



Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

May 24, 2022

BY E-FILING

Mr. Adam Teitzman, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20220067-GU: Petition for rate increase by Florida Public Utilities Company, Florida Division of Chesapeake Utilities Corporation, Florida Public Utilities Company - Fort Meade, and Florida Public Utilities Company - Indiantown Division.

Dear Mr. Teitzman:

Attached, for electronic filing, please find the Testimony and Exhibits BH-1 and BH-2 of William Hancock.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

(Document 13 of 27)

Sincerely,

A handwritten signature in black ink that reads 'Beth Keating'.

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 20220067-GU: Petition for rate increase by Florida Public Utilities Company, Florida Division of Chesapeake Utilities Corporation, Florida Public Utilities Company - Fort Meade, and Florida Public Utilities Company - Indiantown Division.

Prepared Direct Testimony of William D. Hancock

Date of Filing: May 24, 2022

1 **Q. Please state your name and business address.**

2 A. William D. "Bill" Hancock, 331 West Central Avenue, Suite 239, Winter Haven,
3 Florida 33881.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by Chesapeake Utilities Corporation as the Assistant Vice President
6 of Fuel Supply and Energy Logistics.

7 **Q. Briefly describe your educational background and employment experience.**

8 A. I earned my Bachelor of Arts Degrees in Philosophy and Business Administration
9 with a concentration in Economics from Westminster College (Missouri) in 1995. I
10 received a Master of Business Administration degree with an emphasis in
11 Entrepreneurship from the University of Missouri – Kansas City in 1999.

12 I have 25 years of experience in commodity buying, selling, and price risk
13 management. Since 2001, I have been employed in the natural gas and propane
14 industry. I have been responsible for various aspects of the purchase and sale of
15 natural gas. Specifically, price risk management, procurement, scheduling, and sales.

16 I have been employed by Chesapeake Utilities Corporation since 2009. I have held
17 various gas supply responsibilities including the provision of retail natural gas
18 services through Florida Public Utilities Company's former marketing affiliate

1 Peninsula Energy Services Company ("PESCO"). As Assistant Vice-President with
2 PESCO, I was responsible for PESCO's retail customer sales, covering industrial and
3 commercial customers in Florida, Delaware, Maryland, West Virginia, Pennsylvania,
4 and Ohio. These customers were associated with eighteen different utility shipper
5 programs on various local distribution company systems in these states.

6 Upon the consummation of the sale of PESCO by Chesapeake Utilities Corporation
7 in 2019, I was appointed Assistant Vice President of Energy Logistics and Fuel
8 Supply.

9 **Q. Please clarify how you will refer to the various entities involved in your**
10 **testimony.**

11 A. For purposes of clarity and ease of reference, I'd like to explain how I will refer to
12 the various Florida local distribution company ("LDC") systems under the
13 Chesapeake Utilities Corporation umbrella. When referring to the Florida LDC
14 business units as a whole; i.e., Florida Public Utilities Company (Natural Gas
15 Division), Florida Public Utilities Company-Fort Meade, Florida Public Utilities
16 Company-Indiantown Division, and the Florida Division of Chesapeake Utilities
17 Corporation d/b/a Central Florida Gas, I will refer to these entities jointly as "FPUC"
18 or "the Company". When referring to specific systems individually, I will specify the
19 divisional name.

20 When referring to Chesapeake Utilities Corporation, the parent company, I will refer
21 to it as the "CUC" or the "Corporation."

22 **Q. Please describe your current responsibilities with the Company.**

1 A. Currently, I am responsible for the Company's Fuel Supply and Energy Logistics
2 Department. As the Assistant Vice President of Energy Logistics, I am responsible
3 for procurement of gas, contracting for pipeline capacity, and managing the
4 Company's Third-Party Shipper ("TPS") program (also referred to as the Company's
5 state-approved retail choice program). I am, therefore, responsible for certain
6 operational functions, which fall under the Energy Logistics component of my role,
7 as well as long-term, fuel-related initiatives under the Fuel Supply component of my
8 role.

9 My day-to-day responsibilities include i) managing the daily operations surrounding
10 physical gas receipts and deliveries to end use customers; ii) managing the
11 Company's TPS pools and transportation services for our end use customers; and iii)
12 managing the receipts and deliveries of fuel supplies to and from the Company's
13 distribution systems.

14 I'm also responsible for developing our long-term strategies for upstream pipeline
15 capacity procurement, and as such, I coordinate with other management areas within
16 the Company and CUC to ensure our strategy fully supports the Company's i)
17 localized operational requirements; ii) specific development projects; and iii) our
18 longer-term strategy for expansion into new and underserved service areas
19 throughout the state.

20 **Q. Have you previously filed testimony before the Florida Public Service**
21 **Commission?**

22 A. No.

23 **Q. Have you previously testified before other regulatory bodies?**

1 A. No.

2 **Q. What is the purpose of your testimony in this proceeding?**

3 A. My testimony primarily relates to seven specific matters.

4 (1) I will provide an overview of CUC's natural gas distribution systems in Florida.

5 (2) I will provide an overview of the Company's transportation programs in the state
6 of Florida, and the Company's approach regarding retail choice programs.

7 (3) I will discuss some of the changes that the Company has made to
8 transportation/shipper programs that i) consolidate the transport services offered by
9 the Company, ii) align the internal processes necessary to provide transport services
10 and, iii) support a healthy and competitive environment for third party shippers and
11 end-use customers.

12 (4) I will describe some of the market influences on gas price and supply.

13 (5) I will discuss cost and availability of capacity on upstream transmission pipelines
14 in the company's market area.

15 (6) I will discuss secondary capacity and the effects it has on end-use customers.

16 (7) Finally, I will discuss the efficiency gains and fuel clause savings due to the
17 merger of CUC and FPUC.

18 **Q. Do you have any exhibits to which you will refer in your testimony?**

19 A. Yes. Exhibit BH-1, which is a list of Minimum Filing Requirements (MFR) that I am
20 co-sponsoring and BH-2 which is a map of Florida Gas Transmission Company's
21 ("FGT") transmission facilities in Florida.

22

1 **I. NATURAL GAS TRANSMISSION AND DISTRIBUTION SYSTEMS AND**
2 **SERVICES OVERVIEW**

3 **A. Systems**

4 **Q. Would you please describe the gas transmission infrastructure of the state of**
5 **Florida, and how the Company uses it.**

6 A. The Company procures its natural gas capacity from three of four, interstate
7 pipelines operating in FGT, Gulfstream, and Southern Natural ("SONAT").
8 Currently, the Company does not hold capacity on the fourth pipeline, Sabal Trail.
9 The original pipeline, FGT, is the largest pipeline in the state, with a maximum
10 operating capacity (within the market area) of approximately 3.1 billion cubic feet
11 (bcf) per day. FGT has more linear miles of pipe, more interconnects, and serves
12 more Florida residents than any other pipeline. FGT is also the only pipeline that
13 serves certain areas of the state, especially the Company's service territory in south
14 Florida. Generally, FGT has two operating areas, the western division (west of the
15 Florida border) and the market area (east of the western division, the entirety of the
16 pipeline system in the state of Florida). Broadly, gas is received into the pipeline in
17 the Western Division and delivered out of the pipeline in the market area. Exhibit
18 BH-2 depicts the FGT system. Gulfstream is a simpler system, with receipt points in
19 and around Mobile Bay. Gulfstream delivers gas into central Florida beginning in
20 Manatee County. The Company has two points from which gas supply is delivered
21 on Gulfstream, both in the Polk County/Central Florida Gas (CFG) area. SONAT is a
22 more complex system with multiple supply points. SONAT delivers into Northeast
23 Florida (Nassau and Duval counties) and is the primary source of supply for our

1 customers in the Northeast portion of the state. The majority of capacity assets that
2 the Company holds are on FGT with smaller quantities of Gulfstream and SONAT
3 capacity.

