

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Adoption of Numeric Conservation) Docket No. 971004-EG
Goals by Florida Power & Light Company.)

In Re: Adoption of Numeric Conservation) Docket No. 971005-EG
Goals by Florida Power Corporation.)

In Re: Adoption of Numeric Conservation) Docket No. 971006-EG
Goals by Fulg Power Company.)

In Re: Adoption of Numeric Conservation) Docket No. 971007-EG
Goals by Tampa Electric Company.)

Filed: January 29, 1998

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION INC.
PETITION TO INTERVENE

Legal Environmental Assistance Foundation, Inc. (LEAF),
pursuant to Rule 25-22.039, Florida Administrative Code (FAC),
petitions to intervene in the above-captioned dockets and states:

1. LEAF is located at 1115 North Gadsden Street, Tallahassee,
Florida 32303.

2. Persons to be served with copies of documents in this
docket are:

- ACK _____
- AFA _____ Debra Swim/Gail Kamaras
- APP _____ Legal Environmental Assistance Fdn.
- CAF _____ 1115 N. Gadsden Street
- CMU _____ Tallahassee, FL 32303
- CTR _____ Mollie Lampi
- EAG Futrell Pace University Energy Project
- LEG 1 122 S. Swan Street
- LIN 5 Albany, NY 12110

3. LEAF is a public interest advocacy organization whose

corporate purposes include protection of public health and the

environment. The Commission action in this docket will review

conservation goals for Florida's investor-owned utilities, thereby

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determining the extent to which utilities provide cost-effective demand-side management programs and the extent to which utilities use clean renewable energy to meet their customers' need for energy services.

4. LEAF has a substantial interest in the Commission's review of conservation goals and in securing the environmental and health benefits of utility energy efficiency programs and increased use of clean renewable energy to meet energy service needs.

5. A substantial number of LEAF's members use and enjoy the natural resources whose quality is placed at risk by construction and operation of power plants that may result from increased electricity sales or increased use of more polluting energy generation options rather than energy efficiency and clean renewable energy. A substantial number of LEAF members are utility customers whose energy service bills are substantially affected by demand-side management programs implemented by utilities that are parties to this proceeding

6. LEAF participated in the PSC dockets to set utility conservation goals (FPSC Docket Nos. 930548-93551) and subsequent DSM Plans (FPSC Docket Nos. 941170-941173).

7. The following statutes and rules entitle LEAF to relief: Rules 25-17 and 25-22 FAC; Chapters 120 and 366, Florida Statutes. LEAF reserves the right to rely on additional legal authority.

WHEREFORE, LEAF respectfully requests to be allowed to
intervene as a party to this proceeding.

Respectfully submitted,

Gail Kamaras

Gail Kamaras
Legal Environmental Assistance
Foundation, Inc. (LEAF)
1115 N. Gadsden Street
Tallahassee, FL 32303

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of LEAF's **Petition to Intervene** has been provided by hand delivery (*) or U.S. mail to the following on January 29, 1998:

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Gail Kamaras