



William P. Cox
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COMMISSION
CLERK

November 2, 2012

Ms. Ann Cole
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

120278-EQ

Re: Petition for Approval of Facility Charges to Interconnect Customer-Owned Renewable Generation of Manatee County, Florida

Dear Ms. Cole:

Please find enclosed for filing an original and seven (7) copies of Florida Power & Light Company's Petition for Approval of Facility Charges to Interconnect Customer-Owned Renewable Generation of Manatee County, Florida. Also enclosed is a compact disc containing FPL's Petition in Microsoft Word format.

Thank you for your assistance. Please contact me should you or your staff have any additional questions regarding this filing.

Sincerely,

William P. Cox
Senior Attorney
Florida Bar No. 0093531

WPC/bag
Enclosures

COM	_____
AFD	_____
APA	_____
ECO	_____
ENG	_____
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FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's)
Petition for Approval of Facility)
Charges to Interconnect Customer-Owned)
Renewable Generation of Manatee County,)
Florida _____)

Docket No. 120278-EQ
Dated: November 2, 2012

PETITION

Pursuant to Sections 366.06 and 366.91(8), Florida Statutes ("F.S."), and Rule 25-6.065(4)(h), Florida Administrative Code ("F.A.C."), Florida Power & Light Company ("FPL" or the "Company") petitions this Commission for approval of facility charges associated with interconnection of customer-owned renewable generation of Manatee County, Florida ("Manatee"). In support of this Petition, FPL states as follows:

1. FPL is a public utility subject to the jurisdiction of the Commission pursuant to Chapter 366, F.S. FPL's corporate offices are located at 700 Universe Boulevard, Juno Beach, Florida 33408. The Commission has jurisdiction pursuant to Section 366.06, F.S., to establish rates at which a public utility shall provide necessary interconnection facilities for renewable energy generation facilities, and under Section 366.091(8), F.S., a contracting producer of renewable energy must pay the actual costs of its interconnection with the transmission grid or distribution system. Accordingly, FPL invokes the Commission's jurisdiction in filing this petition. FPL has a substantial interest in the fees it charges Manatee for interconnection of Manatee's renewable energy generation facilities with FPL's system.

2. The names and addresses of FPL's representatives to receive communications regarding this docket are:

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William P. Cox
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Kenneth A. Hoffman
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850-521-3919
850-521-3939 (fax)

3. In this petition, FPL seeks Commission approval of charges for facility costs required to interconnect a total of 1.6 MW of customer-owned land fill gas generation to FPL's system as required under Rule 25-6.065(4)(h), F.A.C. and the Company's standard interconnection agreement for Tier 3 renewable generator systems. Attached to this Petition as Exhibit A is a breakdown of the proposed interconnection facility charges.

I. Background

4. FPL currently provides retail electric service to Manatee. Manatee seeks to generate power using landfill gas to serve its own electrical load, utilizing FPL's net metering tariff and related Tier 3 net metering interconnection agreement. Manatee plans to install a landfill gas generator at the Manatee County Landfill and Wastewater Treatment Plant site, which is planned to run in continuous parallel with FPL's system. This synchronous generator will be rated 1.6MW. At all times, the generation facility shall only serve load at the Manatee site. Power generated by Manatee's generation facility shall not flow onto the FPL system. The Manatee generator breaker will be tripped in the event power is exported to FPL's system.

The proposed Manatee interconnection features the use of a synchronous generator that produces fault current. When a generator of this type is connected to the transmission system, a

sync check (*i.e.*, ensuring that generation and transmission system are in phase) must be performed once a fault is cleared to prevent serious damage to the transmission system.

5. To qualify for expedited interconnection under Commission Rule 25-6.065(4), F.A.C., customer-owned renewable generation must have a gross power rating that: (1) does not exceed 90% of the customer's utility distribution service rating; and (2) falls within one of the following ranges: Tier 1 – 10 kW or less; Tier 2 – greater than 10 kW and less than or equal to 100 kW; or Tier 3 – greater than 100 kW and less than or equal to 2 MW. The gross power rating of the proposed landfill gas generation at the Manatee site is 1.6 MW, which does not exceed 90% of Manatee's existing connection and falls within the Tier 3 net metering range.

