

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Gulf Power Company to determine need for proposed electrical power plant in Bay County, Florida.

Docket No. 990325-EI

Filed: March 30, 1999

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION INC. PETITION FOR INTERVENTION

Legal Environmental Assistance Foundation, Inc. (LEAF), pursuant to Rule 25-22.038, 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

ACK [line] 3. LEAF's substantial interests are subject to determination and will be affected
AFA [2] through this proceeding. LEAF has a substantial interest in the Commission's
APP [line] determination of need and in securing the environmental and health benefits of
CAF [line] increased efficiency in the delivery of energy services and increased use of cleaner
CMU [line] energy resources to meet energy service needs.
CTR [line]
EAG [line]
LEG [1]
LIN [5]
OPC [line]
RCH [line]
SEC [1]
WAS [line]
OTH [line]

4. LEAF is a public interest advocacy organization whose corporate purposes include protection of public health and the environment. The Commission action in this

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docket will substantially influence how electric power is provided to Floridians and what energy resources (including demand resources) are relied on, thereby influencing the environmental and health impacts of meeting Florida's energy service needs.

5. A substantial number of LEAF members have an interest in the environmental and energy effects that will occur as a result of a decision in this docket, including the potential for renewable energy and energy efficiency.

6. At issue is whether Gulf has adequately considered reasonably available conservation measures which might mitigate or defer need for the proposed facility. LEAF reserves the right to raise or dispute additional issues.

7. The following statutes and rules entitle LEAF to relief: Rules 28-106 and 25-22 FAC; Chapters 120,366 and 403, 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.
1114 Thomasville Road, Suite E
(850) 681-2591
gkamaras@lewisweb.net

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 March 30, 1999.

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