

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 920807-GP

Filed: March 29, 1993

**FLORIDA POWER CORPORATION'S
OBJECTIONS TO FLORIDA GAS TRANSMISSION COMPANY'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Florida Power Corporation ("FPC") by its undersigned attorneys and pursuant to Florida Administrative Code Rule 25-22.034, Florida Rules of Civil Procedure Rule 1.350, and the Order Establishing Procedure dated March 16, 1993, hereby submits its objections to the First Request for Production of Documents (Nos. 1-9) propounded by Florida Gas Transmission Company ("FGT").

2. Please provide a copy of all documents upon which FPC's witnesses intend to rely or may rely in formulating their opinions and/or testimony at a final hearing in this proceeding.

Request No. 2 is overly broad and unduly burdensome. FPC's final list of witnesses and the documents upon which they may rely are undetermined at this time.

3. Please provide a copy of all documents which establish, discuss, or otherwise form the foundation for the reimbursement arrangement of Electric Fuels Corporation's ownership of International Marine Terminal.

DOCUMENT NUMBER-DATE

03404 MAR 29 1993 53

FPSC-RECORDS/REPORTING

Request No. 3 seeks documents which are irrelevant and immaterial to any issue which may be the subject matter of this case, and the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Electric Fuels Corporation is not a party to this proceeding. The information sought may be available in other dockets before the Commission regarding Electric Fuels.

4. Please provide a copy of all Public Service Commission Orders relating to International Marine Terminal which describe FPC's return on its investment as well as its recovery of costs and rates.

Request No. 4 seeks documents which are irrelevant and immaterial to any issue which may be the subject matter of this case, and the information sought is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. International Marine Terminal is an entity related to Electric Fuels Corporation, which is not a party to this proceeding. Commission orders are available through the Commission or through legal reporting services.

5. Please provide a copy of all documents which FPC intends to use or may use as Exhibits at a final hearing in this proceeding.

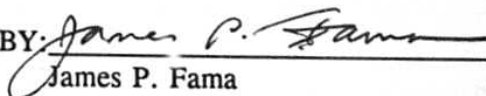
Request No. 5 is overly broad and unduly burdensome. FPC's final list of witnesses and their final hearing exhibits are undetermined at this time.

9. Please provide a copy of all correspondence, agreements, and documents between FPC and SunShine on the issue of FPC's and/or its affiliates or parent corporation's equity ownership in the SunShine Pipeline.

Request No. 9 seeks documents which are irrelevant and immaterial to any issue which is the subject matter of this case. The equity ownership of FPC, or its affiliates, in the SunShine pipeline is not at issue in a proceeding to determine the need for a natural gas pipeline.

RESPECTFULLY SUBMITTED this 29th day of March, 1993.

Florida Power Corporation
3201 34th St. South
St. Petersburg, Florida 33733
(813)866-5182

BY: 
James P. Fama

CERTIFICATE OF SERVICE

DOCKET NO. 920807-GP

I HEREBY CERTIFY that a true and correct copy of Florida Power Corporation's Objections to Florida Gas Transmission Company's First Request for Production of Documents was furnished by U.S. Mail this 29th day of March, 1993 to the following:

Bram D.E. Canter, Esquire
Haben, Culpepper, Dunbar
& French, P.A.
306 N. Monroe Street
Tallahassee, Florida 32302

James P. Sale, Esquire
ANR Southern Pipeline Co.
9 E. Geenway Plaza
Houston, Texas 77046-0995

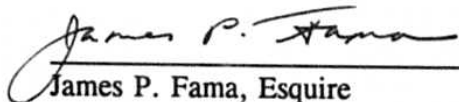
Mr. Daniel F. Collins
Mr. Richard W. Miller
ANR Southern Pipeline Company
2000 M Street N.W., Suite 300
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Gary C. Smallridge, Esquire
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2600 Blair Stone Road
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Florida Public Service Comm.
111 E. Gaines Street
Tallahassee, Florida 32399