6. FPL has completed an interconnection study for the interconnection of Manatee County Net Metering Project to the FPL Distribution System, attached hereto as Exhibit B. FPL has provided a copy of the interconnection study to Manatee. Below is a brief description of the required interconnection equipment and associated costs identified by the interconnection study.

7. The interconnection facilities provided and/or installed by FPL will include a protective relay cabinet and protection and control materials and equipment. The need for, and the primary function of, the interconnection facilities being installed is to prevent a fault on Manatee's system from causing an interruption on FPL's transmission system. This equipment will ensure that the Manatee generation will be tripped in the event that the source feed from FPL is lost, provide isolation from FPL's system during extended outages, and prevent the flow of power onto FPL's system. A comprehensive description of the interconnection facilities is included in the interconnection study attached hereto as Exhibit B.

8. The estimated cost for permitting, engineering, procurement, and construction of all related substation and protection & control work required is \$43,500. This cost includes permitting, engineering, installation, removals, materials, labor, vehicles, and overhead. In addition, FPL estimates costs of approximately \$5,000 for Distribution work under Option 2. This cost is to review transformer fusing and upgrade as needed and to provide assistance/customer disconnect reconnect standby as needed. A breakdown of these costs is attached hereto as Exhibit A. Any difference between the total estimated cost and actual cost will be either refunded or billed to Manatee as appropriate.

II. Request

9. Rule 25-6.065(4)(h), F.A.C., provides (1) that each investor-owned utility shall show that their interconnection fees are cost-based and reasonable; and (2) that no charges or fees shall be assessed for interconnecting customer-owned renewable generation without prior Commission approval. FPL is requesting Commission approval to charge Manatee \$48,500 for the system modifications identified by the interconnection study to safely and reliably enable the continuous parallel connection of the new landfill gas generation at the Manatee site. Commission approval of these interconnection charges and their payment by Manatee will prevent other FPL customers from subsidizing the interconnection costs for Manatee's new landfill gas generation facility.

10. Manatee has not disputed the interconnection study results or the associated costs of the required system modifications, and Manatee is prepared to pay the interconnection facility charges in full to facilitate timely completion of the project. Attached as Exhibit C is a letter from Manatee affirming these facts.

11. The proposed interconnection charges are cost-based and reasonable. These charges address electrical system requirements designed to allow the proposed generation to interconnect safely and reliably. In determining these requirements, FPL analyzed its existing system to determine what facilities are needed and the scope of work required to safely connect Manatee's proposed generation facility. Estimated costs of the needed materials, labor, and overhead expenses are then calculated through a computer estimating system. The costs are aggregated and adjusted for market and project contingencies to provide a final estimate. This construction estimating process typically results in estimated costs within 10% of actual costs. Upon completion of construction, FPL will provide Manatee with an accounting report with finalized costs to compare against the estimate. As noted above, any difference between the total estimate and actual costs will be either refunded or billed to Manatee as appropriate.

12. The requested approval of FPL's proposed interconnection charges to Manatee is similar to a request filed by Tampa Electric Company on January 27, 2012, which the Commission approved by Order No. PSC 12-0148-PAA-EQ on March 29, 2012, in Docket No. 120032-EQ and a request filed by FPL on April 9, 2012, which the Commission approved by Order No. PSC 12-0264-PAA-EQ on May 30, 2012, in Docket No. 120079-EQ.

13. FPL knows of no disputed issues of material fact relative to the interconnection charges proposed herein.

WHEREFORE, for the foregoing reasons, FPL respectfully requests that the Commission approve the requested interconnection facility charges as set forth in Exhibit A.

Dated: November 2, 2012

Respectfully submitted,

By: _____

A handwritten signature in black ink, appearing to read "William P. Cox", written over a horizontal line.

