

COUNTY ATTORNEY
METROPOLITAN DADE COUNTY, FLORIDA



July 26, 1989

ORIGINAL
FILE COPY

SUITE 2810
METRO-DADE CENTER
111 N.W. 1ST STREET
MIAMI, FL 33128-1983
(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

890737-PU

Re: Implementation of Section 366.80-.85,
Florida Statutes, Conservation Activities
of Electric and Gas Utilities

Dear Mr. Tribble:

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

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

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

EAG

LEG W/D

LIN 6

CRG 1

ROB 1

SEC 1 GPF/clw

WAS encl.

OTH

Very truly yours,

Gail P. Fels
Gail P. Fels
Assistant County Attorney

RECEIVED & FILED

J. J.
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07562 JUL 28 1989

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of Section) Docket No. 890737-PU
366.80-.85, Florida Statutes,)
Conservation Activities of) Submitted for Filing:
Electric and Gas Utilities) July 26, 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 its Petition for Leave to Intervene in the above-styled docket 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, notice, 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 approximately \$60 million of electricity annually

DOCUMENT NUMBER-DATE
07562 JUL 28 1989

for use in numerous County facilities. Of that sum, in excess of \$7 million was paid in 1988 as a result of the Florida Public Service Commission's energy conservation and oil backout charges.

4. Dade County also consumes natural gas.

5. 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.

6. The setting and implementation of conservation goals will affect Dade County's substantial interests as a consumer of electricity and gas.

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 890737-PU has been furnished by U. S. Mail to all those on the attached list this 26th day of July, 1989.



Assistant County Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of Section)
366.80-.85, Florida Statutes,)
Conservation Activities of Electric)
and Gas Utilities.)
_____)

DOCKET NO. 890737-PU

CERTIFICATE OF SERVICE

ELECTRIC UTILITIES

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