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October 20, 1999

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oaks Boulevard  
Tallahassee, FL 32399-0850

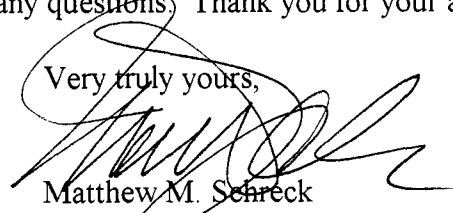
In Re: Petition of Tampa Electric  
Company to Close Rate Schedules  
IS-3 and IST-3, and approve  
New Rate Schedules GSLM-2 and GSLM-3  
Docket No. 990037-EI

Dear Ms. Blanco:

Enclosed please find for filing an original and fourteen copies of the "Supplement to Petition to Intervene of Coronet Industries, Inc." in the above-referenced proceeding. An extra copy of this document is enclosed to be time-stamped and returned in the enclosed self-addressed, stamped envelope.

Please call me if you have any questions. Thank you for your assistance with this matter.

Very truly yours,



Matthew M. Schreck  
Attorney for  
Coronet Industries, Inc.

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- APP
- CAF
- CMU
- CTR        Enclosures
- EAG   1
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Tampa Electric )  
Company to Close Rate Schedules )  
IS-3 and IST-3, and approve )  
new Rate Schedules GSLM-2 and GSLM-3 )

DOCKET No. 990037-EI  
FILED: October 20, 1999

SUPPLEMENT TO PETITION TO INTERVENE  
OF CORONET INDUSTRIES, INC.

Pursuant to Fla. Admin Code Rule 28-106.205, Coronet Industries, Inc. ("Coronet") hereby files this Supplement to the Petition to Intervene ("Petition") filed by Coronet in the above-styled proceeding on February 9, 1999.<sup>1</sup> In support of this Supplement, Coronet respectfully states the following:

I.

The name, address, telephone number, and facsimile number of the petitioner are:

Coronet Industries, Inc.  
4082 Coronet Road  
Plant City, Florida 33564-0760  
(813) 752-1161  
(813) 754-8558 (FAX)

II.

The name, address, telephone number, and facsimile number of the attorney and qualified representative of the petitioner are:

Dave Hines  
Vice President — General Affairs  
Coronet Industries, Inc.  
4082 Coronet Road  
Plant City, Florida 33564-0760  
(813) 752-1161  
(813) 754-8558 (FAX)

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<sup>1</sup> By order issued on May 4, 1999, the Florida Public Service Commission ("FPSC") granted Coronet's Petition. By order issued on June 1, 1999, the FPSC authorized the undersigned to act as Coronet's Qualified Representative in the above-styled proceeding.

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III.

On October 1, 1999, the Florida Industrial Power Users Group ("FIPUG") filed a "Petition for Formal Proceeding on Proposed Action in Order No. PSC-99-1778-FOF-EI" (the "FIPUG Petition"), requesting that the FPSC convene a hearing to address the issues raised therein. In particular, FIPUG demanded the following relief:

1. That Tampa Electric Company's ("TECo") Interruptible Service-3, Interruptible Service Time of Use-3 and Interruptible Standby and Supplemental Service-3 rate schedules not be closed to new customers;
2. That TECo's proposed General Industrial Load Management Rider (GSLM-2) and General Service Industrial Standby and Supplemental Load Management Rider (GSLM-3) be rejected in favor of adding additional load under the provisions of IS-3 if additional non-firm load is justified and needed;
3. That TECo place restrictions on wholesale transactions which imperil service to non-firm customers as a condition to closing the IS-3 rate schedule or opening the additional non-firm schedules at a higher price to firm and non-firm customers;
4. If the Commission finds that non-firm load presently or in the future will exceed installed capacity in violation of TECo's commitment in Docket 970408-EI what remedies should be provided to protect the substantial interests of interruptible customers?; and
5. That the Commission provide such other relief as it deems appropriate.

