

COUNTY ATTORNEY  
METROPOLITAN DADE COUNTY, FLORIDA

ORIGINAL  
FILE COPY



February 28, 1989

SUITE 2810  
METRO-DADE CENTER  
111 N.W. 1ST STREET  
MIAMI, FL 33128-1993  
(305) 375-5151

Mr. Steven C. Tribble, Director  
Office of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Fl 32399-1407

Re: Petition of the Florida Industrial Power Users  
Group to Discontinue Florida Power and Light  
Company's Oil Backout Cost Recovery Factor.  
Docket No. 890148-EI

Dear Mr. Tribble:

Enclosed please find for filing the original and 15 copies  
of Metropolitan Dade County's Petition for Leave to Intervene.

Please acknowledge filing of the same by stamping the  
duplicate copy of this letter and returning it to me.

- ACK  \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMJ \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG** \_\_\_\_\_
- LEG W/m \_\_\_\_\_
- LIN 6 GPF/clw  
encl. \_\_\_\_\_
- OPC 1 \_\_\_\_\_
- ROH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- VRS \_\_\_\_\_
- CTH \_\_\_\_\_

Thank you very much for your time and cooperation in this  
matter.

Very truly yours,

Gail P. Fels  
Assistant County Attorney

RECEIVED & FILED

T.B.  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02222 MAR -2 1989

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of the Florida )  
Industrial Power Users Group to )  
Discontinue Florida Power and )  
Light Company's Oil Backout Cost) )  
Recovery Factor. )  
\_\_\_\_\_ )

Docket No. 890148-EI  
Submitted for Filing:  
March 1, 1989

METROPOLITAN DADE COUNTY'S PETITION  
FOR LEAVE TO INTERVENE

Pursuant to Rule 25-22.039, Florida Administrative Code, Metropolitan Dade County, ("Dade County") by and through its undersigned counsel, files this its Petition for Leave to Intervene in the above-styled dockets and as grounds in support thereof states as follows:

1. The exact name of Dade County and the address of its principal business office is:

Metropolitan Dade County, a political subdivision  
of the State of Florida  
111 N.W. 1st Street  
Miami, FL 33128-1992

2. The person to whom all CASR's, notices, orders, pleadings, staff recommendations, and other documents in connection with this matter are to be sent is:

Gail P. Fels  
Assistant County Attorney  
Dade County Attorney's Office  
111 N.W. 1st Street  
Suite 2810  
Miami, FL 33128-1993  
(305) 375-5151

3. Electrical service in Dade County is provided by Florida Power and Light Company ("FPL"). Dade County is one of the largest consumers of electricity on the FPL system, purchasing more than \$50 million of electricity annually for use in numerous County facilities.

DOCUMENT NUMBER-DATE

02222 MAR -2 1989

FPSC-RECORDS/REPORTING


4. Because of its substantial power bills, Dade County has a substantial interest in the petition to discontinue oil backup costs recovery factor of Florida Power and Light.

Wherefore, Dade County respectfully request that this Commission grant Dade County's Petition for Leave to Intervene as a party in the above captioned docket.

Respectfully submitted,

ROBERT A GINSBURG  
Dade County Attorney  
Metropolitan Dade County  
Suite 2810  
111 N.W. 1st Street  
Miami, FL 33128-1993

By:

  
Gail P. Fels  
Assistant County Attorney

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Metropolitan Dade County's Petition for Leave to Intervene in Docket 890148-EI has been furnished by U. S. Mail to all those on the attached list this 28<sup>th</sup> day of ~~March~~ February, 1989.

  
Assistant County Attorney

Service List

890148-EI

Jeffry Wiggs and Suzanne Brownless  
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