State of Florida

Commissioners: THOMAS M. BEARD, CHAIRMAN BETTY EASLEY J. TERRY DEASON SUSAN F. CLARK LUIS J. LAUREDO



DIVISION OF ELECTRIC & GAS JOSEPH D. JENKINS DIRECTOR (904) 488-8501

Public Service Commission

July 2, 1992

Mr. E. J. Burgin, President SunCoast Pipeline Company P. O. Box 1478 Houston, Texas 77251-1478



Re: SunCoast Request for Determination of Need

Dear Mr. Burgin:

In response to your June 29, 1992 letter informing this Commission of SunCoast's intent to file a request for determination of need for its intrastate pipeline, we have today opened Commission Docket Number 920672-GP. All future correspondence or filings in this matter should include that docket number.

Normally, filing requirements for a determination of need would be specified by Commission rule, but the Natural Gas Pipeline Siting Act was signed into law only a little over one week ago. Accordingly, there has been no time for rule making. Attached are the requirements for your initial filing. They are unchanged from a draft that was previously sent to you by fax.

CK	sent	to you by fax.
ΕĄ		We look forward to receipt of your filing.
PP		we look forward to receipt of your filing.
1F		Sincerely,
		Joseph & M Counces
		71.6/
		Joseph W. McCormick
	TO THE PART OF SALE	Chief, Bureau of Gas Regulation

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Joseph D. Jenkins, Director, Division of Electric and Gas Robert L. Trapp, Assistant Director, Division of Electric and Gas Division of Records and Reporting - Docket 920672-GP

NATURAL GAS TRANSMISSION PIPELINE

DETERMINATION OF NEED

FILING REQUIREMENTS

Pursuant to 403.9422 (2)(b), Florida Statutes, an applicant for a determination of need for an intrastate Natural Gas Transmission Pipeline must file, as a minimum, the following information to support its application. Additional relevant information that the applicant believes would support a determination of need may also be filed with the application.

Identification of existing natural gas pipelines:

Provide a general description and map of existing natural gas pipelines, including laterals, within any Florida counties in which the proposed project will be physically located.

Identification of Project;

- (a) Provide project name and identify ownership, including all company officers, their addresses and phone numbers, and all corporate affiliations.
- (b) Provide a description of the project, including all pipelines and laterals from origination to terminus of each mainline or lateral. Include starting and ending points of each line, initial design capacity and operating pressures, estimated total cost and projected in-service date or dates of the project. Include all pipeline dimensions (diameter), projected initial operating pressures for all pipelines, and the type and horsepower of all compressor stations.
- (c) As evidence of the safety and integrity of the proposed project, provide a statement that the engineering, construction and operation of the project will comply with all provisions of Chapter 368, Florida Statutes, Chapter 25-12, Florida Administrative Code, and Federal rules and regulations, and codes and standards incorporated therein.
- (d) Provide detailed maps of the preferred route and any planned alternate routes, planned locations of compressor stations and other affiliated facilities. Include detailed maps of all laterals up to and including individual terminal points.
- Evidence of need for gas transportation capacity (market area):
 - (a) Provide a statement of the specific situations, conditions, contingencies, or other factors which indicate that need exists for the proposed natural gas transmission line or lines, including the general time when the additional transmission capacity will be needed.
 - (b) As evidence of need for natural gas delivery capability up to

initial design capacity, provide supporting contracts, precedent agreements or letters of intent. As evidence of need for natural gas delivery capability beyond (c) initial design capacity, if future expansion capability is built into the pipeline through use of larger diameter pipeline than needed for planned initial throughput, provide market area load forecasts by customer type, region of state, expected dates of added load, etc., to support projected future load growth. Also provide detailed cost information to permit analysis of the costeffectiveness of using such larger diameter pipeline. Evidence of access to gas supplies and adequacy of upstream transportation 4. capacity (supply areas): As initial evidence of reliability of access to gas supplies, (a) identify sources of gas or access to gas supply areas for the project pipeline and for upstream pipelines. (b) As evidence of reliability of transportation capacity to the point of origination of the project, provide detailed information on currently available firm or interruptible capacity on upstream pipelines and identify all additions required to enable upstream pipelines to supply gas in volumes sufficient to meet throughput design capacity of the project. Also provide contracts, precedent agreements or letters of intent as evidence of adequate capacity on upstream pipelines.

- (c) As additional evidence of reliability of transportation capacity to the point of origination of the project, provide information on FERC requirements that must be met by any upstream pipeline before it can provide transportation service to supply the project. Include information on timing of any necessary expansions of upstream pipelines, including proposed FERC filing dates and projected inservice dates of additions.
- (d) Provide information regarding the project's impact on existing customers of upstream pipelines who now take gas at delivery points within Florida. Specifically describe any decrease in capacity available to serve them and address any negative effect on their economic well-being that may come from having to pay firm, ratier than interruptible transportation rates to ensure continued service.
- 5. Identify competing alternatives:

Provide information on all known competing natural gas pipelines, interstate or intrastate, either proposed or under construction within any Florida counties in which the proposed project will be physically located.

6. Provide specific reasons for adding the proposed natural gas transmission pipeline; specifically whether the proposed pipeline will:

(a) Improve or maintain deliverability, reliability, safety and integrity of natural gas transportation within Florida;

(b) Accommodate load growth;

(c) Improve the economics of natural gas transportation within Florida to assure the economic well-being of the public;

(d) Conserve or displace oil;

- (e) Serve any other useful purpose;
- 7. Provide a statement of adverse consequences to the public which will result if the project is delayed or if the Commission denies the application. Specifically address any adverse consequences to the economic well-being of the public due to delay or denial of approval of the project.