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PLEASE REPLY TO:  
TALLAHASSEE

April 7, 1997

**HAND-DELIVERED**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Re: Docket No. 970171-EU

Dear Ms. Bayo:

✓ Enclosed for filing and distribution are the original and fifteen copies of The Florida Industrial Power Users Group's Petition to Intervene and Preliminary List of Issues in the above docket. 103580-97 103591-97

Please acknowledge receipt of the above on the extra copies enclosed herein and return them to me. Thank you for your assistance.

Sincerely,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

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RECEIVED & FILED  
BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of )  
appropriate cost allocation )  
and regulatory treatment of )  
total revenues associated )  
with wholesales to Florida )  
Municipal Power Agency and )  
City of Lakeland by Tampa )  
Electric Company. )  
\_\_\_\_\_ )

Docket No. 970171-EU

Filed: April 3, 1997

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S  
PETITION TO INTERVENE**

Pursuant to rule 25-22.039, Florida Administrative Code, the Florida Industrial Power Users Group (FIPUG), through its undersigned counsel, files this petition to intervene in this docket. As grounds therefor, FIPUG states:

1. All notices, orders and correspondence should be sent to the following on behalf of FIPUG:

John W. McWhirter, Jr.  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
Post Office Box 3350  
Tampa, Florida 33601

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301

2. FIPUG is an ad hoc group of industrial users of electricity. FIPUG members use millions of kilowatt hours of electricity per year. This expense comprises one of members' largest variable expenditures.

3. In this docket, the Commission will consider the appropriate cost

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FPSC-RECORDS/REPORTING

allocation and the regulatory treatment of revenues associated with Tampa Electric Company's (TECO) wholesale sales to the Florida Municipal Power Agency and the City of Lakeland.

4. As consumers of large amounts of electricity, FIPUG members are vitally concerned that retail consumers do not subsidize wholesale transactions and that any wholesale transactions are accounted for properly. Thus, FIPUG members have a substantial interest in this docket.

**WHEREFORE**, FIPUG requests that the Commission grant FIPUG's petition to intervene and accord it full party status in this docket.

*(Vicki Gordon Kaufman)*

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Attorneys for the Florida Industrial  
Power Users Group

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing **FIPUG Petition to Intervene** has been furnished by \*hand delivery or U.S. Mail to the following this **7th day of April, 1997:**

\*Leslie Paugh  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Gunter Building, Room 370  
Tallahassee, FL 32399-0850

Lee L. Willis  
James D. Beasley  
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227 South Calhoun Street  
Tallahassee, FL 32301

  
Vicki Gordon Kaufman