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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida
Power & Light Company for Approval
of Green Pricing Research and
Development Project

Docket No.: 960624-EG
Filed: August 14, 1996

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION, INC.

PETITION FOR LEAVE TO INTERVENE

Petitioner, Legal Environmental Assistance Foundation, Inc.
(LEAF) petitions for leave to intervene as a full party in
the above docket and states:

1. The name and address of each intervenor is:

Legal Environmental Assistance Foundation, Inc.
1115 N. Gadsden Street
Tallahassee, FL 32303

2. The names and addresses of the persons who should receive
notices, pleadings, informal discovery requests, correspondence,
and other communications are as follows:

Debra Swim and Gail Kamaras
Legal Environmental Assistance Foundation, Inc.
1115 N. Gadsden Street
Tallahassee, FL 32303

3. LEAF is a public interest advocacy organization with
substantial interests that will be affected by the Commission
action in this docket. The corporate purposes of LEAF include
securing environmental and health benefits for its members and the
public. The Commission's action in this docket may cause increased
electricity sales or increased use of more polluting resource
options than solar energy. A substantial number of LEAF's members
use and enjoy the natural resources whose quality is placed at risk
by industrial pollution and by pollution from the electrical

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generation and transmission facilities that may result from the Commission's action. A substantial number of LEAF's members are FPL customers whose energy service bills will be affected by the Commission's action in this docket.

4. Petitioner has sought to promote benign renewable resources such as solar energy in Florida and continues to have that as one of its objectives. The ultimate factual issues that Petitioner disputes are the fairness, justness, reasonableness and prudence of FPL's proposed green pricing research and development project ("project"). Petitioner alleges that the project, as proposed, under-estimates the potential benefits of solar resources, is unnecessarily expensive, and is an imprudent and unreasonable way to promote solar energy through customer contributions. Failure of the project because of insufficient contributions or adverse customer perceptions could result in a severe setback for the future of solar energy in the state. Petitioner reserves the right to raise additional issues as they become known.

5. Petitioner alleges that the petition of FPL should be denied as imprudent, unfair, unjust and unreasonable. Petitioner is entitled to relief under Chapters 120, 366, and 403, Fla. Stat., and implementing regulations. Petitioner reserves the right to rely on additional statutes or rules should additional issues arise or become known.

WHEREFORE, Petitioner requests permission to intervene in this docket and be granted full rights to participate in all proceedings therein.

Respectfully submitted,

Gail Kamaras

Gail Kamaras
Debra Swim
Legal Environmental Assistance
Foundation, Inc.
1115 N. Gadsden Street
Tallahassee, FL 32308
(904) 681-2591

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Legal Environmental Assistance Foundation, Inc. (LEAF) Petition for Leave to Intervene has been furnished by hand delivery to Beth Culpepper, Esq., Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, FL, 32301 and by U.S. Mail to the following parties of record this 14th day of August 1996.

Charles Guyton, Esq.
Steel Hector & Davis
215 S. Monroe St., Suite 601
Tallahassee, FL 32301

Jack Shreve, Esq.
Office of Public Counsel
111 West Madison St., Room 812
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