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COGENERATION & ALTERNATIVE ENERGY  
ENERGY REGULATORY LAW

**VIA FEDERAL EXPRESS**

October 1, 1999

**ORIGINAL**

Ms. Blanca S. Bayó, Director  
Division of Records & Reporting  
Florida Public Service Commission  
Capitol Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

In re: **FPSC Docket No. 981890-EU**  
Generic Investigation Into The Aggregate Electric  
Utility Reserve Margins For Peninsular Florida

Dear Ms. Bayó,

Enclosed for filing in the above captioned Docket please find the original and 10 copies of a Petition For Leave To Intervene filed on behalf of the Florida Industrial Cogeneration Association (FICA). We have also enclosed a 3.5 inch floppy disk containing this document in WordPerfect 6.0 for Windows, and a Certificate Of Service.

Please date stamp one copy of the Petition and return it to us in the enclosed self-addressed stamped envelope.

If you have any questions regarding this filing, or require any additional information, please do not hesitate to contact this office.

Sincerely,



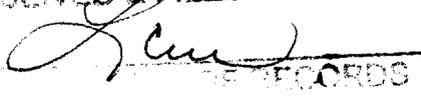
Richard A. Zambo

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Enclosures

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Generic Investigation Into The )  
Aggregate Electric Utility Reserve )  
Margins For Peninsular Florida )  
\_\_\_\_\_ )

Docket No. 981890-EU

Submitted for filing:  
October 1, 1999

**PETITION FOR LEAVE TO INTERVENE**

The Florida Industrial Cogeneration Association (FICA) and its members, through their undersigned attorney and pursuant to Rule 25-22.039, Florida Administrative Code, hereby petition the Commission for leave to intervene in the captioned proceeding, and as grounds therefore state:

1. The exact name of and address of Petitioner are:

Florida Industrial Cogeneration Association  
c/o Richard A. Zambo  
Richard A. Zambo, P.A.  
598 S.W. Hidden River Avenue  
Palm City, FL 34990

2. The person to whom all pleadings, notices, orders, schedules, recommendations and other documents to be filed or served in this Docket are to be sent is:

Richard A. Zambo  
Richard A. Zambo, P.A.  
598 S.W. Hidden River Avenue  
Palm City, FL 34990  
Phone (561) 220-9163  
FAX: (407) 220-9402

3. A primary purpose of this proceeding is to gather information sufficient for the Commission to render a decision regarding the adequacy of Florida's reserve margins.

DOCUMENT NUMBER-DATE

11931 OCT-4 99

4. FICA members own or operate cogeneration facilities in conjunction with their various industrial operations at locations throughout the State of Florida, and sell electricity to Florida electric utilities - including Florida Power Corporation (FPC), Florida Power & Light (FPL) and Gulf Power Company (Gulf), and Tampa Electric Company (TECO).

5. FICA members purchase supplemental and standby electricity from Florida electric utilities - including Florida Power Corporation (FPC), Florida Power & Light (FPL), Gulf Power Company (Gulf), and Tampa Electric Company (TECO).

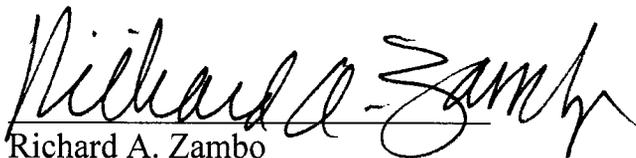
6. Reserve margins, either actual or planned, directly affect the value of cogenerated electricity sold by FICA members, and the cost and reliability of electricity purchased by FICA members from Florida electric utilities.

7. Accordingly, FICA member's substantial interests will undoubtedly be directly and significantly affected by any action taken by the Commission in this Docket.

WHEREFORE, FICA respectfully requests entry of an order granting it leave to intervene as a full party in interest to this proceeding.

Date: October 1, 1999

Respectfully submitted,



Richard A. Zambo  
Florida Bar No. 312525

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Attorney for FICA

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 981890-EU**

I HEREBY CERTIFY that a true and correct copy of the Petition For Leave To Intervene filed on behalf of Florida Industrial Cogeneration Association in the referenced proceeding, has been served by U.S. Mail to the following parties of record on this 15<sup>th</sup> day of October, 1999.

Mr. Robert V. Elias  
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Mr. Larry J. Thompson  
Utility Board of the City of Key West  
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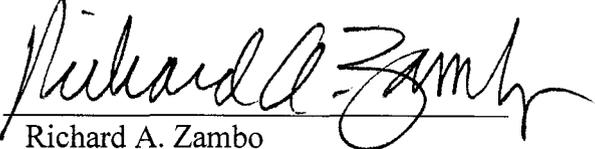
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By:   
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