

JOHNSON AND ASSOCIATES, P.A.
ATTORNEYS AND COUNSELORS

11 100

Barrett G. Johnson
Pamela Anne Poulin

315 South Calhoun Street
Suite 350 (32301)
Post Office Box 1308
Tallahassee, Florida 32302

Telephone (904) 222-2693
Facsimile (904) 222-2702

August 30, 1996

By Hand-delivery

Public Service Commission
Division of Records and Reporting
2540 Shumard Oak Boulevard
Tallahassee, Florida 32301

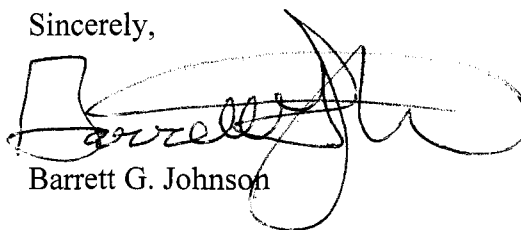
RE: Docket No.: 960725-GU

Dear Madam/Sir:

Enclosed for filing in the above-referenced proceeding is the Petition of Natural Gas Clearinghouse for Leave to Intervene on behalf of Natural Gas Clearinghouse (NGC) and a Notice of Appearance together with 15 copies of each. Also enclosed is a diskette Double Sided High Density 135 TPI containing the above petition using the WordPerfect 5.1 version under the file name *FL960725.MLI*.

Please contact me at the above number if you have any questions.

Sincerely,



Barrett G. Johnson

- CK _____
- FA _____
- PP _____
- AF _____
- MU _____
- TR _____
- YG _____
- EG _____
- PC _____
- TC _____
- ED _____
- AS _____
- TH _____

BGJ/rja
Enclosures

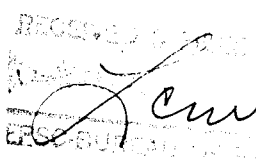
cc: Wayne Schieffelbein, Esquire
Scheffel Wright, Esquire
Ansley Watson, Esquire
Mr. Jack E. Uhl
Mr. Stephen Thompson
Mr. Frank C. Cressman
Vicki Kaufman, Esquire
Mr. Lyle C. Motley, Jr.
Mr. Michael Palecki
Mr. C. Terry Callender
Mr. Darin Cook

Marsha Rule, Esquire
Mr. David Rogers
Ms. Colette M. Powers
Mr. J. Peter Martin
Mr. Stuart L. Shoaf
Mr. J.E. McIntyre
Sebring Gas System, Inc.
General Counsel/Dept. of Management Services
Peter G. Esposito, Esquire
Mr. Vince Vesuvio

Appearance
 DOCUMENT NUMBER-DATE
 09211 AUG 30 96
 FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE
Intervene
 09210 AUG 30 96

FPSC-RECORDS/REPORTING

RECEIVED

 FPSC-RECORDS/REPORTING

**BEFORE THE
STATE OF FLORIDA
PUBLIC SERVICE COMMISSION**

Unbundling of Natural Gas Services)) Docket No. 960725-GU
))
)

**PETITION OF NATURAL GAS CLEARINGHOUSE
FOR LEAVE TO INTERVENE**

This Petition for Leave to Intervene in the above-referenced case (Petition) is filed by Natural Gas Clearinghouse (NGC) pursuant to Florida Public Service Commission (Commission) Rules of Practice and Procedures, § 25-22.039. NGC requests that this Petition be granted for the reasons set forth below:

I.

Communications and correspondence concerning this Motion should be directed to:

C. Terry Callender
Vice President - Regulatory Affairs
Glenn Etienne*
Manager, Regulatory Affairs
NATURAL GAS CLEARINGHOUSE
13430 Northwest Freeway, Suite 1200
Houston, TX 77040
ph: (713) 507-6830
fax: (713) 507-6834

Peter G. Esposito, Esq.*
Gregory K. Lawrence, Esq.*
JOHN, HENGERER & ESPOSITO¹
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036
ph: (202) 429-8800
fax: (202) 429-8805

Barrett G. Johnson, Esq.*
JOHNSON AND ASSOCIATES, P.A.
315 South Calhoun Street, Suite 350 (32301)
Post Office Box 1308
Tallahassee, FL 32302
ph: (904) 222-2693
fax: (904) 222-2702

* Persons designated to be on the Commission's official service list.

¹ Pursuant to Commission Rule, § 25-22.008 and as set forth in the attached *Notice of Appearance*, Barrett Johnson, an attorney licensed to practice law in Florida and practicing before various utility regulatory bodies, sponsors attorneys Esposito and Lawrence from the law firm of John, Hengerer & Esposito, each licensed to practice law in the District of Columbia and practicing before various utility regulatory bodies, as qualified Class A practioners permitted to practice law before the Commission.

II.

NGC is one of the leading independent nationwide marketers of natural gas. NGC currently purchases natural gas from virtually all of the major supply regions in the U.S. and Canada, and markets that gas throughout the U.S. wherever transportation is available. NGC is a Colorado partnership. NGC's principal place of business is located at 13430 Northwest Freeway, Suite 1200, Houston, Texas 77040. NGC also has offices in Pittsburgh, Pennsylvania; Chicago, Illinois; Boston, Massachusetts; Denver, Colorado; Tulsa, Oklahoma; and Atlanta, Georgia. NGC is a subsidiary of NGC Corporation, which has subsidiaries involved in the gathering, processing, and marketing of natural gas, natural gas liquids and crude oil, as well as the marketing of electric power.