The FIPUG Petition was prompted by the FPSC's "Order Approving Closure of Interruptible Service Rate Schedules to New Customers and Approving New Load Management Rate Schedules," which was issued on September 10, 1999 in the above-styled proceeding (the "September 10<sup>th</sup>

Order”). The September 10<sup>th</sup> Order, among other things, approved TECo’s closing of its two interruptible rate schedules and the establishment of the GSLM-2 and GSLM-3 services in lieu thereof.

As part of the grounds underlying its requested relief, FIPUG’s Petition stated:

FIPUG non-firm customers have been interrupted or subjected to unprecedented purchased power costs over the last 24 months. On information and belief, these interruptions and extraordinary purchased power costs have come about because of TECo’s failure to build sufficient capacity to meet the demand of its firm and non-firm customers and because its transactions in the competitive wholesale market have snubbed the cardinal principal [”It is assumed that the sum of the firm load which can be reliably served and the maximum non-firm load at the time of peak should not exceed the capacity of its generating system.”] FIPUG demands strict proof that TECO’s generating capacity exceeds the maximum firm and non-firm load at the time of summer and winter peaks. *Mimeo at 3.*<sup>2</sup>

#### IV.

FIPUG’s Petition requests that the FPSC address several issues that directly impact Coronet, as an existing customer of TECO under Rate Schedule IS-3.

In particular, Coronet has been both interrupted as well as invoiced excessive charges for power purchases during the past year. Such interruptions and excessive power costs appear to be the result of the same facts of which FIPUG’s Petition now complains — the lack of sufficient generating capacity of TECo to satisfy peak demand on its system and the purchase of interruptible power from third-party utilities at exorbitant costs. Because Coronet has no power supply

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<sup>2</sup> FIPUG included the following among the disputed issue of facts to be addressed by the FPSC:

Should retail non-firm customers be required to pay higher prices for purchased power when there is a forced outage of a TECo power plant due to the fact that Rule 25-6.035(5), Florida Administrative Code, enables other Florida utilities to charge TECo higher peak period market rates rather than cost-based emergency rates TECo charges the other utilities when it diverts generators in the retail rate base away from its non-firm customers to meet demands of other utilities’ customers. *Mimeo at 5.*

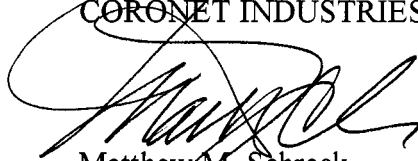
alternatives, obtaining the relief sought by FIPUG is of great interest to Coronet.

Accordingly, Coronet supports FIPUG's Petition, and urges the FPSC to institute a formal proceeding to investigate the issues raised therein and to issue an order in response thereto, including the granting of the relief sought by FIPUG.

V.

WHEREFORE, Coronet respectfully requests that this Supplement be made part of the record in this proceeding, and that the FPSC institutes a formal proceeding to investigate the issues raised by FIPUG's Petition and issue an order in response thereto, including the granting of the relief sought by FIPUG.

Respectfully submitted,  
CORONET INDUSTRIES, INC.



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Houston, Texas 77024  
(713) 464-5759

Attorney for  
Coronet Industries, Inc.

Dated: October 20, 1999

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the following parties by first-class, U.S. Mail, on this 20<sup>th</sup> day of October, 1999:

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James D. Beasley  
Ausley & McMullen  
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Administrator, Regulatory Coordination  
Tampa Electric Company  
P.O. Box 111  
Tampa, FL 33602

Florida Industrial Power Users Group  
C/o John McWhirter, Jr.  
McWhirter Reeves  
P.O. Box 3350  
Tampa, FL 33601-3350

McWhirter Law Firm  
Joseph McGlothlin/Vicki Kaufman  
117 S. Gadsden St.  
Tallahassee, FL 32301

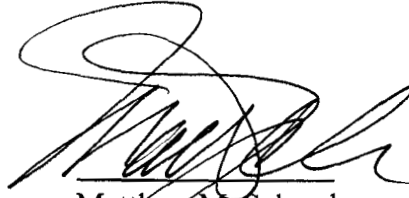
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