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September 30, 2009

VIA Hand Delivery

Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 090125-GU - Petition for increase in rates by Florida Division of Chesapeake Utilities Corporation.

Dear Ms. Cole:

Please accept for filing the original and 7 copies of the Florida Division of Chesapeake Utilities Corporation's responses to the PSC Staff's 6th Data Requests in this Docket (Nos. 194 – 210), along with a CD containing the referenced Excel spreadsheet.

Thank you for your assistance with this filing. Should you have any questions whatsoever, please do not hesitate to contact me.

CD forwarded.

Beth Keating
Beth Keating
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Attorneys for the Florida Division of Chesapeake Utilities Corporation

cc: Patty Christensen
Erik Sayler

{TL204916;1}

The Florida Division of Chesapeake Utilities Corporation

Re: Docket No. 090125- GU: Petition for Increase in Rates by Florida Division of Chesapeake Utilities Corporation

Responses to Staff's Sixth Set of Data Requests (Nos. 194 – 210)

The Florida Division of Chesapeake Utilities Corporation ("Company" of "Chesapeake") provides the following responses to Staff's Sixth Data Requests (Nos. 194 – 210).

194. Of the regulated gas utilities, which of them currently have a Commission approved Competitive Rate Adjustment (CRA) mechanism. As part of this response, please explain or describe how each gas utility with a CRA mechanism recovers the shortfall (ratepayers, sharing between ratepayers and company, etc).

Company Response: The Company is aware of at least two (2) companies in Florida that have a Commission approved CRA mechanism. Florida City Gas (FCG) has a CRA mechanism that allows for the shortfall to be recovered from ratepayers. The Company believes that FCG recovers 100% of the shortfall under this mechanism. Peoples Gas System (PGS) also has a CRA mechanism that appears to allow for the shortfall to be recovered from ratepayers. The Company is unable to determine, based on its review of the PGS tariff, the level of sharing, if any. The Company believes that, for both FCG and PGS, the recovery method from ratepayers is similar to that of the Company, through an administratively approved surcharge mechanism.
(Response by Mr. Geoffroy)

195. Please refer to Chesapeake's response to Staff's Fist Data Request, No. 1 and explain or describe how many consumers used the CRA mechanism in 2008 and in 2009.

Company Response: In 2008, there were two consumers that utilized the CRA mechanism, Standard Sands and Silica Company (they have three (3) locations that each have No. 5 fuel oil as an alternative fuel source) and Smithfield Lykes (they are in close proximity to an interstate pipeline and have a viable bypass alternative). In 2009, only one consumer, Smithfield Lykes, utilized the CRA mechanism through February 17, 2009, when they announced that they were shutting down their facility in June 2009. Currently, the Company has no consumers utilizing the CRA mechanism. **(Response by Mr. Geoffroy)**

196. Please refer to the response to Staff's First Data Request, No. 1c, and provide the same excel spreadsheet for January through December 2008.

Company Response: See attached schedule for the approved 2008 CRA surcharge rates. **(Response by Mr. Geoffroy)**

197. Please explain or describe whether Chesapeake has filed tariff sheets for approval showing the CRA adjustment factors. If not, please explain.

Company Response: The Company has not historically filed tariff sheets for the annual CRA adjustment factors for approval from the Commission. This process has always been handled administratively through the Commission staff. The Company understands that this is consistent with the way it has occurred with Peoples Gas System and Florida City Gas. **(Response by Mr. Geoffroy)**

198. Please explain or describe the CRA differential for the years 2005 through 2007.

Company Response: The following information relates to 2005 through 2007:

Year	Differential	50% Recovery Amount
2005	$223,702	$111,851
2006	$158,852	$79,436
2007	$211,728	$105,864

(Response by Mr. Geoffroy)

199. Please supply a description of a typical customer who has an alternative fuel capability and describe which alternative fuels these customers typically have.

Company Response: As stated in the tariff, all consumers using more than 50,000 therms per year (rate classification FTS-6 and above) that have alternative fuel capability are eligible for the CRA discount. As also described in the tariff, "Alternate Fuel'" is defined as "Any source of energy other than Gas delivered through Company's distribution facilities." A typical consumer can be defined as a large-use consumer who has either: 1) an alternate fuel source, such as fuel oil, propane, coal, wood chips, etc, available for use in the consumers processes in lieu of natural gas; or, 2) is in close proximity to an interstate pipeline and can feasibly bypass the Company to receive natural gas service directly from the pipeline. **(Response by Mr. Geoffroy)**

200. Please refer to the response to Staff's Second Data Request, No. 79. Please explain or describe the difference between the Special Contracts and the Flexible Gas Service Contracts. As part of this response, please explain or describe whether Chesapeake is proposing to change any of the rates, or terms and conditions, contained in those contracts.

