

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

July 19, 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 No.: 000824-EI

Dear Ms. Bayo:

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

► The Florida Industrial Power Users Group's Petition to Intervene.

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

Yours truly,

Vicki Gordon Kaufman

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DOCUMENT NUMBER-DATE

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power Corporation's earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power Corporation by Carolina Power & Light

Docket No.: 000824-EI Filed: July 19, 2000

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The Florida Industrial Power Users Group's Petition to Intervene

The Florida Industrial Power Users Group (FIPUG), pursuant to rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby files its Petition to Intervene in this docket. As grounds therefore, FIPUG states:

1. The name, address and telephone number of Petitioner is:

Florida Industrial Power Users Group c/o John W. McWhirter, Jr. McWhirter, Reeves, McGlothlin, Davidson, Decker Kaufman, Arnold & Steen, P.A. 400 North Tampa Street, Suite 2450 Tampa, Florida 33601-3350 813 224-0866

2. The name, address and telephone number of Petitioner's representatives for purposes of service during the course of the proceeding is:

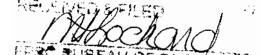
John W. McWhirter, Jr.
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- 3. FIPUG is a group of industrial customers, many of whom take service from Florida Power Corporation (FPC). Electricity represents one of FIPUG's members' largest variable costs. Therefore, FIPUG will be substantially affected by any action the Commission takes in this docket.
- 4. The affected agency is the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.
- 5. In this docket, the Commission will investigate the earnings of FPC, including the affect of the acquisition of FPC by Carolina Power and Light (CP&L) on FPC's earnings.
 - 6. Disputed issued of material fact include, but are not limited to, the following:
 - a. The effect of the proposed merger on FPC's earnings.
 - 7. Ultimate facts include, but are not limited to, the following:
 - a. The merger's impact must be considered in assessing FPC's earnings.

WHEREFORE, FIPUG requests that the Commission grant its Petition to Intervene and that it be accorded full party status in this docket.

John W. McWhirter, Jr.

McWhirter, Reeves, McGlothlin, Davidison, Decker, Kaufman, Arnold & Steen, P.A. 400 North Tampa Street, Suite 2450 Tampa, Florida 33601-3350 813 224-0866

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Attorneys for the Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct opy of the foregoing FIPUG Petition to Intervene has been furnished by (*) hand delivery and U.S. Mail to the following this 19th day of July, 2000:

(*) Robert V. Elias Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

James A. McGee Florida Power Corporation Post Office Box 14042 St. Petersburg, Florida 33733-4042

Roger Howe Office of Public Counsel 111 W. Madison Street Suite 812 Tallahassee, Florida 32399-1400

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