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April 26, 1993

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By Federal Express
Airbill No. 7212701646

Mr. Don Strickland, Clerk
Division of Records & Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, Florida 32301

920807

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

Dear Mr. Strickland:

Pursuant to your instructions in your April 23, 1993 telephone conference with my secretary, I enclose the original and fifteen (15) copies of West Coast Regional Water Supply Authority's Petition to Intervene for filing in the above-referenced matter. I have also enclosed an additional copy for you to date stamp and I request that you return the copy with the appropriate filing date stamped on it to our office in the enclosed self-addressed stamped envelope.

I thank you for your attention to this matter.

Sincerely,

de la Parte & Gilbert, P.A,



Michael A. Skelton

MAS/lko,
Enclosures

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application to determine the need for an intrastate natural gas pipeline in the state.

3. The Commission Docket No. for SunShine's application is 920807-GP. West Coast is unaware of any other names, numbers, or other designation used by the Commission to identify files or documents relating to SunShine's application.

4. On or about March 30, 1993, West Coast received notice of the Commission's intent to hold a public hearing on May 10, 1993 to determine need for the natural gas pipeline proposed by SunShine by the Commission's publication of such notice in the March 12, 1993 Florida Administrative Weekly.

**Proposed Commission's Determination of Need and
Its Affect on the Substantial Interests of
West Coast**

5. SunShine's proposed natural gas lines (steel lines) are proposed to be cathodically protected by an impressed type current system. When in close proximity to other types of transmission lines containing ferrous material, impressed current systems have a deleterious impact on such ferrous materials in the adjacent lines. Electric current from the protected natural gas transmission line leaves the line, travels through the ground, and deteriorates adjacent unprotected transmission lines which contain ferrous material.

6. The natural gas pipeline proposed by SunShine will use the above described system for protection. The planned routes for SunShine will cross perpendicularly or travel parallel to West

Coast's existing water transmission lines causing harmful effects to such transmission lines and West Coast's water supply system.

7. West Coast operates nine wellfields and one surface water withdrawal located within Hillsborough and Pasco Counties. These facilities currently produce water at an annual average daily rate exceeding 100 million gallons. West Coast supplies the public water supply needs of approximately 1.5 million persons residing in Pinellas, Pasco, and Hillsborough Counties.

8. The population of Hillsborough, Pinellas, and Pasco Counties is rapidly growing. New water supply facilities and transmission lines will be needed and are already planned, with some under construction, to support this rapid growth and projected water demand.

9. Presently, West Coast supplies public water through transmission lines made of varying material, including prestressed concrete cylinder pipe ("PCCP"). For example, West Coast presently supplies approximately two-thirds of Pinellas County's water supply through the Cypress Creek Transmission Main ("CCTM"), an approximately 17 mile long PCCP located in Pasco County. This percentage is projected to increase with time. The CCTM is not electrically continuous through joint bonding. West Coast's CCTM transports disinfected, stabilized, and pressurized water from the Cypress Creek Pump Station to the Pinellas County Water System and the City of St. Petersburg's Cosme Water Treatment Plant, located at the Pinellas/Pasco County Line. Approximately 12 miles of the CCTM leaving the pump station is 84-inch diameter PCCP, while the

remainder of the transmission line is 66-inch diameter PCCP. In addition, West Coast supplies water from the Cross Bar Ranch Wellfield to the Cypress Creek Pump Station through the Cross Bar Ranch Transmission Main ("CBRTM"), which travels through approximately 10 miles of 60-inch diameter PCCP located in Pasco County. The CBRTM is not electrically continuous through joint bonding.

10. In June 1987, a section of the 84-inch PCCP in the ECPM ruptured, causing a significant disruption of the majority of the potable water supply to Pinellas County and the City of St. Petersburg. After several years of investigation, West Coast determined that the 84-inch and 66-inch PCCP in the ECPM was defective. In April 1988, West Coast instituted a lawsuit against the manufacturer, the engineer, and the contractor involved with the design, construction, and installation of the ECPM. This lawsuit remains pending at this time.

11. In addition, further investigation demonstrated that the 60-inch CBRTM was also defective. In 1991, West Coast filed a lawsuit against the manufacturer, the engineer, and the contractor involved with the design, construction, and installation of the CBRTM. This lawsuit also remains pending.

12. Moreover, in 1986 the Board of Directors of West Coast adopted the conceptual 2020 Needs and Sources Master Plan. This Master Plan proposed the ultimate construction of a Regional Water Supply System, connecting the existing wellfields and facilities with new wellfields and facilities.

13. The Regional Water Supply System proposed to accomplish, at least, two goals, namely: (a) new water supply, and (b) construction of a regional "grid" system of transmission lines. Both goals of this project represent years of detailed and costly planning efforts.

14. In June 1991, West Coast's Board of Directors approved the Regional Water Supply Contract to accomplish the creation of a Regional Water Supply System.

15. In order to fulfill its statutorily mandated goals of supplying potable water to Pasco, Pinellas, and Hillsborough Counties and the Cities of Tampa and St. Petersburg, West Coast must maintain and operate its existing and future wellfields, facilities, and transmission lines.