4 **Q. Would you please provide an overview of FPUC's natural gas distribution**
5 **systems in Florida?**

6 A. FPUC, as a whole, is Florida's third largest natural gas Local Distribution Company
7 ("LDC") and serves approximately 92,000 customers 26 counties across the state of
8 Florida. Our service to residential customers is divided between customers referred
9 to as our retail sales customers; i.e. Purchased Gas Adjustment ("PGA") customers,
10 for whom we provide bundled gas service, and those customers in one of our
11 transportation service pools for whom we provide unbundled transportation service
12 only. These latter customers in our transportation service pools receive their gas
13 supply from TPS companies. I refer to third-party entities that use our system to
14 supply gas to end users as both TPS and also as gas marketers ("Marketers").

15 **Q. Please describe the Company's system utilized to deliver gas to customers and**
16 **the Company's geographical footprint.**

17 The Company operates 3,043 miles of gas lines throughout the state of Florida. The
18 Company serves customers in the northwest area of Florida as far west as Pensacola,
19 as far east as Fernandina Beach in northeast Florida, and as far south as West Palm
20 Beach/Boca Raton. In addition, the Company has significant operations in Central
21 Florida, including the Deland, Sanford, New Smyrna, and Winter Haven areas.

22 Over time, the Company has grown both organically through extensions to serve
23 customers, as well as through acquisitions of other natural gas distribution systems,

1 as will be described in more detail in the testimony of Company witness Cassel. As a
2 result of these various acquisitions over the years, the distribution systems serving
3 various areas are not contiguous, and in most instances, are not directly
4 interconnected. The facilities that, to date, have been operated under the Florida
5 Division of Chesapeake Utilities Corporation d/b/a Central Florida Gas ("CFG") in
6 Polk County are mostly contiguous with the exception of the facilities located in the
7 Bartow, Florida area. Newer facilities, in Suwannee and Escambia Counties serving
8 industrial customers and the City of Pensacola are non-contiguous. The original
9 FPUC Gas facilities, primarily located on the east side of Florida, serve areas located
10 in northwest Florida's Treasure Coast, east central Florida north of Florida's Space
11 Coast, and southeast Florida. While run by FPUC, these systems are not contiguous.
12 Likewise, the FPUC Indiantown Division ("Indiantown") and the FPUC Fort Meade
13 Division ("Fort Meade") operated as independent systems prior to acquisition by
14 FPUC are not directly interconnected with any other FPUC distribution system.

15 **B. Services**

16
17 **i. Transportation Service**

18 **Q. What is meant by a "Shipper" program?**

19 **A.** Certain customers receive only transportation service from the Company. These
20 customers buy their natural gas supply from third parties who then use our pipes to
21 deliver the gas to the customer. These suppliers are referred to as Third Party
22 Shippers, or "TPS" for purposes of our tariff. Shippers, or TPS on our systems, buy

1 gas for industrial and some commercial customers, as well as pools of residential
2 customers on the CFG part of our system.

3 **Q. Has transportation service offered by the Company evolved over time?**

4 A. Yes. Since 2000, when the Commission adopted Rule 25-7.0335, Florida
5 Administrative Code, requiring each LDC to offer gas transportation service to all
6 non-residential customers, transportation services across each of the current CUC
7 LDCs in Florida has evolved. At present, two of the LDC systems (CFG and
8 Indiantown) are fully unbundled and provide transportation service only, while the
9 other two LDCs (FPUC Natural Gas and Fort Meade) continue to provide both sales
10 and transportation services. Prior to its acquisition by FPUC, the Commission
11 approved Indiantown's transition to providing only gas transportation service by
12 Order No. PSC-02-1655-FOF-GU, issued November 26, 2002. By Order No. PSC-
13 02-1646-TRF-GU, issued November 25, 2002, the Commission approved the Florida
14 Division of Chesapeake Utilities Corporation's multi-phase Transitional
15 Transportation Service Program ("TTS"), which was designed to gradually transition
16 all remaining sales customers to transportation service. By Order No. PSC-07-0427-
17 TRF-GU, issued on May 15, 2007, the Commission authorized Phase Two of that
18 TTS Program.

19 While FPUC did, as noted, implement transportation service tariffs, consistent with
20 Rule 25-7.054, Florida Administrative Code, it did not exit the gas sales market.
21 Consequently, FPUC participates in the Purchased Gas Adjustment cost recovery
22 proceedings, pursuant to which it recovers the costs associated with obtaining and
23 delivering natural gas to customers, as does the Fort Meade division.

1 Once fully implemented, the Florida CUC LDC's various transportation service
2 programs were modified only slightly over time. For instance, in Docket No.
3 20170067-GU, the Company petitioned to suspend CFG's open enrollment process.
4 A couple of years later, in Docket No. 20190036-GU, the Company requested and
5 received approval from the Commission to change the imbalance cash-out
6 mechanism applicable to FPUC and Fort Meade. In Docket No. 20190201-GU, the
7 Company requested and received approval from the Commission to modify the pool
8 balancing process on the FPUC and Fort Meade systems. These changes made the
9 Company's various gas transportation services i) more equitable for all parties, ii)
10 aligned incentives between the TPS serving customers on our system and the
11 Company, and iii) streamlined the management of the programs for the Company's
12 Energy Logistics staff.

13 In 2020, the Company petitioned the Commission for approval to consolidate the
14 terms, conditions, and program provisions of its tariffs. Included in that petition
15 was also a request to establish consistent transportation service programs across
16 the four Florida LDCs. Establishing uniform transportation service rules and
17 processes provides greater uniformity of service and ease of administration of the
18 programs. Additionally, transportation customers and pool managers encounter a
19 less confusing and less cumbersome process, particularly for those marketers that
20 do business in various areas across the Company platform. The Commission
21 approved the tariff consolidation, including consolidation of our transportation
22 service programs, by Order No. PSC-2021-0148-TRF-GU, issued in Docket No.
23 20200214-GU.

1 **Q. Has consolidation of the tariffed transportation service programs for CUC's**
2 **Florida LDCs been beneficial the Company and its customers?**

3 A. Yes. There are a number of benefits that have resulted from the consolidated
4 transportation program, each of which has direct benefits to the retail customer. First,
5 our customer-facing employees will be able to respond to customer's questions about
6 our programs more quickly, efficiently, and accurately given that program
7 distinctions based on which system the customer is served by will be eliminated.
8 Second, these changes increase the understandability and flexibility of our
9 transportation service program, which will encourage more shippers to compete for
10 customers on our system and should result in lower prices for customers. In addition,
11 the changes implemented will better ensure that similarly situated customers have
12 similar service options, structures and pricing available to them, regardless of where
13 they receive service. Consolidation of these programs also positions our operations
14 staff to better plan for growth of the system. Finally, the consolidation program
15 includes a mechanism for allocating the costs for new capacity contracts to our end
16 use customers enrolled in TPS service. This allocation mechanism ensures that the
17 PGA paying ratepayers do not subsidize the TPS customers.

18 As a part of the new shipper program, we have implemented a new gas management
19 software so that the process of TPS pool maintenance (adding/dropping customers,
20 scheduling gas onto the system) is more streamlined and requires less human
21 intervention. Previously, a TPS was required to manually send completed paperwork
22 to Energy Logistics via email. In the future, most simple tasks will be automated,
23 and any TPS on our system will be able to effectuate these transactions themselves

1 without FPUC employee intervention. The system went into production on May 1st,
2 2022. We expect it to facilitate automation of many manual processes and provide a
3 level of service to our TPS and end user community that is significantly higher than
4 the previous more manual processes allowed.

