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November 19, 1999 ORIGINAL

Ms. Blanca S. Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 991754-GP

Dear Ms. Bayó:

Enclosed for filing on behalf of Buccaneer Gas Pipeline Co., L.L.C. are the original and fifteen copies of its Petition to Intervene.

By copy of this letter, this document is being furnished to the parties on the attached service list.

Very truly yours,

Richard D. Melson

Richard D. Melson

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Enclosures

cc: Parties of Record

- AFA
- APP
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FPSC-RECORDS/REPORTING

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Friends of The Aquifer, Inc.,
Petition to Initiate Rulemaking

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DOCKET NO. 991754-GP
Filed December 20, 1999

PETITION TO INTERVENE BY
BUCCANEER GAS PIPELINE CO., L.L.C.

Buccaneer Gas Pipeline Co., L.L.C. (Buccaneer) by and through undersigned counsel, and pursuant to Rule 25-22.039, Florida Administrative Code (F.A.C.), hereby requests that an order be issued granting Buccaneer intervenor status in the above-styled proceeding on a petition for rulemaking filed by Friends of the Aquifer, Inc. (Friends), on November 23, 1999. In support of this position, Buccaneer states the following:

1. On or about November 23, 1999, Friends of the Aquifer, Inc., filed a petition with the Commission requesting it to initiate rulemaking to adopt rules regulating the safety of intrastate and interstate gas pipelines and hazardous liquid pipelines. Friends alleged it is a public interest corporation with a substantial interest in the adoption of the proposed rules set forth in its petition. The rules proposed by Friends seek to have the Commission accept delegation of the regulation of interstate pipelines and pipeline facilities from the United States Department of Transportation.

2. Buccaneer Gas Pipeline Co. L.L.C. is a Delaware limited liability corporation having its principal business address at Post Office Box 1396, Houston, Texas 77251 and its Florida office at 500 S. Florida, Lakeland, Florida 33801. Buccaneer has proposed to own, construct and operate a new interstate natural gas pipeline and related facilities within the state of Florida. On October 28,

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1999, Buccaneer filed with the U.S. Federal Energy Regulatory Commission (FERC) its application for a certificate of public convenience and necessity requesting authorization for the construction and operation of its new natural gas pipeline and related facilities in Florida.

3. The name and address of persons authorized to receive communication in this matter are:

Richard D. Melson
Richard S. Brightman
Hopping Green Sams & Smith
P.O. Box 6526
Tallahassee, FL 32314
(850-222-7500)

4. Buccaneer became aware of Friends' Petition on or about December 9, 1999, when it requested and obtained a copy of the staff recommendation in this matter.

5. Buccaneer's substantial interests will be affected by the Commission's action on the Petition to Initiate Rulemaking filed by Friends because Buccaneer proposes to construct in Florida facilities that would be subject to such rules. Buccaneer's proposed pipeline would extend across central Florida. The Buccaneer pipeline has been designed to deliver natural gas to electrical generating plants located in Central and Eastern Florida as well as to serve local gas companies and other end users. Buccaneer has selected a potential route that seeks to avoid adverse socioeconomic and environmental impacts to the greatest extent possible. The expected total cost of the project will be approximately \$1.5 billion. In addition to the gas pipeline, Buccaneer will construct a liquids collection facility in Pasco County, Florida, to collect liquids that have condensed in the natural gas pipeline. All of these facilities would be affected by the rules proposed in the petition by Friends.

6. Buccaneer seeks to obtain the necessary authorizations for its natural gas pipeline

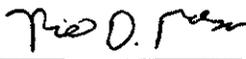
project by December 15, 2000. Construction of the Buccaneer project is proposed to be completed by April 1, 2002. Adoption of new regulations in the midst of this approval and construction process for Buccaneer's proposed natural gas pipeline and related facilities would substantially affect Buccaneer's substantial interests.

7. Even the mere commencement of rulemaking proceedings by the Commission would adversely affect Buccaneer's substantial interests by creating uncertainty as to the regulatory scheme with which Buccaneer's pipeline will eventually have to comply. Such uncertainty at the very time at which Buccaneer designing and attempting to license its pipeline is likely to lead to delays and wasted resources.

WHEREFORE, Buccaneer Gas Pipeline Co., L.L.C., respectfully requests that the Commission enter an order granting Buccaneer intervenor status in the Petition for Rulemaking by Friends of the Aquifer, Inc., and that the Commission enter an order denying the Petition for Rulemaking filed by Friends of the Aquifer, Inc.

Respectfully submitted this 20th day of December, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

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Attorneys for BUCCANEER GAS PIPELINE, CO.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing PETITION TO INTERVENE BY BUCCANEER GAS PIPELINE CO., L.L.C. has been hand delivered this 20th day of 1999, to:

Christiana Moore
Division of Appeals
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

John Folsom
122 S. Calhoun St.
Tallahassee, FL 32301

Richard D. Folsom

Attorney