

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Gulf Power Company
FERC Form 1 for the year
ending December 31, 1998

Docket No. 990557-EI

Filed: July 2, 1999

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION, INC.
PETITION FOR INTERVENTION

Legal Environmental Assistance Foundation, Inc. (LEAF), pursuant to Rule 28-106.205, Florida Administrative Code, petitions to intervene in the above-captioned proceeding and states:

1. LEAF is located at 1114 Thomasville Road, Suite E, Tallahassee, FL 32303-6290.

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

Gail Kamaras
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 in this proceeding. LEAF has a substantial interest in the Commission's decision concerning confidential treatment of the information at issue here.

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

AFA include protection of public health and the environment. The Commission action in this docket will substantially affect the public availability of information that is vital to the conduct of LEAF's work relating to energy services and policies in Florida.

- AFA
- APP 1
- CAF _____
- CMU _____
- CTR _____
- EAG 5
- LEG _____
- MAS _____
- OPC _____
- RRR _____
- SEC 1
- WAW _____
- OTH nothing

5. A substantial number of LEAF's members have an interest in the

environmental, health and energy effects of a decision in this docket as well as the public availability of information directly related to those interests.

Done 7/08/99

DOCUMENT NUMBER-DATE

08001 JUL-28

FPSC-RECORDS/REPORTING

6. At issue is the appropriateness and legality of treating as confidential significant portions of information required to be reported to public agencies; the claims by Gulf that the information is not otherwise publicly available; the proof of irreparable harm; and the effects on Gulf of wholesale and retail electric competition in Florida. LEAF reserves the right to raise or dispute additional issues.

7. The following rules and statutes entitle LEAF to relief: Rules 25-22 and 28-106, FAC and 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

Gail Kamaras
Legal Environmental Assistance Foundation
1114 Thomasville Road, Suite E
Tallahassee, FL 32303-6290
(850)681-2591; (850)224-1275 fx
gkamaras@lewisweb.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LEAF's Petition to Intervene has been furnished by hand delivery (*) or by U.S. mail to the following on July 2, 1999:

Mary Anne Helton
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

John Roger Howe
Office of Public Counsel
111 W. Madison St., Rm 812
Tallahassee, FL 32399-1400

Jeffrey A. Stone
Russell A. Badders
Beggs & Lane
PO Box 12950
Pensacola, FL 32576-2950

Gail Kamaras
Gail Kamaras