5
6 **ii. Retail Gas Supply Service**

7 **Q. Please describe how the Energy Logistics department manages the gas supply**
8 **function for the Company.**

9 A. The Energy Logistics department manages supply processes across three different
10 timelines to supply gas to the Company's customers.

11 Each year, we perform a Request for Proposal (RFP) process for annual gas supply
12 quantities to encourage competition from suppliers that have an interest in providing
13 us supply. We enter a contract with the most competitive supplier for our gas needs.

14 Monthly, after effectuating capacity releases to TPS on our system and special
15 contract customers, we utilize the balance of the remaining interstate capacity to
16 supply our PGA pool, or retail sales, customers. We procure baseload supply
17 whenever possible, that is priced on a less-volatile monthly price.

18 Finally, on a daily basis, we balance our retail sales customers' needs by occasionally
19 buying or selling gas to supplement the monthly deliveries.

20 **Q. Please further describe the Company's sales service customer pool.**

21 A. Sales service is provided in the Company's FPUC and Fort Meade service areas. The
22 Company currently provides sales service to approximately 66,000 residential and
23 commercial customers. To provide sales service, the Company procures gas supplies,

1 upstream pipeline capacity, and ancillary services such as no-notice transportation
2 service necessary to meet the daily demand of its sales service customers. Costs
3 associated with providing sales service are passed through to the Company's sales
4 service customers through the Company's PGA cost recovery factor clause.

5 **Q. Please describe the Company's process for the purchase of system supply gas.**

6 Gas supply is purchased by the Company for resale to our PGA retail gas supply
7 customers served by the Company's Fort Meade and FPUC business units. To
8 acquire gas supply, the Company issues a Request for Proposal ("RFP") to gas
9 suppliers.

10 Typically, the industry standard is to procure the majority of gas supply on a monthly
11 basis where the gas quantities purchased are the same each day of the month. This
12 type of gas procurement is called "baseload." Baseload gas is purchased on a first of
13 month price, so the buyer is not exposed to volatility associated with imbalances of
14 supply and demand in the day-to-day market. The Company purchases nearly all its
15 gas by procuring baseload gas to cover forecasted demand. From time to time, we
16 purchase or sell spot supply as needed for the purposes of load balancing. In those
17 instances, we either purchase or sell based on the daily price, available in the market
18 on that day.

19
20 **iii. Capacity Planning and Environment**

21 **Q. Would you describe the upstream pipeline capacity and natural gas market**
22 **influences currently impacting the Company's gas supply?**

1 A. As mentioned previously, the Company is served by the three interstate pipeline
2 systems, FGT, Gulfstream, and SONAT. The Company contracts for primary firm
3 capacity entitlement on each of these pipelines for purposes of serving retail gas
4 load. Portions of this capacity are released to TPS on both a short-term and a long-
5 term basis as part of the Company's state-approved retail choice program, while other
6 portions of this capacity are used by the utility to serve its retail service customers.
7 The Company also maintains capacity for daily swing and peaking requirements, as
8 well as for future growth. The Company acquires gas to serve its customers at certain
9 receipt points on the upstream transmission pipelines for which we have capacity
10 contracts. Each one of the agreements with FGT, Gulfstream, and SONAT specifies
11 a firm receipt point and a firm delivery point, as well as the quantity of gas that the
12 Company is entitled to receive at each point. When using capacity from its
13 contracted receipt point to its contracted delivery point(s), it can be said that you are
14 using capacity on its "primary path." The alternative is "secondary path" capacity.
15 Capacity used in its primary path has priority over capacity that is being used in a
16 secondary path. During times of high demand, deliveries on primary path capacity
17 will flow, while deliveries on secondary capacity may be cut by the pipeline. Thus,
18 primary capacity is sometimes referred to as "firm" capacity, while secondary
19 capacity is considered somewhat less "firm" and less reliable.
20 Optimally, the Company would hold sufficient capacity in aggregate for our total
21 customer demand using the primary path available for delivery of gas in each of the
22 market areas where customer load exists. Holding sufficient capacity is important,
23 but it is equally critical that the capacity be associated with the Company's customer

1 load centers. Additionally, the capacity contracts must specify the correct points of
2 delivery, in sufficient quantities. This is important since the Company has operations
3 in areas where the FGT pipeline is constrained. FGT has several areas that are
4 constrained on its delivery system. Referring to my Exhibit BH-2, the map of FGT's
5 facilities in Florida, you will note that FGT has two primary pipelines that run down
6 the peninsula portion of the state. The Company must continually address specific
7 constraints on the West Leg (the section of the pipeline providing service to Tampa
8 and the Central Florida region), the East Leg (the section of pipeline running from
9 Union County to Miami Dade County, downstream of FGT compressor station 16),
10 and in the Southeast Group (a particularly constrained area of Broward and Miami
11 Dade county, downstream of FGT compressor station 21) in order to ensure its
12 ability to deliver sufficient gas supply to its various service areas and systems. The
13 periods when demand is greater than available capacity are cyclical, and can span
14 many years until subsequent FGT system expansion project is constructed.
15 Therefore, it is critical for the Company to be able to forecast its needs as accurately
16 as possible to plan for future growth and supply needs.

17 **Q. Has there been a change in the upstream capacity management practices of the**
18 **Company since the acquisition of FPUC by CUC, and if so, what are those**
19 **changes?**

20 Although I was not with the LDC side of the business at the time of the acquisition,
21 based on information I have gleaned from prior records and information available
22 regarding pre-merger functions, there has been a change in capacity management
23 practices, and those changes have been positive for the Company and its customers.

1 FPUC historically relied on the secondary capacity market to serve system supply
2 customers. CFG and Indiantown unbundled the transportation service from the sales
3 service function some time ago and providing transportation service only for some
4 time. As such, these systems have historically depended on the TPS to augment the
5 Company's capacity releases with secondary deliveries. A recognizable outlier, Fort
6 Meade, aggregated its capacity with other municipalities and depended on a third
7 party to manage day to day and future growth requirements through diversity with
8 other municipalities prior to its acquisition by FPUC.

9 Now, as a subsidiary of FPUC, the Company relies on primary firm capacity to
10 deliver gas supplies to the Company delivery points in constrained areas and to new
11 incremental markets.

12 **Q. Does the Company hold sufficient primary firm capacity to serve all sales and**
13 **transportation customers across its system?**

14 A. No. The Company does not hold sufficient primary capacity to serve its entire
15 customer base.

16 **Q. Does the Company utilize the secondary capacity market?**

17 A. Yes, but only to the extent that we allow shippers to supplement our primary
18 capacity with secondary market capacity.

19 **Q. Would you please explain in greater detail what the secondary capacity market**
20 **is?**

21 A. Transmission pipelines are financed through the execution of long-term primary firm
22 capacity service agreements. The pipeline's customers, typically regulated utilities,
23 enter into contracts for a quantity of daily capacity that is equivalent to their daily

1 maximum gas requirement. These contracts are often long-term, with some
2 extending 20 or 30 years. A company uses its maximum requirement infrequently
3 and usually as a function of weather or other extraneous variables. Even during an
4 extreme cold event that has the potential to occur once a decade in Florida, the cold
5 temperatures only last for 2-3 days. This means that on an average day, there are
6 capacity entitlements that are not used on the pipeline.

