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September 29, 1999

VIA HAND DELIVERY

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Re: Docket Number 990947-EI

Dear Ms. Bayo:

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

- ▶ 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.

Yours truly,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

Benkenicz

AFA	_____
APP	_____
CAF	VGK/wb
CMU	_____
CTR	enc.
EAG	_____
LEG	_____
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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

DOCUMENT NUMBER - DATE
11748 SEP 29 99
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a full revenue requirements rate case for Gulf Power Company.

Docket No. 990947-EI

Filed: September 29, 1999

The Florida Industrial Power Users Group's Petition to Intervene

The Florida Industrial Power Users Group (FIPUG), pursuant to rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby files its Petition to Intervene in this docket. As grounds therefor, FIPUG states:

1. The name, address, and telephone number of Petitioner 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
Tampa, Florida 33601-3350
813-224-0866

2. The name, address and telephone number of Petitioner's representatives for purpose 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

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

3. The affected agency is the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

4. In this docket, the Office of Public Counsel (OPC) has petitioned the Commission to conduct a full revenue requirements case for Gulf Power Company (Gulf). OPC has requested, among other things, that certain monies be held subject to refund and that the Commission hold a hearing to set fair, just and reasonable rates for Gulf. FIPUG is a group of large industrial customers, some of whom receive power from Gulf. Electricity is one of the largest variable costs of FIPUG members. Therefore, FIPUG's substantial interests will be affected by the Commission's action in this docket.

5. Disputed issues of material fact include, but are not limited to, the following:

- a. What the appropriate rate of return is for Gulf;
- b. All issues raised in OPC's petition.

6. Ultimate facts include, but are not limited to, the following:

- a. Gulf's return on equity should be lowered to a reasonable level;
- b. Gulf's rates and charges should be set at a reasonable level.

WHEREFORE, FIPUG requests that the Commission grant its petition to intervene and that it be accorded full party status in this docket.

John W. McWhirter, Jr.

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Attorneys for the Florida Industrial Power Users
Group

CERTIFICATE OF SERVICE

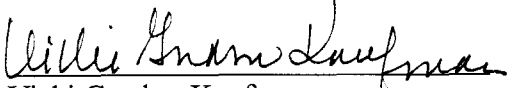
I HEREBY CERTIFY that a true and correct copy of the foregoing FIPUG Petition to Intervene has been furnished by (*) hand delivery and U.S. Mail to the following this 29th day of September, 1999:

(*) Robert V. Elias
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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