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RECORDS AND
REPORTING

July 30, 1999

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

Re: Docket No. 990947-EI

Dear Ms. Bayo:

Enclosed is an original and fifteen (15) copies of The Coalition's Petition to Intervene in the above docket. We have also enclosed a copy of the document on diskette, prepared in Microsoft Word 7.0 on a Windows 95 operating system. The diskette is a "2HD" density and 1.44 MB.

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

Sincerely yours,

Seann M. Frazier
Seann M. Frazier

Enclosures

SMF/skl

- Demelucy*
- ASD _____
- CAF _____
- CMJ _____
- CTR _____
- EAG 2
- LEG 6
- MSB _____
- OFC _____
- RRR _____
- SEC 1
- WAW _____
- OTH *Greg Hog*

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Done 8/12/99

GREENBERG TRAURIG, P.A.

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DOCUMENT NUMBER-DATE

09034 JUL 30 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a full revenue
requirements rate case for
Gulf Power Company.

Docket No: 990947
Filed: July 30, 1999

THE COALITION'S PETITION TO INTERVENE

The COALITION FOR EQUITABLE RATES ("Coalition") hereby petitions to intervene in Docket No. 990947 pursuant to Chapter 366, Florida Statutes and Rules 25-22.039 and 28-106.205, Florida Administrative Code. As support of this Petition the Coalition states:

1. The Coalition is the Petitioner. The Coalition is an association of entities which pay Gulf Power Company ("GP Company") for power at rates approved by the Florida Public Service Commission ("PSC") and an association of entities which represent such ratepayers. Representative examples of those entities within the Coalition include the Florida Health Care Association (which consists of most skilled nursing facilities and many assisted living facilities in Florida), Florida Retail Federation (which consists major retailers in Florida) and the Florida Hotel and Motel Association (which consists of a large number of hotels and motels located in Florida). A substantial portion of the Coalition's members pay GP Company for power. The Coalition is a "person" as defined by §1.01 and §120.52(13), Fla. Stat. The Coalition is authorized to monitor the basis for the rates charged to its members and to challenge such

components, as well as the rates themselves in order to assure reasonable and affordable rates for services.

2. The Coalition maintains offices at 2300 N Street, Northwest, Washington, DC 20037, telephone number (202) 663-9097. However, for purposes of this Petition, the Coalition may be contacted through its counsel, Ronald C. LaFace, Greenberg Traurig, P.A., 101 East College Avenue, Tallahassee, FL 32301, telephone number (850)222-6891.

3. The agency affected by this Petition is the State of Florida, Public Service Commission ("PSC"), located at 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, telephone number (850)413-6248. However, this docket concerns a Petition for Full Revenue Requirements case for GP Company.

4. In this docket, the Office of Public Counsel ("OPC") has petitioned the Commission to conduct a full revenue requirements case for the GP Company. Among other things, OPC has requested that monies be held subject to refund and that a hearing be held to set fair, just and reasonable base rates and charges for GP Company.

5. The Coalition is an organization of large commercial consumers. Members of the Coalition are GP Company customers. As consumers of large amounts of electricity, the Coalition members have a substantial interest in this docket.

6. As noted in OPC's Petition, GP Company has not had a rate case since 1990. The Commission should examine GP Company's rates, charges and return on equity (ROE) in a comprehensive proceeding, like the one OPC seeks.

7. The Coalition's interests will be substantially affected by the action the Commission takes in this docket. If this proceeding results in rate reductions by GP Company, a substantial number of the Coalition's members will receive significant reductions in the amounts they pay to GP Company for electricity.

8. Disputed issues of fact include, but are not limited, to all issues of fact raised in the OPC's Petition to Conduct a Full Revenue Requirements Case for GP Company and facts related to whether GP Company's return on equity is excessive.

9. As a matter of ultimate fact and law, GP Company's rates should be set at a fair just and reasonable levels and that monies be held subject to refund to the customers of GP Company.

WHEREFORE, the Coalition requests that the Commission grant the Coalition's petition to intervene and accord it full party status in this docket that the Commission conduct a full revenue requirements base rate proceeding to establish fair, just and reasonable base rates and charges for GP Company.



Ronald C. LaFace

Florida Bar Id. 098614

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Florida Bar No. 971200

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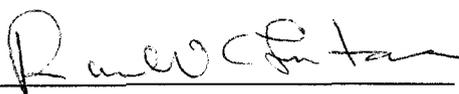
Post Office Drawer 1838

Tallahassee, FL 32302

Attorneys for the Coalition for Equitable Rates

CERTIFICATE OF FILING AND SERVICE

I HEREBY CERTIFY that the original, fifteen (15) has been furnished by Hand Delivery to Public Service Commission, Director, Division of Records and Reporting, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850; and a copy has been furnished via Hand Delivery to the Office of Public Counsel, Jack Shreve, 812 Pepper Building, 111 W. Madison Street, Tallahassee, Florida 32399-1400; as indicated to the parties on the attached mailing list this 30th day of July, 1999.



Ronald C. LaFace

Mailing List

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Via Federal Express

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Via Hand Delivery