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TALLAHASSEE

TALLAHASSEE OFFICE: 117 SOUTH GADSDEN TALLAHASSEE, FLORIDA 32301 (850) 222-2525 (850) 222-5606 FAX

June 16, 1999

VIA HAND DELIVERY

Blanca S. Bayo, Director Florida Public Service Commission Division of Records and Reporting 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

> Re: Docket No. 990724-EI

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and seven 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,

Lilli Andre Saufman Vicki Gordon Kaufman

Done 6/ 18/99

VGK/lp Encls.

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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Tampa Electric for Clarification of its Interruptible Rate Schedules IS-1, IST-1, SBT-1, IS-3, IST-3, and SBT-3.

Docket No. 990724-EI

Filed: June 16, 1998

The Florida Industrial Power Users Group's Petition to Intervene

The Florida Industrial Power Users Group (FIPUG) hereby files its Petition to Intervene

in the above docket. As grounds therefor, FIPUG states:

1. The name, address, and telephone number of Intervenor 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 (33602-5126) Post Office Box 3350 Tampa, Florida 33601-3350 813-224-0866

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

2. Copies of all orders, notices, pleadings and correspondence should be sent to:

John W. McWhirter, Jr. McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A. 400 North Tampa Street, Suite 2450 (33602-5126) Tampa, Florida 33601-3350

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

> DOCUMENT NUMPER-DATE 07302 JUN 168 FPSC-RECORDS/REPORTING

3. In this docket, TECo has filed a petition seeking "clarification" of its currently filed and approved interruptible tariffs. Though TECo couches its request in terms of "clarification," what TECo really seeks in this docket is to change the provisions of its tariffs mid-stream and renege on the bargain it made with customers currently on the interruptible tariffs.

4. FIPUG is an organization of large industrial consumers. The cost of electricity constitutes one of FIPUG's members' largest variable costs. Members of FIPUG are currently customers on Tampa Electric Company's (TECo) interruptible rates--the very rate schedules for which TECo seeks "clarification."

5. Thus, FIPUG has a substantial interest in this docket and will be substantially affected by any action the Commission takes on TECo's petition.

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

Villi Sordne Kaufman

John W. McWhirter, Jr. Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A. 117 South Gadsden Street Tallahassee, Florida 32301

400 North Tampa Street Suite 2450 (33602-5126) Post Office Box 3350 Tampa, Florida 33601-3350

Attorneys for the Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing FIPUG Petition to Intervene was served by hand delivery (*) or U.S. Mail this 16th day of June, 1999 to the following:

(*) Bob Elias Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

Lee L. Willis James D. Beasley Ausley & McMullen Post Office Box 391 Tallahassee, Florida 32302

Vicki Gordon Kaufman