

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: September 25, 2025

TO: Office of Commission Clerk (Teitzman)

FROM: Division of Economics (Ward) *JP*
Office of the General Counsel (Bloom) *JSC*

RE: Docket No. 20250102-GU – Petition for approval of tariff modification to reflect TTS pool manager, by Florida Public Utilities Company.

AGENDA: 10/07/25 – Regular Agenda – Tariff Filing – Interested Persons May Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER: Administrative

CRITICAL DATES: 10/13/25 (60-Day Suspension Date)

SPECIAL INSTRUCTIONS: None

Case Background

On August 14, 2025, Florida Public Utilities Company (FPUC or utility) filed a petition for approval of a tariff modification reflecting the automation of FPUC's Transitional Transportation Service (TTS) pool manager assignment process. The TTS program is designed to allow Indiantown and Central Florida Gas (CFG) Division customers to purchase natural gas from one of two TTS shippers and select from certain gas pricing options offered by the TTS shippers. The TTS tariff was originally established in 2002 to facilitate the conversion of remaining sales customers to aggregated customer pools. These customer pools are administered by qualified gas marketers (also known as pool managers) who have the capability of combining the gas supply requirements of customers in the TTS pools with other customers served by the pool managers, both on and off the utility's distribution system. FPUC's Indiantown and CFG Division provide transportation service only. Under the proposed tariff, FPUC would utilize its new billing system to automate the assignment of TTS pool managers. In response to staff's data request, the utility stated that TTS pool manager A would be assigned to customers moving in on even numbered

calendar days, while TTS pool manager B would be assigned to customers moving in on odd numbered calendar days.¹ Currently, this assignment is done manually.

During the evaluation of the petition, staff issued a data request for which responses were received on September 5, 2025. Proposed tariff sheet No. 6.526 is included to the recommendation as Attachment A. The Commission has jurisdiction over this matter pursuant to Sections 366.03, 366.04, 366.05, and 366.06, Florida Statutes (F.S.).

¹ Document No. 09211-2025, filed September 5, 2025.

Discussion of Issues

Issue 1: Should the Commission approve FPUC's request to automatically assign TTS pool managers and the associated tariff?

Recommendation: Yes, the Commission should approve FPUC's request to automatically assign TTS pool managers and the associated tariff. The new automated process will allow the utility to bill customers efficiently, while ensuring that initial pool manager assignments are made on a fair and unbiased basis. If approved, proposed tariff sheet No. 6.526 should become effective upon the issuance of a Consummating Order. (Ward)

Staff Analysis: Historically, if a premises had previously been assigned a particular pool manager, then any customer that subsequently moved into that premises would automatically be assigned to that same pool manager. If no pool manager had been assigned to the premises in the past, then a pool manager would be manually assigned to either TTS pool manager A or B. In response to staff's data request, the utility stated that pool manager A is assigned to customers signing up for service on even numbered calendar days and pool manager B is assigned to customers signing up for service on odd numbered calendar days.

In its petition, FPUC states that with the utility's new billing system, pool manager assignments can be done automatically without manual intervention, regardless of any prior history. In response to staff's data request, the utility stated that it would utilize the new customer move-in workflow in System Analysis Program Development (SAP), its new billing system, to automate the assignment of TTS pool managers.² The new automated process would automatically assign new customers to TTS pool managers based upon whether the customer at that location signs up for service on an odd or even day of the week. Under the proposed tariff, this would take place regardless of any prior pool manager history at the location. In response to staff's data request, the utility asserted that if in the future a third TTS pool manager was added, the utility would adjust the automation to assign TTS pool managers every third day, ensuring that each pool manager is provided an equal opportunity to be assigned during the move-in workflow.³

Additionally, in response to staff's data request, the utility stated that a periodic review will be performed to confirm TTS pool manager assignments are distributed as expected based on move-in dates.⁴ The utility asserts that the new automated process will improve the utility's ability to bill customers efficiently and accurately, as well as further ensure that initial pool manager assignments are made on a fair and unbiased basis.

