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PLEASE REPLY TO:

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TALLAHASSEE OFFICE:
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TALLAHASSEE, FLORIDA 32301
RECORDS AND REPORTING
(850) 222-4400
(850) 222-5606 FAX

March 14, 2001

VIA HAND DELIVERY

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

Re: Docket No.: 010283-EI

Dear Ms. Bayo:

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

- ▶ 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. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

APP _____
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FPSC-BUREAU OF RECORDS

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & CO.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

Done 3/15/01

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Calculation of gains and)
appropriate regulatory treatment)
for non-separated wholesale)
energy sales by investor-owned)
electric utilities)
_____)

Docket No. 010283-EI

Filed: March 14, 2001

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
PETITION TO INTERVENE**

The Florida Industrial Power Users Group (FIPUG) hereby petitions to intervene in the above docket. As grounds therefor, FIPUG states:

1. The name and address of Petitioner is:

The 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 33602

2. All pleadings, orders and correspondence should be directed to:

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

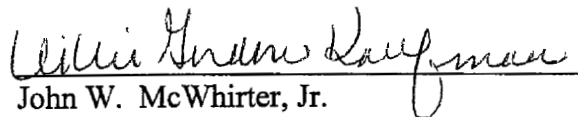
Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301

3. FIPUG is an organization of large industrial consumers. The cost of electricity

constitutes one of FIPUG members' largest variable costs. Because FIPUG members will bear the cost of any incentives permitted in this docket as well as the differential between wholesale and retail power costs, they have a substantial interest in the Commission's actions in this docket.

4. In this docket, the Commission will deal with FIPUG's protest of Order No. PSC-00-1744-PAA-EI. In that protest, FIPUG questioned, among other things, how ratepayers would be made whole when wholesale power is purchased for retail ratepayers to replace less expensive power sold on the wholesale market.

WHEREFORE, FIPUG requests that the Commission grant FIPUG's petition to intervene and accord it full party status in this docket.



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Attorneys for the Florida Industrial
Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of The Florida Industrial Power Users Group's Petition to Intervene has been furnished by (*) hand delivery, or U.S. Mail this 14th day of March, 2001, to the following:

(*)Wm. Cochran Keating IV
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

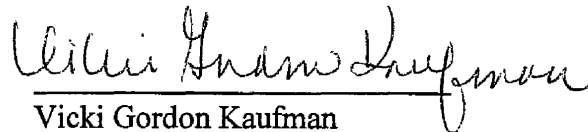
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Vicki Gordon Kaufman