Company Response: As specifically defined in the Commission-approved tariff on Original Sheet No. 19 – Special Contract Service (SCS) is defined as "Transportation Service provided to a Consumer, at the sole option of the Company pursuant to Commission Rule 25-9.034 FAC, where the rates, terms and/or conditions of service may be different than those set forth in the company's approved tariff. All SCS Consumers shall enter into a Special Contract Agreement with the Company, subject to the approval of the Commission."

As shown on Original Sheet No. 20 – Flexible Gas Service (FGS) is defined as "Transportation Service provided to a Consumer, at the sole option of the Company, where rates, terms and/or conditions of service other than those provided in this tariff are required to add or retain a Consumer on the Company's distribution system. The negotiated rates and terms provided in a FGS Agreement are subject to the conditions set forth in Commission Order PSC-98-1485-FOF-GU and other approved rules or regulations of the Company, as applicable. All FGS Consumers must demonstrate a viable Alternate Fuel option and shall enter into a written FGS Agreement with the Company."

The primary difference for regulatory purposes between SCS and FGS is that SCS rate base, revenues and expenses are all recorded "above-the-line" for rate making purposes and FGS rate base, revenues and expenses are recorded "below-the-line" for rate making purposes, thus the Company is at risk for these investments.

The Company is NOT proposing to change any of the rates, or terms and conditions, contained in either Special Contact Service or Flexible Gas Service agreements in this proceeding. **(Response by Mr. Geoffroy)**

201. Please refer to the testimony of Witness Householder, page 29, lines 1-2. Since the eight Special Contract consumers receive service through Commission-approved special contracts, please explain or describe the purpose of conducting a cost of service study for the special contract consumers.

Company Response: The cost of service analysis for Special Contract consumers was conducted for the purpose of directly assigning cost responsibility to these consumers. As noted on page 23 of my testimony, "The primary objective in cost of service analysis is to establish a relationship between the Company's costs to provide service and the customers who cause such costs to be incurred." The accuracy of any cost study is improved when the cost to serve an individual consumer can be determined and directly assigned rather than allocated through a common cost allocation method. Of the eight Special Contract consumers, four are served through dedicated facilities. The remaining Special Contract consumers are served through facilities where it is relatively straight-forward to separate facility costs for the Special Contract consumers from other consumers on the applicable main segment.

The original facility costs for each Special Contract consumer are known as are the annual O&M costs and depreciation and tax rates. Calculating a Special Contract individual cost assignment amount is easily accomplished. The Company's individual Special Contract cost studies indicated that the rates of return for these consumers in the PTY remained significantly above the proposed overall system rate of return. The Special Contract accounts are contributing to the Company's cost recovery at a level that exceeds their cost to serve.

The Commission has not historically adjusted the rates approved for Special Contract consumers during a base rate proceeding. Consumers enter into Special Contracts with the understanding that the provisions of the agreement approved by the Commission (including the rate) will be honored over the term of the agreement. The Company's revenue forecast for the Special Contract consumers assumed no rate adjustment.

Given that the forecast revenue amount exceeds the aggregate Special Contract cost to serve as determined in the individual cost studies, the Company set the Special Contract cost of service to equal the forecast PTY revenues from the Special Contract consumers. This approach is consistent with the Company's 2000 base rate case cost allocation methodology.

The direct assignment of costs for Special Contract accounts (along with the SAS, SABS, OS-DPO and FTS-13 accounts) was subtracted from the Company's total cost to serve prior to the application of the traditional cost allocators used in Staff's Cost of Service Model for the remaining consumer classes. The traditional Peak and Average allocator used to apportion capacity related costs, is based on gas consumption and typically over allocates costs to

high load factor industrial consumers. The Special Contract consumers are all large volume industrial accounts. Use of the Peak and Average allocator would have resulted in a cost assignment that exceeded not only the actual costs from the Special Contract cost studies, but also would have exceeded the total annual revenues forecast from the Special Contract agreements.
(Response by Mr. Householder)

202. Please refer to the testimony of Witness Householder, page 30, lines 8-11 and explain or describe why the Flexible Gas Service (FGS) Consumers were eliminated from the cost of service study, while the Special Contract consumers were included in the cost of service.

