

**STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS**

In Re: Florida Power & Light
Company, Bobwhite-Manatee
230-KV Transmission Line Project,
Transmission Line Siting
Application No. TA07-14

DOAH Case No. 07-0105

OGC Case No. 07-0026

FILED
2007 APR -9 P 1:46
DIVISION OF
ADMINISTRATIVE
HEARINGS

MOTION TO INTERVENE

Pursuant to Chapter 120, Florida Statutes, Section 403. 527 (2) , Florida Statutes, and Rules 28-106.106, Florida Administrative Code ("F.A.C."), ManaSota-88, Inc. hereby petitions to intervene in these proceedings.

IDENTITY OF PETITIONER

1. Petitioner, ManaSota-88, Inc. (hereinafter, "ManaSota-88"), is a public interest conservation and environmental protection organization which is a Florida not-for-profit corporation and a citizen of the State of Florida. The corporate purposes of ManaSota-88 include the protection and preservation of water quality and wildlife habitat in Manatee and Sarasota Counties and, therefore, intervening in the proposed project falls within ManaSota-88's general scope of interest and activity.

2 . A number of Petitioner's members own real property and reside in Manatee and Sarasota Counties and may be substantially adversely affected by this project.

3. The address of Petitioner, ManaSota-88, Inc. is P.O. Box 1728 Nokomis, Florida 34274, and its telephone number is (941) 966-6256 and fax number is (941) 966-0659 and email address is manasota88@comcast.net.

RECEIPT OF NOTICE

4. ManaSota-88 first received notice of the Certification Hearing via email sent from the Florida Department of Environmental Protection by Linda Korokous, (Landa.Korokous@dep.state.fl.us) providing a copy of departmental notices regarding the subject project pursuant to section 403.5115(4), F.S., published in the Florida Administrative Weekly on March 23, 2007.

MANASOTA-88'S SUBSTANTIAL INTERESTS

5. Petitioner, ManaSota-88, Inc. and its members may be substantially and adversely affected by the conditions and activity which will result if the project is approved, including by water pollution, degradation of the water quality of surface and ground waters, long-term degradation or destruction of natural habitat for wildlife which members of Petitioner enjoy and value observing, and by those consequences and others will have a substantial and adverse effect on the quality of life of its members.

6. Project approval being sought in this proceeding may have the effect of impairing, polluting, or otherwise injuring the water or other natural resources of the State of Florida, directly, and cumulatively, by degrading the water quality of surface and ground waters, adversely affecting wildlife habitat, and otherwise.

DISPUTED ISSUES OF MATERIAL FACT

The material facts in dispute include, but are not limited to, whether Florida Power and Light provides reasonable assurance that the Bobwhite - Manatee Transmission Line;

a.) will not adversely impact the value of functions provided to wildlife, and listed species including wetland dependent species, by wetlands, other surface waters and other water related resources of the State;

b.) will not cause adverse secondary impacts to protected upland and water resources;

c.) will not adversely affect the conservation of fish and wildlife, including endangered or threatened species, or their habitats;

d.) will not cause unacceptable cumulative impacts upon wetlands and other surface waters;

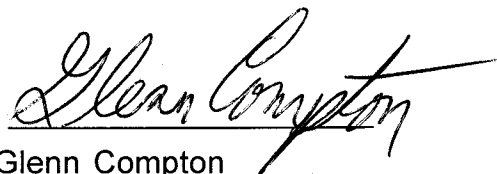
e.) will not be contrary to the public interest, or if such an activity significantly degrades water resources, will be clearly in the public interest, as determined by balancing certain rule criteria.

RELIEF REQUESTED

WHEREFORE, ManaSota-88 respectfully requests that the Administrative Law Judge assigned to this case enter an order granting this Petition to Intervene and requiring all parties to this proceeding serve copies of all pleadings, notices and other documents to ManaSota-88 as identified in paragraph 3 above.

Respectfully submitted this 4th day of April, 2007.

BY

A handwritten signature in cursive script that reads "Glenn Compton". The signature is written in dark ink and is positioned above the printed name.

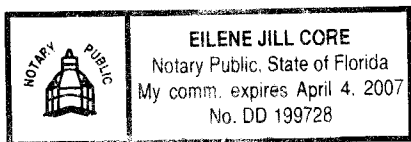
Glenn Compton
Chairman, ManaSota-88

Verification

Before me, the undersigned Notary Public, personally appeared, Glenn Compton, Chairman an authorized agent for ManaSota-88, Inc. who is personally known to me or provided proper identification.

Eilene Jill Core
NOTARY PUBLIC *Eilene Jill Core*

BY : *Glenn Compton*
Glenn Compton
Chairman, ManaSota-88



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail on this ____ day of April, 2007.

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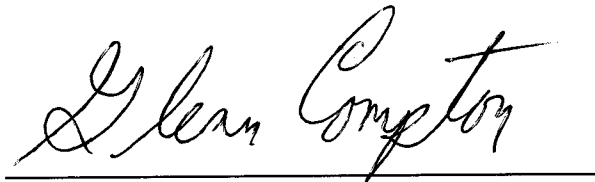
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A handwritten signature in cursive script, reading "Glenn Compton". The signature is written in dark ink and is positioned above a horizontal line.

Chairman, ManaSota-88