

**RICHARD A. ZAMBO, P.A.**  
ATTORNEYS AND COUNSELLORS  
398 S.W. HIDDEN RIVER AVENUE  
PALM CITY, FLORIDA 34990  
Telephone (561) 220-9163  
FAX (561) 220-9402

ORIGINAL

REGISTERED PROFESSIONAL ENGINEER  
REGISTERED PATENT ATTORNEY

COGENERATION & ALTERNATIVE ENERGY  
ENERGY REGULATORY LAW

**VIA FEDERAL EXPRESS**

December 8, 1997

Ms. Blanca S. Bayo, Director  
Division of Records & Reporting  
Florida Public Service Commission  
Capitol Circle Office Center  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

RECEIVED  
FEDERAL EXPRESS  
97 DEC 9 10 13  
TALLAHASSEE

In Re: Petition of IMC-Agrico Company for a Declaratory Statement  
FPSC Docket No. 971313

Dear Ms. Bayo:

Enclosed for filing in the above Docket please find an original and 7 copies of the Florida Global Citrus, Ltd.'s Petition for Leave to Intervene. If you have any questions regarding this filing, please do not hesitate to call.

Sincerely,

  
Richard A. Zambo

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AFA \_\_\_\_\_  
APP Bell  
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~~12540-DEC-95~~  
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of IMC-Agrico Company )  
for a Declaratory Statement Confirming )  
Non-Jurisdictional Nature of Planned )  
Self Generation. )

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Docket No. 971313-EU

Submitted for filing:  
December 8, 1997

**PETITION OF FLORIDA GLOBAL CITRUS, LTD.**  
**FOR LEAVE TO INTERVENE**

Florida Global Citrus, Ltd. (Florida Global) through its undersigned attorney and pursuant to Rule 25-22.039, F.A.C, hereby petitions the Commission for leave to intervene in the captioned proceeding in support of IMC-Agrico. As grounds for its petition, Florida Global says:

1. The exact name of and address of Petitioner are:

Florida Global Citrus, Ltd.  
6225 Bridgers Road  
P.O. Box 37  
Auburndale, FL 33823  
Attn: Richard J. Reichler, CFO

2. The person to whom all pleadings, notices, orders, schedules, recommendations and other documents to be filed or served in this Docket are to be sent is:

Richard A. Zambo  
Richard A. Zambo, P.A.  
598 S.W. Hidden River Avenue  
Palm City, FL 34990  
Phone (561) 220-9163  
FAX: (561) 220-9402

DOCUMENT NUMBER-DATE

12548 DEC-96

3. Florida Global owns and operates citrus processing facilities in Auburndale, Florida and currently purchases all of its electrical requirements from Tampa Electric Company (TECO) pursuant to firm rate schedule GSLDT.

4. The citrus processing business has become increasingly competitive, dictating that citrus processors, such as Florida Global, reduce production costs to remain competitively and financially viable. The cost of electricity purchased from TECO constitutes a significant portion of Florida Global's overall production cost. Florida Global is at a cost disadvantage to other citrus processors who cogenerate or purchase electricity at lower cost.

5. Over the past several years, Florida Global has sought a transfer to TECO's IST-3 interruptible rate schedule in an effort to reduce its electric costs. TECO has advised that its interruptible rates are fully subscribed to the subscription limits and are not available to new subscribers. TECO has also recently advised that Florida Global is at the "top" of the waiting list for transfer to an interruptible rate schedule as soon as the rate is available to new subscribers. (Florida Global has a peak electrical demand in the range of 4,000 kW.)

6. IMC-Agrico states in its petition that it purchases interruptible power from two public utilities. Florida Global understands that one of those utilities is TECO. Therefore, if IMC-Agrico's petition is granted and IMC-Agrico constructs the proposed self-generation facility, Florida Global understands that TECO would be well below the interruptible rate subscription limit thereby making the rate available to Florida Global. Transfer to an interruptible rate would significantly reduce Florida Global's electric costs.

7. Moreover, the granting of IMC-Agrico's petition would confirm that lease-financing mechanisms traditionally employed by industry for a range of capital equipment continue to be appropriate when applied to electric generating facilities such as cogeneration; and, construction of the proposed self-generation facility would increase generating reserve margins thereby deferring TECO's need to install additional generating capacity and the associated increase in electric rates.

8. Based on the foregoing, the substantial interests of Florida Global will clearly be affected in a number of ways by the Commission's decision regarding the IMC-Agrico petition.

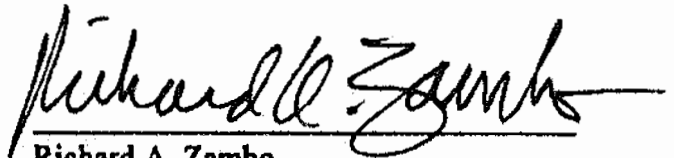
9. Florida Global recognizes that Commission decisions in recent years have typically denied intervention in declaratory statement proceedings. Florida Global fully agrees with and supports those decisions as being an appropriate application of the law. However, in light of the number of requests for intervention, for hearing or other means of participation by parties, and the lengthy arguments supporting such requests which have been filed in this proceeding, Florida Global has filed this petition in the unlikely event that the Commission should grant intervention or provide other means of participation by other parties, including Florida Global.

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WHEREFORE, subject to paragraph 9. hereof, Florida Global respectfully requests entry of an order: (a) granting it leave to intervene as a full party in interest to this proceeding; or alternatively, (b) granting it an opportunity to participate in this proceeding on the same basis as the Commission allows any other person(s) to participate.

Date: December 8, 1997

Respectfully submitted,



Richard A. Zambo  
Florida Bar No. 312525

RICHARD A. ZAMBO, P.A.  
598 S.W. Hidden River Avenue  
Palm City, FL 34990  
Phone: (561) 220-9163  
FAX: (561) 220-9402

Attorney for Florida Global Citrus, Ltd.

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 271313-EU**

I HEREBY CERTIFY that a copy of the Petition of Florida Global Citrus, Ltd. For Leave To Intervene in the referenced proceeding has been furnished by U.S. Mail to the following parties of record, this 8th day of December, 1997

Richard Bellak, Esquire  
Division of Appeals  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

Joseph A. McGlothlin, Esquire  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
315 S. Calhoun Street, Suite 716  
Tallahassee, FL 32301

John V. McWhirter, Jr., Esquire  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
Post Office Box 3350  
100 North Tampa Street  
Tampa, Florida 33602

Lee L. Willis, Esquire  
James D. Beasley, Esquire  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32302

James A. McGee, Esquire  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, Florida 33733

Matthew M. Childs, P.A.  
Charles A. Guyton  
Steel, Hector & Davis  
Suite 601, 215 S. Monroe St.  
Tallahassee, Florida 32301

By:   
Richard A. Zambo