Company Response: The Commission originally authorized the Company to execute FGS agreements in Order No. PSC-98-1485-FOF-GU, issued November 5, 1998. The FGS agreements are designed to enable the Company to compete for customers that have viable fuel options or other service alternatives while ensuring that other ratepayers are not adversely impacted if the Company elects to serve such customers. At the Company's option, it may negotiate rates and service terms, and enter into a FGS transportation agreement with a customer. Unlike the Special Contract agreements, the Commission does not approve FGS agreements. The Company assumes the full risk associated with serving an FGS customer. None of the investment cost to provide service is included in the Company's rate base, and all O&M and related expenses are recorded as shareholder costs. As directed in the above Order, "... all capital costs, expenses and revenues ... are placed below-the-line for earnings surveillance report purposes." In the event the FGS customer discontinues service, the Company bears the cost of any stranded investment or uncollected receivables. Given that the Company bears the full risk for the FGS accounts, the costs and revenues associated with the accounts should not be included in the cost of service or used to determine the Company's revenue requirement.

Such is not the case for Special Contract accounts. The Special Contracts are subject to review and approved by the Commission. Part of the Commission review is an assessment of the feasibility of extending service to a Special Contract consumer and the potential impact on other ratepayers. Special Contract consumer's rates or service terms may differ from the standard rates or terms in the Company's tariff, but in other respects the costs and revenues are accounted for in the same manner as any other consumer. **(Response by Mr. Householder)**

203. Please refer to the testimony of Witness Householder, page 31, lines 9-11 and explain or describe why it is appropriate to assign the entire plant investment in Automated meter reading (AMR) technology to the shipper rate classes. As part of this response, please reference or cite to the specific MFR Schedule, page number, and line where that assignment was done.

Company Response: The AMR investment assigned to Shippers is shown on MFR Schedule H-2, page 4 of 10, line no. 5. The AMR investment is included in the Schedule entitled "Allocation of Rate Base to Customer Classes" as a Customer classified, "All Other" cost. The AMR investment costs by rate class are as follows:

	SABS	SAS
AMR Equipment	$2,681,732	$107,558
AMR Software	$54,364	$2,180
Scion Programmers	$15,949	$640
Boom Truck	$15,196	$609
Total	$2,767,241	$110,987

There are two fundamental benefits related to AMR technology. First, the electronic reads enable the Company to eliminate physical meter reading and over time achieve substantial cost savings. Second, the data provided through the electronic reads, especially the access to daily consumption information, is valuable to the Company, Shippers and ultimately Consumers. Jeff Sylvester's testimony (pages 32-33) provides a general outline of these benefits.

The Company is proposing to assign its entire AMR investment to Shippers. Given that the Company operates in a transportation only environment, our thinking was that the primary benefit of the daily read data, at least initially, would be related to the gas supply services provided by Shippers to Consumers. Access to daily electronic meter reads will enable Shippers to better manage gas deliveries to the Company's distribution system and minimize imbalance charges and Operational Order penalties.

Ultimately, one would expect that the AMR related costs assigned to Shippers will be passed through to consumers in the Shipper's gas supply charges. The Shipper's recovery of the AMR costs will be determined by the Shipper's commercial contracts with its customers. Consumers should also realize gas supply cost savings as a result of the improved daily delivery data provided to Shippers. The Shipper's pass-through of imbalance and penalty charges to consumers should be reduced.

To that end, one of the principal beneficiaries of the AMR data should be the consumers in the Company's small volume TTS Program. It is difficult for the TTS Shipper's to manage gas deliveries for cycle billed consumers in the TTS pool since the monthly consumer billing cycles are significantly different from the calendar month gas supply cycle. Substantial imbalances between deliveries and consumption have historically occurred with the associated charges passed through to consumers. The Company expects that these imbalances will drop and the resulting savings will be passed through to TTS consumers. To the extent that TTS pool imbalance percentages do not decline, the Company has the contractual ability to revise the TTS agreements or find new TTS Shippers.

Over time, consumers will likely find the enhanced account data provided through the AMR technology useful. The Company expects to launch a web based portal which will enable consumers' greater access to specific and detailed information about their account. Additionally, the Company is already integrating AMR capabilities into its operations and beginning to take advantage of the features described in Mr. Sylvester's testimony (read-in and out with no site visit, identification of meter problems and theft, etc.). In a future rate proceeding it may be appropriate to review the distribution of AMR investment (and O&M) costs among rate classes and reduce the Shipper assignment. In its last three rate proceedings (including rate restructurings) the Company has incrementally adjusted the cost allocations to Shippers for meters, record and collection expenses, etc., to reflect the evolution of its transportation programs. AMR costs should be viewed in a similar manner. In the current proceeding, the Company believes the AMR investment should be assigned to Shippers rather than individual consumer rate classes. **(Response by Mr. Householder)**

204. Please refer to the response to Staff's Second Data Request, Nos. 86c and 87c. Please supply responses to the following:

a. Since the closing of the Winter Haven and Citrus County offices, please list the locations, including local businesses, where a customer may pay its bill with cash?

