

Unbundling
FREE COPY

ANDREWS & KURTH L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

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PETER J. THOMPSON
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November 21, 1996

Ms. Blanca Bayo
Director of Records and Reporting
Florida Public Service Commission
2540 Schumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Unbundling of Natural Gas Services
Docket No. 960725-GU

Dear Ms. Bayo:

Enclosed please find for filing with the Commission in the above-captioned proceeding an original and fifteen (15) copies of the "Petition of Andrews & Kurth L.L.P. to Intervene."

Also enclosed is an additional copy of the petition to be date stamped and returned in the enclosed self-addressed, stamped envelope.

Sincerely,



Peter J. Thompson

Enclosures
cc: All Parties

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Andrews & Kurth's interest in this proceeding derives from the fact that the restructuring of the regulated natural gas industry will affect natural gas consumers and the natural gas market, which may impact the business activities of Andrews & Kurth's clients.

III.

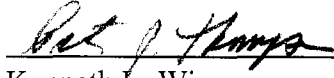
In an order issued July 2, 1996, the Commission established this proceeding to investigate the unbundling of gas services of the local distribution companies ("LDCs") operating in the State of Florida. Andrews & Kurth's clients have an interest in the developments affecting markets behind the Florida LDCs' distribution systems. Andrews & Kurth understands that Commission Staff and interested parties are holding workshops to discuss generic issues concerning the proposed implementation of restructured/unbundled transportation services. In order to provide knowledgeable counsel to our clients, Andrews & Kurth may desire to attend the workshop scheduled for December 12-13, 1996, and to submit written comments if necessary.

IV.

As potential suppliers to customers in Florida, Andrews & Kurth's clients may be substantially affected by changes in the gas market in Florida resulting from this proceeding. As counsel to those clients, Andrews & Kurth submits that no other party can adequately represent its interests in this proceeding. Andrews & Kurth agrees to accept the record in this proceeding as developed prior to this intervention. The granting of this petition to intervene will place no additional burdens upon the parties and will not disrupt or delay the procedural schedule.

WHEREFORE, for the foregoing reasons, Andrews & Kurth respectfully submits its intervention herein, requesting that it be permitted to participate as a party in the above-captioned proceeding.

Respectfully submitted,



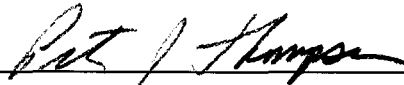
Kenneth L. Wiseman
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November 21, 1996

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all parties of record in this proceeding in accordance with Rule 25-22.028 of the Florida Administrative Code.

Dated at Washington, D.C. this 21st day of November, 1996.



Peter J. Thompson