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In Reply Refer to:
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ab@macfar.com

March 29, 2018

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 20180055-GU- Petition to resolve territorial dispute in Sumter County and/or Lake County with City of Leesburg and/or South Sumter Gas Company, LLC, by Peoples Gas System

Dear Ms. Stauffer:

Attached for electronic filing with the Commission on behalf of Peoples Gas System, please find Peoples' Motion to Expedite the Resolution of the Territorial Dispute in the above referenced matter.

Your assistant in this matter is greatly appreciated.

Sincerely,

Andrew M. Brown

AB/plb
Attachment

cc: Parties of Record
Ms. Kandi M. Floyd
Ansley Watson, Jr., Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to resolve territorial dispute)
in Sumter County and/or Lake County with) Docket No. 20180055
City of Leesburg and/or South Sumter Gas)
Company, LLC, by Peoples Gas System.)
_____) Submitted for filing: 3-29-18

MOTION TO EXPEDITE THE RESOLUTION OF THE TERRITORIAL DISPUTE

COMES NOW, Peoples Gas System (“Peoples” or the “Company”), by its undersigned counsel and hereby seeks an order to expedite the resolution of the territorial dispute and in support thereof states:

1. Peoples filed a Petition asking the Florida Public Service Commission to resolve a territorial dispute between Peoples and the City of Leesburg (“Leesburg”) and/or South Sumter Gas Company, LLC (“SSGC”) on February 23, 2018 (the “Petition”).

2. Peoples alleges in the Petition that Leesburg and/or SSGC are constructing gas distribution lines and main lines directly adjacent to and in at least one case intersecting with, already existing Peoples infrastructure.

3. The construction notices previously filed by Leesburg/SSGC describe a 6-inch main line running for approximately 4.5 miles along County Road 501 in Sumter County (“The Main”), and are shown in maps attached to the Petition as Exhibits A and E. Those Exhibits are attached to this Motion for ease of reference. The Main in question is depicted in green on Exhibit E.

4. It appears the sole purpose of The Main is to allow Leesburg to supply gas to distribution lines that either are or will be constructed by SSGC and/or The Villages. If Peoples is successful in its territorial dispute, there would be no need for The Main because Peoples could provide gas to those developments through Peoples already existing infrastructure, without having

to construct a similar Main.

5. If completed, The Main line would represent a construction of duplicative uneconomic facilities which the resolution of the territorial dispute is designed to prevent.

6. Although Peoples has asked Leesburg to halt construction on The Main until the territorial dispute has been resolved, Leesburg and/or SSGC is continuing to construct the line. See the attached Affidavit of Rick Gullett, Ocala Division Manager of Peoples Gas.

7. Peoples has been in contact with counsel for SSGC who indicated it opposes this Motion. Peoples has contacted counsel for Leesburg to see if Leesburg opposes this Motion via email on the morning of March 27, 2018, and via voice mail message on the morning of March 29, 2018, but has not received a response.

8. As a result of the continued construction of The Main, it is necessary to have an expedited treatment of the territorial dispute in order to prevent the imminent construction of what will become an uneconomic duplication of resources to serve gas customers.

Respectfully submitted,



ANDREW M. BROWN

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Facsimile: (813) 273-4396

ab@macfar.com

ANSLEY WATSON, JR.

Telephone: (813) 273-4321

Facsimile: (813) 273-4396

aw@macfar.com

Macfarlane Ferguson & McMullen

Post Office Box 1531

Tampa, Florida 33601-1531

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing petition has been furnished to the following by means of the following, this 29th day of March, 2018:

Floyd R. Self, Esquire
Berger, Singerman, LLP
313 N. Monroe St., Ste. 301
Tallahassee, FL 32301
Attorneys for South Sumter
Gas Company, LLC
fself@bergersingerman.com

Jon C. Moyle, Jr., Esquire
Karen A. Putnal, Esquire
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
Attorneys for City of Leesburg
jmoyle@moylelaw.com
kputnal@moylelaw.com

