

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for Determination )  
of Need for Intrastate Natural Gas ) DOCKET NO. 920807-GP  
Pipeline by Sunshine Pipeline Partners ) Submitted for Filing:  
4-8-93

PETITION OF PEOPLES GAS SYSTEM, INC.  
FOR LEAVE TO INTERVENE

Peoples Gas System, Inc. ("Peoples" or "Intervenor"), by its undersigned attorneys and pursuant to Rule 25-22.039, F.A.C., hereby petitions the Commission for leave to intervene in the above proceeding and in support thereof says:

IDENTITY OF INTERVENOR

1. The name of Intervenor and the mailing address of its principal office are:

Peoples Gas System, Inc.  
P. O. Box 2562  
Tampa, Florida 33601-2562

2. The name and mailing address of the person authorized to receive all pleadings, notices, orders and other communications in this proceeding is:

Ansley Watson, Jr., Esq.  
Macfarlane Ferguson  
P. O. Box 1531  
Tampa, Florida 33601

3. Peoples -- Florida's largest local distribution company -- is a public utility engaged in the distribution and sale of natural gas to residential, commercial and industrial customers located in twelve separate geographic areas of the state. Intervenor also provides transportation of customer-owned natural gas. Peoples' headquarters is located at 111 Madison Street, 17th

DOCUMENT NUMBER-DATE

03853 APR-88 64

FPSC-RECORDS/REPORTING

Floor, Tampa, Florida. Divisional offices are located at Jacksonville, Daytona Beach, Orlando, Eustis, Lakeland, Tampa, St. Petersburg, Sarasota, Avon Park, Palm Beach Gardens, Miami and North Miami, Florida.

SUBSTANTIAL INTERESTS AFFECTED

4. Peoples currently receives transportation delivery of natural gas from two interstate pipelines, Florida Gas Transmission Company ("FGT") and South Georgia Natural Gas Company, and also purchases natural gas from FGT.

5. In order to meet the future needs of its customers, to add to the competitive alternatives available to Intervenor and its customers, and to obtain more direct access to additional sources of gas supply, Peoples has executed Precedent Agreements with ANR Southern Pipeline Company for firm transportation service on the interstate and intrastate portions of the new natural gas transmission facilities which the applicant in this proceeding proposes to construct and operate.

6. The Commission's action in this proceeding will determine whether the applicant is entitled to a determination of need for the intrastate portion of its proposed new natural gas pipeline pursuant to the Natural Gas Transmission Pipeline Siting Act, Sections 403.9401 et seq., Florida Statutes. Such determination will directly affect whether the service for which Peoples has subscribed will ultimately be made available. Thus, the determination to be made by the Commission in this docket will directly affect the substantial interests of Peoples and its

customers.

KNOWN DISPUTED ISSUES OF MATERIAL FACT

7. Although issues in addition to those identified below will be identified prior to the Prehearing Conference which will be held in this docket after the filing of testimony by the applicant, the Commission Staff and other intervenors, Peoples states that the following are (or will be) disputed issues of material fact in this proceeding:

a. Whether there is a present and future need for the applicant's proposed natural gas transmission line.

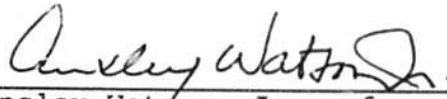
b. Whether there is a need for clean-burning natural gas to assure the economic well-being of the public.

ULTIMATE FACTS ALLEGED

8. Peoples asserts that a present and future need for the applicant's proposed natural gas transmission line exists within the contemplation of the Natural Gas Transmission Pipeline Siting Act.

WHEREFORE, Peoples prays the Commission will enter its order granting this Petition for Leave to Intervene, permitting Peoples to participate as a full party in this proceeding, and directing that copies of all pleadings, notices, orders and other communications filed, given or entered herein be furnished to the person named in paragraph 2 hereof.

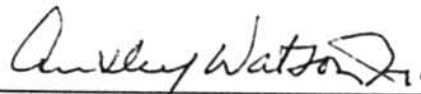
Respectfully submitted,



Ansley Watson, Jr., of  
Macfarlane Ferguson  
P. O. Box 1531, Tampa, Florida 33601  
(813) 273-4200  
Attorney for Peoples Gas System, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Petition for Leave to Intervene has been furnished this 7th day of April, 1993, by regular U.S. Mail, to Peter M. Dunbar and Bram Canter, Esquires, Haben, Culpepper, Dunbar & French, P.A., 306 N. Monroe St., Tallahassee, Florida 32301, William L. Hyde, Esquire, Peoples, Earl & Blank, 215 S. Monroe St., Ste. 350, Tallahassee, Florida 32301, James P. Fama, Esquire, Florida Power Corporation, P. O. Box 14042, 3201 34th St. S., St. Petersburg, Florida 33733, Wayne L. Schiefelbein, Esquire, Gatlin, Woods, Carlson & Cowdery, 1709-D Mahan Dr., Tallahassee, Florida 32308, Richard T. Donelan, Jr. and Gary C. Smallridge, Esquires, Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Rd., Tallahassee, Florida 32399-2400, and Martha Carter Brown, Esquire, Division of Legal Services, Florida Public Service Commission, Fletcher Building, 101 E. Gaines St., Tallahassee, Florida 32399-0863.



Ansley Watson, Jr.