

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for)
Determination of Need for)
Intrastate Natural Gas)
Pipeline by SunShine)
Pipeline Company)
_____)

DOCKET No. 920807-GP
FILED: April 15, 1993

FLORIDA CITIES PREHEARING STATEMENT

Pursuant to Order No. PSC-93-0406-PCO-GU establishing the Prehearing procedure in this Docket, the Florida Cities hereby file their Prehearing Statement:

A. APPEARANCES

BARRETT G. JOHNSON, ESQUIRE, and REBECCA S. CONLAN, ESQ. of Johnson Law Firm, 315 South Calhoun St., Suite 750, Tallahassee, FL 32301.
On behalf of the Florida Cities.

B. WITNESSES

None.

C. EXHIBITS

None.

D. STATEMENT OF BASIC POSITION

No position at this time.

E. STATEMENT OF ISSUES AND POSITIONS

ISSUE 1: Is SunShine's forecast of future transmission capacity requirements reasonable for planning purposes?

POSITION: No position at this time.

ISSUE 2: Has SunShine Pipeline provided adequate support to justify a need for 250,000 Mcf per day in 1995, 425,000 Mcf per day in 1998, and 550,000 Mcf per day in 1999?

POSITION: No position at this time.

ISSUE 3: Is the proposed Pipeline needed to improve or maintain natural gas delivery reliability and integrity within Florida?

POSITION: No position at this time.

ISSUE 4: Are there any adverse consequences to SunShine and its customers if the petition is denied or if construction is delayed?

POSITION: No position at this time.

ISSUE 5: Is the timing of SunShine's petition to determine the need for its proposed pipeline appropriate?

POSITION: No position at this time.

ISSUE 6: Is the fuel price forecast used by SunShine reasonable for planning purposes?

POSITION: No position at this time.

ISSUE 7: Do there exist sufficient divertible supplies of natural gas to meet the expected needs of SunShine's customers?

POSITION: No position at this time.

ISSUE 8: Does sufficient capacity exist on pipelines upstream from SunShine to assure natural gas supply can be transported to SunShine sufficient to meet its design capabilities?

POSITION: No position at this time.

ISSUE 9: Will sufficient capacity exist on pipelines upstream from SunShine to assure natural gas supply can be transported to SunShine at the expected in-service date?

POSITION: No position at this time.

ISSUE 10: Do existing pipeline companies in Florida have sufficient excess capacity to fulfill the forecasted need for transmission capacity?

POSITION: No position at this time.

ISSUE 11: Has SunShine acquired sufficient commitments for transmission capacity to warrant construction of the pipeline?

POSITION: No position at this time.

ISSUE 12: Is SunShine's forecast of growth in demand for gas capacity to serve existing and proposed electric utility power plants reasonable?

POSITION: No position at this time.

ISSUE 13: Are approved capacity additions to existing pipelines sufficient to satisfy the growth in demand for natural gas forecasted by SunShine?

POSITION: No position at this time.

ISSUE 14: Do the proposed design, operation and maintenance procedures of SunShine's natural gas pipeline provide a prudent and reasonable level of safety for the public?

POSITION: No position at this time.

ISSUE 15: Has SunShine provided sufficient information on the route, planned alternative routes, planned location of compressor stations, and, other affiliated facilities to evaluate whether the need exists for its proposed pipeline?

POSITION: No position at this time.

ISSUE 16: Are the commencement and terminus of SunShine's proposed facilities appropriate to serve the need identified in Issue 2?

POSITION: No position at this time.

ISSUE 17: Has SunShine selected an appropriate pipeline diameter and configuration for the project?

POSITION: No position at this time.

ISSUE 18: Are SunShine's construction cost estimates reasonable for planning purposes?

POSITION: No position at this time.

ISSUE 19: Can the necessary financing for the SunShine Intra-state Pipeline Project be acquired by the partnership?

POSITION: No position at this time.

ISSUE 20: Can the necessary financing for the SunShine Intra-state Pipeline Project be acquired without the participation of Florida Cities as an investor?

POSITION: No position at this time.

ISSUE 21: Would the citizens of the State of Florida benefit from the existence of competing pipelines?

POSITION: No position at this time.

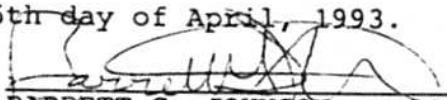
ISSUE 22: What associated facilities are required in conjunction with the SunShine Pipeline Project?

POSITION: No position at this time.

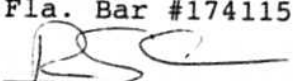
ISSUE 23: Based on the resolution of the previous factual and legal issues, should SunShine's petition for determination of need for a natural gas mainline and laterals as shown in Exhibit JPL-1 be approved?

POSITION: No position at this time.

Respectfully submitted this 15th day of April, 1993.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of FLORIDA CITIES PREHEARING STATEMENT has been furnished by U.S. Mail postage prepaid to the following, this 15th day of April, 1993:

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