, FL 32399-1400

Steel Law Firm Matt Childs 215 S. Monroe St. #601 Tallahassee, FL 32301-1804

Tampa Electric Company
Ms. Angela Llewellyn
Regulatory and Business Strategy
P.O. Box 111

Tampa, FL 33601-01-1

Matthew M. Schreck