7 The Federal Energy Regulatory Commission ("FERC") has created a robust capacity
8 release process that allows entities holding surplus capacity to be matched up with
9 entities in search of capacity. Another similar option is for the party with capacity
10 surplus to sell delivered gas to the party with a capacity need. In either case, the
11 party with surplus capacity entitlements earns a small return on what would
12 otherwise be a wasting asset. The process of bilaterally transacting in this way is
13 broadly called the secondary market. Supply and demand impact the value of the
14 capacity bought/sold in this fashion. In times of average or low demand, it is typical
15 for capacity to trade at a discount to the value on the transmission pipeline's rate
16 card. In periods of high demand, it is not unusual for the value of the capacity in the
17 secondary market to be higher than the pipeline rates.

18 **Q. How do the Company's customers benefit from the secondary capacity market?**

19 A. Allowing secondary capacity has three primary benefits. First, it serves to make the
20 delivery costs of gas onto the system less expensive, and therefore end-use customers
21 pay less. Second, it enables the TPS to supplement their margins and therefore
22 encourages healthy competition among TPS who are active on our system over the
23 long term. Finally, it allows the utility to hold a reduced quantity of primary

1 interstate capacity, which allows for more complete utilization of all capacity
2 holdings, and therefore a reduction in capacity being charged to the PGA. Relying on
3 secondary capacity does, however, have its risks. Most importantly, it is less reliable
4 than firm capacity. For example, from time to time, typically due to extreme
5 temperatures in the weather, the market for surplus capacity dries up. No market
6 participant has any "extra" capacity and on the rare occasions when all firm capacity
7 is delivering at the maximum, there is simply no secondary capacity available. As
8 such, fully reliance on secondary capacity means you run the risk of being unable to
9 deliver gas supplies to customers during high-use periods.

10 **Q. How can a utility evaluate the efficiency of its capacity holdings versus system**
11 **consumption?**

12 **A.** One simple metric that can be used to evaluate the capacity utilization is to compare
13 the volume of gas consumed by customers on the system to the aggregate capacity
14 holdings. Over time, the differential between utilization and capacity holdings can
15 change. For instance, in 2009, prior to the turnback of capacity associated with the
16 merger of FPUC and CFG, the coverage ratio of capacity to retail volumes was
17 107%. That means, in aggregate over the entire calendar year, the Company as a
18 whole held 7% more capacity than the system had demand for gas, on average. This
19 coverage ratio has been decreasing from 2009. It has been at or near 60% for the last
20 several years. This means that for every 10 dekatherms delivered to the system, the
21 Company currently holds primary firm capacity for only 6 dekatherms of this
22 demand. TPSs make up the balance of this supply and the capacity necessary for
23 delivery via access to the secondary market.

1 **Q. Does the Company allow TPS on its systems to utilize secondary capacity?**

2 A. Yes. As I will describe further, the Company's current shipper programs run along a
3 continuum from having no access to secondary capacity to having full access to
4 secondary capacity. Secondary sources for supply typically return the least expensive
5 transportation costs for retail contracts; however, this practice can expose the end-
6 use customers to supply disruption under certain extreme circumstances. Primary
7 supply ensures reliability but is also the most expensive supply solution. We
8 recognize many large end-use customers are in competitive businesses where energy
9 costs matter. We also believe there is a balance that needs to be struck when dealing
10 with the secondary market. Therefore, the new shipper program allows TPS to larger
11 customers to supplement 50% of their pool's supply with secondary capacity/supply.
12 We believe this 50%/50% allocation equitably balances the supply reliability of
13 primary capacity with the cost sensitivity of the secondary market.

14 It should be further noted that only larger customers, who are provided service
15 pursuant to the Company's rate schedules CTS or FGS or are otherwise served
16 pursuant to a Special Contract that has been approved by the Commission, qualify
17 for the shipper pool that is supplemented with secondary capacity. Due to the level of
18 delivery risk, secondary capacity may be appropriate for those customers. In
19 contrast, it is inappropriate for residential/small commercial (higher priority)
20 customer classes – those customer classes that are reliant upon gas for home heat and
21 human needs concerns or other end uses that do not readily have an alternate form of
22 energy supply. Hospitals typically participate in the TPS program, but typically they
23 have alternate fuel backup on site. Nursing homes typically do not participate in the

1 TPS program, and are served via 100% primary capacity allotment through the
2 Company's PGA clause.

3 **Q. Are there disadvantages to designing a shipper program with the intent of**
4 **allowing secondary capacity to be used by Marketers for the benefit of large end**
5 **use customers?**

6 A: There are two main disadvantages of relying upon secondary supply. First, when
7 electric generation is at peak load, and therefore does not have any extra capacity to
8 release into the secondary market, customers served by TPSs utilizing secondary
9 capacity risk potential service interruptions. This is why it is important that only
10 large, sophisticated customers have access to these TPS pools, as the larger
11 customers are more likely to be able to plan for and arrange contingencies in the
12 event of a short-term interruption. For these facilities, contingency plans might
13 include temporary operational curtailment (partial or full) or the switching to a
14 backup fuel source.

15 A second drawback of secondary capacity is that the utilization of secondary
16 capacity mutes the market signal that would otherwise be sent to the interstate
17 pipeline when an area is growing and facing constraint and thus a good candidate for
18 capacity expansions. To be clear, economic development and growth do not occur
19 without access to primary capacity. Utilization of secondary capacity, when
20 available, is the most efficient short-term use of the capacity and of the pipeline asset
21 that supports gas delivery, which makes the market more efficient by raising
22 throughput and lowering costs. However, when those holding firm, primary capacity
23 begin to utilize their entitlements more completely, the load served by secondary

1 capacity can be exposed to interruption more frequently because less capacity is
2 released into the secondary market. Thus, while its use carries certain benefits and
3 efficiencies, reliance upon secondary capacity can, for a time, mask the need for new
4 pipeline projects to provide incremental supply, delaying relief to LDCs, shippers,
5 and customers in capacity constrained regions – sometime for years.

6 **Q. How has the Company addressed this issue through its planning processes?**

7 A. The Company's capacity planning is designed to ensure we can deliver gas to
8 customers on all parts of our system and that we do so in the most efficient, low cost
9 manner possible. For instance, in Southeast Florida, FGT has already created a
10 named constraint point designated "south of compressor station 21." Our Delray and
11 Boca Raton gates are within this affected area. There is no capacity available for
12 subscription that has a primary delivery point on the east leg, and certainly nothing
13 that reaches all the way to the very southeast of the system (South Palm Beach
14 County). The Company has therefore designed an alternate solution that will enable
15 it to continue providing safe and reliable gas service to the high-growth area in and
16 around West Palm Beach.

17 Specifically, this alternative approach has involved partnering with Florida Power &
18 Light ("FPL"). The approach originated in 2017, when the Company acquired
19 additional capacity on FGT. At the time, FGT had a small quantity of capacity
20 available with delivery points on the Western leg of their system. The Company
21 requested a primary delivery point for the new capacity at FPL's Martin Power Plant,
22 the delivery point located at the extreme South and East of FGT's western group of
23 delivery points. This made it possible to deliver to our system on the Western side of

1 the state. Additionally, we entered a commercial agreement with FPL wherein FPL
2 agreed to receive gas on the Company's behalf at the Martin plant, and then to
3 deliver a like quantity of gas onto the Florida Southeast Connection ("FSC") Pipeline
4 on the Company's behalf for movement south of Martin. We then built two new city
5 gates on our West Palm Beach distribution system to interconnect with FSC. By
6 virtue of this unique commercial arrangement, the Company has been able to utilize
7 its capacity on FGT's western leg to ensure delivery of gas to the constrained and
8 difficult to reach Southeastern area of the state. The Company brought these points
9 into service in 2020 and 2021, respectively, and anticipates that, over time, they will
10 play a significant role in ensuring our ability to maintain reliable supply for our
11 customers in the Southeastern part of the state.

