

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Determination of Need
for an Electrical Power Plant in
Okeechobee County by Okeechobee
Company, LLC

Docket No. 991462
Filed: October 8, 1999

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION, INC.
PETITION FOR INTERVENTION

Legal Environmental Assistance Foundation, Inc. (LEAF), pursuant to Rules
25-22.039 and 28-106.205, 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 determination of need and
in securing the environmental and health benefits of increased efficiency in the delivery of
energy services and increased use of cleaner energy resources to meet energy service needs.

4. 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
substantially influence how electric power is provided to Floridians and what energy resources
(whether supply or demand-side 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, health,
and energy effects that will occur as a result of a decision in this docket, including the potential

AFA _____
 APP _____
 CAF _____
 CMU _____
 CTR _____
 EAG 2
 LEG 2
 MAS 3
 OPC _____
 PAI _____
 SEC 1
 WAW _____
 OTH orig. filing

Done 10/13/99

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FPSC-RECORDS REPORTING

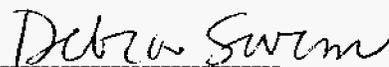
for renewable energy and energy efficiency.

6. At issue is whether reasonably available generation alternatives, and reasonably available conservation measures, are adequately considered. 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 F.A.C.; Chapters 120, 366, and 403, F.S. 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,



Debra Swim
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and fifteen true copies were hand delivered to the offices of Ms. Blanca Bayo, Florida Public Service Commission, Division of Records and Reporting, 2540 Shumard Oak Blvd., Tallahassee, FL 32399--0850, and that a true and correct copy of the foregoing Legal Environmental Assistance Foundation, Inc. (LEAF) Petition for Intervention has been furnished by hand delivery (*) or by U.S. Mail to the following parties of record on Oct. 8, 1999:

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