William P. Cox
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Florida Bar No. 0093531
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(561) 304-5662
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EXHIBIT A

BREAKDOWN OF INTERCONNECTION CHARGES

Below is a breakdown of the estimate for the Manatee County Net Metering Project:

1.	Labor (Pulling cable, wiring, and programming relay cabinet and relay panel for sync check)	\$14,255.00
2.	Materials (Protective relay cabinet, control cable, cable tray and/or conduits, and other miscellaneous materials)	\$18,360.00
3.	Engineering & Overheads (Permitting, designing, drafting prints, and procuring material needed for the interconnection)	\$10,885.00
	Sub Total for Protection & Control Work	\$43,500.00
4.	Option 2 Distribution Work (Reviewing transformer fusing and upgrading as needed and providing customer disconnect/reconnect standby assistance)	\$5,000.00
	Total Charge	\$48,500.00

EXHIBIT B
INTERCONNECTION STUDY
MANATEE COUNTY NET METERING PROJECT

SMALL GENERATION INTERCONNECTION SERVICE

FEASIBILITY STUDY

**MANATEE COUNTY
NET METERING PROJECT
TIER III
(MCNMP)**

September 5, 2012

TRANSMISSION PROJECTS SCOPE OF REQUIRED WORK FOR INTERCONNECTION OF THE MANATEE COUNTY NET METERING PROJECT (MCNMP) TO THE FPL DISTRIBUTION SYSTEM

In accordance with the Standard Generator Interconnection Procedures and Florida Public Service Commission (FPSC) Rule 25-6.065, Florida Power & Light (FPL) has completed a Feasibility Study regarding the interconnection of the Manatee County Net Metering Project (MCNMP) to the FPL Distribution System. In summary, the following are the facilities, technical requirements, costs, and schedule for implementation in order to interconnect the project pursuant to the interconnection request.

This study addresses the results of the distribution generation interconnection assessment. It also addresses the scope of changes and additional equipment installation required for the interconnection of MCNMP into the FPL distribution system. The project is implemented for the purposes of adding a 1.6MW generator which is to be net metered at the Manatee County landfill. The results delineated below may be subject to change based on the final engineering design or due to unforeseen circumstances.

Configuration and General Design Requirements

See one line diagram, Figure 1, last page of this Feasibility Study.

MCNMP is responsible for protecting their generating facility so that utility reclosing, faults, or other disturbances on the FPL system do not cause damage to the MCNMP generating equipment.

The generating facility shall be designed, operated, and maintained in conformance with IEEE Std. 519 Recommended Practices and Requirements for Harmonic Control in Electrical Power Systems, IEEE Std. 1547 and IEEE Std. 1547.2 Interconnection Standards.

A power source for tripping and control shall be provided at the facility by a DC battery bank that is equipped with a DC charging system powered from an AC load center. MCNMP shall comply with applicable IEEE Standards for sizing, installing, and maintaining stationary battery systems to ensure satisfactory operation of the protective relays and associated equipment. For vented lead-acid batteries, reference IEEE Stds. 450, 484, and 485. For nickel-cadmium batteries, reference IEEE Std. 1106 and IEEE Std. 1115. For VRLA (valve regulated lead-acid) batteries, reference IEEE Stds. 1187, 1188, and 1189.

The interrupting device used shall comply with the functional and technical specifications as outlined in this study. As applicable, MCNMP shall comply with ANSI C37.06-2000 American National Standard for AC High Voltage Circuit Breakers – Preferred Ratings, ANSI/IEEE C37.13 Standard for Low Voltage AC Power Circuit Breakers and ANSI/IEEE C37.60 Requirements for Automatic Circuit Reclosers and Fault Interrupters for AC Systems when sizing their fault interrupting device(s).

To allow for future system growth, all fault clearing devices shall be rated, at a minimum, to clear 120% of the existing fault current at the point of interconnection.

The generation facilities at MCNMP must be applied with a grounding arrangement that is compatible with an effectively grounded distribution system. (IEEE Std. 1547). This ground source, to be provided by MCNMP, will be through the interconnect transformer configuration.

Before proceeding with generation parallel operation, MCNMP drawings and schematics are subject to review and approval by FPL. The drawings shall include the following:

1. One-line diagram showing connection between the MCNMP facility and utility.
2. Three line diagram showing current transformer (CT) and potential transformer (PT) circuits for protective relays.
3. DC tripping and control schematic.
4. Wiring/Connection Diagrams.
5. Written summary of operating sequence for generation facility with description of interlocks in place to prevent parallel operation by G1, G2, and G3.
6. Mechanical trip time of breaker 52-G

FPL shall have the option to review MCNMP facility and generator relay settings to coordinate protective relaying. FPL's review of MCNMP drawings and settings shall not be considered as an endorsement.

