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April 6, 1993

VIA HAND DELIVERY

Mr. Steve C. Tribble, Director Division of Records and Reporting Florida Public Service Commission 111 E. Gaines St. Tallahassee, FL 32301

RE: DOCKET NO. 920807-GP - MOTION TO INTERVENE

Dear Mr. Tribble:

Enclosed are the original and fifteen (15) copies of Florida Cities (FC) Motion to Intervene in the above referenced Docket.

		Thank	you	for	your	assistance	in this ma	tter.	
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for) Docket No. 920807-GP Determination of Need for an) Filed: April 6, 1993 Intrastate Natural Gas Pipeline) by SunShine Pipeline Partners)

MOTION TO INTERVENE

COME NOW, the Florida municipal utility systems listed below, individually and as an ad hoc group, Florida Cities, (FC) by and through their undersigned attorneys, and file this Motion to Intervene in the above styled Docket, and as grounds therefor state:

- 1. Florida Cities includes:
- (a) Jacksonville Electric Authority
- (b) Orlando Utilities Commission
- (c) City of Tallahassee Electric Department
- (d) Lakeland Department of Electric & Water Utilities
- (e) City of Gainesville
- (f) City of Homestead
- (g) Kissimmee Utility Authority
- (h) City of Starke
- (i) City of St. Cloud
- Each municipal utility system is a large purchaser of natural gas.

- 3. SunShine Pipeline Partners have filed an Application for Determination of Need for an intrastate natural gas pipeline.
- 4. Construction and operation of the proposed pipeline could have very large long term or permanent consequences for the supply and price of natural gas in Florida.
- 5. Accordingly, the substantial interests of FC and of its constituent municipal utility systems are being determined in this proceeding.

WHEREFORE, the municipal utility systems listed above, individually and as Florida Cities (FC), respectfully move this Commission to grant intervention in the above styled proceeding this 6th day of April, 1993.

Respectfully Submitted,

Barrett G. Johnson 315 S. Calhoun St. 750 Barnett Bank Bldg. Tallahassee, FL 32301 (904) 222-2693 Fla. Bar #174115

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Tallahassee, FL 32301

(904) 561-1111 Fla. Bar #599808

CERTIFICATE OF SERVICE

DOCKET NO. 920807-GP

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Intervene has been served by U.S. Mail on this 6th day of April, 1993 to the following parties of record:

William L. Hyde Peeples, Earl & Blank, P.A. 250 South Monroe Street Suite 350 Tallahassee, FL 32301

Mr. Daniel F. Collins Mr. Richard W. Miller ANR Southern Pipeline Co. 2000 M Street, N.W., #300 Washington, DC 20036

Tallahassee, FL 32302

Martha Carter Brown, Esq. Division of Appeals Florida Public Service Comm. 111 East Gaines Street Tallahassee, FL 32399

Mr. James P. Sale ANR Southern Pipeline Co. 9 Greenway Plaza Houston, TX 77046

Peter M. Dunbar Haben, Culpepper, Dunbar & French, P.A. P.O. Box 10095

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