John L. Wharton, Esquire
215 S. Monroe Street, Ste. 815
Tallahassee, FL 32301
Co-Counsel for South Sumter
Gas Company, LLC
JWharton@deanmead.com

Kandi M. Floyd
kfloyd@tecoenergy.com
Manager – State Regulatory
Peoples Gas System
P.O. Box 111
Tampa, FL 33601-0111

Jack Rogers, Director
Gas Department, City of Leesburg
P.O. Box 490630
Leesburg, FL 34749
Jack.rogers@leesburgflorida.gov



Andrew M. Brown

EXHIBIT A

FLORIDA PUBLIC SERVICE COMMISSION

PIPELINE CONSTRUCTION NOTIFICATION

TO: Rick Moses, Bureau Chief
Bureau of Safety and Reliability
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

FROM: City of Leesburg Gas Department
Dawn Barrett, Compliance Specialist
306 S. 6th Street
Leesburg, FL. 34748

Date of Notification: Dec. 5, 2017

Pursuant to Florida Public Service Commission Rule 25-12.082, written notice is hereby given in reference to a major construction project or alteration of natural gas pipeline facilities.

Location:

CR 501 commencing at CR 470 and going North 2.8 miles

Start Date: December 21, 2017

Completion Date: Feb. 4, 2018

Diameter of Pipe: 6.625"

Length of Pipe: 2.8 miles

Type of Materials: 6" nominal steel pipe, X52, .0188" wall

Comments:

Hamlet Construction will be constructing this gas main which is anticipated to be owned and operated by the City of Leesburg Natural Gas System.



Signature

Director
Title

Copy to: Hassan Badran
(Local Area Safety Engineer), PSC

Notes: Major construction is defined as both 2 inches in diameter and 2,000 feet or more in length. Attached construction and site maps, if available.

City of Leesburg
Post Office Box 490630

306 S. 6th Street
Leesburg, FL 34748



Phone: 352-728-9840
Fax: 352-326-6636

Leesburg, FL 34748

Date: December 5, 2017

Mr. Rick Moses
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Construction notice

Mr. Moses

Pursuant to Chapter 25-12.082 Construction Notice, written Notice shall be given to the Commission at least 15 days prior to the start of all major construction or alteration of pipeline facilities, stating the size, approximate location and contemplated time of construction. Notice is required when the pipeline involved is either at least 2 inches in diameter as well as 2,000 feet or more in length.

Please accept this letter as our official notification to the Commission that we will be performing work that meets these criteria. Specific information about this project is listed below.

