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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Unbundling of Natural)	DOCKET NO.: 960725-GU
Gas Services)	ORDER NO.: PSC-96-0844-PCO-GU
_____)	ISSUED: July 2, 1996

Motion to Add Issues

CNB Olympic Gas Services (CNB), by and through its undersigned attorney, hereby moves to add the following additional issues to the above-referenced Docket Number:

1. Should the FERC Gas Tariff of FGT be used as an unbundled tariff model?
2. Should all LDC services be performed pursuant to filed tariffs and should any desired rate flexibility be effected under a filed rider?
3. Should the commission require the LDC's to adopt a standardized OFO mechanism with a graduated system of control (like FGT)?
4. Should shippers erring on the side of caution and being out of tolerance in the "right" direction and that "help" the LDC's system during operational controls be rewarded?
5. Should LDCs have the right to unilaterally terminate transportation agreements without cause?
6. Should LDCs be required to "act reasonable" and should "sole discretion" provisions in the tariffs read "reasonable discretion"?
7. Should LDC's start-up issues allow for the implementation of procedural requirements (such as paperwork, metering, initial eligibility limitations, access fees, and mandatory agreements) if they act as barriers to service?
8. After passing a reasonable creditworthiness test, should marketers or their customers be free from additional credit-related costs such as deposits, letters of credit, or corporate guarantees?
9. Should LDCs require interruptible customers to pick up released firm FGT capacity from the native LDC as a prerequisite to transportation service?

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FPSC-RECORDS/REPORTING

10. Should supplier's competitively sensitive information, such as upstream contracts, remain confidential?

11. Should aggregators be afforded the same load management tools used by the LDC in its capacity as supplier of bundled sales service:

- * hold the upstream capacity of their customers, if asked to do so;
- * receive and pay their customer's transportation bills;
- * balance all their customers' usage as one pool;
- * choose to have all LDC penalties and operational orders directed at their pools, rather than their customers;
- * aggregate any collection of customers; and
- * aggregate upstream capacity for the purpose of submitting one citygate nomination for their customers?

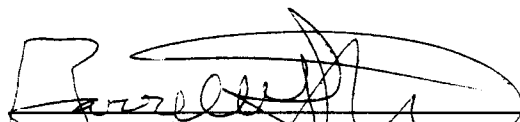
12. Should customers be able to order transportation service by phone and simply ask their agents to take care of the details of arranging service?

13. Should the Commission mandate intensive technical conferences on each LDC's unbundling proposal: ...involving all interested parties?

14. Should there be mandatory review of unbundled tariffs: Should there be a plan to come back and fine-tune the tariffs implemented?

15. Should municipals with their different state and federal tax treatments, be scrutinized when acting as a marketer outside of their municipal territory and competing with unbundled, FPSC-regulated LDC market affiliates and independent natural gas marketers?

Motion dated this 23rd day of July, 1996.


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Certificate of Service

I HEREBY CERTIFY that a copy hereof has been furnished to the following parties of record by U.S. Mail this 23rd day of July, 1996.

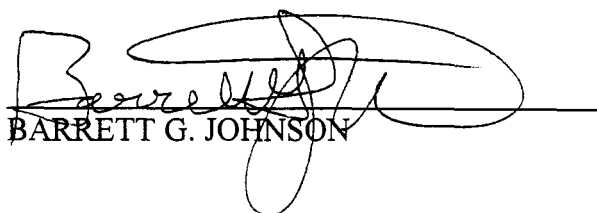
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