# ATTORNEYS AT LAW

TAMPA OFFICE: 400 NORTH TAMPA STREET, SUITE 2450 TAMPA, FLORIDA 33602 P. O. BOX 3350 TAMPA, FL 33601-3350 (813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

**TALLAHASSEE** 

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301

August 24, 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.: 000810-GU

Dear Ms. Bayo:

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

The Florida Industrial Gas Users' 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.

Sincerely,

Vicki Gordon Kaufman

Willie Sordere Kaufman

APP Take CMP COM .VGK/bae CTR Enclosure

**ECR** LEG

OPC PAI RGO

SEC SER

Done 8/25/00

McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A.

# ORIGINAL

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of modifications to tariff provisions governing transportation of customer-owned gas and tariff provisions to implement Rule 25-7.0335, F.A.C., by Tampa Electric Company d/b/a Peoples Gas System

Docket No.: 000810-00 Filed: August 24, 2000 A

#### The Florida Industrial Gas Users' Petition to Intervene

The Florida Industrial Gas Users (FIGU), 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, FIGU states:

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

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

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FPSC-BUREAU OF MECORDS

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Decker Kaufman, Arnold & Steen, P.A. 117 South Gadsden Tallahassee, Florida 32301 850 222-2525

- 3. FIGU is a group of industrial customers, many of whom take service from Peoples Gas System (Peoples), and who wish to take transportation service from Peoples. Therefore, FIGU will be substantially affected by any action the Commission takes in this docket in regard to Peoples' proposed tariff.
- 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 review Peoples' proposed transportation service tariff for non-residential customers.
  - 6. Disputed issues of material fact include, but are not limited to, the following:
    - a. Whether the proposed modifications should be approved.
  - 7. Ultimate facts include, but are not limited to, the following:
    - a. The appropriateness of the proposed modifications.

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

John W. McWhirter, Jr.

Whiter 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 Gas Users

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct opy of the foregoing FIGU Petition to Intervene has been furnished by (\*) hand delivery and U.S. Mail to the following this 24th day of August, 2000:

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

Ansley Watson, Jr MacFarlane Ferguson Law Firm Post Office Box 1531 111 Madison Street, Suite 2300 Tampa, Florida 33601

> Uilli Andre Laufman Vicki Gordon Kaufman