Wayne L. Schiefelbein, Esquire
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1709-D Mahan Drive
Tallahassee, Florida 32308


James P. Fama, Esquire

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
 NOTICE OF NEED DETERMINATION HEARING
 ON PROPOSED INTRASTATE NATURAL GAS PIPELINE
 TO
 SUNSHINE PIPELINE PARTNERS
 FLORIDA GAS TRANSMISSION COMPANY
 AND
 ALL OTHER INTERESTED PERSONS
 DOCKET NO. 920807-GP

IN RE: APPLICATION FOR DETERMINATION OF NEED FOR
 INTRASTATE NATURAL GAS PIPELINE BY
 SUNSHINE PIPELINE PARTNERS
 ISSUED: MARCH 19, 1993

NOTICE is hereby given that the Florida Public Service Commission will hold a public hearing in the above docket at the time and place listed below. All persons who wish to be heard are urged to be present at the beginning of the hearing on May 10, 1993.

9:30 a.m., Monday, May 10, 1993*
 101 East Gaines Street
 Room 106 — Fletcher Building
 Tallahassee, Florida 32399-0850

*Tuesday, May 11, 1993, has been reserved for continuation of the hearing, if necessary.

PURPOSE AND PROCEDURE

The purpose of this hearing will be to take evidence to determine the need, pursuant to Section 403.9422, Florida Statutes, for the construction and operation of a proposed intrastate natural gas pipeline in Florida. The pipeline would originate at a point in Okaloosa County and extend east and south through the following counties: Dale, Gladstone, Gilchrist, Hardee, Hernando, Highlands, Holmes, Jackson, Jefferson, Lake, Leon, Levy, Madison, Marion, Okaloosa, Oklawaha, Pasco, Pinellas, Polk, Sumter, Taylor, Walton and Washington.

Initially the pipeline will consist of approximately five hundred two (502) miles of mainline and lateral having capacity of 250,000 Mcf (thousand cubic feet) per day which will be operated without compression during the first three years of service, scheduled to commence in February 1994. Sunshine's thirty inch (30") mainline system will originate at the interconnection with the proposed interstate natural gas pipeline system known as SunShine Interstate Transmission Company (SITCO) at a point in Okaloosa County, and will extend east and south to a termination point in Polk County. It is also proposed that lateral lines and branch lines off the lateral lines, which will vary in size from four inches (4") to twenty four inches (24"), will extend from the SunShine mainline system in the following manner: a four inch (4") lateral originating in Marion County to the City of Ocala; and eight inch (8") lateral originating in Sumter County and extending into Lake County to the City of Leesburg; a twenty inch (20") lateral originating in Pinellas County, which will include a six inch (6") branch line into Hernando County and a six inch (6") and twelve inch (12") branch line into Pasco County; and twenty-four inch (24") lateral from Sumter County extending through Lake County into Polk County.

In order to meet increased delivery obligations commencing in 1998, SunShine will construct and place in-service in 1998, additional facilities consisting of approximately one hundred thirteen (113) miles of new lateral and two compressor stations having approximately ten thousand horsepower (10,000 H.P.) each. As part of this additional construction, the twenty-four inch (24") lateral in Polk County will be extended, and two new branch lines will be built, one sixteen inch (16") in Polk County and one twenty inch (20") that will extend from Polk County through Hardee and Highlands Counties into Oklawaha County. These additional facilities will increase the system capacity to approximately 425,000 Mcf per day and the overall miles of the pipeline to approximately six hundred fifteen (615).

A further expansion of the capacity of the SunShine Pipeline will be placed in-service in 1999. This expansion will add three new compressor stations, two having approximately ten thousand horsepower (10,000 H.P.) each and the other having approximately five thousand horsepower (5,000 H.P.). This expansion will bring the total compression on the SunShine Pipeline to approximately forty-five thousand horsepower (45,000 H.P.), and the total system capacity to approximately 550,000 Mcf per day.