Pipe Diameter/ Material: 6.625" nominal steel pipe, X52, .118 wall

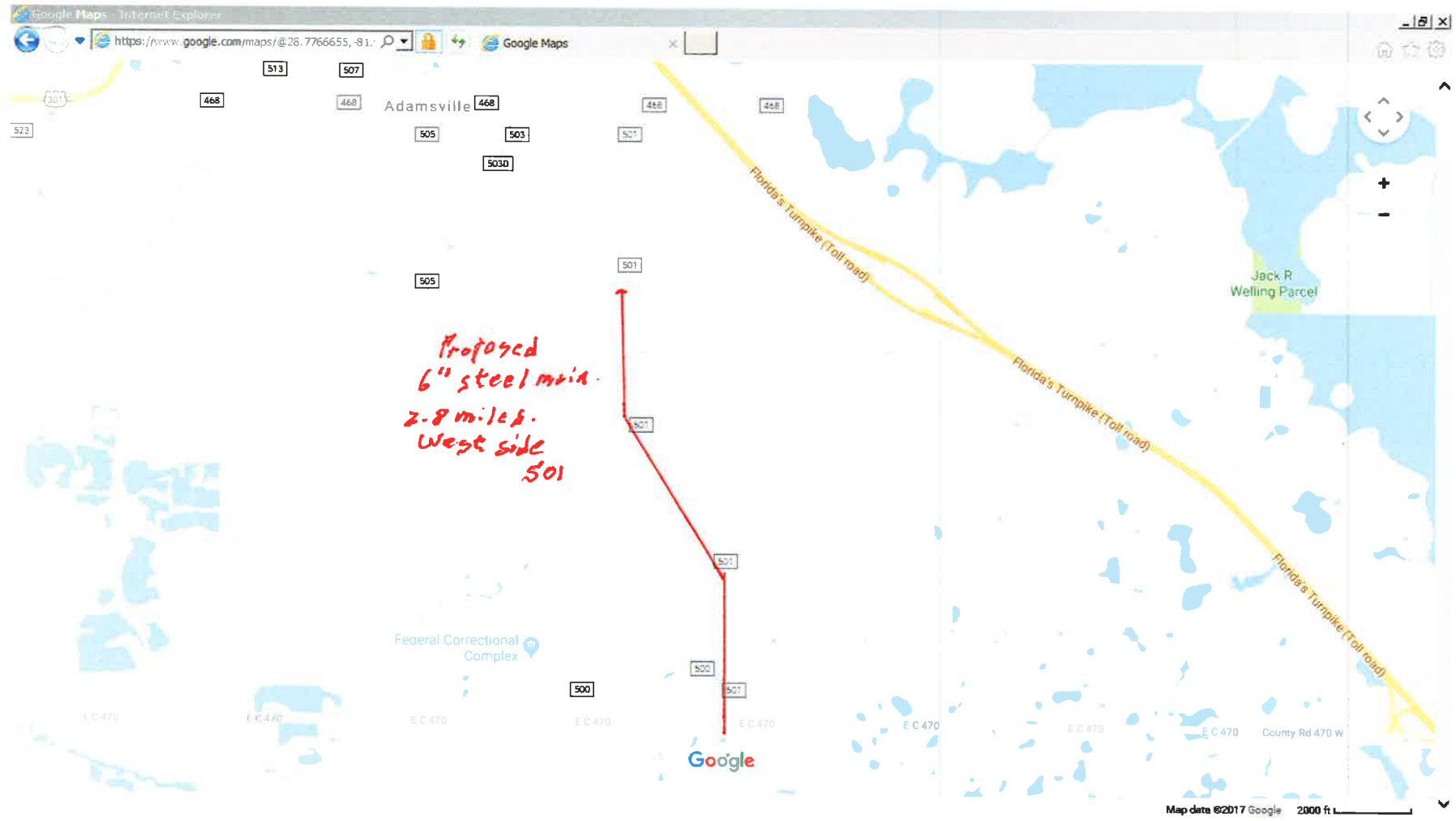
Total Length of Pipe: 2.8 miles

Location: CR 501 commencing at CR470 and going north 2.8 miles

Projected Start Date: Dec. 21, 2017

Projected End Date: Feb. 4, 2018

Description of Project: Installing 6.625" gas main to service a future subdivision on CR 501. A general location map is attached.



FLORIDA PUBLIC SERVICE COMMISSION
PIPELINE CONSTRUCTION NOTIFICATION

TO: Rick Moses, Bureau Chief
Bureau of Safety and Reliability
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

FROM: City of Leesburg Gas Department
Dawn Barrett, Compliance Specialist
306 S. 6th Street
Leesburg, FL. 34748

Date of Notification 12/7/17

Pursuant to Florida Public Service Commission Rule 25-12.082, written notice is hereby given in reference to a major construction project or alteration of natural gas pipeline facilities.

Location: _____
The Villages, South Sumter. South West corner of C-501 and C-468. Bigham West

Estimated Construction Schedule:
Start Date: 12/23/17 **Completion Date:** 7/15/18
Diameter of Pipe: 2", 4", 6" **Length of Pipe:** 29,875', 4,033', 4,629'
Type of Materials: MDPE Pipe and Fittings

Comments: Hamlet Construction will be installing these mains which are anticipated to be operated by the City of Leesburg Natural gas system.



Signature

Director of Gas
Title

Copy to: Hasan Badran
(Local Area Safety Engineer), PSC

Notes: Major construction is defined as both 2 inches in diameter and 2,000 feet or more in length. Attached construction and site maps, if available.

