BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of GULF POWER COMPANY an increase in its rates and charges.

DOCKET NO. 891345-E1 Filed: April 12, 1990

INDUSTRIAL INTERVENORS' PETITION TO INTERVENE

American Cyanamid Company, Air Products & Chemicals, Stone Container Corporation, Champion International Corporation and Exxon Company, USA, ("Industrial Intervenors") $\frac{1}{2}$ / through their undersigned attorney, petition for leave to intervene in the above proceeding, and in support state:

 The full names and addresses of the Industrial Intervenors are:

> American Cyanamid Company Attn: Mr. C. J. Greimel One Cyanamid Plaza Wayne, New Jersey 07470

Air Products & Chemicals Attn: Mr. John DelPezzo Post Office Box 538 Allentown, Pennsylvania 18105

Stone Container Corporation Attn: Mr. Tom Kisla 2150 Parklake Drive, Suite 400 Atlanta, Georgia 30345

^{1/} Monsanto Company was granted leave to intervene in Order No. 22533. Monsanto is also one of the Industrial Intervenors.

Champion International Corporation Attn: John Murphy 1 Champion Plaza Stamford, Connecticut 06921

Exxon Company, USA Attn: Stuart Urban Post Office Box 61707 New Orleans, Louisiana 70161-1707

Copies of all pleadings, orders, notices, and other documents should be served on the following:

> John W. McWhirter, Jr. Lawson, McWhirter, Grandoff & Reeves Post Office Box 3350 Tampa, Florida 33601

Joseph A. McGlothlin Lawson, McWhirter, Grandoff & Reeves 522 E. Park Avenue, Suite 200 Tallahassee, Florida 32301

- 3. The Industrial Intervenors are industrial concerns with facilities located in Gulf Power's service area. The cost of electricity comprises a major portion of the Industrial Intervenors' costs of production.
- 4. Any decision by the Commission affecting the rates which the Industrial Intervenors pay to Gulf Power would affect their substantial interests by impacting their ability to compete and their level of employment.

WHEREFORE, the Industrial Intervenors request the Commission to enter an order authorizing them to intervene as full parties in this docket.

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Attorneys .or Industrial Intervenors

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Industrial Intervenors' Petition to Intervene has been furnished by U.S. Mail to the following parties of record, this <u>12th</u> day of April, 1990:

G. Edison Holland Jeffrey A. Stone Beggs and Lane Post Office Box 12950 Pensacola, Florida 32576

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Jack Haskins Gulf Power Company Corporate Headquarters 500 Bayfront Parkway Pensacola, Florida 32501

Suzanne Brownless Division of Legal Services Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32399-0872

Jack Shreve, Public Counsel Stephen C. Burgess, Deputy Public Counsel Office of the Public Counsel c/o The Florida Legislature 111 W. Madison Street, Rm. 801 Tallahassee, Florida 32399-1400

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Joseph A. Hellothlin