12 **Q. Has the acquisition of FPUC by CUC resulted in benefits for FPUC in terms of**
13 **capacity holdings and costs?**

14 A. Yes. For one, as noted above, the larger company platform has enabled us to utilize
15 our FGT access points on FGT's western leg to benefit the Company and its
16 customers in the capacity constrained portions of the state. This also enables the
17 Company to utilize the capacity it holds more efficiently, which is important given
18 the rising cost of new capacity, which I will address later in my testimony. The
19 Company is also now better able to manage its capacity holdings, thereby enabling it
20 to turn back excess capacity when it can produce savings for our customers and to
21 likewise acquire capacity when necessary to ensure continued reliable service.

22 For instance, after the acquisition by CUC, and as discussed by the Company in
23 Docket No. 20110133-GU, the Company was able to turnback interstate capacity to

1 FGT. At the time, projections reflected that the combined interstate pipeline
2 capacity quantity held by FPUC and CFG was greater than the quantity required to
3 provide reliable service to customers. Therefore, in August 2010, concurrent with the
4 expiration of one of the Company's capacity contracts, 25% of the existing monthly
5 capacity was returned to FGT, resulting in savings of more than \$900,000 per year,
6 which was passed on to customers through the PGA mechanism.

7 **Q. Have the capacity markets changed since CUC acquired FPUC?**

8 A. Yes, as have the Company's capacity needs. Interstate capacity costs have increased
9 significantly over time and continue to escalate. This is due to a number of factors,
10 the primary one being that costs have increased to build new pipelines. The three
11 major costs relevant to pipeline construction, labor costs, pipe costs (steel), and land
12 costs, have all increased over time due to inflation, as well as other exogenous
13 variables that impact prices. Additionally, it is getting more challenging to permit
14 and construct interstate pipelines. Throughout the country, dozens of projects have
15 been terminated or postponed in the last few years, due to permitting issues,
16 regulatory concerns, and cost overruns. Thus, while demand for capacity continues
17 to increase, the market has been slow to build the much-needed new capacity.
18 Consequently, the price for existing capacity has also escalated. By way of example,
19 in 1993, the FERC mandated open access to the interstate pipeline system. At that
20 time, the rate associated with the newly developed FTS-1 rate schedule on FGT was
21 below \$0.20 per dekatherm. Currently, the FTS-1 rate for FGT is \$0.5150 per
22 dekatherm, while the rate for capacity on the newest pipeline, Sabal Trail
23 Transmission, is \$1.5680 per dekatherm.

1 **Q. How has the Company addressed its incremental interstate pipeline capacity**
2 **requirements and subsequent costs?**

3 A. The Company has had a decreasing capacity coverage since we turned back capacity
4 in 2010. While the Company acquired some capacity in 2017 as a response to growth
5 needs, the coverage ratio maintained remains at a relatively low level. Reflecting the
6 significant growth and expansion on our system statewide, the Company projects
7 that it will need to acquire additional capacity in the near future to maintain the
8 appropriate reserve margin for essential service and future growth.

9 **Q. What other mechanisms has the Company utilized to manage its capacity**
10 **needs?**

11 A. The Company uses capacity more efficiently today than it has at any point in the last
12 10 years. The Company has firm capacity rights on the interstate pipelines and
13 releases capacity, on a temporary basis, each month on behalf of transportation
14 customers to pool managers. The Companies now manage their pipeline capacity
15 portfolio as a whole, rather than acquiring and releasing capacity on a piecemeal
16 basis across its various Company systems.

17 In this filing, the Company is also proposing to further update its capacity release
18 methodology and release capacity to pool managers in an equitable manner across
19 the FPUC platform, eliminating distinctions between the four gas systems.
20 Specifically, the Company proposes to release monthly capacity based on the
21 transportation customers' same month/prior year billed therm quantities. This will
22 give the pool managers interstate pipeline capacity rate certainty from year to year.
23 Any natural gas consumed by the transportation customers that is in excess of the

1 natural gas delivered by the pool managers will be addressed by the Companies
2 through the swing service rider.

3 **Q. Can the Company avoid the need to acquire additional, expensive interstate**
4 **capacity?**

5 A. Ultimately, no. The Company will need to acquire additional interstate capacity in
6 order to ensure that it can continue to provide safe, reliable natural gas service for its
7 customers across the state. This is due to the significant growth on the Company's
8 system in several parts of the state, and anticipated additional growth.

9 The state is growing as people migrate to Florida from other parts of the country.
10 Florida's economy is growing along with these new residences, and they want gas.
11 From a residential perspective, it is an important source of energy for efficient
12 residential homes. From an industrial perspective, natural gas creates economic
13 opportunity and is highly desired by businesses large and small. In reality, the
14 necessity to acquire new tranches of capacity should be viewed as a positive, as it is
15 representative of and commensurate with the growth that the state continues to enjoy.

16 **Q. Would you please summarize your testimony?**

17 A. The Company has continually evolved with the demand of its customers, TPSs, and
18 marketing influences. Over a period of five years, the Company has consolidated and
19 modified its transportation services to make them more equitable for all stakeholders.
20 The Company has modified its upstream capacity portfolio as warranted to address
21 pipeline constraints, distribution system integrity and to address customer growth
22 and expansion opportunities. These efforts have resulted in customer growth of over

1 30% in the last decade (2012-2021), and customer volume growth of over 75% in the
2 same time frame.

