

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Approval of a Pilot Program for Small Photovoltaic Systems by Tampa Electric Company.

PSC DOCKET NO: 000758-EI

ORIGINAL RECORDS AND REPORTING 00 JUL 14 PM 2:28 RECEIVED-FPSC

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION'S PETITION FOR LEAVE TO INTERVENE

Petitioner, Legal Environmental Assistance Foundation, Inc., ("LEAF"), files this Petition to Intervene pursuant to Rules 25-22.039, FAC, and as grounds therefore states:

- 1. LEAF is located at 1114 Thomasville Road, Suite E, Tallahassee, FL.
2. Persons to be serviced with copies of documents in this docket are:

Debra Swim
Legal Environmental Assistance Foundation, Inc.
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 decision to affect interconnection of small photovoltaic systems and in securing the environmental and health benefits of increased efficiency and sustainability of energy services and increased use of cleaner energy resources to meet energy needs.

4. LEAF is a public interest advocacy organization whose corporate purposes include protection of public health and the environment. The Commission's action in this docket will substantially influence how energy services are provided and which energy resources (including solar and efficiency resources) are relied upon, thereby influencing the environmental and health impacts of meeting Florida's energy service needs. A substantial number of LEAF's 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 increased use of sustainable energy supplies.

4. The Commission has, through Order No. PSC-99-1192-PCO-EI, granted LEAF

intervention in PSC Docket No. 990538-EI, which will determine substantially similar matters.

The precedent set in this proceeding may influence the outcome of Docket No. 990538-EI which

will establish requirements for small photovoltaic systems (10 kW or less) requesting

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Done 7/18/00 [Signature] FPSC-BUREAU OF RECORDS

interconnection with and investor-owned utility.

5. Tampa Electric Company's Petition in this case was filed, in part, under the terms of an agreement between TECO and LEAF in settlement of a prior legal proceeding.

6. At issue are the terms and conditions under which TECO's customers will be allowed or required to interconnect small photovoltaic systems to the electric grid and the ease with which such interconnection will be made. LEAF reserves the right to raise additional issues as they become known.

7. The following statutes and rules entitle LEAF to relief: Rules 25-17, 25-22, 25 and 25-106, FAC; and Chapters 120 and 366, Florida Statutes. LEAF reserves the right to rely on additional legal authority.

WHEREFORE, LEAF respectfully requests that the Commission grant its request to intervene as a party to this proceeding.

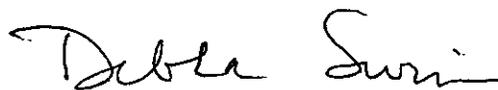
Respectfully submitted,



Debra Swim
Legal Environmental Assistance Foundation
1114 Thomasville Road, Suite E
Tallahassee, FL 32303-6290
(850) 681-2591; fx (850) 224-1275
dswim@leaf-envirolaw.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and 14 copies of the foregoing Petition of Legal Environmental Assistance Foundation for Leave to Intervene were hand delivered to the Florida Public Service Commission, and that a copy was hand delivered to the Ausley Law Firm, Attention, Mr. James Beasley, 227 S. Calhoun St., Tallahassee, FL 32302, this 14th day of July, 2000.



DEBRA SWIM

STATE OF FLORIDA

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
E. LEON JACOBS, JR.
LILA A. JABER



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770

Public Service Commission

June 26, 2000

James D. Beasley, Esquire
Ausley & McMullen Law Offices
Post Office Box 391
Tallahassee, Florida 32302

Re: Docket No. 000758-EI

Dear Mr. Beasley:

This will acknowledge receipt of a petition for approval of a pilot program for small photovoltaic systems by Tampa Electric Company, which was filed in this office on June 22, 2000 and assigned the above-referenced docket number. Appropriate staff members will be advised.

Mediation may be available to resolve any dispute in this docket. If mediation is conducted, it does not affect a substantially interested person's right to an administrative hearing. For more information, contact the Office of General Counsel at (850) 413-6248 or FAX (850) 413-7180.

Division of Records and Reporting
Florida Public Service Commission