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STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

In the Matter of

Section 403.9422, Florida
Statutes, Petition for a
Determination of Need

/ PSC File No. 92-0807GP

PETITION FOR INTERVENTION

Petitioner, PINELLAS COUNTY, FLORIDA, by and through its undersigned attorney, petitions to intervene in the above-referenced hearing, pursuant to Chapter 120 and Section 403.9422, Florida Statutes and Chapter 25-22, Florida Administrative Code, stating as follows:

Identification of Intervener

1. The Petitioner's name, address and telephone number are as follows:

Pinellas County, Florida
Attention of Charles Rainey, Chairman
Pinellas County Board of County Commissioners
315 Court Street
Clearwater, Florida 34616
(813) 462-3354

✓ Receipt of Notice

2. The Petitioner received its notice of the May 10, 1993 public hearing pursuant to an advertisement in the March 19, 1993 edition of the St. Petersburg Times.

Substantially Affected Interests

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3. This Petition for Intervention concerns the proposal of a natural gas pipeline system by the Sunshine Interstate Transmission Company ("pipeline") which will extend into Pinellas

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County, Florida. The substantial interests of the Petitioner will be affected by the Public Service Commission ("Commission") determination of need for said pipeline at a public hearing scheduled for May 10, 1993, as follows:

a. Proprietary - Petitioner owns and has a 99-year lease on land (Brooker Creek Preserve) in which the pipeline is proposed to be located. (See Exhibit "A"). Most of the above land has been designated as a wellhead zone of protection pursuant to Pinellas County Ordinance No. 90-2, as amended, as the land is a major source of water supply for Pinellas County (see Exhibit "B"). The property interests of the County may be substantially and adversely affected by the placement of the proposed pipeline on the above properties.

b. Statutory - Petitioner is an affected "local government" as defined in Section 403.9403, Florida Statutes.

c. Public Welfare - Petitioner has a substantial interest in determining and assessing the safety, reliability, costs, integrity, and need for natural gas delivery for the citizens of Pinellas County, Florida, all of which are subject to determination or will be affected through the public hearing. (See Section 125.01, Florida Statutes, and Chapter 80-590, Laws of Florida, as amended, the Pinellas County Charter).

Disputed Issues of Material Fact

4. The Petitioner has concerns, which it perceives as unresolved issues of material fact, as follows:

a. The safety, reliability, and impact of placing the pipeline in right-of-way corridors with and adjacent to other local government infrastructure.

b. Whether the economic impact and need of the pipeline outweighs the above-mentioned safety and reliability.

c. The impact of the proposed location of the pipeline through the Brooker Creek Preserve, a six thousand acre wilderness preserve owned by the Petitioner and located in northeast Pinellas County, Florida. (See Exhibit "A")

d. The safety, reliability, and impact of placing the pipeline over land which is a designated wellhead zone of protection and one of Pinellas County's major source of water supply.

e. Whether the citizens of Pinellas County will receive any economic benefit from the extension of the pipeline into Pinellas County, Florida.

Rules and Statutes Entitling Movant to Relief

5. The following rules and statutes entitle the Petitioner to the relief requested:

a. Section 403.9401-9425, Florida Statutes, the Natural Gas Transmission Pipeline Siting Act.

b. Chapter 120 and 125, Florida Statutes.

c. Rules 25-22.036(7) and 25-22.039, Florida Administrative Code.

Concise Statement of Ultimate Facts

6. Section 403.9422, Florida Statutes, establishes the procedure for the Commission to make a determination of need for

natural gas transmission pipelines. Section 403.9422(1)(b), Florida Statutes, states that:

In the determination of need, the Commission shall take into account the need for natural gas delivery reliability, safety, and integrity; the need for abundant, clean burning natural gas to assure the economic well-being of the public; the appropriate commencement and terminus of the line; and other matters within its jurisdiction deemed relevant to the determination of need.

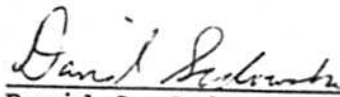
7. Pinellas County, Florida is the proposed terminus of a branch of the pipeline. Pinellas County owns the Brooker Creek Preserve, property which the pipeline is proposed to traverse. Pinellas County has a 99-year lease and owns property which is designated as a wellhead zone of protection, property which the pipeline is proposed to traverse. The Petitioner has serious concerns over the need for and the safety, reliability, and integrity of the pipeline for Pinellas County, Florida. Petitioner, therefore, requests that it be allowed to intervene to express these concerns to the Commission concerning the need, as defined above, for the pipeline in Pinellas County.

WHEREFORE, Petitioner requests permission to intervene in the May 10, 1993 public hearing and all associated hearings on the Petition For a Determination of Need.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Petition for Intervention has been furnished by U.S. Mail to Steve Tribble, Director, Division of Records and Recording, Florida Public Service

Commission, 101 East Gaines Street, Tallahassee, Florida
32399-0850, this 21st day of April, 1993.