City of Leesburg
Post Office Box 490630

306 S. 6th Street
Leesburg, FL 34748



Phone: 352-728-9840
Fax: 352-326-6636

Leesburg, FL 34748

Date: 12/07/17

Mr. Rick Moses
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Construction notice

Mr. Moses

Pursuant to Chapter 25-12.082 Construction Notice, written Notice shall be given to the Commission at least 15 days prior to the start of all major construction or alteration of pipeline facilities, stating the size, approximate location and contemplated time of construction. Notice is required when the pipeline involved is either at least 2 inches in diameter as well as 2,000 feet or more in length.

Please accept this letter as our official notification to the Commission that we will be performing work that meets these criteria. Specific information about this project is listed below.

Pipe Diameter/ Material: 2", 4", 6" MDPE

Total Length of Pipe: 29,875', 4,033', 4,629' respectively

Location: The Villages, South Sumter. South West corner of C-501 and C-468. Bigham West

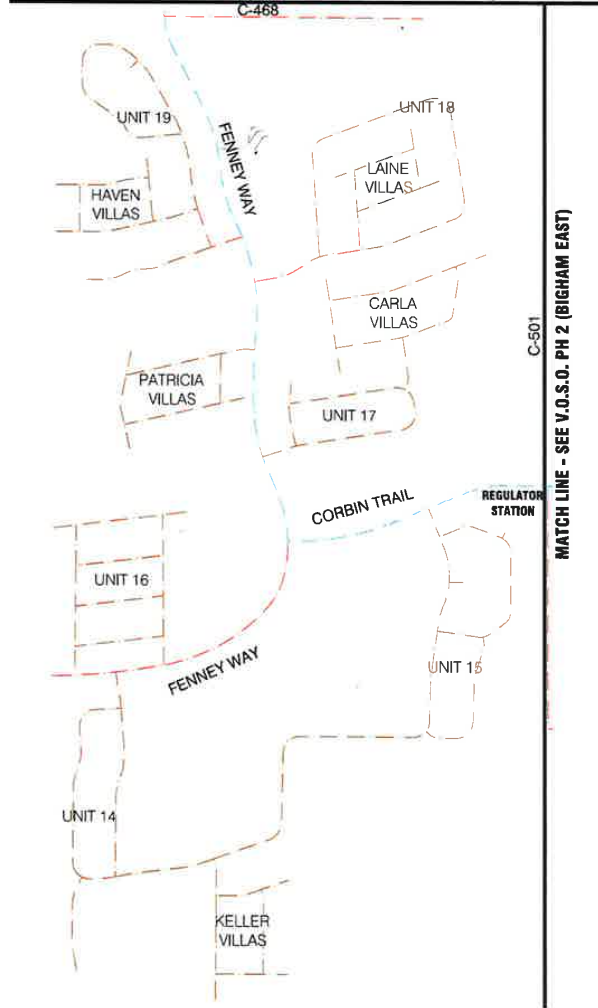
Projected Start Date: 12/23/17 Projected End Date: 7/15/18

Description of Project: Hamlet Construction is installing MDPE gas mains which are anticipated to be operated by the City Of Leesburg Natural Gas Department.

The Villages
SOUTH SUMTER GAS EXHIBIT
 V.O.S.O. PH 1 (BIGHAM WEST)
 12/06/2017



MATCH LINE - SEE V.O.S.O. PH 3 (BIGHAM NORTH)



MATCH LINE - SEE V.O.S.O. PH 2 (BIGHAM EAST)

SECTION TOWNSHIP RANGE
 33 19S 23E

- LEGEND**
- = 2" GAS (29,875 LF)
 - = 4" GAS (4,033 LF)
 - = 6" GAS (4,629 LF)

CONSTRUCTION BEGINS: 15 DAYS FOLLOWING NOTIFICATION TO PSC
COMPLETION DATE: 7-15-18

FARNER
BOURLEY
 AND ASSOCIATES, INC.
 Certificate of Authorization Number: 4709
 4450 N.E. 63rd Road, Midwood, Florida 34763 (352) 746-3126

