

LAWSON, McWHIRTER, GRANDOFF & REEVES  
ATTORNEYS AT LAW

ORIGINAL  
FILE COPY

201 EAST KENNEDY BLVD. SUITE 200  
TAMPA, FLORIDA 33602  
(813) 224-0866  
TELECOPIER (813) 221-1854  
CABLE GRANDLAW

MAILING ADDRESS TAMPA  
P O Box 3050 TAMPA, FLORIDA 33601

MAILING ADDRESS TALLAHASSEE  
522 EAST PARK AVENUE  
SUITE 200  
TALLAHASSEE, FLORIDA 32301  
(904) 222-2525  
TELECOPIER (904) 222-5606

JOHN W. HARAS, JR.  
ENOLA T. BROWN  
C. THOMAS DAVIDSON  
ALLEN S. DAVIS  
STEPHEN O. DECKER  
J. BERT GRANDOFF  
G. CALVIN HAYES  
LESLIE JOUGHIN, III  
JOHN R. LAWSON, JR.  
THOMAS A. MANN, II  
JOSEPH A. MCGLOTHLIN  
JOHN W. McWHIRTER, JR.  
JEAN OWENS  
RICHARD W. REEVES  
WILLIAM W. SHIELDS, III  
DANA G. TOOLE

PLEASE REPLY TO:  
TALLAHASSEE

June 12, 1989

HAND DELIVERED

Steve Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
Fletcher Building  
101 East Gaines Street  
Tallahassee, Florida 32399- 0850

Re: Docket No. 890737-PU In re: Implementation of  
Section 366.80-.85, F.S., Conservation Activities of  
Electric and Gas Utilities

Dear Mr. Tribble:

Enclosed for filing and distribution are the original and  
twelve (12) copies of Florida Industrial Power Users Group's  
Petition to Intervene in the above docket.

Yours truly,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

- ACK ✓
- AFA
- APP *1/1/89*
- CAF
- CMU
- CTR
- (EAG)
- LEG *1/2/89*
- LIN *6*
- OPC *1*
- RCH *1*
- SEC *1* enclosures
- WAS
- OTH        VGK:taf

DOCUMENT NUMBER-DATE

05795 JUN 12 1989

FPSC-RECORDS/REPORTING

**ORIGINAL  
FILE COPY**

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In Re: Implementation of Section )  
366.80-.85, F.S., Conservation )  
Activities of Electric and Gas )  
Utilities )

Docket No.: 890737-PU  
Filed: June 12, 1989

**FLORIDA INDUSTRIAL POWER USERS GROUP'S  
MOTION TO INTERVENE**

The Florida Industrial Power Users Group ("FIPUG"), through its undersigned attorney, petitions to intervene in the above docket and states:

1. The name of the individual who should receive copies of notices, orders and pleadings in this proceeding is:

Vicki Gordon Kaufman  
Lawson, McWhirter, Grandoff & Reeves  
522 East Park Avenue  
Suite 200  
Tallahassee, Florida 32301

2. FIPUG is a voluntary, ad hoc organization of industrial users of electricity. Collectively, members of FIPUG consume many million kilowatt hours of electricity annually. The cost of electricity constitutes a significant portion of the production costs of FIPUG's members.

3. FIPUG members also consume many therms of gas annually. This constitutes a significant portion of the production costs of some FIPUG members.

4. In this docket, the Commission will set conservation

goals for electric and gas utilities as well as decide how such goals will be implemented by the utilities.

5. The setting and implementation of conservation goals will affect FIPUG's substantial interests as a consumer of electricity and gas.

WHEREFORE, FIPUG requests that its Petition to Intervene be granted and that it be permitted to participate as a full party in this proceeding.

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman  
Lawson, McWhirter, Grandoff  
& Reeves, P.A.  
522 East Park Avenue  
Suite 200  
Tallahassee, Florida 32301  
904/222-2525

Attorney for Florida  
Industrial Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Industrial Power Users Group Motion to Intervene has been furnished by U.S. Mail or hand delivery \* to the following parties of record, this 12th day of June, 1989:

Richard D. Nelson, Esquire  
Hopping, Boyd, Green & Sams  
Suite 420  
First Florida Bank Building  
P.O. Box 6526  
Tallahassee, Florida 32301

\* Suzanne Brownless, Esquire  
Staff Counsel  
Division of Legal Services  
Florida Public Service  
Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0850

James A. McGee, Esquire  
Florida Power Corporation  
3201 34th Street, South  
P.O. Box 14042  
St. Petersburg, Florida 33733

Lee Rampey, Esquire  
General Counsel  
Department of Energy  
Southeastern Power Adm.  
Elberton, GA 30635

James D. Beasley, Esquire  
Lee L. Willis, Esquire  
Ausley, McMullen, McGehee,  
Carothers & Proctor  
227 South Calhoun Street  
P.O. Box 391  
Tallahassee, Florida 32302

Susan Delegal, Esquire  
Broward County General Counsel  
115 South Andrews Avenue  
Suite 406  
Ft. Lauderdale, Florida 33301

Matthew H. Childs, Esquire  
Charles Guyton, Esquire  
Steel, Hector & Davis  
310 West College Avenue  
Tallahassee, Florida 32301

