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PLEASE REPLY TO:  
Florida

October 12, 1990

Mr. Steve C. Tribble  
Director, Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: Docket No. 900796-EI

Dear Mr. Tribble:

Enclosed for filing are the original and fifteen (15) copies of the Petition for Leave to Intervene of the Coalition of Local Governments in the above-referenced proceeding.

In accordance with Rule 25-22.008, Florida Administrative Code, the undersigned counsel hereby states that he is a "Class A" practitioner within the meaning of Rule 25-22.008(1) (a), and that he is licensed to practice law in the State of Florida. The undersigned certifies that he has practiced extensively before utility regulatory bodies in accordance with Rule 25-22.008(2) (b).

Please stamp the extra copy of this Petition as filed and return it in the enclosed self-addressed, stamped envelope. Thank you for your assistance in this matter.

Respectfully submitted,

Frederick J. Murrell

Attorney for the  
Coalition of Local Governments

- ACK ✓
- AFA 1
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG (circled)
- LEG LW/m
- LIN 6
- OPC 1
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH orig to Ron

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09204 OCT 15 1990

FPSC-RECORDS/REPORTING

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Florida Power )  
and Light Company For the Inclusion )  
Scherer Unit No. 4 Purchase in Rate )  
Base, Including an Acquisition )  
Adjustment. )  
\_\_\_\_\_ )

Docket No. 900796-EI

Submitted for filing:  
October 12, 1990

**PETITION FOR LEAVE TO INTERVENE  
OF THE COALITION OF LOCAL GOVERNMENTS**

Pursuant to Rule 25-22.039, Florida Administrative Code, the Coalition of Local Governments ("CLG"), by and through its undersigned counsel, hereby respectfully files its Petition for Leave to Intervene in the above-captioned proceeding. In support thereof, Petitioner states as follows:

1. CLG is an association representing local government entities which are retail customers of Florida Power & Light Company ("FPL"), including the City of Daytona Beach Shores, Florida, the City of Hialeah Gardens, Florida, the City of South Daytona, Florida, the city of Stuart, Florida, the city of Ft. Myers, Florida and Union County, Florida.

2. Communications concerning this Petition should be addressed as follows, and the following should be included in the Commission's official service list:

Frederick J. Murrell  
Schroder & Murrell  
The Barnett Center Suite 375  
1001 Third Avenue West  
Bradenton, Florida 34205

H. G. Wells  
Director, Coalition of Local Governments  
P.O. box 4748  
Clearwater, Florida 34618-4748

DOCUMENT NUMBER-DATE  
09204 OCT 15 1990  
PSC-RECORDS/REPORTING

3. FPL has filed a petition requesting the inclusion of Scherer Unit Number 4, a coal-fired power plant, into its rate base, which request, if granted, would impact upon the entities that compose this petitioner, the Coalition of Local Governments ("CLG").

4. The local government entities represented by CLG have a substantial interest in the final results of the efforts of Florida Power & Light to the extent that the actions of the Commission in this matter affect rate design, rate levels or cause changes in depreciation and decommissioning costs set by other proceedings before this Commission, all of which will have an impact upon the entities which compose CLG. CLG desires to be a party to this proceeding and to do all things which such an intervening party may properly do. Unless CLG is granted leave to intervene, its ability to protect its interests in this proceeding will be impaired and impeded.

WHEREFORE, the Coalition of Local Governments requests that this Petition for Leave to Intervene be granted and that it be permitted to engage in the discovery and testimony phases of this docket.

Respectfully submitted this 12th day of October, 1990.

  
\_\_\_\_\_  
Frederick J. Murrell, Esquire  
Schroder & Murrell  
1001 3rd Avenue West Suite 375  
Bradenton, Florida 34205  
Florida Bar #: 0227447  
(813) 747-2630

Attorneys for the  
Coalition of Local Governments

**CERTIFICATE OF SERVICE**

I Frederick J. Murrell, hereby certify that I have this day served the foregoing Petition for Leave to Intervene by hand delivery or mailing it first-class, postage prepaid to parties on the service list shown below.

Dated at Bradenton, Florida this 12th day of October, 1990.

  
Frederick J. Murrell, Esquire

**Service List**

M. Robert Christ, Esquire  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399

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

Jack Shreve, Esquire  
Office of the Public Counsel  
624 Fuller Warren Building  
202 Blount Street  
Tallahassee, Florida 32304

DATE: 10-15-90  
TO: Legal

The attached is sent to you for:

- Your Information
- Further Handling
- Necessary action
- Advice on Handling
- Response

Remarks: 9204-90

Division of Records & Reporting  
PSC/R&R 9 (3/87)

TB