Any MCNMP facility deviations from this design document shall have prior FPL written approval.

General Operation

The F4662 feeder from FPL Castle Substation is the primary source connecting to MCNMP through existing FPL distribution service equipment. Generator "G" connects to the FPL distribution feeder through 4160 breaker 52-G, 480V breaker 52-M, and subsequently through breaker 52-M4. MCNMP has additional generation installed on an alternate bus. Generators G1, G2, and G3 are not to be operated in parallel with the utility. MCNMP shall have interlocks in place to prevent G1, G2, and G3 from operating in parallel with FPL. Generators G1, G2, and G3 may be operated in an islanded mode only.

The MCNMP facility shall not actively regulate the voltage at the Point of Interconnection.

MCNMP operator phone number(s) and FPL Dispatcher phone number(s) shall be exchanged for the operation and maintenance of the MCNMP interconnection equipment.

FPL has automatic reclosing on its distribution breakers following operations for feeder faults. The reclosing sequence is 0.0s (instantaneous trip), 0.4s (1st reclose) and 15.0s (2nd reclose).

The interconnecting facility shall be designed so as not to interfere with FPL's ability to quickly restore distribution service following a momentary fault. Therefore, MCNMP total fault clearing time shall be less than the first automatic reclose time of the FPL source breaker.

During generation paralleling operations at the MCNMP site, synchronization controls shall be in place to prevent out-of-phase parallel connection to the FPL source feeder. In addition, there shall be undervoltage relaying in place at MCNMP to trip generation upon loss of FPL source.

In the event the generation interconnect facility is disconnected from FPL, MCNMP shall apply a five minute stabilization delay on re-connection to the utility ensuring utility voltage and frequency have returned to normal.

General Configuration Requirements

1) **Point of Interconnection**

The Point of Interconnection will be the existing point at which the MCNMP facility connects to the existing FPL 23 kV distribution system.

2) **Point of Change of Ownership**

The Point of Change of Ownership will be the Point of Interconnection.

3) **Interconnect Protection**

FPL requires that the MCNMP facility, interconnecting with the FPL Distribution System as a net metering project, shall have installed interconnect protection as designed and set by FPL, in addition to the MCNMP installed protection.

I. SCOPE OF WORK (SUBSTATION)

FPL - Castle Substation

No work required.

MCNMP Substation Equipment Requirements

MCNMP facility breakers shall be rated as previously outlined above and in accordance with applicable ANSI/IEEE standards. The breakers shall also be rated to exceed the available continuous current and 120% of available fault current.

Current Transformers

MCNMP shall provide a dedicated set of three, 400/5 ratio CTs, relay class accuracy C200, installed on the generation side of 52-G. Output from these CTs shall provide input to FPL's interconnect relay, R1.

Potential Transformers

MCNMP shall provide access to the set of three phase wye-wye PTs, 4 wire, 120 volt circuit, relay class accuracy, on the load side of 52-G to be used for FPL R1 relay.

Protective Relaying Cabinet

MCNMP shall provide space inside the facility switchgear room for FPL to install one wall mount paralleling interconnect, protective relay cabinet. The cabinet will have a clear plexiglass front window for local, visual verification of relay targets and status indications.

The cabinet will contain the FPL Relay R1 and various associated components. The door will have locks with keys for access by FPL personnel only. The cabinet is required to be grounded. MCNMP shall arrange to solidly ground the cabinet to earth ground. In addition, space shall be provided so that the outer door and inner swing panel have an unobstructed path when fully open.

Cable tray and/or conduits shall be provided by MCNMP as needed for the connection of remote cabling from the MCNMP facility to the FPL protective relay cabinet. MCNMP shall supply all cabling as specified by FPL for the interconnection relay cabinet at the facility site. MCNMP will install all cabling. FPL field engineers will land the cable wiring to the cabinet terminal blocks at the appropriate time.

