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LEGAL DEPARTMENT
TRANSPORTATION AND PROCESSING SECTION

DONNA F. BOHN
ATTORNEY

May 4, 1993

VIA AIRBORNE MAIL

The Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32301
Attn: Division of Records & Reporting

RE: Application of Need for Intrastate Natural Gas
Pipeline by Sunshine Pipeline Partners
Docket No. 920807-GP

Dear Sir or Madam:

Please find enclosed one (1) original and fifteen (15) copies of a Motion to Intervene in the above mentioned Docket. Also, enclosed is a Certificate of Service. If you have any questions, please feel free to call me at the below number. Thank-you for your assistance.

- ACK ✓
- AFA 1
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1 w/m
- LIN 6
- OPC 1
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Sincerely,

Donna F. Bohn

DOCUMENT NUMBER-DATE

04903 MAY-58

FFSC-RECORDS/REPORTING

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CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Wichita, Kansas this 4th day of May, 1993.

Donna J. Behm

MOTION TO INTERVENE

STATE OF FLORIDA
BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application of Need)
For Intrastate Natural Gas) Docket No. 920807-GP
Sunshine Pipeline Partners)

Pursuant to Rule 25-22-039 of the Florida Administrative Code, United Gas Pipe Line Company, 600 Travis, Houston, Texas, 77002 ("United") hereby moves for leave to intervene in the captioned docket. In support thereof, United shows as follows:

1. United is a Delaware corporation with its principal place of business at 600 Travis, Houston, Texas. United's primary business is the interstate transportation of natural gas by pipeline in the states of Texas, Louisiana, Mississippi, Alabama and Florida. In its Application for Determination of Need filed with the Commission on March 5, 1993, Sunshine states that its proposed intrastate pipeline will connect with a new interstate pipeline system known as the Sunshine Interstate Transmission Company (the "SITCO Pipeline"). The SITCO Pipeline will interconnect with facilities of Gateway Pipeline Company near Mobile Bay, Alabama and Chandeleur Pipeline Company near Pascagoula, Mississippi. Both the Gateway and Chandeleur systems interconnect with United's system. In its Application, Sunshine states that through these interconnects Sunshine will have access to upstream capacity and gas supplies along United's system.

2. There are no known disputed issues of material fact.

3. Rule 25-039 of the Florida Administrative Code requires the Commission to allow a party to intervene in a proceeding when the party has a substantial interest that is subject to determination or will be affected through the proceeding. United has a substantial interest in these proceedings, because based on filings made by Sunshine with the Commission, Sunshine is anticipating using capacity on United's system to supply natural gas for its proposed intrastate pipeline in Florida. Accordingly, Sunshine's

proposed intrastate pipeline could have a direct impact on United's operations and competitive position in the Gulf Coast area.

4. United hereby requests the Commission to find that United be allowed to intervene in the above captioned proceeding as having a substantial interest in the intrastate natural gas pipeline project proposed by Sunshine Pipeline Partners in Florida.

5. The following persons should be included on the official service list in this proceeding, and all communications concerning this motion should be addressed to the following:

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Respectfully submitted,

Donna F. Bohn

Donna F. Bohn
Attorney