

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Generic Investigation into the Aggregate)
Electric Utility Reserve Margins Planned for)
Peninsular Florida)

Docket No. 981890-EU

Filed: February 26, 1999

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION INC.
PETITION FOR LEAVE TO INTERVENE

Legal Environmental Assistance Foundation, Inc. (LEAF), pursuant to rules 25-22.036(7) AND 25-22.039, Florida Administrative Code (FAC), petitions to intervene in the above-captioned docket and states:

1. LEAF is located at 1114 Thomasville Road, Suite E, Tallahassee, Florida 32303.

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

Gail Kamaras/Debra Swim
Legal Environmental Assistance Fdn.
1114 Thomasville Road, Suite E
Tallahassee, FL 32303

3. LEAF's substantial interests are subject to determination and will be affected through this proceeding. LEAF has a substantial interest in the Commission's actions that may occur as part of a rulemaking docket following conclusion of the instant

ACK _____
AFA 1 generic investigation. The Commission's determinations in this proceeding will affect
APP _____
CAF _____ the extent to which various supply and demand energy alternatives are used by electric
CMU _____ utilities in meeting reliability concerns in the state. Such determinations will affect the
CTR _____
EAG Dudley environmental and health benefits of energy efficiency, the delivery of energy services,
LEG 2 and increased use of cleaner energy resources to meet energy service needs.
LIN 5

4. LEAF is a public interest advocacy organization whose corporate purposes

DOCUMENT NUMBER-DATE

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FRSC-RECORDS/REPORTING

ACK _____
AFA 1
APP _____
CAF _____
CMU _____
CTR _____
EAG Dudley
LEG 2
LIN 5
OPC _____
RCH _____
SEC by [unclear]
WAS _____
6/8/99

Done 2/03/99

include protection of public health and the environment. The Commission action in this docket will substantially influence how electric power is provided to Floridians, what energy resources are relied on, and how much utilities should rely on demand side energy services.

5. Issues of fact include whether the methodologies used to evaluate peninsular Florida reserve margins adequately consider the effects of demand-side management alternatives. LEAF reserves the right to raise additional issues as they become known.

6. This docket will determine the bases on which decisions regarding power plant need and the use of demand resources will be made. The following statutes and rules entitle LEAF to relief: rules 28-106 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
Legal Environmental Assistance
Foundation, Inc. (LEAF)
1114 Thomasville Road, Suite E
Tallahassee, FL 32303
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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 (*) or by U.S. Mail to the following parties of record on February 26, 1999:

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