BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Power & Light Company for Approval of Green Pricing Research and Development Project

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Docket No.: 960624-EG Filed: August 14, 1996

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION, INC.

PETITION FOR HEARING

Petitioner, Legal Environmental Assistance Foundation, Inc. (LEAF) petitions for a hearing in the above docket and states:

1. The name and address of each intervenor is:

Legal Environmental Assistance Foundation, Inc. 1115 N. Gadsden Street Tallahassee, FL 32303

2. The names and addresses of the persons who should receive notices, pleadings, informal discovery requests, correspondence, and other communications are as follows:

> Debra Swim and Gail Kamaras Legal Environmental Assistance Foundation, Inc. 1115 N. Gadsden Street Tallahassee, FL 32303

3. LEAF is a public interest advocacy organization with substantial interests that will be affected by the Commission action in this docket. The corporate purposes of LEAF include securing environmental and health benefits for its members and the public. The Commission's action in this docket may cause increased electricity sales or increased use of more polluting resource options than solar energy. A substantial number of LEAF's members use and enjoy the natural resources whose quality is placed at risk by industrial pollution and by pollution from the electrical generation and transmission facilities that may result from the

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Commission's action. A substantial number of LEAF's members are FPL customers whose energy service bills will be affected by the Commission's action in this docket.

Petitioner has sought to promote benign renewable 4. resources such as solar energy in Florida and continues to have that as one of its objectives. The ultimate factual issues that Petitioner disputes are the fairness, justness, reasonableness and prudency of FPL's proposed green pricing research and development project ("project"). Petitioner alleges that the project, as proposed, under-estimates the potential benefits of solar resources, is unnecessarily expensive, and is an imprudent and unreasonable way to promote solar energy through customer Failure of the project because of insufficient contributions. contributions or adverse customer perceptions could result in a severe setback for the future of solar energy in the state. Petitioner rserves the right to raise additional issues as they become known.

5. Petitioner alleges that the petition of FPL should be denied as imprudent, unfair, unjust and unreasonable. Petitioner is entitled to relief under Chapters 120, 366, and 403, Fla. Stat., and implementing regulations. Petitioner reserves the right to rely on additional statutes or rules should additional issues arise or become known. WHEREFORE, Petitioner requests a hearing in this docket and that it be granted full rights to participate in all proceedings therein.

Respectfully submitted,

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Gail Kamaras Debra Swim Legal Environmental Foundation, Inc. 1115 N. Gadsden Street Tallahassee, FL 32308 (904) 681-2591

Assistance

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Legal Environmental Assistance Foundation, Inc. (LEAF) Petition for Hearing has been furnished by hand delivery to Beth Culpepper, Esq., Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, FL, 32301 and by U.S. Mail to the following parties of record this 14th day of August 1996.

Charles Guyton, Esq. Steel Hector & Davis 215 S. Monroe St., Suite 601 Tallahassee, FL 32301

Jack Shreve, Esq. Office of Public Counsel 111 West Madison St., Room 812 Tallahassee, FL 32399-1400

Lail Kamans

Gail Kamaras Legal Environmental Assistance Foundation, Inc. 1115 N. Gadsden Street Tallahassee, FL 32303 904-681-2591