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June 16, 1999

BY HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
4750 Esplanade Way, Room 110
Tallahassee, FL 32399

RECEIVED-FPSC
JUN 16 PM 4:55
RECORDS AND REPORTING

Re: Generic Investigation into the Aggregate Electric Utility Reserve Margins Planned for Peninsular Florida, Docket No. 981890-EU

Dear Ms. Bayo:

Enclosed is the original and fifteen (15) copies of PG&E Generating Company's Petition for Leave to Intervene for filing in the above-referenced matter. Also enclosed is a formatted disk containing the Petition for Leave to Intervene.

Sincerely,

Jon C. Moyle, Jr.

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FPSC BUREAU OF RECORDS

JCM/jd

Enclosures

- AFA 2
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG Quelley
- LEG 2
- MAS 5
- OPC _____
- RRR _____
- SEC 1
- WAW _____
- OTH big. Flory

Done 6/18/99

DOCUMENT NUMBER-DATE

07310 JUN 16 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: GENERIC INVESTIGATION INTO
THE AGGREGATE ELECTRIC UTILITY
RESERVE MARGINS PLANNED FOR
PENINSULAR FLORIDA

Docket Number: 981890-EU
Filed: June 16, 1999

PG&E GENERATING COMPANY'S PETITION FOR LEAVE TO INTERVENE

PG&E Generating Company ("PG&E Generating") (formerly U. S. Generating Company) files this Petition for Leave to Intervene in the subject cause, pursuant to Rule 25-22.039, Florida Administrative Code. In support of the instant request, PG&E Generating states as follows:

I. NAME AND ADDRESS OF AGENCY AND PETITIONER

1. The name and address of the affected agency is:

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

2. The name and address of the Petitioner is:

PG&E Generating Company
7500 Old Georgetown Road
Bethesda, Maryland 20814

3. All pleadings, motions, orders and other documents directed to the Petitioner are to be served on:

Jon C. Moyle, Jr.
Moyle, Flanigan, Katz, Kolins,
Raymond & Sheehan, P.A.
210 S. Monroe Street
Tallahassee, Florida 32301

Sanford L. Hartman, Esquire
PG&E Generating Company
7500 Old Georgetown Road
Bethesda, MD 20814

II. EXPLANATION OF HOW SUBSTANTIAL INTERESTS OF PETITIONER WILL BE AFFECTED BY COMMISSION DETERMINATION

4. PG&E Generating is a Bethesda, Maryland-based company which operates electrical generating plants in Florida and other locations throughout the United States. PG&E Generating develops

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and manages electric power and cogeneration facilities which supply electricity to public utilities and steam to industrial firms.

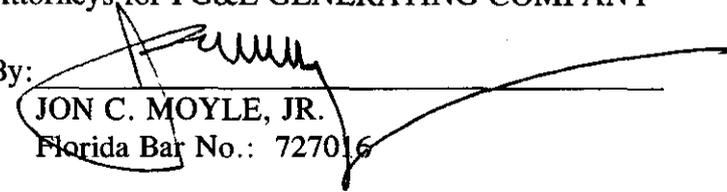
5. Because the Commission will undertake an analysis of the appropriate reserve margins and other reliability factors for Peninsular, Florida and determine the efficacy of the manner in which the reserve margin for Peninsular, Florida is calculated, issues regarding the reliability of the electric power grid and the need for future power plants in this State will be decided in this docket. As a generator of electrical power and, more specifically, a provider of electric power to the Florida electric power grid, as well as a company which has an interest in developing future power plant projects in Florida, Petitioner's substantial interests will be affected.¹

WHEREFORE, PG&E Generating respectfully requests that the Commission grant its Petition to Intervene into the instant proceeding and be afforded all rights and obligations of a party with intervenor status.

Respectfully submitted this 16th day of June, 1999.

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Attorneys for PG&E GENERATING COMPANY

By:


JON C. MOYLE, JR.

Florida Bar No.: 727016

¹U. S. Generating Company's name was changed to PG&E Generating Company on June 1, 1999. The name change does not reflect a change in the ownership structure or operations of the Company for purposes of this Petition or otherwise.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of PG&E Generating Company's Petition for Leave to Intervene has been furnished by hand delivery* or by U.S. Mail to the following parties of record this 16th day of June, 1999:

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Leslie J. Paugh*
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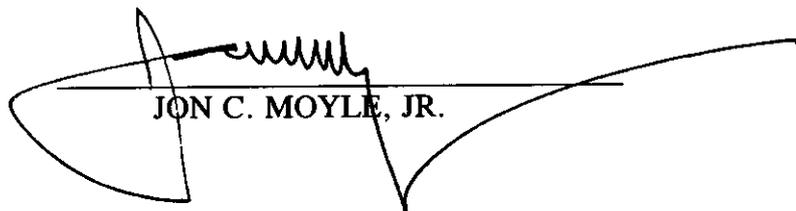
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Jacksonville Electric Authority
Tracy E. Danese
21 West Church Street, T-16
Jacksonville, FL 32202

Orlando Utilities Commission
T. B. Tart
Post Office Box 3193
Orlando, FL 32802

Utility Board of the City of
Key West
Larry J. Thompson
Post Office Box 6100
Key West, FL 33041



JON C. MOYLE, JR.