

ORIGINAL

**MCWHIRTER REEVES**  
ATTORNEYS AT LAW

TAMPA OFFICE:  
400 NORTH TAMPA STREET, SUITE 2450  
TAMPA, FLORIDA 33602  
P. O. BOX 3350 TAMPA, FL 33601-3350  
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:  
  
TALLAHASSEE

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

July 19, 2000

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

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RECORDS AND REPORTING

Re: Docket No.: 000824-EI

Dear Ms. Bayo:

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

- ▶ The Florida Industrial Power Users Group's 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

APP	_____
CAF	_____
COM	_____
CTR	_____
ECR	_____
LEG	_____
OPC	_____
PAI	_____
RGO	_____
SEC	_____ VGK/bae
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OTH	_____

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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEIN, P.A. 00720 JUL 19 8

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power Corporation's earnings, including effects of proposed acquisition of Florida Power Corporation by Carolina Power Corporation by Carolina Power & Light

Docket No.: 000824-EI  
Filed: July 19, 2000

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REPORTING AND

**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 therefore, 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 purposes 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.

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Tallahassee, Florida 32301  
850 222-2525

3. FIPUG is a group of industrial customers, many of whom take service from Florida Power Corporation (FPC). Electricity represents one of FIPUG's members' largest variable costs. Therefore, FIPUG will be substantially affected by any action the Commission takes in this docket.

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

5. In this docket, the Commission will investigate the earnings of FPC, including the affect of the acquisition of FPC by Carolina Power and Light (CP&L) on FPC's earnings.

6. Disputed issued of material fact include, but are not limited to, the following:

a. The effect of the proposed merger on FPC's earnings.

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

a. The merger's impact must be considered in assessing FPC's earnings.

**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.  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
400 North Tampa Street, Suite 2450  
Tampa, Florida 33601-3350  
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Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
850 222-2525

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 19th day of July, 2000:

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

James A. McGee  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733-4042

Roger Howe  
Office of Public Counsel  
111 W. Madison Street  
Suite 812  
Tallahassee, Florida 32399-1400

  
Vicki Gordon Kaufman