

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Consideration of the tax impacts  
associated with Tax Cuts and Jobs Act of 2017  
for Peoples Gas System.

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DOCKET NO.: 20180044-EI  
FILED: August 1, 2018

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

Pursuant to sections 120.569, 120.57, Florida Statutes, and rules 25-22.039, 28-106.201 and 28-106.205, Florida Administrative Code, the Florida Industrial Power Users Group (FIPUG), through its undersigned counsel, files its Petition to Intervene. In support thereof, FIPUG states the following:

1. Name and address of agency. The affected agency is the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

2. Name and address of Petitioner. The name and address of the Petitioner is:

Florida Industrial Power Users Group  
c/o Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
Telephone: (850) 681-3828  
Facsimile: (850) 681-8788

3. Petitioner's representatives. Copies of all pleadings, notices and orders in this docket should be provided to:

Jon C. Moyle, Jr.  
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4. Notice of docket. Petitioner received notice of this docket by a review of the Commission's website.

5. Statement of Substantial Interests. FIPUG is an ad hoc association consisting of industrial users of electricity and natural gas in Florida. For FIPUG members using natural gas, the cost of natural gas is significant.

6. In this case, the Commission will consider the tax impacts associated with the federal Tax Cuts and Jobs Act of 2017 (the Act) on Peoples Gas System ("Peoples"). This Act will affect Peoples and Peoples' customers, including FIPUG members who receive natural gas from Peoples.

7. FIPUG's interests are of the type that this proceeding is designed to protect. *See, Agrico Chemical Company v. Department of Environmental Regulation*, 406 So.2d 478 (Fla. 2nd DCA 1981). The purpose of the proceeding is to consider the tax impact of the Act on Peoples and Peoples' customers, including certain FIPUG members. Thus, the purpose of the proceeding coincides with FIPUG's substantial interests, which is to ensure that the rates of its members who receive natural gas service from Peoples are fair, just and reasonable rates.

8. Disputed Issues of Material Fact. As an intervener, FIPUG will take the case as it finds it.

9. Disputed Legal Issues. Disputed legal issues include, but are not limited to, the following:

a. Has Peoples met its burden of proof in this matter?

10. Statement of Ultimate Facts Alleged. Ultimate facts include, but are not limited to, the following:

a. What impacts does the Act have upon Peoples and Peoples' customers and the rates that Peoples charges its customers, including FIPUG members?

11. Rules and statutes justifying relief. The rules and statutes that entitle FIPUG to intervene and participate in this case include, but are not limited to:

- a. Section 120.569, Florida Statutes;
- b. Section 120.57, Florida Statutes;
- c. Section 366.03, Florida Statutes;
- d. Section 368.104, Florida Statutes;
- f. Section 368.105, Florida Statutes;
- f. Rule 28-106.201, Florida Administrative Code;
- g. Rule 28-106.205, Florida Administrative Code.

12. Relief. FIPUG requests that it be permitted to intervene as a full party in this docket. In recent discussions with the Office of Public Counsel and Peoples, FIPUG became aware of certain matters that warranted its intervention in this docket at this time, and constitutes good cause.

13. Position of PEOPLES. The undersigned is authorized to represent that Peoples does not oppose FIPUG's Petition to Intervene.

**WHEREFORE,** FIPUG requests that the Commission enter an order allowing it to intervene and participate as a full party in this docket.

*/s/ Jon C. Moyle*  
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Attorneys for Florida Industrial Power Users Group

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Florida Industrial Power Users Group's Petition to Intervene has been furnished by electronic mail this 1st day of August, 2018, to the following:

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*/s/ Jon C. Moyle* \_\_\_\_\_  
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