

ORIGINAL

LAW OFFICES
MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, RIEF & BARAS, P.A.

100 NORTH TAMPA STREET, SUITE 2800
TAMPA, FLORIDA 33602-5126

TALLAHASSEE OFFICE
117 S. GADSDEN
TALLAHASSEE, FLORIDA 32301

LYNWOOD F. ARNOLD, JR.
JOHN W. BARAS, JR.
C. THOMAS DAVIDSON
STEPHEN O. DECKER
LINDA E. JORGE
VICKI GORDON KAUFMAN
JOSEPH A. MCGLOTHLIN
JOHN W. MCWHIRTER, JR.
RICHARD OLIVER
RICHARD W. REEVES
FRANK J. RIEF, III
DAVID W. STEEN
PAUL A. STRASKE

MAILING ADDRESS: TAMPA
P.O. BOX 3350, TAMPA, FLORIDA 33601-3350

TELEPHONE (850) 222-2525
FAX (850) 222-5006

TELEPHONE (813) 221-0800

FAX (813) 221-1854

CABLE: GRANDLAW

PLEASE REPLY TO
TALLAHASSEE

June 2, 1998

VIA HAND DELIVERY

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

Re: Docket No. 980693-EI

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 Response to Tampa Electric Company's Petition for Approval of Cost Recovery for New Environmental Program in the above docket.

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

VGK/pw

Encls.

- ACK
- AFA
- ADD
- CAF
- CFR
- CTR
- EA
- LL
- LT
- CF
- FL
- WA
- OTH

RECEIVED & FILED DOCUMENTS
15938 JUN-2 88
FPSC-BUREAU OF RECORDS

3339 333-288

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by Tampa Electric Company)
 for Approval of Cost Recovery for a New)
 Environmental Program, the Big Bend Units)
 1 and 2 Flue Gas Desulfurization System.)

Docket No. 980693-EI

Filed June 2, 1998

**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. In this docket, the Commission will determine whether Tampa Electric Company (TECO) can pass through the costs of retrofitting Big Bend Units 1 and 2 with scrubbers, plus collect AFUDC and other charges.

3. FIPUG is an ad hoc group of industrial users of electricity. FIPUG members use millions of kilowatt hours of electricity per year.

4. As consumers of large amounts of electricity, FIPUG has a substantial interest in whether the large amounts of money requested by TECO will be flowed through the environmental cost recovery clause to customers.

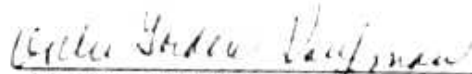
DOCUMENT NUMBER DATE

05938 JUN-28

FILED IN 1998

5. FIPUG's interests will be substantially affected by the Commission's decision in this docket.

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



John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas
Post Office Box 3350
Tampa, Florida 33601
Telephone: (813) 224-0866

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (904) 222-2525

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 2nd day of June, 1998:

Leslie Paugh*
Division of Legal Services
Florida Public Service Commission
Gerlad L. Gunter Building, Room 390Q
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

John Roger Howe
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400

Gail Kamaras, Director
Energy Advocacy Program
Legal Environmental Assistance Foundation
1115 North Gadsden Street
Tallahassee, Florida 32303-6327

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

Matthew M. Childs
Steel Hector & Davis
215 South Monroe Street
Suite 601
Tallahassee, Florida 32301-1804

Jeffrey A. Stone
Beggs and Lane
Post Office Box 12950
Pensacola, Florida 32576-2950


Vicki Gordon Kaufman