Company Response: There are several locations throughout the Company's service areas that accept cash payments from customers and remit those payments to the Company. Western Union and Amscot are the largest pay remittance facilities. There are numerous local grocery stores, restaurants, and other small businesses that will accept and remit cash payments for utility or other obligations.

b. Does a customer pay a transaction fee when paying over the phone by credit card, debit card, or direct debit (EFT)? If so, how much?

Company Response: No.

c. Does a customer pay a transaction fee when paying at a local business that accepts utility bill payments? If so, how much?

Company Response: Western Union charges $1.00 per payment; Amscot charges $1.50 per payment. The local businesses referred to above charge similar amounts.

d. Does a customer pay a transaction fee when paying on-line through Chesapeake's website? If so, how much?

Company Response: No.

e. Besides making on-line payments through Chesapeake's website, are there other on-line payment options available to the customer (e.g., PayPal, etc.)?

Company Response: Yes. Fidelity, Pay Pal and Check Free are the most commonly used on-line and electronic payment sources. **(Response by Mr. Householder)**

205. Please refer to Witness Geoffroy's testimony, page 36, lines 13-18, where Chesapeake proposes a surcharge mechanism to more timely recover these costs from consumers and eliminate the environmental cleanup recovery of $71,114 annually from base rates. He also states that, once all cleanup costs are incurred, the proposed surcharge will allow Chesapeake to immediately cease recovery of these costs from ratepayers without an expensive rate filing. Besides these things mentioned in his testimony, what else does the surcharge mechanism provide to Chesapeake and/or the ratepayers? Conversely, what does recovering these environmental clean-up costs in base rates provide Chesapeake and/or the ratepayers?

Company Response: The testimony offered on this issue completely delineates the benefits of the surcharge mechanism used for the recovery of the environmental cleanup recovery costs. In the alternative, having the recovery remain in base rates imposes a potential burden on ratepayers when the remediation is completed, all costs have been recovered through the base rate recovery, and the Company is in between rate cases, whereas, absent any other action, the recovery amount would continue to be collected from ratepayers. This would require a costly filing to eliminate the recovery rate and make some type of refund to consumers, both of which would require the Company to incur costs that the Company would seek to offset against any refund amount to ratepayers. A surcharge mechanism would eliminate the above described administrative burden and additional costs incurred for the environmental remediation activities.
(Response by Mr. Geoffroy)

206. Please refer to MFR Schedule H-2, page 5, lines 6 and 13, special assignment. Please explain or describe whether Chesapeake proposing to move $744,367 from a capacity to a customer allocation. As part of this response, please explain or describe the allocation of the special assignment costs to the various rate classes on line 6, with some classes receiving an increase, and others a decrease.

Company Response: The Company is proposing to move $744,367 from a capacity to a customer allocation. However, such a reallocation does necessarily reflect a philosophical adjustment of cost causation. The adjustments to each rate class were made to achieve a revenue requirement for each class that resulted in reasonable base rates and rates of return. The distribution of costs between customer and capacity classifications was a function of the dollars available in a given rate class. Typically, customer related costs for large volume classes with few customers is small compared to the capacity related costs, which are driven by the consumption based peak and average cost allocation method. It is the opposite for smaller volume classes with greater numbers of customers and lower relative consumption. In the Company's cost study, there were not sufficient dollars in the large volume (FTS-9 through FTS-12) classes to achieve the appropriate reallocation using only customer classified costs, and there were insufficient dollars in the small volume classes to utilize only capacity classified costs. It should be noted, that the Company views virtually all its costs, including both the customer and capacity classified costs, as essentially fixed. That is, these costs do not vary with fluctuations in consumer consumption. An adjustment of costs between the customer and capacity cost categories for the purpose of adjusting the total revenue requirement for a given class should not be viewed as an attempt to influence rate design. Any discussion of rate design that contemplates fixed vs. variable cost components would, in my view, not be dependent on the customer vs. capacity cost classifications in the cost study.
(Response by Mr. Householder)

207. Please refer to the direct testimony of Witness Householder, page 16, lines 1-2. Please cite to where in the MFRs (page number and line) any differences in cost of service between FTS-2 and FTS-2.1, and FTS-3 and FTS-3.1 are shown.