A circuit schedule and relay panel drawings will be provided by FPL when engineering is complete. In addition, MCNMP shall supply all panel interconnections for protection, control, and monitoring as outlined here and elsewhere in this document.

Power Supply

One dedicated DC circuit shall be provided by MCNMP for use as power supply to the FPL interconnecting protective relaying cabinet. MCNMP shall notify FPL of the DC voltage level to be used.

II. SCOPE OF WORK (SITING/PERMITTING)

No work required.

III. SCOPE OF WORK (PROTECTION AND CONTROL)

Relay Protection at FPL Castle Substation

No additional protection is required.

Relay Protection at MCNMP

MCNMP is responsible for protection of the MCNMP facility including all electrical equipment associated with the net metering project, including 52-G and the 480/4160V transformer.

FPL will design, engineer, and furnish an interconnection protection relay system. The generation interconnection protective relay cabinet will contain R1 interconnect relay for breaker 52-G (*See Figure 1*).

FPL intends to stock spares only for equipment in the interconnect protection cabinet that uses 125 VDC. If MCNMP elects to use equipment that requires a different DC supply

voltage, failure of any FPL equipment may result in extended periods where the MCNMP facility will not be allowed a generation parallel with FPL. MCNMP shall notify FPL of the DC voltage level to be used.

Protection

FPL Relay R1 is a multi-function relay. Its settings will be coordinated with MCNMP relay settings. Relay R1 shall be connected to a set of CTs on the generator side of 52-G. R1 shall also be connected to the output of the relaying PTs on the load side of 52-G. A dedicated 52-G “a”, 52-M “a”, 52-M4 “a” contact, and 52-ST “a” contact shall be provided for R1. Status input to the R1 relay is required to signal that MCNMP is generating in parallel with FPL.

R1 Alarm

An alarm contact from R1 shall be provided to MCNMP for local indication, if desired. In addition, if R1 is in alarm, generation parallel with FPL shall be blocked.

Close

MCNMP shall provide access to the 52-G close circuit for use by R1 relay. R1 relay will block closing of 52-G for FPL relay failure.

Trip

MCNMP shall provide access to the 52-G trip circuit for use by R1 relay. R1 relay will trip 52-G for system disturbances and relay failure.

Breaker Failure

Breaker failure protection will be handled by the R1 relay. After a trip has been initiated by R1 and 52-G has not come open, the R1 relay will shunt trip breaker 52-M.

Status and Communications

FPL’s SCADA system does not require status of the MCNMP facility. Therefore, a communications channel is not required.

Metering

New revenue metering is not required since this is a net metering project.

IV. OPERATIONS

There may be requirements for various transmission and distribution clearances. Timing of these clearances will be dependent upon many factors including but not limited to the time of year, maintenance requirements, other previously granted clearances, weather, telecommunication traffic/contracts and system load conditions.

Clearances are reviewed on a daily basis and may be cancelled or delayed due to reliability considerations associated with the factors listed above. Such cancellations or delays associated with planned clearances will be considered unavoidable and may affect the scheduled completion of requirements associated with this project which in turn may delay the in-service date as well as impact the total cost of the project.

Summary of Costs – Substation, Protection & Control, & Metering

The total cost for permitting, engineering, procurement, and construction of all FPL related Substation, Protection & Control, and Metering work required is \$43,500. This cost includes permitting, engineering, installation, removals, materials, labor, vehicles and overheads (reimbursable adders). This cost is a non-binding, good faith cost estimate as described in the scope of work above.

V. SCOPE OF WORK (DISTRIBUTION)

Option 1 – Approximate cost \$120,000

FPL Distribution Responsibility:

1. FPL will design, permit and extend the 23 kV line section from the existing feeder location to the Manatee County Waste Water Treatment Plant Southwest property corner of property, exact location to be determined by FPL.
2. FPL will install a new concrete pole within the existing circuit adjacent to the project site (i.e. Southwest corner of site) and then, install an underground riser to a new 25 kV pad-mounted primary metering cabinet. FPL will pull new primary cable through the customer installed PVC 6” pipe, “FPL provided”. FPL will terminate the FPL installed cable to the primary metering cabinet at the Point of Change of Ownership provided by FPL.
3. At the Point of Change of Ownership, on the FPL segment, FPL will terminate cables from the OH source on the Line side of the primary metering cabinet. (Interconnection customer will provide terminators and cable for the Interconnection customer segment “Load Side” of the 23kV distribution line, which connects to the Small Generating Facility). FPL will make final connection.

