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RICHARD A. ZAMBO PAUL SEXTON PLEASE REPLY TO: TALLAHASSEE COGENERATION
ALTERNATIVE ENERGY
ENERGY REGULATORY LAW
PUBLIC UTILITY LAW
ADMINISTRATIVE LAW
APPELLATE LAW

September 25, 1990

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

> Re: Docket No. 900004-EU - Hearings On Load Forecasts, Generation Expansion Plans and Cogeneration Prices for Peninsular Florida's Electric Utilities.

> > Sincerely,

Dear Mr. Tribble:

Enclosed please find an original and ten copies of both Broward County's Petition for Leave to Intervene and Brief for filing in the above docket.

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ACK	Paul Sexton
AFA ——PS:1g	
APPenclosures	
CAFcc: Parties of Record	
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CTR	
EAG	
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SEC \_\_\_

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Petition DOCUMENT NUMBER -DATE 08553 SEP 25 1990

FSC-RECORDS/REPORTING

Briet DOCUMENT NUMBER-DATE

08554 SEP 25 1990

-PSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Hearings On Load Forecasts, )
Generation Expansion Plans and )
Cogeneration Prices for Peninsular )
Florida's Electric Utilities. )
September 25, 1990

PETITION OF BROWARD COUNTY FOR LEAVE TO INTERVENE

Broward County, by and through its undersigned attorneys, files its Petition for Leave to Intervene in the above Docket pursuant to Rule 25-22.039.

1. The name and address of the Intervenor are:

Broward County
C/O Thomas M. Henderson
Project Director
Broward County Resource Recovery
115 South Andrews Avenue
Room 521
Ft. lauderdale, Florida 33301

2. All notices, pleadings and other documents directed to Broward County should be served on:

Richard A. Zambo, Esquire Richard A. Zambo, P.A. 598 S.W. Hidden River Ave. Palm City, Florida 34990 (407) 220-9163

Paul Sexton, Esquire Richard A. Zambo, P.A. 211 South Gadsden Street Tallahassee, Florida 32301 (904) 222-9445

3. The substantial interests of Broward County will be affected by Commission action in this Docket. On May 25, 1990 the Commission voted to designate a 500MW coal-fired unit, with an inservice date of January 1, 1996, as the statewide avoided unit under Rule 25-17.083. At present, there are over 2,500MW of potential QF contracts signed and/or submitted to Florida Utilities for the 1996 500MW avoided unit and the Commission is considering

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what QF contracts are subject to the 500MW subscription limit on that unit. Two solid waste facilities are being constructed for the benefit of Broward County, who will receive the benefit of revenues for the sale of firm capacity and energy from the facilities. Commission action in this docket may prevent the sale of excess firm capacity from these facilities, to the detriment of Broward County.

WHEREFORE Broward County requests entry of an order granting it leave to intervene in the above proceedings.

Dated: September 25, 1990

Respectfully Submitted,

RICHARD A. ZAMBO, ESQUIRE Richard A. Zambo, P.A. 598 S.W. Hidden River Ave. Palm City, Florida 34990 (407) 220-9163 PAUL SEXTON, ESQUIRE Richard A. Zambo, P.A. 211 South Gadsden Street Tallahassee, Florida 32301 (904) 222-9445

Attorneys for Broward County

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following persons by U.S. Mail (Hand-delivery)\*, this 25th day of September, 1990.

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