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PLEASE REPLY TO:  
TALLAHASSEE

January 26, 1999

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. 990017-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 in the above docket.

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

Sincerely,

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_ *Vicki Gordon Kaufman*  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG \_\_\_\_\_  
LIN \_\_\_\_\_  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC \_\_\_\_\_  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

Vicki Gordon Kaufman

VGK/pw

Encls.

*Done 1/29/99*

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01055 JAN 26 99

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Tampa Electric Company Non- )  
 Firm Electric Service - 1999 Assessment )  
 of Need. )  
 \_\_\_\_\_ )

Docket No. 990017-EI

Filed: January 26, 1999

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

The Florida Industrial Power Users Group (FIPUG) hereby petitions to intervene in the above docket. As grounds therefor, FIPUG states:

1. All notices, orders and correspondence should be sent to the following:

John W. McWhirter, Jr.  
 McWhirter, Reeves, McGlothlin,  
 Davidson, Decker, Kaufman,  
 Arnold & Steen, P.A.  
 Post Office Box 3350  
 Tampa, Florida 33601

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

2. In this docket, the Commission will review Tampa Electric Company's (TECo) Non-Firm Electric Service Assessment of Need. This filing purports to show that the IS-3 and IST-3 rates are not cost-effective.

3. As consumers of large amounts of electricity, FIPUG has a substantial interest in this docket. Some FIPUG members are currently on the IS-3 and IST-3 rates and may seek to increase their loads on those rates. Other FIPUG members may seek service under those rates in the future.

4. FIPUG's interests will be substantially affected by any action the Commission takes.

5. FIPUG disputes TECo's assertion that the IS-3 and IST-3 rates are no longer cost-

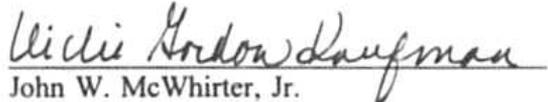
DOCUMENT NUMBER-DATE

01055 JAN 26 99

FISC-RECORDS/REPORTING

effective and further disputes TECo's contention that these rates should be closed. Interruptible rates offer many benefits which TECo has not taken into consideration.

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



John W. McWhirter, Jr.

Joseph A. McGlothlin

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 FIPUG's foregoing **Petition to Intervene** has been furnished by hand delivery (\*) or by U.S. Mail to the following parties of record this **26th** day of **January, 1999**:

Robert V. Elias\*  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Gunter Building, Room 370N  
Tallahassee, Florida 32399-0850

James Beasley  
Ausley & McMullen  
227 South Calhoun Street (32301)  
Post Office Box 391  
Tallahassee, Florida 32302

  
Vicki Gordon Kaufman