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February 3, 1999

RECORDS AND
REPORTING

Blanca S. Bayo, Director
Division of Records and Reporting
Public Service Commission
4750 Esplanade Way, Room 110
Tallahassee, FL 32399

Re: Docket No. 990067-EI

Dear Ms. Bayo:

Enclosed is an original and fifteen (15) copies of The Coalition's Petition to Intervene in the above docket. We have also enclosed a copy of the document on diskette, prepared in Microsoft Word 7.0 on a Windows 95 operating system. The diskette is a "2HD" density and 1.44 MB.

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

Sincerely yours,



Seann M. Frazier

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMJ _____ Enclosures
- CTR _____ SMF/skl
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- LEG 1 _____
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DOCUMENT NUMBER-DATE
01398 FEB-39
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for a full revenue)
requirements case for Florida Power &)
Light Company)
_____)

Docket No. 990067-EI
Filed: February 3, 1999

THE COALITION'S PETITION TO INTERVENE

The COALITION FOR EQUITABLE RATES ("Coalition") hereby petitions to intervene in Docket No. 990067-EI pursuant to Chapter 366, Florida Statutes and Rules 25-22.039 and 28-106.205, Florida Administrative Code. As support of this Petition the Coalition states:

1. The Coalition is the Petitioner. The Coalition is an association of entities, which pay Florida Power & Light Company ("FPL" or "Company") for power at rates approved by the Florida Public Service Commission ("PSC") and an association of entities, which represent such ratepayers. Representative examples of those entities within the Coalition include the Florida Health Care Association (which consists of most skilled nursing facilities and many assisted living facilities in Florida), Florida Retail Federation (which consists of major retailers in Florida) and the Florida Hotel and Motel Association (which consists of a large number of hotels and motels located in Florida. A substantial portion of the Coalition's members pay FPL for power. The Coalition is a "person" as defined by §101 and §120.52(13), Fla. Stat. The Coalition is authorized to monitor the basis for the rates charged to its members and to challenge such components, as well as the rates themselves in order to assure reasonable and affordable rates for services.

2. The Coalition maintains offices at 2300 N Street, Northwest, Washington, DC 20037, telephone number (202) 663-9097. However, for the purposes of this Petition, The Coalition may be contacted through its counsel, Ronald C. LaFace, Greenberg Traurig, P.A., 101 East College Avenue, Tallahassee, FL 32301, telephone number (850) 222-6891

3. The agency affected by this Petition is the State of Florida, Public Service Commission ("PSC"), located at 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, telephone number (850) 413-6248. However, this docket concerns a Petition for Full Revenue Requirements case for Florida Power & Light Company. Thus, Florida Power & Light Company ("FPL") is the company most affected by this proceeding and this petition.

4. In this docket, the Office of Public Counsel ("OPC") has petitioned the Commission to conduct a full revenue requirements case for the Florida Power & Light Company (FPL). Among other things, OPC has requested that monies be held subject to refund and that a hearing be held to set fair, just and reasonable base rates and charges for FPL.

5. The Coalition is an organization of large industrial consumers. Members of the Coalition are FPL customers. As consumers of large amounts of electricity, the Coalition members have a substantial interest in this docket.

6. As noted in OPC's Petition, FPL has not had a rate case since 1984. The Commission should examine FPL's rates, charges and return on equity (ROE) in a comprehensive proceeding, like the one OPC seeks.

7. The Coalition's interests will be substantially affected by the action the Commission takes in this docket. If this proceeding results in rate reductions by FPL, a substantial number of the Coalition's members will receive significant reductions in the amounts they pay to FPL for electricity.

8. Disputed issues of fact include, but are not limited, all issues of fact raised in the OPC's Petition to Conduct a Full Revenue Requirements Case for FPL; facts related to whether FPL's return on equity is excessive; whether accelerated base rate cost recovery plans approved

for FPL are unreasonable unjust and unfair; and all facts, assumptions, and criteria used by FPL to set its rates.

9. As a matter of ultimate fact and law, FPL's rates should be set at fair just and reasonable levels and that monies be held subject to refund to the customers of FPL.

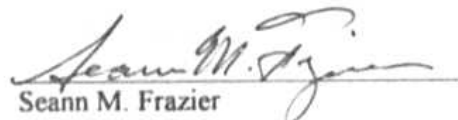
WHEREFORE, the Coalition requests that the Commission grant the Coalition's petition to intervene and accord it full party status in this docket that the Commission conduct a full revenue requirements base rate proceeding to establish fair, just and reasonable base rates and charges for FPL.



Ronald C. LaFace
Seann M. Frazier
Greenberg Traurig, P.A.
101 East College Avenue
Post Office Drawer 1838
Tallahassee, FL 32302
Attorneys for The Coalition for Equitable Rates

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and fifteen (15) copies of the foregoing has been furnished by Hand Delivery to Public Service Commission Director, Division of Records and Reporting, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850; a copy has been furnished via Hand Delivery to the Office of Public Counsel, Jack Shreve, 812 Pepper Building, 111 W. Madison Street, Tallahassee, Florida 32399-1400; via U.S. Mail to the parties on the attached mailing list this ____ day of February, 1999.



Seann M. Frazier

Office of Public Counsel
John Roger Howe
Office of Public Counsel
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Tallahassee, FL 32399-1400

*Florida Alliance for Lower Electric Rates Today and
Georgia-Pacific Corporation*

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