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August 25, 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.: 000810-GU

Dear Ms. Bayo:

On behalf of the Industrial Intervenors, 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.

Sincerely,



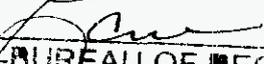
Vicki Gordon Kaufman

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Enclosure

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FPSC-BUREAU OF RECORDS

Done 9/13/00

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD, STEELE

DOCUMENT NUMBER-DATE

10580 AUG 25 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of modifications to tariff provisions governing transportation of customer-owned gas and tariff provisions to implement Rule 25-7.0335, F.A.C., by Tampa Electric Company d/b/a Peoples Gas System

Docket No.: 000810-GU
Filed: August 25, 2000

The Industrial Intervenors' Petition to Intervene

Tropicana Products, Inc., Universal Studios, and Juice Bowl Products, Inc. (Industrial Intervenors), pursuant to rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby file this Petition to Intervene in this docket. As grounds therefore, Industrial Intervenors state:

1. The name, address and telephone number of Petitioner is:

Industrial Intervenors
C/o Hugh Grey
KTM Energy Consulting Services
400 N. Indian Rocks Road, Suite E
Belleair Bluffs, Florida 33770
727-518-6363

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
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3. Industrial Intervenors are industrial customers who take service from Peoples Gas System (Peoples) and who wish to take transportation service from Peoples. Therefore, Industrial Intervenors will be substantially affected by any action the Commission takes in this docket in regard to Peoples' proposed tariff.

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 review Peoples' proposed transportation service tariff for non-residential customers.

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

a. Whether the proposed modifications should be approved.

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

a. The appropriateness of the proposed modifications.

8. Further, Industrial Intervenors suggest that the Commission ensure that Peoples will take the following actions as it implements its new tariff:

▶ Provide timely metered usage data to customers to allow customers adequate opportunity to adjust scheduled transportation quantities to avoid balancing charges or alert day penalty charges;

▶ Improve Peoples' field technician response when remote telemetry outages occur;

▶ Agree to provide timely usage data to customers and their agents, by email or fax, upon request;

▶ Assure adequate staff is available to promptly respond to telephone calls from customers and their agents;

▶ Continue to adjust and control receipts of gas from interstate pipelines at Peoples' receipt points to permit individual transportation customers a reasonable degree of daily flexibility to use more or less than that customer's scheduled quantities, without Peoples imposing frequent or routine alert day restrictions upon its individual transportation customers;

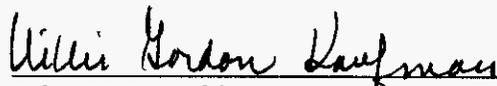
▶ Allow individual transportation customers adequate opportunities during each month and near the end of each month to resolve imbalance quantities prior to the end of a month;

▶ Provide individual transportation customers as much transportation scheduling flexibility in submitting nominations as such customers would have, had they been direct customers of the interstate pipeline;

▶ Avoid, whenever possible, the need to curtail or interrupt the delivery of gas to individual transportation customers;

▶ Avoid, whenever possible, the need to impose Unauthorized Overrun Penalties.

WHEREFORE, Industrial Intervenors requests that the Commission grant its Petition to Intervene and that it be accorded full party status in this docket.



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Attorneys for the Industrial Intervenors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing The Industrial Intervenors' Petition to Intervene has been furnished by (*) hand delivery and U.S. Mail to the following this 25th day of August, 2000:

(*) Cochran Keating
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Ansley Watson, Jr
MacFarlane Ferguson Law Firm
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