Company Response: My testimony on page 16 fails to clearly make the applicable point. The Company's proposed FTS-2 and FTS-3 class is proposed to be split into four classes. However, the Company is not proposing to simply split the existing FTS-2 class into two classes and the FTS-3 class into two classes. The annual therm range for the existing FTS-2 class is 500 to 3,000 therms. The upper therm range for the FTS 2.1 class is proposed at 2,500 annual therms. The Company identified an investment cost change at the 2,500 therm level. The service line, meter, regulator and AMR cost difference between the proposed FTS-2.1 and FTS-3 rate classes is indicated in MFR Schedule E-7, line 4. There are no initial investment cost differences between the FTS-2 and FTS-21 and between the FTS-3 and FTS-3.1 rate classes as indicated on MFR Schedule E-7, line 4. My testimony identifies several reasons for splitting the classes other than cost of service differences.
(Response by Mr. Householder)

208. MFR Schedule E-7, line 4, does not appear to show a difference in the service line, meter, and regulator costs between the FTS-2 and FTS-2.1 class. Please explain or describe why Chesapeake is proposing a higher customer charge for the FTS-2.1 class than the FTS-2 class.

Company Response: As noted in my testimony beginning on page 43, the Company is proposing to continue to move toward a greater recovery of its fixed costs through fixed charges. The Company's fixed costs are not related only to the investment in service lines, meters and regulators displayed on MFR Schedule E-7. The cost differences on MFR E-7 are instructive and helpful (but not exclusively so, as described in Response No. 207) in establishing distinctions between rate classes. However, the Company's fixed costs are not limited to the investment costs included in MFR Schedule E-7. As noted in Response No. 206, virtually all of the Company's costs are fixed. The proposed rate design is intended to recover a larger portion of the total revenue requirement established for each class from fixed vs. variable charges. The Company was guided by market competitiveness and consumer perception concerns along with the general rate design principals of fairness and gradualism in setting the fixed vs. variable rate components.

Exhibit JMH-7 indicates the percentage of fixed vs. variable rate revenue for the FTS-2 (69.1%) and FTS-2.1 (38.3%) classes under existing rates. The Company's proposed rate design attempts to collect approximately 70% of total revenues from fixed charges in the low load factor small volume classes (primarily residential) and approximately 50% from the higher volume higher load factor commercial and industrial classes. Over time the Company's goal is move all rate classes to an equivalent fixed charge percentage. As indicated on Exhibit JMH-7, the fixed revenue percentage for FTS-2 class is proposed at 70% and the percentage for the FTS-2.1 class is proposed at 50.1%.
(Response by Mr. Householder)

209. MFR Schedule E-7, line 4, does not appear to show a difference in the service line, meter, and regulator costs between the FTS-3 and FTS-3.1 class. Please explain or describe why Chesapeake is proposing a higher customer charge for the FTS-3.1 class than the FTS-3 class.

Company Response: See response to No. 208.

Exhibit JMH-7 indicates the percentage of fixed vs. variable rate revenue for the FTS-3 (67.2%) and FTS-3.1 (41.9%) classes under existing rates. The Company's proposed rate design attempts to collect approximately 70% of total revenues from fixed charges in the low load factor small volume classes (primarily residential) and approximately 50% from the higher volume higher load factor commercial and industrial classes. Virtually all of the consumers in rate class FTS-3 and above are non-residential. As indicated on Exhibit JMH-7, the fixed revenue percentage for FTS-3 class is proposed at 65.2% and the percentage for the FTS-2.1 class is proposed at 49.8%. The small decrease in the fixed revenue percentage for the FTS-3 class was proposed to provide continuity in the rates between classes.
(Response by Mr. Householder)

Data Requests

210. Please refer to the response to Staff's First Data Request, No. 1c, and provide the same excel spreadsheet for January through December 2008.

