

ORIGINAL

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March 2, 1999

VIA HAND DELIVERY

Blanca S. Bayo, Director  
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Tallahassee, Florida 32399-0870

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Re: Docket No. 981890-EU

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and fifteen copies of the Florida Industrial Power Users Group's Petition to Intervene in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Sincerely,

ACK Vicki Gordon Kaufman  
AFA 2 Vicki Gordon Kaufman

APP \_\_\_\_\_  
CAF VGK/pw  
Encl.

CMU \_\_\_\_\_

CTR \_\_\_\_\_

EAG Dudley

LEG 2

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OTD \_\_\_\_\_

ROH \_\_\_\_\_

SEC 1

WAS \_\_\_\_\_

OTH \_\_\_\_\_

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Generic Investigation into the )  
Aggregate Electric Utility Reserve )  
Margins Planned for Peninsular Florida. )  
\_\_\_\_\_ )

Docket No. 981890-EU

Filed: March 2, 1999

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S  
PETITION TO INTERVENE**

The Florida Industrial Power Users Group (FIPUG) hereby petitions to intervene in the above docket. As grounds therefor, FIPUG states:

- 1. The name and address of Petitioner is:

The Florida Industrial Power Users Group  
c/o John W. McWhirter, Jr.  
McWhirter Reeves  
400 North Tampa Street, Suite 2450 (33602-5126)  
Post Office Box 3350  
Tampa, Florida 33601-3350

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter Reeves  
117 South Gadsden Street  
Tallahassee, Florida 32301

- 2. All pleadings, orders and correspondence should be directed to:

The Florida Industrial Power Users Group  
c/o John W. McWhirter, Jr.  
McWhirter Reeves  
400 North Tampa Street, Suite 2450 (33602-5126)  
Post Office Box 3350  
Tampa, Florida 33601-3350

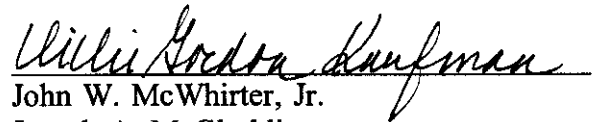
Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter Reeves  
117 South Gadsden Street  
Tallahassee, Florida 32301

3. In this docket, the Commission will examine the methodologies used to calculate reserve margin as well as investigate what the appropriate reserve margin for peninsular Florida should be.

4. FIPUG is an organization of large industrial consumers. The cost of electricity constitutes one of FIPUG's members' largest variable costs. Equally important to FIPUG members is the reliability of the Florida grid. As consumers of large amounts of electricity who depend upon the utilities to provide reliable service, FIPUG members have a substantial interest in this docket.

5. FIPUG's interests will be substantially affected by the action the Commission takes in this docket.

**WHEREFORE**, FIPUG requests that the Commission grant FIPUG's petition to intervene and accord it full party status in this docket.



John W. McWhirter, Jr.  
Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman,  
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Attorneys for the Florida Industrial  
Power Users Group

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of FIPUG's foregoing **Petition to Intervene** has been furnished by hand delivery (\*) or by U.S. Mail to the following parties of record this **2nd** day of **March, 1999**:

Robert V. Elias\*  
Florida Public Service Commission  
Division of Legal Services  
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Tallahassee, Florida 32399-0850

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Tallahassee, Florida 32302

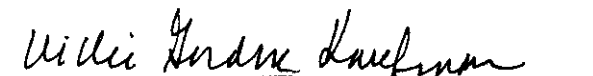
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\_\_\_\_\_  
Vicki Gordon Kaufman