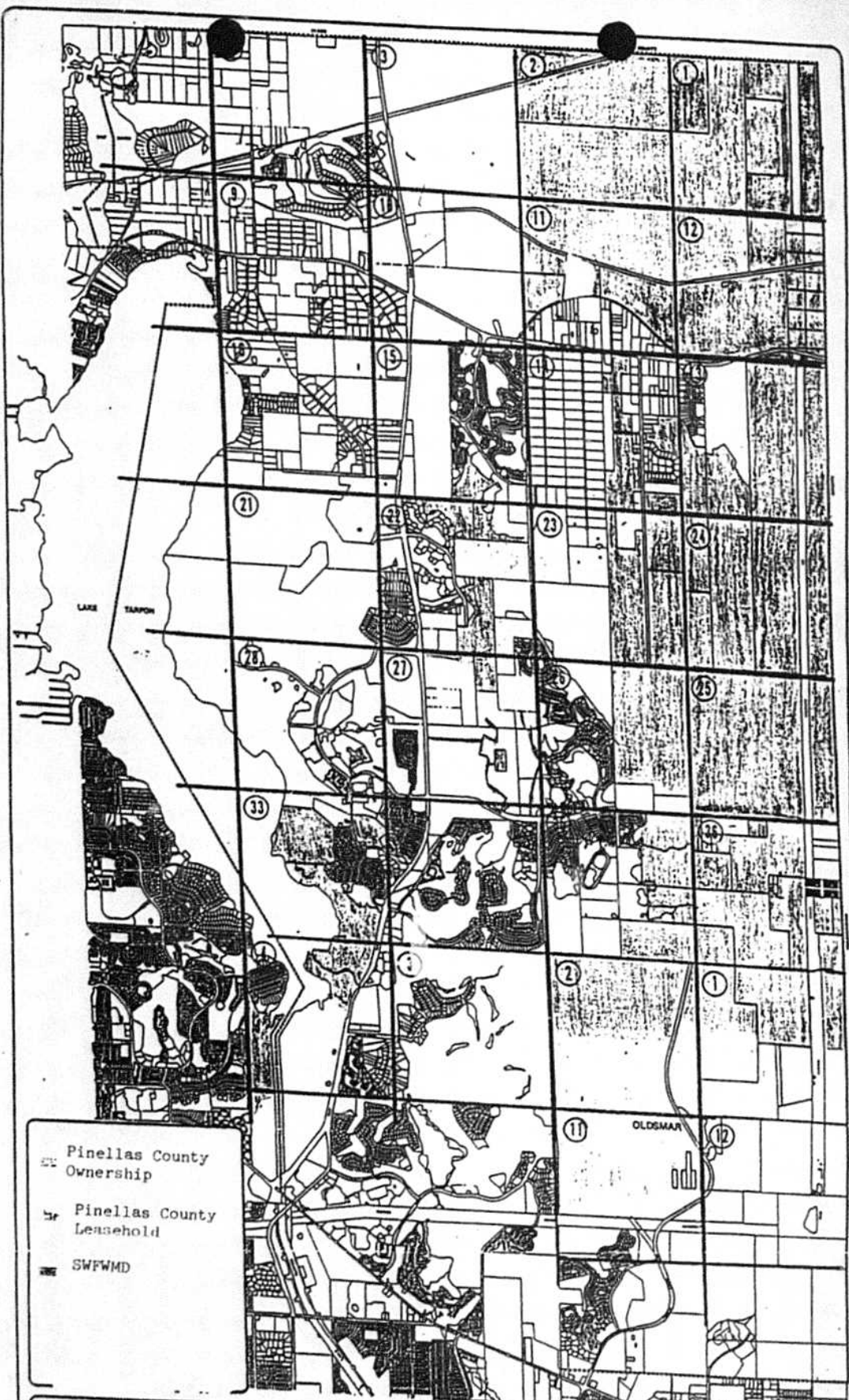


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EXHIBITS A and B

- A. Map of the Northeast portion of Pinellas County with the red portions designating land owned by Pinellas County and part of the Brooker Creek Preserve and the green portions designating land in which Pinellas County is the lessee in a 99-year lease.
- B. The Pinellas County Wellhead Protection Overlay District, which encompasses most of the land designated in Exhibit "A".



[Hatched pattern] Pinellas County Ownership
 [Dotted pattern] Pinellas County Leasehold
 [Solid black] SWFWMD

SECTOR 2 - EAST LAKE TARPON
 Pinellas County Comprehensive Plan
 — Planning Sector Boundary — Municipal Limits as of August, 1968
 Prepared by: PINELLAS COUNTY PLANNING DEPARTMENT

