

B

LAW OFFICES
McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON & BAKAS

JOHN W. BAKAS, JR.
LEWIS J. CONWELL
LINDA C. DARSEY
C. THOMAS DAVIDSON
ALISEN S. DAVIS
STEPHEN O. DECKER
ENRICO G. GONZALEZ
LESLIE JOUGHIN, III
VICKI GORDON KAUFMAN
JOSEPH A. MCGLOTHLIN
RICHARD S. MCIVER
JOHN W. McWHIRTER, JR.
RICHARD W. REEVES
FRANK J. RIEP, III
MATTHEW D. SOYSTER
PAUL A. STRASSE

100 NORTH TAMPA STREET, SUITE 2900
TAMPA, FLORIDA 33602-5126

MAILING ADDRESS: TAMPA
P.O. BOX 3350, TAMPA, FLORIDA 33601-3350

TELEPHONE (813) 224-0866

FAX (813) 221-1854

CABLE GRANDLAW

PLEASE REPLY TO:
TALLAHASSEE

TALLAHASSEE OFFICE
315 SOUTH CALHOUN STREET
SUITE 716
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 222-2525
FAX (904) 222-5606

December 21, 1993

ORIGINAL
FILE COPY

HAND DELIVERED

Mr. Steve Tribble, Director
Division of Records and Reporting
101 East Gaines Street
Tallahassee, Florida 32399

Re: Docket No. 931044-BI, Petition for Authority to Implement
a Replacement Rate Schedule for Stand-by Electric Service
by Gulf Power Company.

Dear Mr. Tribble:

ACK Enclosed for filing and distribution are the original and 15
AFA copies of the Petition to Intervene, filed by Monsanto Company,
APP Stone Container Corporation and Champion International Corporation,
in the above docket.

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

EAG
LEG 1
LIN 4
OPC
RCH JAM/jfg
SEC 1 Enclosures
WAS
OTH Orig to Don

Yours truly,

Joe McGlothlin
Joseph A. McGlothlin

RECEIVED & FILED

M. Saly
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13534 DEC 21 83

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Petition for Authority to)
Implement a Replacement Rate)
Schedule for Stand-by Electric)
Service by Gulf Power Company.)

DOCKET NO. 931044-EI

FILED: December 21, 1993

PETITION TO INTERVENE

Monsanto Company, Stone Container Corporation, and Champion International Corporation, by and through their undersigned counsel, petition for leave to intervene in the above case and state:

1. The names and address of the Intervenor are as follows:

Monsanto Company
Stone Container Corporation
Champion International Corporation
c/o McWhirter, Reeves, McGlothlin,
Davidson & Bakas, P.A.
315 S. Calhoun Street, Suite 716
Tallahassee, Florida 32301

2. The names and addresses of the persons who should receive notices, pleadings and other communications are as follows:

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson & Bakas, P.A.
315 S. Calhoun Street, Suite 716
Tallahassee, FL 32301

John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin,
Davidson & Bakas, P.A.
Post Office Box 3350
Tampa, FL 33601-3350

DOCUMENT NUMBER-DATE

13534 DEC 21 83

FPSC-RECORDS/REPORTING

3. Monsanto Company, Stone Container Corporation and Champion International Corporation, hereinafter referred to as "Industrial Intervenors," are industrial concerns having facilities in Gulf Power Company's service area who receive standby and supplemental service from Gulf Power Company through rate schedule SS ("Standby Service").

4. Over time, certain deficiencies in the existing SS standby tariff have caused difficulties in the interpretation and application of the schedule. Over the course of the last eighteen months, Industrial Intervenors have coordinated with Gulf Power Company in an attempt to devise solutions to the problems associated with the existing standby tariff.

5. The replacement tariff proposed by Gulf Power Company in Docket No. 931044-EI represents the mutual efforts of Gulf Power Company and Industrial Intervenors to significantly improve the existing situation. Industrial Intervenors wish to intervene in support of the tariff revisions proposed by Gulf Power Company.

6. Any decision by the Commission regarding Gulf Power's standby rate, including a decision on the tariff revisions proposed by Gulf to cure some of the deficiencies identified by Industrial Intervenors, would affect their substantial interests.

WHEREFORE, Monsanto Company, Stone Container Corporation, and
Champion International Corporation request the Commission to enter
an order authorizing them to intervene as full parties in the above
proceeding.

Joseph A. McGlothlin
Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson & Bakas, P.A.
315 S. Calhoun Street, Suite 716
Tallahassee, Florida 32301
904/222-2525

John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin,
Davidson & Bakas, P.A.
Post Office Box 3350
Tampa, Florida 33601-3350
813/224-0866

Attorneys for the Industrial
Intervenors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Petition to Intervene has been furnished by U.S. Mail or by hand delivery* to the following parties of record, this 21st day of December, 1993.

Mary Anne Helton*
Division of Legal Services
Florida Public Service
Commission
101 E. Gaines Street
Rm. 212, Fletcher Building
Tallahassee, FL 32399

G. Edison Holland, Jr.
Jeffrey A. Stone
Teresa E. Liles
Beggs and Lane
Post Office Box 12950
Pensacola, FL 32576-2950

Jack L. Haskins
Manager of Rates and
Regulatory Matters
Gulf Power Company
Post Office Box 13470
Pensacola, FL 32591-3470


Joseph A. McGlothlin