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VIA FEDERAL EXPRESS

COGENERATION & ALTERNATIVE ENERGY
ENERGY REGULATORY LAW

October 26, 1994

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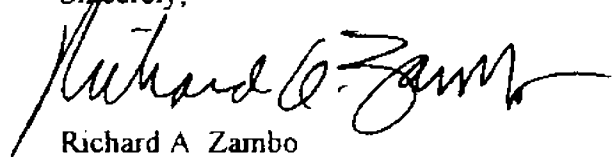
Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

In Re: Petition of Florida Power Corporation for determination that its plan for curtailing purchases from Qualifying Facilities in minimum load conditions is consistent with Rule 25-17.086, F.A.C.
FPSC Docket No. 941101-EQ

Dear Ms. Bayó:

Enclosed for filing in the above Docket please find an original and 15 copies of the Florida Industrial Cogeneration Association's Petition for Leave to Intervene. Also enclosed is a double-sided high density 3.5 inch floppy disk containing this document in WordPerfect 6.0 format as prepared on a Windows-based computer. If you have any questions regarding this filing, please do not hesitate to call.

Sincerely,



Richard A. Zambo

RAZ/jnh
Enclosures

cc: James A. McGee, Esquire

Handwritten notes and initials on the left margin, including "E", "LF", "L", "F", "S", "V", and "10/27/94".

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**ORIGINAL
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In re: Petition of Florida Power Corporation)
for determination that its plan for curtailing)
purchases from Qualifying Facilities in)
minimum load conditions is consistent with)
Rule 25-17.086, F.A.C.)
_____)

Docket No. 941101-EQ

Submitted for filing:
October 26, 1994

PETITION FOR LEAVE TO INTERVENE

The Florida Industrial Cogeneration Association ("FICA") and its members, by and through their undersigned attorney, file this Petition for Leave to Intervene in the captioned proceeding and as grounds therefore say:

1. The exact name of and address of Petitioner are:

Florida Industrial Cogeneration Association
598 S.W. Hidden River Avenue
Palm City, FL 34990

2. The person to whom all pleadings, notices, orders, schedules, recommendations and other documents to be filed or served in this Docket are to be sent is:

Richard A. Zambo
Richard A. Zambo, P.A.
598 S.W. Hidden River Avenue
Palm City, FL 34990
(407) 220-9163 Fax: (407) 220-9402

3. FICA members own and/or operate highly efficient cogeneration facilities in conjunction with various industrial manufacturing, processing or refining operations at locations throughout the State of Florida.

4. Some FICA members purchase electric power from and sell firm and/or as-available cogenerated electric power to Florida Power Corporation (FPC). Those members are included under Groups "B" and "C" in FPC's "Generation Curtailment Plan For Minimum Load Conditions" (Curtailment Plan) which is the subject of this proceeding.

5. FICA members who neither purchase electric power from nor sell electric power to FPC will nonetheless be affected by the decision in this proceeding since, as FPC states in its Curtailment Plan,

During periods of low minimum load for Florida Power Corporation, other utilities in Florida and the southeast are likely to be facing similar if not the same low load conditions.
(at page 9)

Accordingly, all FICA members will be impacted directly or indirectly by the actions of FPC in response to low load conditions on its system.

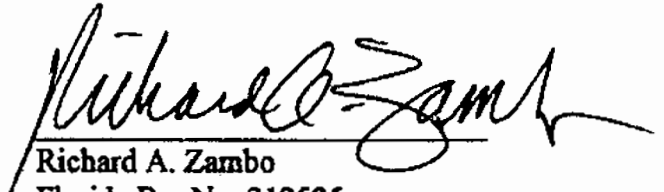
6 The issues raised and the solutions proposed by FPC present this Commission with a case of first impression. Indeed, it was reported recently in the industry trade press that FPC's October 18th and 19th QF curtailments under the Curtailment Plan were believed to be the first time QF's have been curtailed in the U.S. Regardless of whether this report is accurate, it is clear that the precedent established by the Commission in resolving the issues presented in this Docket will broadly impact on Florida QF's in general.

7. The substantial interests of FICA and its members will unquestionably be affected by the Commission's resolution of matters within the scope of this proceeding.

WHEREFORE, FICA and its members respectfully request entry of an order granting it leave to intervene as a full party in interest to this proceeding.

Date: October 26, 1994

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard A. Zambo", written over a horizontal line.

Richard A. Zambo
Florida Bar No. 312525
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Attorneys for FICA