- ▲ ENGINEERS
- ▲ SURVEYORS
- ▲ PLANNERS

FLORIDA PUBLIC SERVICE COMMISSION

PIPELINE CONSTRUCTION NOTIFICATION

TO: Rick Moses, Bureau Chief
Bureau of Safety and Reliability

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

FROM: City of Leesburg Gas Department
Dawn Barrett, Compliance Specialist
Jack Rogers, Director of Gas
306 S. 6th Street
Leesburg, FL. 34748

Date of Notification 12/8/17

Pursuant to Florida Public Service Commission Rule 25-12.082, written notice is hereby given in reference to a major construction project or alteration of natural gas pipeline facilities.

Location: _____
The Villages, South Sumter. North West corner of C-501 and C-468. Bigham North

Estimated Construction Schedule:

Start Date: 1/1/18 **Completion Date:** 2/15/19

Diameter of Pipe: 2", 6" **Length of Pipe:** 17,215', 7,066'

Type of Materials: MDPE Pipe and Fittings

Comments: Hamlet Construction will be installing these mains which are anticipated to be operated by the City of Leesburg Natural Gas Department.


Signature

Director of Gas
Title

Copy to: Hasan Badran
(Local Area Safety Engineer), PSC

Notes: Major construction is defined as both 2 inches in diameter and 2,000 feet or more in length. Attached construction and site maps, if available.

City of Leesburg
Post Office Box 490630

306 S. 6th Street
Leesburg, FL 34748



Phone: 352-728-9840
Fax: 352-326-6636

Leesburg, FL 34748

Date: 12/08/17

Mr. Rick Moses
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Construction notice

Mr. Moses

Pursuant to Chapter 25-12.082 Construction Notice, written Notice shall be given to the Commission at least 15 days prior to the start of all major construction or alteration of pipeline facilities, stating the size, approximate location and contemplated time of construction. Notice is required when the pipeline involved is either at least 2 inches in diameter as well as 2,000 feet or more in length.

Please accept this letter as our official notification to the Commission that we will be performing work that meets these criteria. Specific information about this project is listed below.

Pipe Diameter/ Material: 2", 6" MDPE

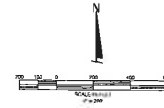
Total Length of Pipe: 17,215', 7,066' respectively

Location: The Villages, South Sumter. North West corner of C-501 and C-468. Bigham North

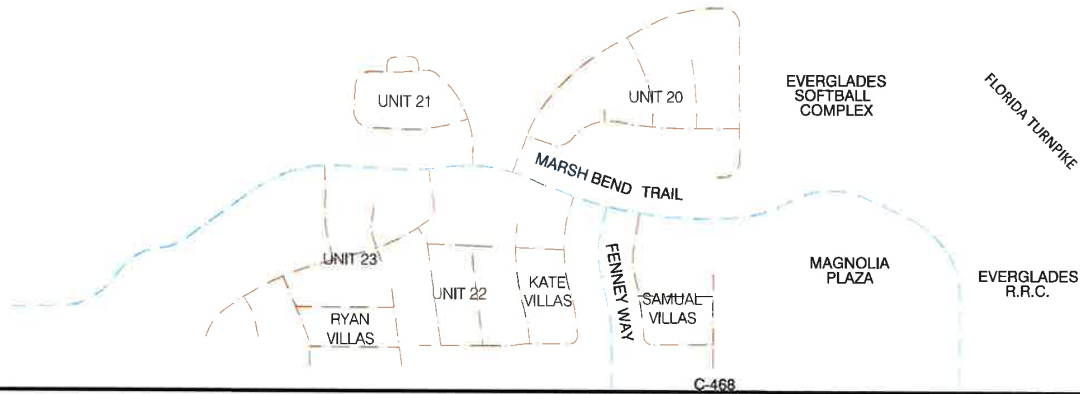
Projected Start Date: 1/1/18 Projected End Date: 2/15/19

Description of Project: Hamlet Construction is installing MDPE gas mains which are anticipated to be operated by the City Of Leesburg Natural Gas Department.