3 **Q. Does this conclude your testimony?**

4 A. Yes.

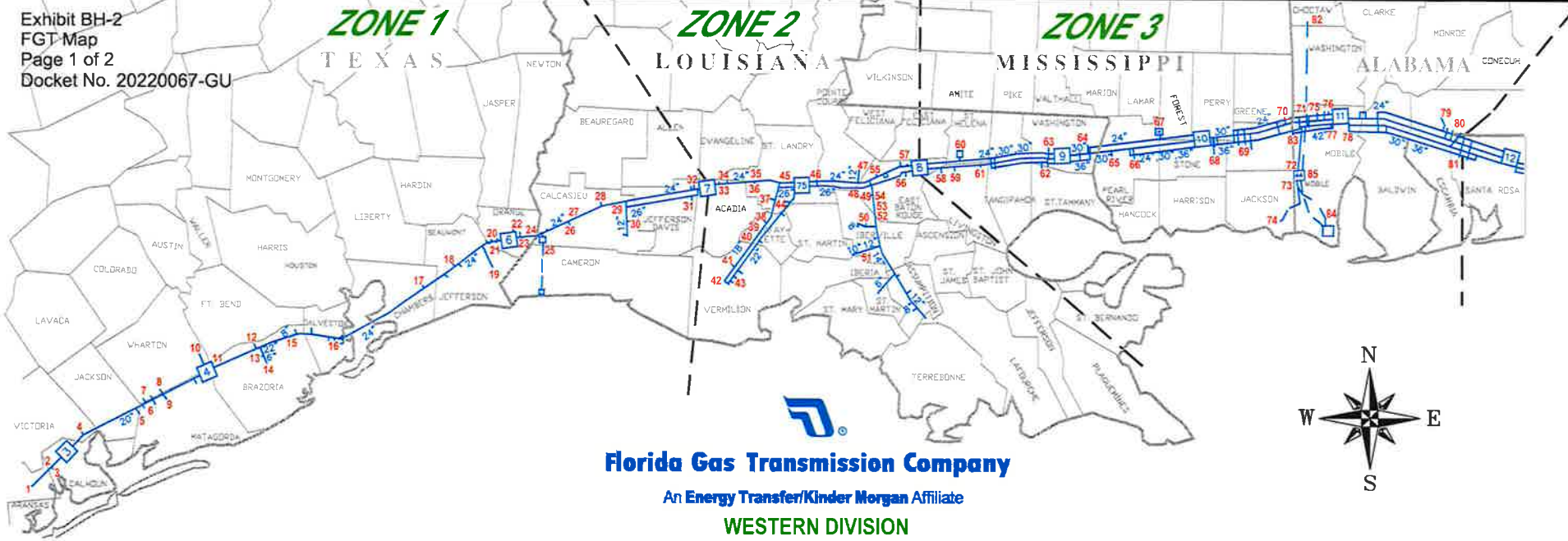
SCHEDULE

TITLE

Witness

PROJECTED TEST YEAR

G2-19 a to d	Projected Test Year - Calculation of Operation and Main Expense Supplement	M. Cassel, J. Bennett, M. Galtman, V. Gadgil, M. Napier, K. Parmer, N. Russell, K. Lake, D. Rudloff, B. Hancock
G2-19e	Projection Basis Factor	M. Napier / M. Galtman
G2-19f	Over and Under Adjustments	M. Cassel, J. Bennett, M. Galtman, V. Gadgil, M. Napier, K. Parmer, N. Russell, K. Lake, D. Rudloff, B. Hancock



Florida Gas Transmission Company
 An Energy Transfer/Kinder Morgan Affiliate
WESTERN DIVISION

MAITLAND, FLORIDA (407) 838-7011
 HOUSTON, TEXAS (713) 888-2500
 JULY 2021

ZONE 1

ID	POI	Name
1	78349	Refugio-Crosstex Energy
2	71444	Tejas Calhoun Co ITE
3	16494	Union Carbide-Seadrift
4	71238	Mustang Fuel Corp-Keeran #2
5	78485	Stowal #1
6	16228	Moath North Ranch
6	78476	Tres Palacios Storage (Del)
6	78475	Tres Palacios Storage (Rec)
6	16227	Tres Palacios-Farm Tap
7	78427	Merham-Gulf Shore
8	8576	HPL Magnet Withers
9	78513	Magnet Withers-Enterprise
10	100720	Wilson-Coastal Bend
11	100032	Pledger-Enterprise
12	100748	Lochridge-Cerberus
13	16128	Ramsey Entex
14	100021	Chenango No. 1 Powell
15	10222	Rowan Union TX
16	78032	Cross Media Well Connect
16	18059	HPL Texas City
16	100749	Attwater - Topaz
17	78538	Dembury Oyster Bayou
18	10240	NGPL Jefferson
19	100725	Port Arthur-Motiva
20	58624	Centana Jefferson
20	8774	HPL Texoma (Rec)
20	100035	McFadden Bend-Enterprise
21	100024	Beaumont-OCI
22	78503	Golden Pass (Rec)
22	78524	Golden Triangle Storage (Del)
22	78523	Golden Triangle Storage (Rec)
23	16503	Dow P/L Orange
23	872	GSU Sabine P/L
24	78499	Enbridge-Orange Co
24	78106	Lake Robert Starks #1 PDC
24	71210	Neumin Production PDC
25	406	TRANSCO Vinton
26	78531	Duncan Oil - Bayou Choupique
27	78450	Liberty Storage (Del)
27	78448	Liberty Storage (Rec)
28	10150	Varibus Calcasieu
29	100729	Gillis-Trunkline
30	23059	Trunkline Manchester
31	78300	Egan Hub (Del)
31	78299	Egan Hub (Rec)
32	62071	City of Eunice
32	100733	Eunice-ANR
32	10178	TX Gas Eunice

ZONE 2

ID	POI	Name
33	78498	Acadia-KMLP
33	78457	Pine Prairie Storage (Del)
33	78456	Pine Prairie Storage (Rec)
34	78318	Acadia Partners P/L CTG
35	59204	GSPL Opelousas
35	16042	Severg-Opelousas
36	78156	Severg-Claudia Billeaud Well
37	78517	Grand Meras St Landry Parish
38	71297	City of Carecero
39	78425	Duhon #1
39	100018	Lafayette Phalanx
40	62410	Columbia Gulf-Lafayette
41	78459	Liberty Kaplan
42	16509	LRK Kaplan
43	57391	NGPL Vermilion
43	25405	Trunkline Vermilion
44	78303	ANR St. Landry Parish
44	10102	GSPL St. Landry
44	100027	Port Barre-Pay Oil
45	78468	Bobcat Gas Storage (Del)
45	78467	Bobcat Gas Storage (Rec)
46	59305	TETCO Atchafalaya (Del)
46	10147	TETCO Atchafalaya (Rec)
47	16077	AMOCO-Judge Digby
47	78442	GMT-Frisco
48	78533	Frisco Acadian
49	78405	Acadian W Baton Rouge
49	16514	NW Bayou Choctaw
50	78347	Bayou Bleu Oil/Iberville Co
50	78079	Iberville Parish Bayou Bue
51	62117	Bayou Sorrel Iberville
52	78510	Petrologistics Storage (Del)
52	78509	Petrologistics Storage (Rec)
53	72495	Iberville HWY 1148
53	100026	Plaquemines Boardwalk
54	78084	Mid LA Port Allen ITE
54	63025	Oleum Op W Baton Rouge
55	78406	Pennington Oil / Gas Bueche
56	100039	City of Zachary West
56	78458	Pennington Profit Island
57	71520	City of Zachary LA
57	59022	Endevco Port Hudson
57	71384	Mid LA E Baton Rouge ITE

ZONE 3

ID	POI	Name
58	61430	East Baton Rouge
59	60751	City of Walker
60	10114	TRANSCO St Helena
61	10109	GSPL St Helena
62	62368	SNG Franklinton West
62	78507	Bannere
63	10095	SNG Franklinton (Rec)
64	78304	Washington Parish Power Plant
64	100023	Bogalusa Mardi Gras (Del)
64	78514	Bogalusa Mardi Gras (Rec)
65	57143	Pearl River
66	60760	Skrivandas Engineering
67	10258	TENN Carnes (Rec)
68	10218	Pounds Black Creek
69	71298	Destin P/L
69	10037	GSPL Merrill
69	78488	SESH Lucedale (Del)
69	78487	SESH Lucedale (Rec)
70	78400	GSPL Greene City
71	78540	Gulf LNG Citronelle
71	78461	Southern Pines Citronelle (D)
71	78460	Southern Pines Citronelle (R)
72	78486	SESH Mobile Bay
73	78535	Grand Bay (Del)
73	78534	Grand Bay (Rec)
74	78536	Gulf LNG Pascagoula
75	10145	Enerfin Clarke-Mobile (Del)
75	62899	Enerfin Clark-Mobile (Rec)
76	62249	Bay Gas (Del) Storage
76	62248	Bay Gas (Rec) Storage
76	71379	GSPL Mt Vernon
77	62908	Clarke-Mobile/Mt Vernon T85
78	71440	Clarke-Mobile/Mt Vernon B
79	16521	Big Escambia Creek
79	100707	City of Brewton
79	16522	GSPL Flomaton
79	60023	Mallard P/L Big Escambia Fuel
80	100751	Crist - Gulf Power
80	62215	Alabama Electric Co-Op
80	100725	Fannie Rd Breunburn
80	100717	Pensacola CUC
81	16235	St Regis Gas P/L-Fuel
82	62152	TRANSCO Butler

TRANSCO - MOBILE BAY		
ID	POI	Name
83	62132	TRANSCO Citronelle FGT Capacity
83	71462	TRANSCO Citronelle FGT Mainline
84	62136	Calton-Dauphin Island
84	62137	Dauphin Island Gathering System
84	62135	Exxon Plant
84	71441	MBPP Outlet FGT
84	62134	Mobil Plant
84	62133	Shell Plant
84	78462	TRANSCO-Gulfstream Coden
84	71414	Williams Plant