The need determination proceedings will be governed by the provisions of Chapter 120, Florida Statutes, Section 403.9422, Florida Statutes, and Chapter 25-22, Florida Administrative Code. Under Section 403.9422, Florida Statutes, the Commission is the sole forum for the determination of need for the proposed intrastate natural gas pipeline and associated facilities. In making its determination, the Commission must take into account the need for natural gas delivery in a reliable, safe, and integrity, the need for abundant, clean-burning natural gas at a reasonable cost, and other matters within its jurisdiction that it deems relevant.

Only issues relating to the need for the proposed intrastate natural gas pipeline and its associated facilities will be heard at the May 10, 1993, hearing. Separate public hearings will be held before the Division of Administrative Hearings and the Governor's Cabinet sitting as the Natural Gas Transmission Pipeline Siting Board to consider other matters required to be determined under the Natural Gas Transmission Pipeline Siting Act, Sections 403.9041-403.9425, Florida Statutes.

Members of the public who are not parties to the need determination proceeding will have an opportunity to present testimony regarding the need for the proposed pipeline. All witnesses will be sworn and will be subject to cross-examination at the conclusion of their testimony.

Written comments regarding the need for the pipeline may be sent to the Commission at the following address:

Steve Tribble
 Director, Division of Records and Reporting
 Florida Public Service Commission
 101 East Gaines Street
 Tallahassee, Florida 32399-0850
 Re: Docket No. 920807-GP

Anyone wishing to become a party to the need determination proceeding should file an appropriate petition pursuant to rule 25-22.039, Florida Administrative Code with the Director of the Commission's Division of Records and Reporting at the address listed above. Copies of the petition should be sent by mail to all parties. Those wishing to intervene in these proceedings, unless appearing on their own behalf, must be represented by an attorney or other person who can be determined to be a qualified representative pursuant to Chapter 120, Florida Statutes, and Rule 25-22.036, Florida Administrative Code. Petitions for leave to intervene must be filed at least five (5) days before the final hearing, must conform with Commission Rule 25-22.036 (7) (a), Florida Administrative Code, and must include allegations sufficient to demonstrate that the intervenor is entitled to participate in the proceeding as a matter of constitutional or statutory right or pursuant to Commission rule, or that the substantial interests of the intervenor are subject to determination or will be affected through the hearing.

Any person requiring some accommodation at this hearing because of a physical impairment should call the Division of Records and Reporting at (904) 488-8371 at least five (5) calendar days prior to the hearing. If you are hearing or speech impaired, please contact the Florida Public Service Commission using the Florida Relay Service, which can be reached at 1-800-955-8771 (TDD).

PREHEARING CONFERENCE

A prehearing conference will be held at the following time and place:

1:00 p.m., Monday, May 3, 1993
 101 East Gaines Street
 Room 122 — Fletcher Building
 Tallahassee, Florida 32399-0850

The purpose of this prehearing conference will be to consider: (1) the simplification of the issues; (2) the identification of the positions of the parties on the issues; (3) the possibility of obtaining admissions of fact and of documents which will avoid unnecessary proof; (4) the identification of exhibits; (5) the establishment of an order of witnesses; and (6) such other matters as may aid in the disposition of the action.

JURISDICTION

Jurisdiction over this determination of need is vested in the Commission by Chapter 366 and Section 403.9422, Florida Statutes. This proceeding will be governed by the provisions of Chapter 120, Florida Statutes, as well as Chapters 25-6 and 25-22, Florida Administrative Code.

APPLICATION

A copy of the Petition For A Determination of Need and supporting exhibits are available for public inspection during normal business hours at the following location:

Florida Public Service Commission
 Division of Records and Reporting
 Fletcher Building — Room 111
 101 East Gaines Street
 Tallahassee, Florida 32399-0850