The Villages
SOUTH SUMTER GAS EXHIBIT
 V.O.S.O. PH 3 (BIGHAM NORTH)
 12/06/2017



CADE
 VILLAS



MATCH LINE - SEE V.O.S.O. PH 1 (BIGHAM WEST)

MATCH LINE - SEE V.O.S.O. PH 2 (BIGHAM EAST)

SECTION TOWNSHIP RANGE
 28 19S 23E

LEGEND

- = 2" GAS (17,215 LF)
- = 4" GAS (0 LF)
- = 6" GAS (7,066 LF)

CONSTRUCTION BEGINS: 1-1-18
COMPLETION DATE: 2-15-19

**FARNER
 BARLEY** AND ASSOCIATES, INC.
 ENGINEERS SURVEYORS PLANNERS
 Certificate of Authorization Number: 4709
 4450 N.E. 83rd Road Micovood, Florida 34795 (352) 748-3126

18

FLORIDA PUBLIC SERVICE COMMISSION

PIPELINE CONSTRUCTION NOTIFICATION

TO: Rick Moses, Bureau Chief
Bureau of Safety and Reliability

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

FROM: City of Leesburg Gas Department
Dawn Barrett, Compliance Specialist
Jack Rogers, Director of Gas
306 S. 6th Street
Leesburg, FL. 34748

Date of Notification 12/8/17

Pursuant to Florida Public Service Commission Rule 25-12.082, written notice is hereby given in reference to a major construction project or alteration of natural gas pipeline facilities.

Location: _____
The Villages, South Sumter. South east corner of C-501 and C-468. Bigham East

Estimated Construction Schedule:

Start Date: 2/15/18 **Completion Date:** 11/1/19
Diameter of Pipe: 2"4",6" **Length of Pipe:** 63,110',5,519', 6,534'.
Type of Materials: MDPE Pipe and Fittings

Comments: Hamlet Construction will be installing these mains which are anticipated to be operated by the City of Leesburg Natural Gas Department.



Signature

Director of Gas
Title

Copy to: Hasan Badran
(Local Area Safety Engineer), PSC

Notes: Major construction is defined as both 2 inches in diameter and 2,000 feet or more in length. Attached construction and site maps, if available.

City of Leesburg
Post Office Box 490630

306 S. 6th Street
Leesburg, FL 34748



Phone: 352-728-9840
Fax: 352-326-6636

Leesburg, FL 34748

Date: 12/08/17

Mr. Rick Moses
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Construction notice

Mr. Moses

Pursuant to Chapter 25-12.082 Construction Notice, written Notice shall be given to the Commission at least 15 days prior to the start of all major construction or alteration of pipeline facilities, stating the size, approximate location and contemplated time of construction. Notice is required when the pipeline involved is either at least 2 inches in diameter as well as 2,000 feet or more in length.

Please accept this letter as our official notification to the Commission that we will be performing work that meets these criteria. Specific information about this project is listed below.

Pipe Diameter/ Material: 2",4", 6" MDPE

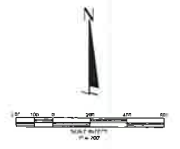
Total Length of Pipe: 63,110', 5,519', 6,534' respectively

Location: The Villages, South Sumter. South east corner of C-501 and C-468. Bigham East

Projected Start Date: 2/15/18 Projected End Date: 11/1/19

Description of Project: Hamlet Construction is installing MDPE gas mains which are anticipated to be operated by the City Of Leesburg Natural Gas Department.

