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March 20, 2007

VIA HAND DELIVERY

Keino Young
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED
MAR 20 2007
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Re: Docket No. 070135-GU - Petition for waiver of service line abandonment provisions of Rule 25-12.045, F.A.C. by Florida Natural Gas Association.

Dear Mr. Young:

As you know, the Florida Natural Gas Association (FNGA) filed the above-referenced Petition for Waiver on March 1, 2007. In subsequent discussions with Commission staff, we have learned that the ambiguity of the post-waiver time frame is a concern that needs to be addressed. Specifically, the concern, as we understand it, arises with regard to language at Page 8 of our Petition under our Request for Relief, which states, as follows:


- 2. Allow a sufficient period of time for FNGA's members to return to compliance with the provisions of Rule 25-12.045, Florida Administrative Code, should the temporary waiver not be extended at the conclusion of the waiver period.

Having considered our discussions with Commission staff, we offer and suggest that the period for returning to compliance with Rule 25-12.045, F.A.C., be specifically defined as 24 months following the conclusion of the waiver period, not to extend beyond December 31, 2011.

Keino Young
March 20, 2007
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We sincerely hope that this suggestion addresses Commission staff's concern. If you should have any further questions or concerns, please do not hesitate to let me know.

Sincerely,



Beth Keating
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cc: Mr. David Rogers (FNGA)
Mr. Ed Mills (RCA)

C. HILDEBRANDT



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