Company Response: See attached spreadsheet provided for Data Request No. 196.
(Response by Mr. Geoffroy)

RESPONSE TO DATA REQUEST 196

CHESAPEAKE UTILITES - FLORIDA DIVISION
COMPETITIVE RATE ADJUSTMENT (CRA)
PROJECTED CUSTOMER DATA AND THERM USAGE
JANUARY 2008 THROUGH DECEMBER 2008

RATE CLASS	BILLS	THERMS	CUSTOMER CHARGE REVENUES	ENERGY CHARGE	TOTAL	RECOVERY OF CRA BALANCE	% SURCHARGE	CENTS PER THERM	TAX FACTOR	CRA ADJ. FACTOR	EXPER. CRA RATE
FTS-A	37,712	331,795	$377,120	$146,232	$523,352	$5,707	1.09%	$0.01720	1.00503	$0.01729	$0.15
FTS-B	30,548	452,547	$381,850	$199,451	$581,301	$6,339	1.09%	$0.01401	1.00503	$0.01408	$0.21
FTS-1	83,075	1,785,476	$1,246,125	$786,913	$2,033,038	$22,170	1.09%	$0.01242	1.00503	$0.01248	$0.27
FTS-2	21,832	1,695,244	$600,380	$497,656	$1,098,036	$11,974	1.09%	$0.00706	1.00503	$0.00710	$0.55
FTS-3	4,998	2,711,214	$449,820	$536,305	$986,125	$10,754	1.09%	$0.00397	1.00503	$0.00399	$2.16
FTS-4	2,111	2,876,892	$348,315	$515,165	$863,480	$9,416	1.09%	$0.00327	1.00503	$0.00329	
FTS-5	408	1,135,691	$112,200	$188,831	$301,031	$3,283	1.09%	$0.00289	1.00503	$0.00291	
FTS-6	204	1,075,575	$91,800	$157,722	$249,522	$2,721	1.09%	$0.00253	1.00503	$0.00254	
FTS-7	240	2,978,000	$114,000	$330,379	$444,379	$4,846	1.09%	$0.00163	1.00503	$0.00164	
FTS-8	132	3,144,900	$99,000	$321,786	$420,786	$4,589	1.09%	$0.00146	1.00503	$0.00147	
FTS-9	132	5,731,000	$118,800	$513,326	$632,126	$6,893	1.09%	$0.00120	1.00503	$0.00121	
FTS-10	36	2,256,000	$54,000	$187,564	$241,564	$2,634	1.09%	$0.00117	1.00503	$0.00117	
FTS-11	72	8,736,000	$216,000	$599,988	$815,988	$8,898	1.09%	$0.00102	1.00503	$0.00102	
FTS-12	24	6,710,000	$96,000	$421,254	$517,254	$5,641	1.09%	$0.00084	1.00503	$0.00084	
TOTAL	181,524	41,620,334	$4,305,410	$5,402,573	$9,707,983	$105,864	1.09%				

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for increase in rates by Florida Division of Chesapeake Utilities Corporation	)))	Docket No. 090125-GU

AFFIDAVIT

State of Florida
County of Bay

I, Jeff Householder, having been duly sworn, depose and say that:

1. I am the President of Jeff Householder & Company, Inc., a consulting firm engaged by the Florida Division of Chesapeake Utilities Corporation; and

2. On September 30, 2009 under my direction and supervision, the attached responses (201-204 and 206-209) to Staff's Sixth Data Request Nos. 194-210 were prepared and submitted and are true and correct to the best of my knowledge.

Jeff Householder

Sworn to and subscribed before me this 30TH day of September, 2009, by Jeff Householder.

Peggy Rogerson
NOTARY PUBLIC
State of Florida

PEGGY ROGERSON
Notary Public - State of Florida
My Comm. Expires Aug 14, 2012
Commission # DD 814835
Bonded Through National Notary Assn.

Personally known ✓ or Produced Identification ______
Type of identification produced ______________________

My commission expires:

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for increase in rates by Florida Division of Chesapeake Utilities Corporation	)))	Docket No. 090125-GU

AFFIDAVIT

State of Florida
County of Polk

I, Thomas A. Geoffroy, having been duly sworn, depose and say that:

1. I am the Vice President of Chesapeake Utilities Corporation; and
2. On September 28, 2009 under my direction and supervision, the attached responses (194-200, 205 and 210) to Staff's Sixth Data Request Nos. 194-210 were prepared and submitted and are true and correct to the best of my knowledge.

Thomas A. Geoffroy
Thomas A. Geoffroy

Sworn to and subscribed before me this 28 day of September, 2009, by Thomas A. Geoffroy.

Cynthia A Austad
NOTARY PUBLIC
State of Florida

Personally known X or Produced Identification ______________
Type of identification produced ______________________________

My commission expires:

CYNTHIA A AUSTAD
MY COMMISSION # DD614041
EXPIRES: November 13, 2010
(407)398-0153 FloridaNotaryService.com