Conclusion

Staff recommends approval of FPUC's request to automatically assign TTS pool managers and the associated tariff. The new automated process will allow the utility to bill customers efficiently, while ensuring the initial pool manager assignments are made on a fair and unbiased basis. If approved, proposed tariff sheet No. 6.526 should become effective upon the issuance of a Consummating Order.

² *Id.*

³ *Id.*

⁴ *Id.*

Issue 2: Should this docket be closed?

Recommendation: If a timely protest is filed, the tariff should not be implemented while the protest is pending. If no protest is filed by a person whose substantial interests are affected within 21 days of the issuance of the Order, this docket should be closed upon the issuance of a Consummating Order. (Bloom)

Staff Analysis: If a timely protest is filed, the tariff should not be implemented while the protest is pending. If no protest is filed by a person whose substantial interests are affected within 21 days of the issuance of the Order, this docket should be closed upon the issuance of a Consummating Order.

Florida Public Utilities Company
FPSC Tariff
Original Volume No. 2
No. 6.526

~~Second~~^{First} Revised Sheet No. 6.526
~~Replaces Original~~^{Cancels First Revised} Sheet

RULES AND REGULATIONS - CONTINUED

Service Initiation Existing Premise Continued:

- ~~For new Customer premises to which an initial bill has not been issued, Service will be delayed until the first day of the second calendar month following enrollment by the Pool Manager.~~
2. **Service Transfer Between Pools:**
To initiate the transfer of service between Transportation Service pools that includes Individual Transportation Service, CI Transportation Service, and TTS Service, a Customer shall select a Company-approved replacement Pool Manager and replacement Pool Manager shall enroll Customer electronically via Company's website. Prior to electronic enrollment transfer, Pool Manager shall obtain a Letter of Authorization from the Customer in the form set forth on Sheet Nos. 8.134-8.137 of this tariff and have signed by the Customer prior to enrollment. Transportation Service by the Company to a Customer account for which service hereunder has been properly requested by electronic enrollment prior to the tenth (10th) Business Day prior to the end of the month will commence on the first day of the following calendar month following receipt by the Company of the aforesaid electronic enrollment.
 3. **Reactivation of Existing Residential Customer Premise:**
Residential Customers reactivating Transportation Service at an existing premise shall be assigned to the daily prevailing TTS Pool Manager ~~that was serving the previous Residential Customer located at the premise.~~
 6. **Transfer of Residential Customer:**
When a Residential Customer transfers Transportation Service from an existing premise to another premise, Customer will be assigned to the daily prevailing TTS Pool Manager ~~upon request by Customer, said Residential Customers' existing TTS Pool Manager shall transfer with the Customer to the new premise.~~
 7. **Transfer of Non-Residential Customer:**
~~When a Non-Residential Customer transfers Transportation Service from an existing premise to another premise, Customer will be assigned to the daily prevailing TTS Pool Manager. Non-Residential Customers transferring Transportation Service from an existing premise to another premise shall be required to~~ Customer must submit a new LOA to Pool Manager, and Pool Manager shall transfer service no later than ten (10) Working Days prior to the end of the Month to retain its selected Pool Manager at the new premise. All Ft. Meade and FPUC Service Area Non-Residential Customers who change Pool Managers will be charged a \$23.00 fee when a Pool Manager is changed after Customer's initial designation.
 8. **Indiantown and CFG Service Area Non-Residential Customers Currently Receiving Service from CI Pool Manager:**
Non-Residential Customers receiving service from a CI Pool Manager may select to be assigned to a TTS Customer Pool. Said Non-Residential Customer shall execute a Letter of Authorization specifying the TTS Pool Manager or shall be assigned by Company to a TTS Pool Manager no later than ten (10) Working Days prior to the end of the Month.

Issued by: Jeffrey Sylvester, Chief Operating Officer
Florida Public Utilities Company

Effective: ~~JUN 05 2025~~