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ORIGINAL  
RECORDS AND  
REPORTING  
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October 23, 2000

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

RE: Docket No. 991779-EI

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of a Response to the Florida Industrial Power Users Group's Motion for Clarification of Partis I & II and Protest to Part III of Order No. PSC-00-1744-PAA-EI for filing in the above referenced file.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Stephen C. Burgess  
Deputy Public Counsel

SCB/dsb  
Enclosures

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- OMP \_\_\_\_\_
- COM 5
- CTR \_\_\_\_\_
- EQR 1
- LEG 1
- ORG \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC 1
- SER Handwritten
- OTH \_\_\_\_\_

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DOCUMENT NUMBER-DATE

13504 OCT 23 8

FPSC-RECORDS/REPORTING

Done 10/27/00

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of the appropriate )  
application of incentives to )  
wholesale power sales by )  
investor-owned electric )  
utilities. )  
\_\_\_\_\_ )

DOCKET NO. 991779-EI  
FILED: October 23, 2000

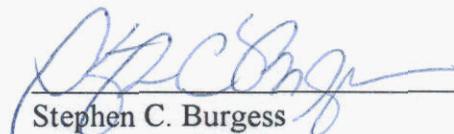
**RESPONSE TO THE FLORIDA INDUSTRIAL POWER  
USERS GROUP'S MOTION FOR CLARIFICATION OF PARTS  
I & II AND PROTEST TO PART III OF ORDER NO. PSC-00-1744-PAA-EI**

The Citizens of the State of Florida, through their attorney, the Public Counsel pursuant to Section 350.0611, Florida Statutes, and Rules 28-106.204, and 25-22.060, Florida Administrative Code, hereby file this response to Florida Industrial Power Users Group's (FIPUG) Motion for Clarification, or in the Alternative for Reconsideration of Order No. PSC-00-1744-PAA-EI.

The Citizens agree that FIPUG has raised valid issues which should be clarified by the Commission. The Citizens believe that no retail customer should be disadvantaged by an IOU's decision to make non-separated wholesale sales. The Citizens further believe that no Florida IOU should receive any incentive reward for making a non-separated wholesale sale which disadvantages its retail customers.

Respectfully submitted,

JACK SHREVE  
Public Counsel

  
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Stephen C. Burgess  
Deputy Public Counsel

DOCUMENT NUMBER-DATE  
13504 OCT 23 8  
FPSC-RECORDS/REPORTING

Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400

(850) 488-9330

Attorneys for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE  
DOCKET NO. 991779-EI**

I HEREBY CERTIFY that a true and exact copy of the above and foregoing **RESPONSE TO THE FLORIDA INDUSTRIAL POWER USERS GROUP'S MOTION FOR CLARIFICATION OF PARTS I & II AND PROTEST TO PART III OF ORDER NO. PSC-00-1744-PAA-EI** has been furnished by hand-delivery\* or U.S. Mail to the following parties of record this 23rd day of October, 2000.

William Cochran Keating, Esquire\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 37 0, Gunter Building  
Tallahassee, FL 32399-0872

Mr. Bill Walker  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, Florida 32301-1859

Florida Industrial Power Users Group  
c/o John McWhirter, Jr.  
McWhirter Reeves  
P.O. Box 3350  
Tampa, FL 33601-1859

Ms. Susan D. Ritenour  
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Mr. James A. McGee, Esquire  
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