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July 23, 1996

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
Room 110, Easley Building  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

BY HAND DELIVERY

Re: Docket No. 960725-GU

Dear Ms. Bayo:

Enclosed is the original and fifteen copies of Comments of West Florida Natural Gas Company for filing in the above-referenced docket. Copies have been provided to parties of record.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Your attention to this filing is appreciated.

Sincerely,

*Norman H. Horton, Jr.*

Norman H. Horton, Jr.

NHH/amb  
Enclosures  
cc: Mr. Jeff Householder  
Parties of Record

RECEIVED & FILED

*U. S. 1996*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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COMMENTS OF

WEST FLORIDA NATURAL GAS COMPANY

ORIGINAL  
FILE COPY

DOCKET NO. 960725-GU

West Florida Natural Gas Company supports a measured, rational transition to unbundled gas distribution service in Florida. We appreciate the opportunity to participate in the workshop process, and look forward to a series of productive sessions. As a member of the Associated Gas Distributors of Florida, our company worked closely with other Florida LDC's in developing comments on the staff's initial list of unbundled service issues. We fully support the positions outlined in the AGDF comments, including the list of additional issues which need to be addressed during this docket.

West Florida Gas has offered transportation service to its customers since the inception of open access in FGT's system in 1993. Over the years we have expanded our tariff offerings and lowered eligibility thresholds to accommodate customer needs. Last year we signed a transportation service contract with the State which combined throughput volumes for two adjacent facilities and further reduced the threshold for that class of service. We recently entered into an agreement for transportation to a Federal government facility that requires segmenting sales and transportation services beyond a master meter. Some of our customers are using West Florida's capacity, and others are acquiring market capacity. In short, if a customer wants transportation service we have worked to meet their needs. To our knowledge, we have accommodated all current requests for transportation.

Much of our concern with the docket is related to the scope of the unbundling process anticipated by the Commission, and the implementation schedule that is ultimately defined. West Florida is prepared to move expeditiously to offer additional transportation opportunities to our customers. However, we want to be able to offer service options that meet our customer's expectations. Additionally, we want to ensure that our company is capable, both technically and financially, of addressing the transition issues related to providing these services. In our view each LDC will need significant flexibility to design unbundling plans that meet both the utilities and customer's interests. The AGDF comments specifically speak to these concerns. We urge you to give them careful consideration.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the West Florida Natural Gas Company's Comments in Docket No. 960725-GU have been served upon the following parties by U. S. Mail this 23rd day of July, 1996:

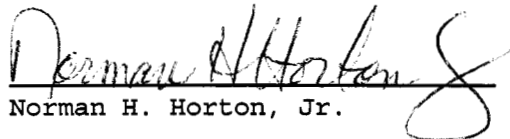
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