

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Establishment of electric requirements for small photovoltaic systems (10 kW or less) requesting interconnection and parallel operation with an investor-owned utility.

Docket No. 990538-EI

Filed: May 18, 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, Florida, 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 32303-6290

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 action in this docket will substantially influence how electric service is provided to Floridians and what

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC \_\_\_\_\_
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

*Polson*

*Greg Hoyt*

*Done 5/19/99*

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energy resources (including solar 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 increased use of renewable energy.

6. At issue are the terms and conditions under which investor-owned utility 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 or dispute additional issues.

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



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the 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 May 18, 1999:

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