

BEFORE THE FLORIDA PUBLIC COMMISSION

PREPARED
FILE COPY

IN RE: PETITION OF GULF POWER
COMPANY FOR AN INCREASE IN ITS
RATES AND CHARGES

Docket No. 891345-EI
Filed: February 9, 1990

PETITION FOR LEAVE TO INTERVENE OF THE
FLORIDA RETAIL FEDERATION

The Florida Retail Federation ("Federation"), through the undersigned counsel and pursuant to Chapter 25-22, Florida Administrative Code, hereby files this Petition for Leave to Intervene in the above-referenced proceeding and in support thereof states:

1. The Federation is a trade association of Florida's retailing industry. Its corporate address is 100 East Jefferson Street, Tallahassee, Florida 32301. The Federation's primary purpose and reason for existence is to represent Florida's retailing industry before the state and national legislative bodies and to work with government agencies on behalf of the retailing industry of Florida.

ACK ✓ 2. The Federation represents retailers throughout the State of Florida, a
AFF 1 substantial number of which obtain regulated utility service from Gulf Power Company.
APP _____ Thus, a substantial number of the Federation's members, especially those residing in the
CAF _____
CMU _____ areas served by Gulf Power Company, have a significant interest in paying reasonable
CTR _____ utility rates for electricity service provided to them by Gulf Power Company. The cost
EAG 2 of electricity comprises a major portion of these retailers cost of doing business.
LEG 1/12/91
LRI 1/2 3. As users of electrical service, the individual members of the Federation would
CRD _____ be adversely affected by any rate increase or change in the rate structuring and thus it
RCH _____ will have a significant interest in this proceeding. Since the subject matter of this
SCL 1
WAS _____ proceeding is within the Federation's general scope of interest and activity and the relief
OTH _____

requested is of a type appropriate for the Federation to receive or request on behalf of its constituent members, the Federation hereby seeks permission to intervene and participate in the above-referenced proceeding for the purpose of protecting Florida's retailing industry from unreasonably high electric rates and charges.

4. The Federation further submits that evidence and information submitted by it will be of material value to the Commission in its determination of the issues involved and that this intervention will not broaden the issues nor cause unnecessary delay.

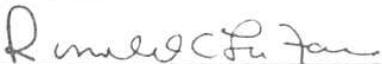
5. Copies of all pleadings, orders, notices and other documents should be served on the following:

Ronald C. LaFace
Roberts, Baggett, LaFace & Richard
Post Office Drawer 1838
Tallahassee, Florida 32302

WHEREFORE, Florida Retail Federation requests the Commission to enter an order authorizing it to intervene and to be treated as a full party to this proceeding with a right to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel.

Respectfully, submitted this 15th day of May, 1990.

ROBERTS, BAGGETT, LAFACE & RICHARD
101 East College Avenue
Post Office Drawer 1838
Tallahassee, Florida 32302
(904) 222-6891



RONALD C. LAFACE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by U.S. Mail to the following parties of records, this 15th day of February, 1990:

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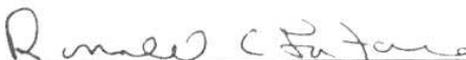
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