GULF SOUTH - MOBILE BAY		
ID	POI	Name
85	78173	GSPL Dauphin Island Gathering
85	78179	GSPL Exxon
85	78177	GSPL MAGS Callon
85	78174	GSPL MBPP Outlet
85	78176	GSPL Mobile Bay-FGT Capacity
85	78306	GSPL Mobile Bay-GS Capacity
85	78178	GSPL Mobile Mary Anne
85	78175	GSPL Shell Yellowhammer
85	78319	GSPL Williams Field Serv PDC

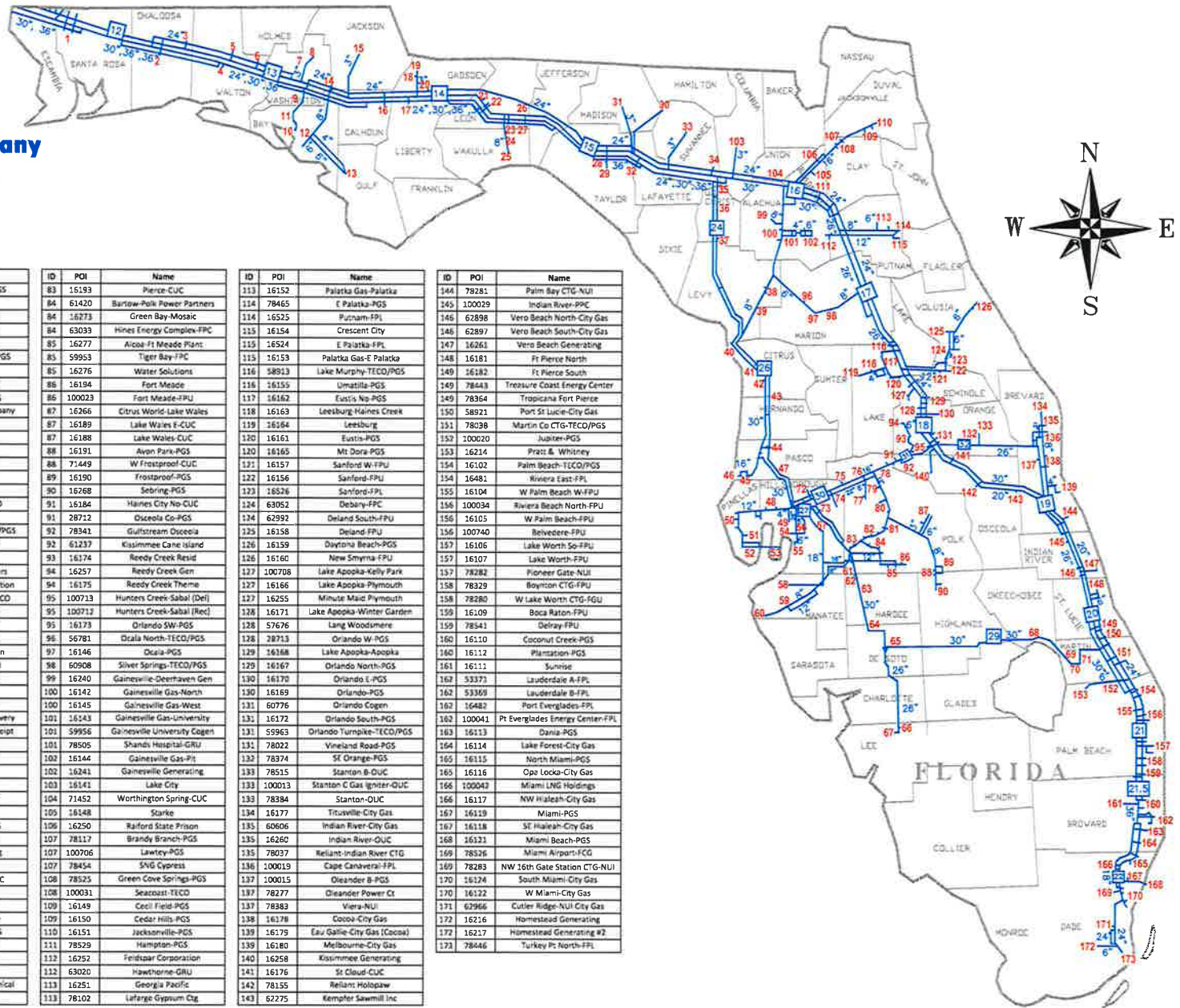


Florida Gas Transmission Company

An Energy Transfer/Kinder Morgan Affiliate

MARKET AREA

MAITLAND, FLORIDA (407) 838-7011
 HOUSTON, TEXAS (713) 988-2500
 JULY 2021



ID	POI	Name
1	10128	GSP: Santa Rosa Five Flags
2	16129	Jay
3	55685	Okaloosa Co
4	16130	Florida
4	78516	Walton Okaloosa
5	56658	De Funiak Springs
6	16131	Geneva Co Gas District
7	78112	Bonifay CTG-CUC
8	16132	Chisley
9	78434	Washington Co-CFG
10	78301	Gulf Power Smith Plant
11	100014	Southport-PGS
12	100753	Panama City-PGS
13	56657	St Joe Overstreet
14	100001	Cottondale-PGS
15	16135	Marianne
16	16136	BrownsTown
17	63009	Liberty-PGS
18	78111	Sneads CTG-CUC
19	16137	Chattahoochee
20	72125	Quincy-CUC
21	78426	Tallahassee-Midway
22	78469	Tallahassee Hopkins #2
23	16237	Tallahassee W (Hopkins)
24	56667	Tallahassee South
24	62909	Tallahassee-Wakulla CTG
25	16238	Tallahassee-St Marks (Purdum)
26	62870	Tallahassee-E
27	63004	Leon-TECO/PGS
28	16138	Perry
29	16239	Buckeye Cellulose
30	100036	SNG Suwannee
30	78530	Suwannee-Progress Energy
31	16139	Madison
32	63010	Mayo-PGS
33	16140	Live Oak
34	100714	Suwannee - Sabal Trail
35	78373	Suwannee-CUC
36	78438	FL Rock Gilchrist
36	61552	North Florida Holsteins
37	71448	Trenton-CUC
38	78410	City of Williston South
38	16147	Williston
39	71199	Levy Co-TECO/PGS
40	100742	Citrus County - Sabal Trail
41	71453	Crystal River-CUC
42	78527	Leandro-CUC
43	78432	Brooksville No-PGS
44	63717	Hudson-TECO/PGS
44	78295	Shady Hills-Mirant
45	78137	Clearwater Trinity
46	71404	Anclote-FPC
47	78372	Oak Grove-PGS
48	16203	Tarasol North-PGS