III.

On June 12, 1996, the Commission opened Docket No. 960725-GU, an investigation concerning the unbundling of natural gas service in Florida, and subsequently issued an *Order Establishing Procedure*, establishing a schedule for the investigation, workshop dates, and an tentative issues list. To date, initial workshops have been held as part of the Commission's investigation.

IV.

As a potential marketer of natural gas in Florida, NGC has an specific interest in the Commission's investigation and will be directly and substantially affected by the outcome of the instant proceeding. Moreover, the interests of NGC in this proceeding cannot be adequately represented or protected by any other party hereto. The participation of NGC in this case will not cause undue delay or prejudice any party. Under the circumstances, NGC

submits that good cause exists for the Commission to grant NGC leave to intervene and participate herein.

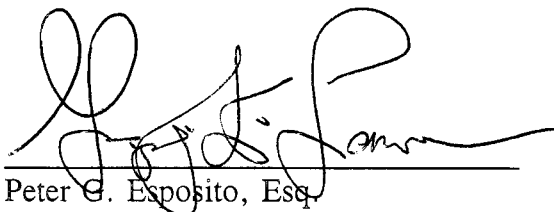
V.

WHEREFORE, NGC requests that the Florida Public Service Commission grant this Petition to Intervene and that NGC be made a party to this proceeding for all purposes.

Respectfully submitted,



Barrett G. Johnson, Esq.
JOHNSON AND ASSOCIATES, P.A.
315 South Calhoun Street, Suite 350
Post Office Box 1308
Tallahassee, FL 32302



Peter G. Esposito, Esq.
Gregory K. Lawrence, Esq.
JOHN, HENGERER & ESPOSITO
1200 17th Street, N.W.
Suite 600
Washington, D.C. 20036

Counsels for

Natural Gas Clearinghouse

It is hereby certified that this day the foregoing document has been served upon all parties of record on the official service list compiled by the Chief Clerk in this proceeding.

Dated: August ^{30th} 28, 1996

Certificate of Service

I HEREBY CERTIFY that a copy hereof has been furnished to the following parties of record by U.S. Mail this 30th day of August, 1996.

Wayne Schiefelbein, Esquire
Gatlin Law Firm
1709-D Mahan Drive
Tallahassee, Florida 32308

Mr. Stephen Thompson
Chesapeake Utilities
Post Office Box 960
Winter Haven, Florida 33883-0960

Mr. Frank C. Cressman
Florida Public Utilities Company
Post Office Box 3395
West Palm Beach, Florida 33402-3395

Vicki Kaufman, Esquire
McWhirter Law Firm
117 South Gadsden Street
Tallahassee, Florida 32301

Mr. Lyle C. Motley, Jr.
President/CEO
City Gas Company of Florida
955 East 25th Street
Hialeah, Florida 33013-3498

Mr. Michael Palecki
City Gas Company of Florida
955 East 25th Street
Hialeah, Florida 33013-3498

Scheffel Wright, Esquire
Landers Law Firm
Post Office Box 271
Tallahassee, Florida 32302

Ansley Watson, Esquire
Macfarlane Ausley Law Firm
Post Office Box 1531
Tampa, Florida 33601-1531

Mr. Jack E. Uhl
Peoples Gas System, Inc.
Post Office Box 2562
Tampa, Florida 33601-2562

Marsha Rule, Esquire
Wiggins Law Firm
Post Drawer 1657
Tallahassee, Florida 32302

Mr. David Rogers
Associated Gas Distributors of Florida
Post Office Box 11026
Tallahassee, Florida 32302

Office of General Counsel
Department of Management Services
4050 Esplanade Way, Bldg. 4030
Tallahassee, Florida 32399-0950

Ms. Colette M. Powers
Indiantown Gas Company
Post Office Box 8
Indiantown, Florida 34956-0008

Sebring Gas System, Inc.
3515 Highway 27 South
Sebring, Florida 33870-5452

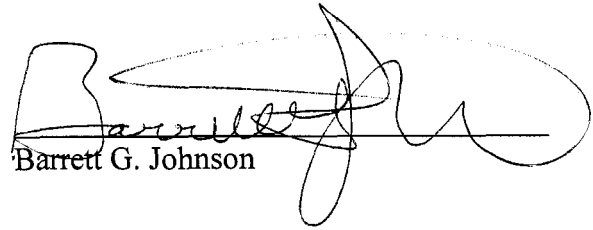
Mr. J. Peter Martin
South Florida Natural Gas Company
101 N.W. 202 Terrace
Post Office Box 69000-J
Miami, Florida 33269-0078

Mr. Stuart L. Shoaf
St. Joe Natural Gas Company, Inc.
Post Office Box 549
Port St. Joe, Florida 32457-0549

Mr. J.E. McIntyre
West Florida Natural Gas Company
Post Office Box 1460
Panama City, Florida 32402-1460

Mr. Vince Vesuvio
CNB Olympic Gas Services
14 East University Avenue, Suite 213
Gainesville, Florida 32601

Mr. Darin Cook
CNB Olympic Gas Services
14 East University Avenue, Suite 213
Gainesville, Florida 32601


Barrett G. Johnson