

GREENBERG
ATTORNEYS AT LAW
TRAUBIG

July 21, 2000

ORIGINAL

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

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RECORDS AND
REPORTING

Re: Docket No. 000824-EI

Dear Ms. Bayo:

Enclosed is an original and fifteen (15) copies of Florida Retail Federation'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.

Thank you in advance for your assistance.

Sincerely yours,

Seann M. Frazier

Enclosures
SMF/skl

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Done 7/25/00

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GREENBERG TRAUBIG, P.A.

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DOCUMENT NUMBER-DATE

08887 JUL 21 0

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Review of Florida Power Corporation's)
earnings, including effects of proposed)
acquisition of Florida Power Corporation by)
Carolina Power & Light.)
_____)

Docket No. 000824-EI
Filed: July 21, 2000

FLORIDA RETAIL FEDERATION'S PETITION TO INTERVENE

FLORIDA RETAIL FEDERATION ("Federation") hereby petitions to intervene in Docket No. 000824-EI pursuant to Chapter 366, Florida Statutes and Rules 25-22.039 and 28-106.205, Florida Administrative Code. In support of this Petition, the Federation states:

1. The Federation is the Petitioner. The Federation is an association of retail operators, a substantial portion of which pay Florida Power Corporation ("FPC" or "Company") for power at rates approved by the Florida Public Service Commission ("PSC"). The Federation is a "person" as defined by §1.01 and §120.52(13), Florida Statutes. The Federation is authorized to monitor the basis for earnings of electrical companies such as FPC and to challenge such components.

2. The Federation maintains offices at 100 E. Jefferson Street, Tallahassee, Florida 32301, telephone number (850) 222-3461. However, for the purposes of this Petition, the Federation may be contacted through its counsel, Ronald C. LaFace and Seann M. Frazier, 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,

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FPSC-RECORDS/REPORTING

telephone number (850) 413-6248. However, this docket concerns FPC, whose earnings are subject to review.

4. In this docket, PSC staff have requested the Commission to review FPC's earnings, including the effects of the proposed acquisition of Florida Power Corporation by Carolina Power & Light.

5. The Federation is an organization of large commercial consumers. A substantial portion of the Federation's members are FPC customers. As consumers of large amounts of electricity, the Federation and its members will be substantially affected by actions taken in this docket.

6. Disputed issues of fact include, but are not limited, all facts related to the effects of the proposed acquisition of FPC by Carolina Power & Light on the earnings of FPC.

7. As a matter of ultimate fact and law, the PSC should investigate the effect on FPC's earnings caused by the proposed acquisition of FPC by Carolina Power & Light.

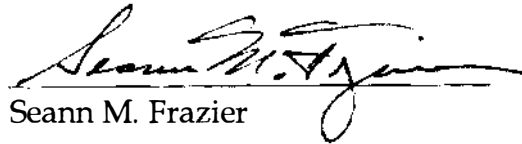
For the foregoing reasons, the Federation requests that the Commission grant the Federation's Petition to Intervene and accord it full party status in this docket.



Ronald C. LaFace
Seann M. Frazier
Greenberg Traurig, P.A.
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Tallahassee, FL 32302
Attorneys for Florida Retail Federation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and fifteen (15) copies of the foregoing has been furnished by Hand Delivery to Public Service Commission, Director, Division of Records and Reporting, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850; a copy has been furnished to the parties on the attached mailing list via U.S. Mail this 21st day of July, 2000.


Seann M. Frazier

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***Florida Industrial Power Users Group and
Tropicana Products, Inc.***

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