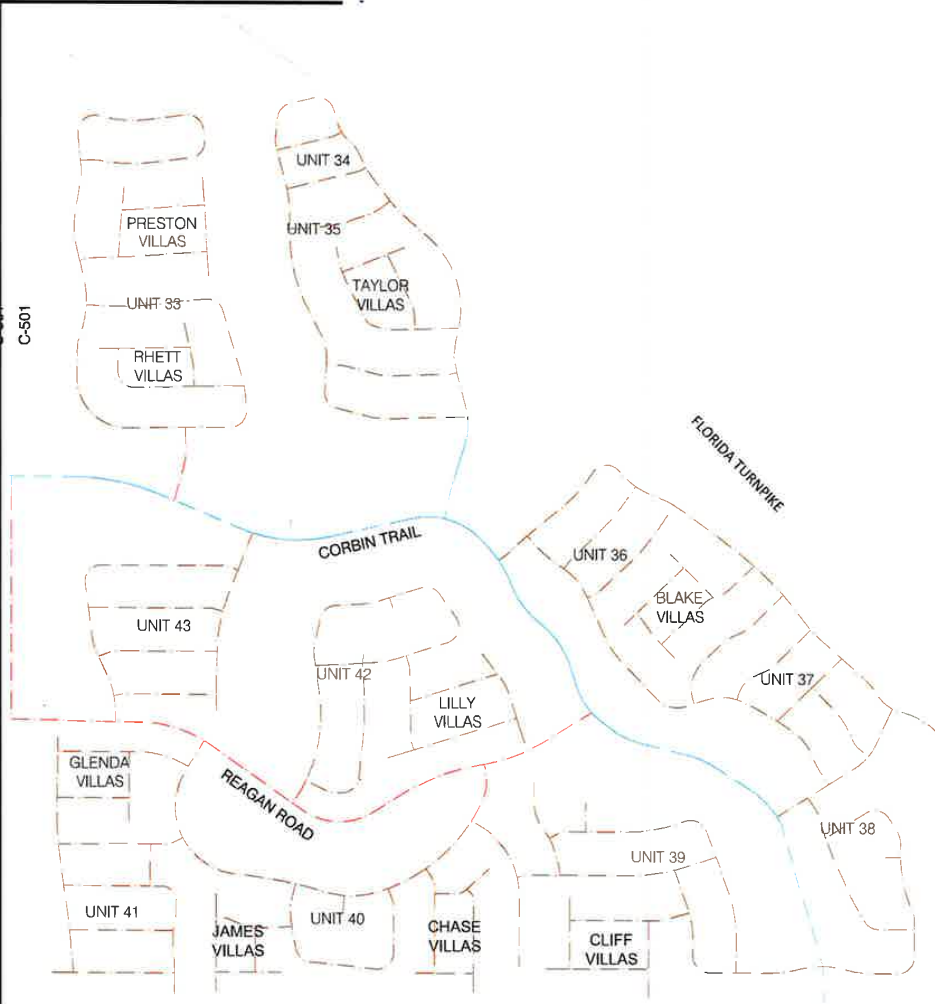
The Villages
SOUTH SUMTER GAS EXHIBIT
 V.O.S.O. PH 2 (BIGHAM EAST)
 12/06/2017



MATCH LINE - SEE V.O.S.O. PH 3 (BIGHAM NORTH)

MATCH LINE - SEE V.O.S.O. PH 1 (BIGHAM WEST)