Roy Young, Esquire  
Young, Van Assenderp, Vanadoes  
and Benton, P.A.  
225 South Adams Street  
P.O. Box 1833  
Tallahassee, FL 32302-1833

Paul Sexton, Esquire  
Richard A. Zambo, P.A.  
820 East Park Avenue  
Suite 200  
Building A  
Tallahassee, Florida 32301

Yvonne Gsteiger  
Florida Rural Electric  
Cooperatives  
2916 Appalachee Parkway  
P.O. Box 590  
Tallahassee, Florida 32302

\* hand delivery

G. Edison Holland, Esquire  
Beggs and Lane  
P.O. Box 12950  
Pensacola, Florida 32576

Barney L. Capehart  
1601 N.W. 35th Way  
Gainesville, Florida 32605

Ann Carlin, Esquire  
Gainesville Regional Utilities  
200 E. University Avenue  
Gainesville, Florida 32602

Jack Shreve  
Office of the Public Counsel  
624 Fuller Warren Building  
202 Blount Street  
Tallahassee, Florida 32301

Gary Tipps  
Seminole Electric Cooperative  
P.O. Box 272000  
Tampa, Florida 33680-2000

Quincy Municipal Electric  
Light Department  
P.O. Box 941  
Quincy, Florida 32351

Frederic H. Bryant, Esquire  
William J. Peebles, Esquire  
306 East College Avenue  
P.O. Box 1169  
Tallahassee, Florida 32301

Alabama Electric Cooperative  
P.O. Box 560  
Andalusia, Alabama 37320

E.H. Grant  
Florida Keys Electric Cooperative  
P.O. Box 377  
Tavernier, Florida 33070

Terry O. Brackett, Esquire  
Associate General Counsel  
Sunshine Natural Gas System  
1899 L Street, N.W.  
Suite 500  
Washington, D.C. 20036

Edward C. Tannen, Esquire  
Assistant Counsel  
Jacksonville Electric  
Authority  
1300 City Hall  
Jacksonville, Florida 32202

Guyte P. McCord, III, Esquire  
Macfarlane, Ferguson, Allison  
& Kelly  
215 South Monroe Street  
P.O. Box 82  
Tallahassee, Florida 32302

City of Chattahoochee  
Attn: Superintendent  
115 Lincoln Drive  
Chattahoochee, Florida 32324

C.M. Haeve, Esquire  
Shaheda Sultan, Esquire  
Skadden, Arps, Slate, Meagher  
& Flom  
1440 New York Avenue, N.W.  
Washington, D.C. 20005-2107

Gail Fels, Esquire  
Assistant County Attorney  
Metro-Dade Center  
111 NW 1st Street  
Suite 2810  
Miami, Florida 33128-1993

Jean Blackburn  
P.O. Box 405  
Haitland, Florida 32751

Mike Peacock  
Florida Public Utilities Co.  
P.O. Box 610  
Marianna, Florida 32302

Ray Maxwell  
Reedy Creek Utilities Co.  
P.O. Box 40  
Lake Buena Vista, FL 32830

Governor's Energy Office  
Atten: Cogeneration Programs  
Manager  
301 Bryant Building  
Tallahassee, Florida 32301

J.E. McIntyre  
President  
West Florida Natural Gas  
Ocala Division  
112 East Fort King  
P.O. Box 579  
Ocala, Florida 32670

Phillip Barefoot  
Division Director  
Central Florida Gas Co.  
1015 6th Street, N.W.  
Winter Haven, FL 33881

Jack Langer  
President  
City Gas Company of Florida  
Brevard Division  
4180 U.S. 1  
Rockledge, FL 32922

Paul David Larsen  
Manager  
Florida Public Utilities Co.  
Deland Division  
401 N. Stone Street  
Deland, FL 32720

Russell B. Deegan  
President  
Gainesville Gas Company  
530 W. University Ave.  
P.O. Box 1128  
Gainesville, FL 32602

Timer Powers  
President  
Indiantown Gas Co., Inc.  
P.O. Box 8  
Indiantown, FL 34956

Richard H. Fleisher  
Vice Pres. - Finance  
Miller Gas Company  
9301 S.W. 56th Street  
Miami, FL 33165

John H. Hickman, III  
Chairman  
Palm Beach County  
Utilities Corporation  
P.O. Box 30787  
Palm Beach Gardens, FL 33410

Jack E. Uhl  
Executive Vice President  
Finance & Administration  
Peoples Gas System, Inc.  
P.O. Box 2562  
Tampa, FL 33601-2562

Philip Barefoot  
Division Director  
Plant City Natural Gas Co.  
607 South Evers Street  
Plant City, FL 33566

Stuart Shoaf  
Regulatory Affairs  
St. Joe Natural Gas Co., Inc.  
P.O. Box 549  
Port St. Joe, FL 32456-0549

J. Peter Martin  
President  
South Florida Natural Gas Co.  
101 N.W. 202 Terrace  
P.O. Box 69000J  
Miami, FL 33169

John McLelland  
General Manager  
Southern Gas Company  
1565 State Street  
P.O. Box 3499  
Sarasota, FL 33578

*Vicki Gordon Kaufman*  

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Vicki Gordon Kaufman

Attorney for Florida  
Industrial Power Users Group