

ORIGINAL

Matilda Sanders

From: Ansley Watson, JR. [AW@macfar.com]
Sent: Friday, November 17, 2006 10:08 AM
To: Filings@psc.state.fl.us
Cc: Wraye Grimard; Kandi Floyd; RegDept@tecoenergy.com; Beth Keating
Subject: Petition of Peoples Gas System, etc.
Attachments: PGS - Pet to Intervene.pdf

- a. Ansley Watson, Jr.
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 E-mail: aw@macfar.com
- b. Docket No. 060675-GU
- c. Peoples Gas System
- d. Total of four (4) pages
- e. The attached document consists of a cover letter and Peoples Gas System's Petition for Leave to Intervene as a party in the captioned docket.

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IN REPLY REFER TO:

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November 17, 2006

VIA E-FILING

Blanca S. Bayo, Director
Division of Commission Clerk & Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 060675-GU -- Petition for authority to implement Phase Two of experimental transitional transportation service pilot program and for approval of new tariff to reflect transportation service environment, by Florida Division of Chesapeake Utilities Corporation

Dear Ms. Bayo:

Enclosed for filing with the Commission on behalf of Peoples Gas System, please find Peoples' Petition for Leave to Intervene as a party in the above docket.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a
Enclosure

cc: Beth Keating, Esquire
Mrs. Wraye J. Grimard
Mrs. Kandi M. Floyd

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition for authority to implement)
Phase Two of experimental transitional)
transportation service pilot program and)
for approval of new tariff to reflect)
transportation service environment, by)
Florida Division of Chesapeake)
Utilities Corporation.)
_____)

Docket No. 060675-GU

Submitted for Filing:
11-17-06

PEOPLES GAS SYSTEM'S PETITION FOR LEAVE TO INTERVENE

Peoples Gas System ("Peoples", "Petitioner" or the "Company"), by its undersigned attorneys, files this petition for leave to intervene and participate as a party in the captioned docket, and in support of its petition states:

1. The name, address and telephone number of the petitioner are:

Peoples Gas System
P. O. Box 2562
Tampa, Florida 33601-2562
(813) 228-4111

2. The names and mailing addresses of the persons to whom notices, orders and correspondence regarding this petition are to be sent are:

Ansley Watson, Jr.
Macfarlane Ferguson & McMullen
P. O. Box 1531
Tampa, Florida 33601-1531

Ms. Paula Brown
Regulatory Affairs
Peoples Gas System
P. O. Box 2562
Tampa, Florida 33601-2562

3. Peoples is a customer of the Florida Division of Chesapeake Utilities Corporation (Chesapeake"), taking transportation service under Chesapeake's Rate Schedule FGS (Flexible Gas Service). Peoples moved approximately 58,736 MMBtu of gas across the Chesapeake distribution system from October 2005 through September 2006.

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FPSC-COMMISSION CLERK

4. On October 10, 2006, Chesapeake filed a petition for authority to implement Phase Two of its experimental Transitional Transportation Service Program, and for approval of certain tariff changes in connection therewith. The proposed tariff changes include, among other things, changes in the Rules and Regulations set forth in Chesapeake's current tariff, and consolidation of such current rules and regulations for Consumers and Shippers, respectively, into a new Consumer Services Section and a new Shipper Services Section of the proposed new tariff. The decisions that the Commission makes in this docket with respect to these and other issues will affect the substantial interests of Peoples.

5. Peoples' interests are of the type that this proceeding is designed to protect. *Agrico Chemical Company v. Department of Environmental Regulation*, 406 So.2d 478 (Fla. 2d DCA 1981); *Royal Palm Square Associates v. Servco*, 623 So.2d 533 (Fla. 2d DCA 1993). The purpose of the proceeding is to ensure that the rates, rules and regulations of Chesapeake are fair, just, reasonable and non-discriminatory pursuant to Chapter 366, *Florida Statutes*.

6. Peoples anticipates that issues of disputed fact in this case will include, but not be limited to whether certain of the changes and charges proposed in the new tariff are applicable to Peoples, as a Flexible Gas Service customer of Chesapeake.

7. Peoples alleges ultimately that the Commission should approve only those proposed changes that are fair, just, reasonable and non-discriminatory as applied to Peoples.

WHEREFORE, Peoples respectfully requests that the Commission enter its order permitting Peoples to intervene as a full party in this docket.

Respectfully submitted,



Ansley Watson, Jr.
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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Petition for Leave to Intervene has been furnished electronically and by regular U.S. Mail this 17th day of November, 2006, to Beth Keating, Esquire, Akerman Senterfitt, 106 East College Avenue, Suite 1200, Tallahassee, Florida 32302-1877.



Ansley Watson, Jr.