REGULATOR STATION



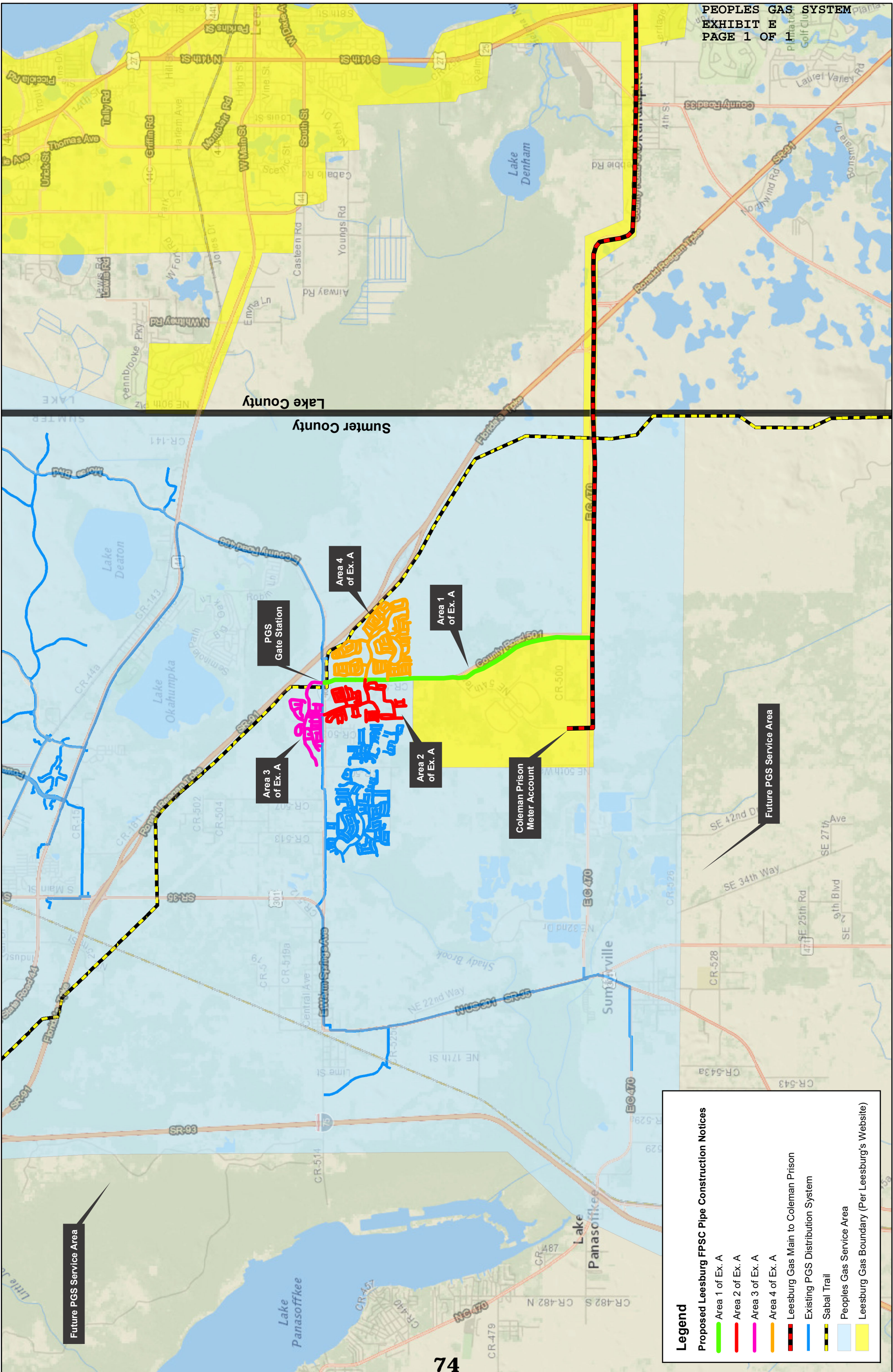
SECTION TOWNSHIP RANGE
 34 19S 23E

LEGEND
 — 2" GAS (63,110 LF)
 — 4" GAS (5,519 LF)
 — 6" GAS (6,534 LF)

CONSTRUCTION BEGINS: 2-15-18
 COMPLETION DATE: 11-1-19

FARNER BARLEY AND ASSOCIATES, INC.
 ENGINEERS SURVEYORS PLANNERS
 Certificate of Authorization Number: 4709
 4400 N.E. 83rd Road, Wildwood, Florida 34785 (352) 748-3156

EXHIBIT E



Legend

- Proposed Leesburg FPSC Pipe Construction Notices
 - Area 1 of Ex. A
 - Area 2 of Ex. A
 - Area 3 of Ex. A
 - Area 4 of Ex. A
- Leesburg Gas Main to Coleman Prison
- Existing PGS Distribution System
- Sabal Trail
- Peoples Gas Service Area
- Leesburg Gas Boundary (Per Leesburg's Website)