Manatee County / Customer Responsibility:

1. Customer will install the FPL provided 6” PVC conduit in the center point of the FPL 10’ FPL easement. PVC must be installed per FPL design drawings/standards.
2. Customer will install the FPL provided Primary metering cabinet concrete pad. The foundation must be level and compacted to final grade.
3. Interconnection customer will provide terminators and cable for the Interconnection customer segment of the 23kV distribution line, which connects to the Small Generating Facility.

4. Customer must provide an FPL dedicated easement for all installed FPL equipment. The document must be recorded and an original must be provided before work is to begin.
5. Customer must have easement staked by a surveyor prior to FPL work.

In accordance with FPSC Rule 25-6.065, FPL will be responsible for the installation of a bi-directional meter.

Option 2 – Approximate cost \$5,000

Review transformer fusing and upgrade as needed. Provide assistance/customer disconnect reconnect standby as needed.

This analysis for this interconnection was built on the following assumptions:

- This study is based on the attached one-line diagrams dated June 29, 2012.
- The customer's protection scheme must coordinate with the existing upstream 65A "K" Kearny fuse.
- The customer shall prevent the ability (as shown on the one-line diagram) to parallel FPL sources.
- The customer shall prevent the ability (as shown on the one-line diagram) to parallel the existing generation (6000 KW) with the FPL system.
- The customer shall confirm that the interconnection will be effectively grounded per IEEE 1547 and 1547.2 standards.
- The customer will tie interconnection into customer's existing bus.

In accordance with FPSC Rule 25-6.065, FPL will be responsible for the installation of a bi-directional meter.

V. SUMMARY OF PROJECT COST

The following reflects the good faith, non-binding estimate of the MCNMP project:

\$ 163,500 Option 1 Total

\$ 48,500 Option 2 Total

All estimates are shown in year 2012 dollars. In addition, labor, material and equipment costs are subject to change depending upon market conditions and delivery schedules. Labor costs are based upon contractors performing the work under FPL supervision.

The estimated duration to engineer, permit, acquire material and construct the FPL scope of work described in the configuration shown on Figure A is **6 months** from the date of receipt of an executed interconnection agreement.

