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August 3, 2000

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Blanca S. Bayo, Director  
Division of Records and Reporting  
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Tallahassee, Florida 32399-0870

Re: Application of Cargill Fertilizer, Inc. to engage in a pilot project for self service wheeling to, from and between points within Tampa Electric Company's service area, Docket No. 001048-EP

Dear Ms. Bayo:

On behalf of Cargill Fertilizer, Inc., enclosed for filing and distribution are the original and fifteen copies of the following:

- ▶ Petition of Cargill Fertilizer, Inc. and Request for Expedited Treatment

We request that this petition be processed on an expedited basis so that the program may be promptly put in place. Please acknowledge receipt of the above on the extra copy and return the stamped copies to me in the envelope provided. Thank you for your assistance.

Yours truly,

*Vicki Gordon Kaufman*

Vicki Gordon Kaufman

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cc: All parties on Service List.

DOCUMENT NUMBER - DATE  
**09461 AUG-30**  
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Application of Cargill Fertilizer, Inc.  
to engage in a pilot project for self service wheeling  
to, from and between points within Tampa Electric  
Company's service area.

Docket No. 001048-ER  
Filed: August 3, 2000

**PETITION OF CARGILL FERTILIZER, INC.  
AND REQUEST FOR EXPEDITED TREATMENT**

Cargill Fertilizer, Inc. (Cargill), through its undersigned attorneys, seeks authority from the Florida Public Service Commission (Commission) to authorize Tampa Electric Company (TECo) to transmit power generated by Cargill at its cogeneration sites to other Cargill plant sites located within the TECo service area under the provisions of Chapters 366.051 and 366.075, *Florida Statutes*, and Commission rule 25-17.008, Florida Administrative Code. In support of its petition, Cargill alleges:

1. Cargill is an industrial enterprise with cogeneration plants located within the TECo service area. These plants have been classified as "qualifying facilities" under the relevant state and federal regulations. Cargill is engaged in mining operations and related activities at several locations and operates fertilizer plants at other locations. The fertilizer plants convert phosphate rock and other materials into a variety of agricultural products.

2. Cogeneration is encouraged under the provisions of the Federal Public Utility Regulatory Policies Act, the Florida Energy Efficiency and Conservation Act in general, and Chapter 366.82, *Florida Statutes*; in particular, by Chapter 25-17, F.A.C. and by TECo's cogeneration conservation program.

3. Chapter 366.051, *Florida Statutes*, authorizes self-service wheeling:

...if the commission finds that the provision of this service, and the charges, terms, and other conditions associated with the provision of this service, are not likely to result in higher cost electric service to the utility's general body of retail and wholesale customers or adversely affect the adequacy or reliability of electric service to all customers.

4. Cargill operates a fertilizer plant near Riverview, Florida. The electric meter at this site is designated "New Millpoint" by TECo. It is interconnected with the TECo transmission grid at 69,000 volts. Cargill operates the transformer substation and internal distribution system behind

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the TECo electric meter. In the 1920s, Cargill's predecessor constructed self-generation at this site to serve the site and the surrounding vicinity. From time to time, additional self-generation and cogeneration has been added. The most recent cogeneration plant expansion was completed at this site in early 2000.

5. The New Millpoint cogeneration plant is normally adequate to meet the entire electrical demand of the New Millpoint fertilizer plant with sufficient surplus power to sell incidental amounts in the wholesale electric energy market. The capacity and production records of the plant are known to TECo. New Millpoint is provided standby interruptible service by TECo under its SBIT-3 tariff.

6. A second Cargill fertilizer plant is located in TECo's service territory on Highway 60 near Bartow, Florida. It is a similar fertilizer plant/cogeneration facility as described above at New Millpoint. It is interconnected with the TECo transmission grid at 69,000 volts. It is classified by TECo as the "Ridgewood Master." The Ridgewood Master plant is served by TECo under its SBIT-1 tariff. The Ridgewood Master plant is also connected to Cargill's Hooker's Prairie mine (located within TECo's service area) by Cargill's 12-mile 69,000 volt line. TECo provides service to Cargill's Hooker's Prairie mine at 69,000 volts through an IST-1 meter.

7. This Commission's Order No. PSC-00-1266-PAA-EI issued in Docket No. 000001-EI on July 11, 2000 states:

If a non-firm retail customer meets the conditions set forth in Rule 25-17.0883, Florida Administrative Code, then the customer may request transmission and distribution services from TECO in order to transmit electrical power generated at one location to the customer's facilities at another location. If TECO does not provide transmission and distribution services to the customer pursuant to such request, the customer may petition the Commission for relief.

8. TECo has authorized Cargill to state that it agrees to provide self service wheeling service to Cargill to, from and between points within TECo's service area as a pilot project approved by this Commission under Section 366.075, *Florida Statutes*, on an experimental and transitional basis to gain experience and to more fully understand the costs and benefits of the provision of self-service wheeling to its customers. TECo has agreed to not oppose any such service request by Cargill to this Commission with service to be provided until TECo's next full revenue requirements rate case.

9. Cargill requests that the Commission find that the provisions of this requested self service wheeling service by TECo to Cargill as described herein meets the requirements of Rule 25-17.0883, Florida Administrative Code, and Section 366.075, Florida Statutes.

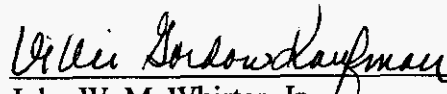
10. The internal use of cogenerated power by Cargill partially avoids the operation of TECo's peaking units and older high heat rate generating stations.

11. Self service wheeling by Cargill will partially avoid the necessity of requiring TECo to purchase off system power generated by higher cost units.

12. The ability to transmit power between its locations will enable Cargill to operate and maintain its system efficiently without any perceptible impact on TECo except for the revenue that will be gained from wheeling charges.

13. Cargill may be able to avoid interruptions when TECo lacks capacity to service its locations.

**WHEREFORE**, Cargill, Inc. petitions the Commission to make an expeditious finding that self service wheeling by Cargill to, from and between its various plant locations in the TECo service area under the terms of the proposed pilot project as described herein is not likely to result in higher cost electric service to the general body of retail and wholesale customers or adversely affect the adequacy or reliability of electric service to all customers.

  
\_\_\_\_\_  
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Attorneys for Cargill Fertilizer, Inc.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing **Petition** has been provided by (\*) hand delivery or U.S. Mail to the following persons this 3rd day of August 2000:

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