16. Of great concern to West Coast is the need (a) to protect the integrity of its own existing unbonded water transmission lines, which will contain ferrous material in the prestressed wires and cylinder; (b) to protect the integrity of future transmission lines, which contain ferrous materials; and (c) to protect the integrity of its property interests in existing easements.

17. Generally, West Coast does not have sufficient easement width or rights that enables it to "share" its existing rights with a gas utility.

18. If the Commission issues a certificate of need to Sunshine without assuring appropriate safety measures will be taken by Sunshine when in close proximity to West Coast's Transmission Lines, then West Coast will be substantially affected.

19. For the reasons stated in Paragraphs 5 - 18, West Coast is entitled to full party status in this proceeding.

Disputed Issues of Material Fact and Law

20. The disputed issues of material fact and law in this proceeding are as follows:

a. Whether the placement of natural gas pipelines protected by impressed type current systems in close proximity to water transmission lines will cause detrimental effects to such lines.

b. Whether SunShine has provided adequate information and support to demonstrate the safety, reliability, and integrity of its pipeline system when such system is placed in close proximity to water transmission lines.

c. Whether the proposed design, operation, and maintenance procedures of SunShine's natural gas pipeline provide a prudent and reasonable level of safety for the public.

d. Whether SunShine has provided sufficient information on the route, planned alternative routes, planned locations of compressor stations, and other affiliated facilities, to evaluate whether the need exists for its proposed pipeline.

e. Whether based on the resolution of the previous factual and legal issues, should SunShine's petition for determination of need for a natural gas pipeline (mainline and laterals) be approved.

Rules and Statutes Which Entitle West Coast to Relief

21. The following rules and statutes entitle West Coast to the relief requested:

a. Sections 403.9401 - 403.9425, Florida Statutes, the Natural Gas Transmission Pipeline Siting Act.

b. Chapter 120, Florida Statutes.

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

Concise Statement of Ultimate Facts

22. Section 403.9422, Florida Statutes, establishes the procedure for the Commission to determine the need for natural gas transmission pipelines. Section 403.9422(1)(b), Florida Statutes, states

(b) 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.

23. The proposed routes for SunShine's natural gas pipeline will cross or run parallel to West Coast's water transmission mains and easements. West Coast has serious concerns over the need for and the safety, reliability, and integrity of the SunShine pipeline proposed to travel through Pasco County, where West Coast maintains existing and plans to construct water transmission lines.

24. Therefore, based upon the above, West Coast requests to intervene to express and explore these concerns before the Commission.

WHEREFORE, West Coast respectfully requests:

1. The Commission grant West Coast's Petition to Intervene in this cause as a party, pursuant to Section 120.57, Florida Statutes, and Florida Administrative Code Rules 25-22.039 and 25-22.036(7)(a); and

2. The Commission determine the safety, reliability, and integrity of SunShine's proposed natural gas pipeline.

Respectfully Submitted,
de la PARTE & GILBERT, P.A.



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Attorneys for Intervenor
WEST COAST REGIONAL WATER
SUPPLY AUTHORITY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and fifteen (15) copies of West Coast Regional Water Supply Authority's Petition to Intervene has been furnished by Federal Express (Airbill No.

7212701646) to Mr. Don Strickland, Clerk of the Florida Public Service Commission, 101 East Gaines, Tallahassee, Florida 32399-0850 and a true and correct copy of the petition has also been furnished by Facsimile Transmission and U.S. Regular Mail to Ms. Martha Carter Brown, Florida Public Service Commission, 101 East Gaines, Tallahassee, Florida 32399-0850 [(904) 487-0509, James Beasley, Esquire, P.O. Box 391, Tallahassee, Florida 32302 [(904) 222-7560], John Fons, Esquire, P.O. Box 391, Tallahassee, Florida 32302 [(904) 222-7560], Gary C. Smallridge, Esquire, Department of Environmental Regulation, Twin Towers Office Building, 2600 Blairstone Road, Tallahassee, Florida 32399-2400 [(904) 487-4938], Barrett Johnson, Johnson & Associates, P.O. Box 1308, Tallahassee, Florida 32302 [(904) 222-2702], James Fama, Florida Power Corporation, P.O. Box 14042, 3201 34th Street South, St. Petersburg, Florida 33733 [(813) 231-4931], Wayne Schiefelbein, Esquire, 1709-D Mahan Drive, Tallahassee, Florida 32308 [(904) 877-9031], Peter Dunbar, Esquire, P.O. Box 10095, Tallahassee, Florida 32301 [(904) 222-2126], Kenneth L. Warnstadt, Esquire, 20 North Main Street, Room 462, Brooksville, Florida 34601 [(904) 754-4477], Ansley Watson, Esquire, P.O. Box 1531, Tampa, Florida 33601 [(813) 273-4396], and Anthony Policastro, Assistant County Attorney, 7530 Little Road, Room 203, New Port Richey, Florida 34654 [(813) 847-8021] on this 26th day of April, 1993.



Edward P. de la Parte, Jr.