

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of
Commercial/Industrial Service
Rider by Tampa Electric Co.

Docket No.: 980706-EI

Filed: July 8, 1998

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION, INC.
PETITION FOR LEAVE TO INTERVENE

Petitioner, Legal Environmental Assistance Foundation, Inc.
(LEAF), requests leave to intervene as a full party in
the above docket and states:

1. The name and address of each intervenor is:

Legal Environmental Assistance Foundation, Inc.
1114 Thomasville Road, Suite E
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.
1114 Thomasville Road, Suite E
Tallahassee, FL 32303

Mollie Lampi
Pace Energy Project
122 S. Swan Street
Albany, NY 12210

3. The industrial discount rates used by Tampa Electric

ACK _____
AFA 1 Company (Tampa) will substantially influence the level of demand
APP _____ side resources Tampa uses to meet its customers' need for energy
CAF _____ services (and, as a result, how much power plant generation can be
CMU _____
CTR _____ avoided or postponed), the amount that customers pay for energy
EAG Proposed services, and the level of pollution emitted in Tampa's service
LEG 1 territory.
LIN 5

4. LEAF is a public interest advocacy organization with

OPC _____
RCH _____
SEC 1
WAS _____
OTU Brush

RECORDED AND INDEXED DATE

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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. 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 increased electricity sales or increased use of more polluting resource options than energy efficiency. A substantial number of LEAF's members are utility customers whose energy service expenses will be affected by the Commission's action in this docket.

5. Petitioner disputes the fairness, justness, and reasonableness of the industrial discount rate proposed by Tampa in that the proposed terms are overly broad, fail to require reasonable amounts of energy and demand reductions, and unduly discriminate against other Tampa customers. Petitioner reserves the right to raise or dispute additional factual issues as they become known.

6. Petitioner alleges that the industrial rates proposed by Tampa are unfair, unjust, and unreasonable and should be denied absent modification to fully correct the deficiencies identified in paragraph 5 of this petition. 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 permission to intervene in this

docket and be granted full rights to participate in all proceedings therein.

Respectfully submitted,

Gail Kamaras
Gail Kamaras
Debra Swim
Legal Environmental Assistance
Foundation, Inc.
1114 Thomasville Road, Suite E
Tallahassee, FL 32303
(850) 681-2591

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Legal Environmental Assistance Foundation, Inc. (LEAF) Petition for Leave to Intervene has been furnished by hand delivery (*) or by U.S. Mail to the following parties of record on July 8, 1998.

Jorge Cruz-Bustillo *
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