FIGURE 1

MANATEE COUNTY

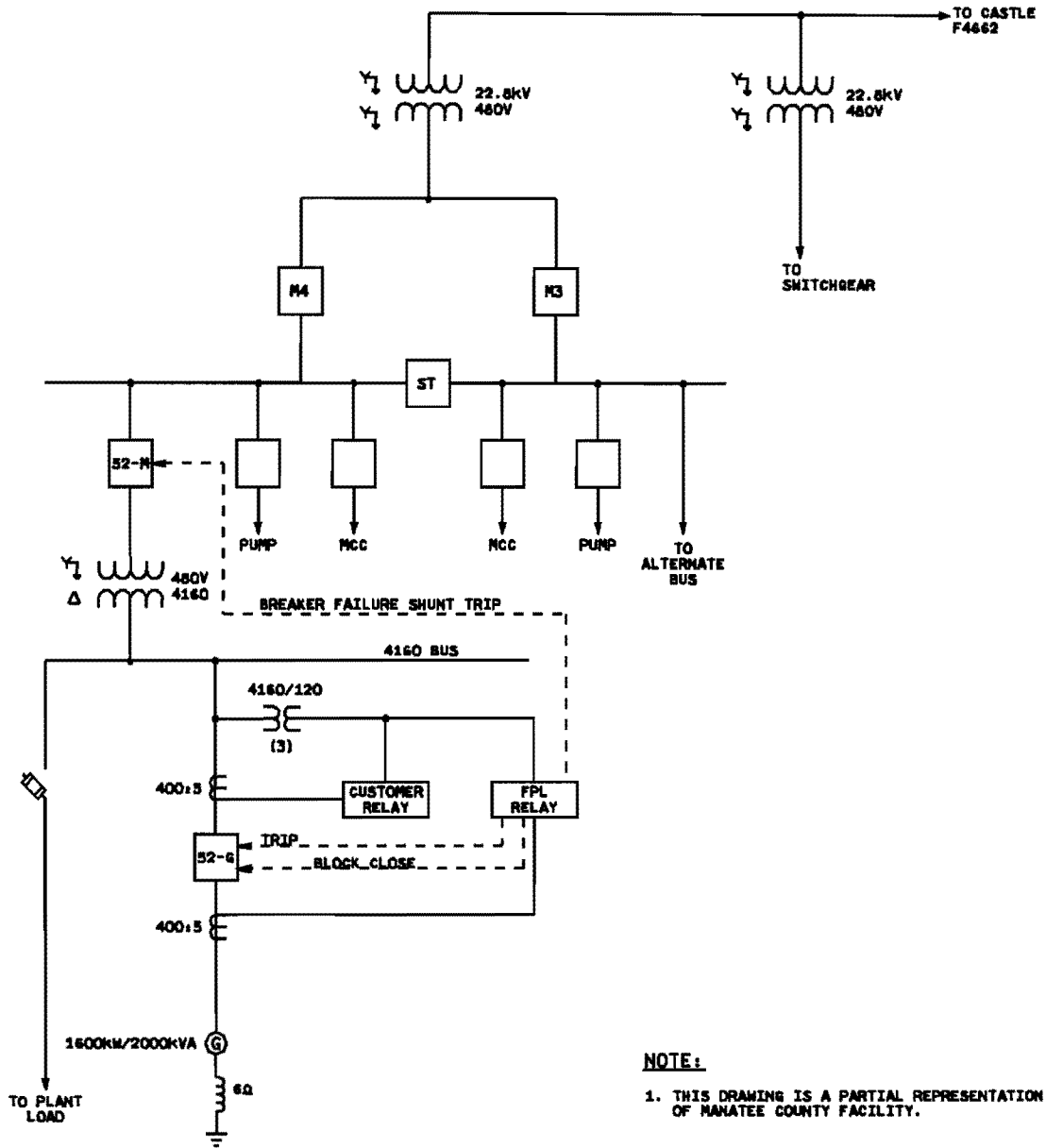


EXHIBIT C

MANATEE COUNTY APPROVAL LETTER

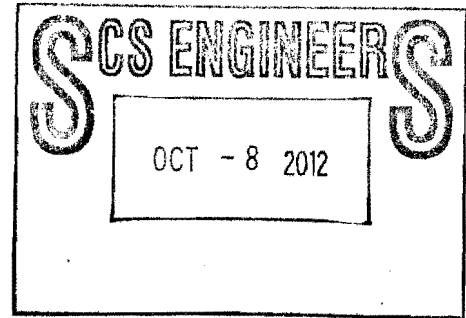
MANATEE COUNTY NET METERING PROJECT



MANATEE COUNTY
FLORIDA

October 5, 2012

Charles Knight
Wholesale Services Manager – Transmission & Substation
Florida Power & Light Company
4200 West Flagler Street
Miami, FL 33134



RE: Tier 3 Net Metering Generation at Manatee County

Dear Mr. Knight:

Manatee County approves Florida Power and Light's (FPL) Interconnection Study and supports its request for subsequent filing to the Florida Public Service Commission (FPSC). Manatee County has worked with FPL throughout the study process and does not dispute the interconnection study results or the associated costs of the required system modifications under Option 2. Manatee County is prepared to pay the facility charges in full for Option 2 - \$48,500. to facilitate timely completion of this project.

Please contact me with any comments or concerns related to this issue at 941.792.8811 ext. 8005.

Sincerely,

C. Michael Gore
Solid Waste Division Manager

CMG / lkf

cc: Daniel T. Gray, Director, Utilities Department
Jeff Streitmatter, Project Management Division Manager, Public Works Department

UTILITIES DEPARTMENT – SOLID WASTE DIVISION
Mailing Address: 3333 Lena Road, Bradenton, FL 34211
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