ID	POI	Name
48	62995	Tampa NW-TECO/PGS
49	16202	Tampa E-PGS
50	16204	Clearwater East
50	16205	Clearwater North
50	16206	Clearwater South
51	16207	St Petersburg North-PGS
52	63053	Barrow B-FPC
52	16208	St Petersburg-PGS
52	100012	Weedon Island-PGS
53	16285	National Gypsum Company
53	16209	Tampa W-PGS
54	100755	Big Bend-PGS
54	78375	Bayside-TECO
54	16201	Tampa South-PGS
55	16283	Tampa-Mosaic
56	16200	Brandon-PGS
57	71229	Fishhawk-PGS/TECO
58	78518	Manatee-FPL
59	71403	Lakewood Ranch-TECO/PGS
60	16195	Dinco-TECO/PGS
61	100093	Brewster-FPU
61	57345	Hardee Power Partners
61	78138	Midula Generation Station
61	78075	Polk Power Station-TECO
62	78340	Gulfstream Hardee
63	78307	El Paso Vanoblah
64	78296	Arcadia NW-CUC
65	78312	Desoto Co Generation
65	100032	Desoto Correctional
66	78152	Fl Myers CTG-PGS
67	78083	Fl Myers-FPL
68	100038	Dixiechoyee-FPU
69	100709	Gulfstream Martin-Delvey
69	100702	Gulfstream Martin-Receipt
70	78522	Martin-FPL
70	100090	Riviera West-FPL
71	16101	Indianpwn
72	16282	C F Industries
73	78537	W Plant City CFG
74	16199	Plant City-CUC
75	16198	Lakeland North-PGS
76	55687	Lakeland McIntosh
77	16280	Lakeland Generating
77	16197	Lakeland-PGS
78	62991	Polk Correctional-CUC
79	78528	Lake Mattie-CUC
80	16186	Auburndale-CUC
80	16264	Auburndale-Cutrale
80	60953	Lake Blue-TECO/PGS
80	16187	Winter Haven-CUC
81	16199	Barrow A-CUC
81	60923	Barrow B-CUC
82	16270	Asland Specialty Chemical
82	16271	Barrow-Mosaic

ID	POI	Name
83	16193	Pierce-CUC
84	61420	Barlow-Polk Power Partners
84	16273	Green Bay-Mosaic
84	63033	Hines Energy Complex-FPC
85	16277	Alico-Ft Meade Plant
85	59953	Tiger Bay-FPC
85	16276	Water Solutions
86	16194	Fort Meade
86	100023	Fort Meade-FPU
87	16266	Citrus World Lake Wales
87	16189	Lake Wales E-CUC
87	16188	Lake Wales-CUC
88	16191	Avon Park-PGS
88	71449	W Frostproof-CUC
89	16190	Frostproof-PGS
90	16268	Sebring-PGS
91	16184	Haines City No-CUC
91	28712	Osceola Co-PGS
92	78401	Gulfstream Osceola
92	61237	Kissimmee Cane Island
93	16174	Reedy Creek Resid
94	16257	Reedy Creek Gen
94	16175	Reedy Creek Theme
95	100713	Hunters Creek-Sabal (Del)
95	100712	Hunters Creek-Sabal (Rec)
95	16173	Orlando SW-PGS
96	56781	Dixie North-TECO/PGS
97	16146	Ocala-PGS
98	60908	Silver Springs-TECO/PGS
99	16240	Gainesville-Deerhaven Gen
100	16142	Gainesville Gas-North
100	16145	Gainesville Gas-West
101	16143	Gainesville Gas-University
101	59956	Gainesville University Cogent
101	78505	Shands Hospital-GRU
102	16144	Gainesville Gas-Plat
102	16241	Gainesville Generating
103	16141	Lake City
104	71452	Worthington Spring-CUC
105	16148	Starke
106	16250	Rainford State Prison
107	78117	Brandy Branch-PGS
107	100706	Lawley-PGS
107	78454	SNG Cypress
108	78525	Green Cove Springs-PGS
108	100031	Seacoast-TECO
109	16149	Cecil Field-PGS
109	16150	Cedar Hills-PGS
110	16151	Jacksonville-PGS
111	78529	Hampton-PGS
112	16252	Fruitbar Corporation
112	63020	Hawthorne-GRU
113	16251	Georgia Pacific
113	78102	Lafarge Gypsum Ctg

ID	POI	Name
113	16152	Palatka Gas-Palatka
114	78465	E Palatka-PGS
114	16525	Punam-FPL
115	16154	Crescent City
115	16524	E Palatka-FPL
115	16153	Palatka Gas-E Palatka
116	58913	Lake Murphy-TECO/PGS
116	16155	Umattila-PGS
117	16162	Eustis No-PGS
118	16169	Leesburg-Haines Creek
119	16184	Leesburg
120	16161	Eustis-PGS
120	16165	Mt Dora-PGS
121	16157	Sanford W-FPU
122	16156	Sanford-FPU
123	16526	Sanford-FPL
124	63052	Deberry-FPC
124	62992	Deland South-FPU
125	16158	Deland-FPU
126	16159	Daytona Beach-PGS
126	16160	New Smyrna-FPU
127	100708	Lake Apopka-Kelly Park
127	16166	Lake Apopka-Plymouth
127	16255	Minute Maid Plymouth
128	16171	Lake Apopka-Winter Garden
128	57676	Lang Woodmere
128	78713	Orlando W-PGS
129	16168	Lake Apopka-Apopka
129	16167	Orlando North-PGS
130	16170	Orlando E-PGS
130	16169	Orlando-PGS
131	60776	Orlando Cogent
131	16172	Orlando South-PGS
131	59963	Orlando Turnpike-TECO/PGS
131	78022	Vineland Road-PGS
133	78374	St Orange-PGS
133	78515	Stanton B-CUC
133	100013	Stanton C Gas Lighter-CUC
133	78384	Stanton-CUC
134	16177	Truville-City Gas
135	60606	Indian River-City Gas
135	16260	Indian River-CUC
135	78037	Kelant-Indian River CTG
136	100019	Cape Canaveral-FPL
137	100015	Oleander B-PGS
137	78277	Oleander Power Ct
137	78383	Viera-NUI
138	16178	Cocoa-City Gas
139	16179	Eau Gallie-City Gas (Cocoa)
139	16180	Melbourne-City Gas
140	16258	Kissimmee Generating
141	16176	St Cloud-CUC
142	78155	Reliant Holograp
143	62275	Kempler Sawmill Inc

ID	POI	Name
144	78281	Palm Bay CTG-NUI
145	100029	Indian River-PFC
146	62898	Vero Beach North-City Gas
146	62897	Vero Beach South-City Gas
147	16261	Vero Beach Generating
148	16181	Fl Pierce North
149	16282	Fl Pierce South
149	78443	Treasure Coast Energy Center
149	78364	Trappana Fort Pierce
150	58921	Port St Lucie-City Gas
151	78038	Martin Co CTG-TECO/PGS
152	16214	Pratt & Whitney
154	16102	Palm Beach-TECO/PGS
154	16481	Riviera East-FPU
155	16104	W Palm Beach W-FPU
156	100034	Riviera Beach North-FPU
156	16105	W Palm Beach-FPU
156	100740	Belvedere-FPU
157	16106	Lake Worth So-FPU
157	16107	Lake Worth-FPU
157	78282	Pioneer Gate-NUI
158	78329	Boynton CTG-FPU
158	78280	W Lake Worth CTG-FGU
159	16109	Boca Raton-FPU
159	78541	Delray FPU
160	16110	Coconut Creek-PGS
160	16112	Plantation-PGS
161	16111	Sunrise
162	53373	Lauderdale A-FPL
162	53369	Lauderdale B-FPL
162	16482	Port Everglades-FPL
162	100041	Pt Everglades Energy Center-FPL
163	16113	Dania-PGS
164	16114	Lake Forest-City Gas
165	16115	North Miami-PGS
165	16116	Opa Locka-City Gas
166	100043	Miami LNG Holdings
166	16117	NW Hialeah-City Gas
167	16119	Miami-PGS
167	16118	St Hialeah-City Gas
168	16121	Miami Beach-PGS
169	78526	Miami Airport-FCG
169	78283	NW 16th Gate Station CTG-NUI
170	16124	South Miami-City Gas
170	16122	W Miami-City Gas
171	62966	Cutler Ridge-NUI City Gas
172	16216	Homestead Generating
172	16217	Homestead Generating #2
173	78446	Turkey Pt North-FPL