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April 29, 1993

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Original
FILE COPY

By Federal Express
Airbill No. 7212701462 and
Airbill No. 7212701650

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

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

Dear Mr. Strickland:

I enclose the original and fifteen (15) copies of (a) West Coast Regional Water Supply Authority's Motion for Official Recognition, along with attachments and (b) West Coast Regional Water Supply Authority's Motion to Allow Witness at Final Hearing for filing in the above-referenced matter.

ACK 1 Please note that due to the voluminous nature of these
AFA 3 documents it was necessary to send them in two Federal Express
APP Boxes (Airbill No. 7212701462 and Airbill No. 7212701650). I have
CAF also enclosed an additional copy of each motion for you to date
CMU stamp and I request that you return these copies with the
 appropriate filing date stamped on them to our office in the
 enclosed self-addressed stamped envelope.

CTR
EAC I thank you for your attention to this matter.

LEG 1 w/m

LIN 6

OPC

RCH

SEC 1

WAS MAS/lko
Enclosures

OTH

Sincerely,

de la Parte & Gilbert, P.A.

Michael A. Skelton

m/official Recog
DOCUMENT NUMBER-DATE

04713 APR 30 88

FPSC-RECORDS/REPORTING

m/all witness
DOCUMENT NUMBER-DATE

04712 APR 30 88

FPSC-RECORDS/REPORTING

RECEIVED & FILED

28
EPSC BUREAU OF RECORDS

STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

In Re: Application for) DOCKET NO. 920807-GP
Determination of Need for an) ORDER NO.
Intrastate Natural Gas Pipeline) ISSUED:
by Sunshine Pipeline Partners.)

ORIGINAL
FILE COPY

WEST COAST REGIONAL WATER SUPPLY AUTHORITY'S
MOTION TO ALLOW WITNESS AT FINAL HEARING

Intervenor, West Coast Regional Water Supply Authority, ("West Coast"), respectfully requests the Florida Public Service Commission ("Commission") to allow West Coast to present direct testimony through one witness at the final hearing scheduled in this matter for May 10, 1993 and states:

1. West Coast first received notice of this proceeding on or about March 30, 1993 by reviewing the published notice of this proceeding in the March 12, 1993 edition of the Florida Administrative Weekly.

2. West Coast raised its concerns about the natural gas pipeline proposed by SunShine at West Coast's next Board of Directors meeting on April 19, 1993.

3. After hearing West Coast's staff's concerns about the safety of the SunShine pipeline and its potential harm to West Coast's water transmission lines when in close proximity to the water transmission lines, the Board of Directors of West Coast directed West Coast staff and counsel to intervene in this proceeding before the Commission.

4. West Coast could not intervene in this proceeding until the Board of Directors approved such action. West Coast could not have intervened any earlier than it did in this proceeding.

DOCUMENT NUMBER-DATE

5. However, upon contact with counsel for the Commission, West Coast learned that the deadline for filing of pre-filed direct testimony had passed already.


6. West Coast believes all safety issues relating to the design, construction, and installation of the SunShine pipeline are vital to the Commission's determination of the need and safety of the pipeline proposed by SunShine.

7. West Coast will be severely prejudiced if it is not allowed to introduce direct testimony at this proceeding and believes that the Commission's proceeding will be flawed if testimony relating to these safety issues is not accepted from West Coast.

8. West Coast respectfully requests oral argument on this motion.

WHEREFORE, Intervenor, West Coast Regional Water Supply Authority, respectfully requests that the Commission allow it to present the testimony of one witness on the issue of safety at the final hearing in this matter.

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



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No. 7212701554), Peter Dunbar, Esquire, Haben, Culpepper, Dunbar, French, 306 North Monroe Street, Tallahassee, Florida 32301 (Airbill No. 7212701543), Kenneth L. Warnstadt, Esquire, 20 North Main Street, Room 462, Brooksville, Florida 34601 (Airbill No.

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7212701532), Ansley Watson, Esquire, Macfarlane, Ferguson, Allison & Kelly, 111 E. Madison (23rd Floor), Tampa, Florida 33601 (Airbill No. 7212701521), and Anthony Policastro, Assistant County Attorney, 7530 Little Road, Room 203, New Port Richey, Florida 34654 (Airbill No. 7212701510) on this 29th day of April, 1993.



Michael A. Skelton