

ORIGINAL

# MCWHIRTER REEVES

ATTORNEYS AT LAW

TAMPA OFFICE:  
400 NORTH TAMPA STREET, SUITE 2450  
TAMPA, FLORIDA 33602-5126  
P.O. BOX 3350 TAMPA, FL 33601-3350  
(813) 224-0866 (813) 221-1854 Fax

PLEASE REPLY TO:  
TALLAHASSEE

TALLAHASSEE OFFICE:  
117 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 Fax

May 11, 2000

## VIA HAND DELIVERY

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

RECEIVED-FPSC  
00 MAY 11 PM 12:43  
RECORDS AND REPORTING

Re: Docket Number 000531-EI

Dear Ms. Bayo:

On behalf of Florida Industrial Power Users Group, enclosed for filing and distribution are the original and 15 copies of:

- FIPUG's Objection to Gulf Power Company's Request for Confidential Classification and,
- ▶ The Florida Industrial Power Users Group's Petition to Intervene.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me in the envelope provided. Thank you for your assistance.

Yours truly,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

FA	_____
PP	_____
AF	_____
MM	_____
TR	_____
EAG	3
EG	1
AS	_____
PC	_____
ER	_____
EC	_____
AW	1
OTH	_____

Key

VGK/bae  
Enclosure

RECEIVED & FILED  
*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE  
05878 MAY 11 8  
FPSC-RECORDS/REPORTING

In re: Gulf Power Company FERC  
Form 1 for the year ending  
December 31, 1999.

Docket No. 000531-EI

Filed: May 11, 2000

**The Florida Industrial Power Users Group's Petition to Intervene**

The Florida Industrial Power Users Group (FIPUG), pursuant to rules 25-22.039 and 28-106.205, Florida Administrative Code, hereby files its Petition to Intervene in this docket. As grounds therefor, FIPUG states:

1. The name, address, and telephone number of Petitioner is:

Florida Industrial Power Users Group  
c/o John W. McWhirter, Jr.  
McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen , P.A.  
400 North Tampa Street, Suite 2450  
Tampa, Florida 33601-3350  
813-224-0866

2. The name, address and telephone number of Petitioner's representatives for purpose of service during the course of the proceeding is:

John W. McWhirter, Jr.  
McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen , P.A.  
400 North Tampa Street, Suite 2450  
Tampa, Florida 33601-3350  
813-224-0866

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen , P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
850-222-2525

3. The affected agency is the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

4. In this docket, Gulf Power Company (Gulf), has petitioned the Commission for confidential classification of Gulf's costs and operations as detailed in Gulf's FERC Form 1, for the year ending December 31, 1999. FIPUG is a group of large industrial customers, some of whom receive power from Gulf and are responsible for their share of the costs Gulf wants to shield from public view. Therefore, FIPUG's substantial interests will be affected by the Commission's action in this docket.

5. Disputed issues of material fact include, but are not limited to, the following:

- a. Has Gulf made the required showing to prevent public disclosure of this information to ratepayers?
- b. Are ratepayers entitled to access to information related to items for which they bear cost responsibility?

6. Ultimate facts include, but are not limited to, the following:

- a. Should the information Gulf has identified be kept confidential from its ratepayers?

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

*Willie Gudwin Kaufman*

John W. McWhirter, Jr.  
McWhirter Reeves McGlothlin Davidson  
Decker Kaufman Arnold & Steen, P.A.  
400 North Tampa Street, Suite 2450  
Tampa, Florida 33601-3350

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

Attorneys for the Florida Industrial Power  
Users Group

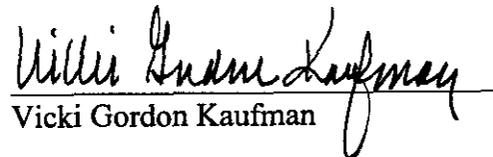
**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing FIPUG Petition to Intervene has been furnished by (\*) hand delivery and U.S. Mail to the following this 11th day of May, 2000:

(\*)Robert V. Elias  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Roger Howe  
Office of the Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399

Jeffrey A. Stone  
Beggs & Lane  
Post Office Box 12950  
Pensacola, Florida 32576

  
Vicki Gordon Kaufman