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August 16, 2002

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
02 AUG 16 PM 3:51
COMMISSION
CLERK

Re: Docket No.: ~~001048-EQ~~

020898 - EQ

Dear Ms. Bayo:

On behalf of Cargill Fertilizer, Inc. (Cargill), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Petition of Cargill Fertilizer, Inc. For Permanent Approval of Self-Service Wheeling Program and Request for Expedited Treatment. 08667-02
- ▶ Cargill Fertilizer, Inc.'s Motion to Continue Self-Service Wheeling of Waste Heat Cogenerated Power During Resolution of Petition for Permanent Approval. 08668-02

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

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/mls
Enclosure

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application of Cargill Fertilizer, Inc.
to engage in for self-service wheeling of
waste heat cogenerated power to, from and
between points within Tampa Electric
Company's service area.

Docket No. ~~001048-EQ~~

020898-EQ

Filed: August 16, 2002

**CARGILL FERTILIZER, INC.'S MOTION TO CONTINUE
SELF-SERVICE WHEELING OF WASTE HEAT COGENERATED
POWER DURING RESOLUTION OF PETITION
FOR PERMANENT APPROVAL**

Cargill Fertilizer, Inc. (Cargill), pursuant to rule 28-106.204, Florida Administrative Code, requests the Commission to enter an order requiring the continuance of the Self-Service Wheeling Program approved in Order No. PSC-00-1596-TRF-EQ pending resolution of Cargill's Petition for permanent approval of the program. As grounds therefore, Cargill states:

1. Cargill is an industrial enterprise that uses waste heat to self generate electricity at two industrial plants located within the service area of Tampa Electric Company (TECo). Cargill's plants have been classified as "qualifying facilities" under the relevant state and federal regulations. The facilities are presently being served and will continue to be served by TECo under its Interruptible Standby Tariff.

2. In Order No. PSC-00-1596-TRF-EQ, the Commission approved an experimental self-service wheeling program for self-service wheeling among three Cargill plants in TECo's service territory.

3. The program is set to expire on September 30, 2002. Cargill has requested that TECo continue the program, but TECo has refused. Cargill has simultaneously filed a Petition requesting that, for the numerous reasons set forth in the Petition, the Commission approve permanent implementation of the program. Cargill has requested that its Petition be processed as an expedited schedule.

4. While Cargill has asked for expedited treatment of its Petition, it is unlikely that the issues raised therein will be finally resolved prior to September 30th. Therefore, Cargill requests that the self-service wheeling program remain in place pending final resolution of its Petition.

5. As more fully set out in Cargill's Petition, the self-service wheeling program complies with the requirements of the pertinent Florida statutes and this Commission's rules on the subject. Section 366.051, *Florida Statutes*, provides that utilities shall provide self-service wheeling unless there is a finding that it will result in materially higher costs for the general body of ratepayers. No such finding has been made in this case. Further, Cargill has not had the opportunity to provide the Commission and Staff with its analysis of the reports filed during the

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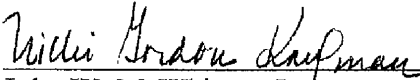
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FPSC-COMMISSION CLERK

pendency of the program. It will do so during the hearing in this case and believes its analysis will demonstrate the benefits of the program.

6. If Cargill cannot fully use its waste heat cogenerated power, it will be irreparably harmed, both operationally and economically. TECo has indicated that, as was the case this spring, it will be unable to serve Cargill from its own resources during portions of October and November, thus resulting in significant harm to Cargill. Cargill should not be harmed while the Commission takes evidence and considers this matter.

WHEREFORE, Cargill requests that during the pendency of its Petition for Permanent Approval of the Self-Service Wheeling, the self-service wheeling program remain in full force and effect.



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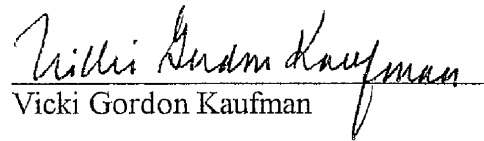
CERTIFICATE OF SERVICE

I **HERBY CERTIFY** that a true and correct copy of the foregoing Petition of Cargill Fertilizer, Inc. to Continue Self-Service Wheeling of Waste Heat Cogenerated Power During Resolution of Petition for Permanent Approval has been furnished by (*) hand delivery on this 16th day of August, 2002 to the following:

(*) Mary Anne Helton
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Tallahassee, Florida 32399

(*) Michael Haff
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