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July 2, 2010

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BY HAND DELIVERY

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 100186-EG

Dear Ms. Cole:

Enclosed for filing on behalf of Associated Gas Distributors of Florida are an original and five copies of Associated Gas Distributors of Florida's Responses to Staff's First Data Request in the above referenced docket.

Please confirm receipt of these documents by stamping the enclosed extra copy of this letter with the date and time.

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Thank you for your assistance.

Sincerely,

Handwritten signature of Norman H. Horton, Jr.

Norman H. Horton, Jr.

NHH/amb
Enclosure

cc: Mr. Marc Schneidermann
Parties of Record

100186-EG
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**Associated Gas Distributors of Florida
Responses to Staff's Data Request No.1
Docket No. 100186- EG**

Residential Energy Conservation Programs

1. Please provide a chart showing, by LDC, the annual impact on customers' monthly bills for the proposed modifications to residential gas energy conservation programs.

AGDF Response:

Attachment 1 to this document provides an Excel worksheet that calculates the "theoretical" monthly bill impact for each LDC and each applicable rate class related to the proposed increase in rebate amounts. The rates are described as "theoretical" due to the nature of the annual ECCR rate determination process. ECCR rates in a given year are a function of a prior period true-up calculation, a forward period forecast of expenses and ECCR revenues.

The rate impacts included in this analysis assume that the proposed rebate amounts were in effect when rates for 2010 were established. A percentage increase for each proposed rebate amount was calculated by comparing the current allowances to the proposed rebates. The average percentage increase for all programs (18%) was used to calculate a 2010 "theoretical" rebate amount for each LDC (assuming the proposed rebate amounts). The 2010 approved conservation recovery amount for each LDC was also adjusted by the same percentage (18%) to reflect the recovery of the cost of the proposed rebate amounts. The difference between the theoretical rebate amounts and the theoretical recovery amounts equals the theoretical percentage increase in total program costs for the respective LDC.

The approved ECCR rate by class for each LDC was increased by the respective percentage increase described above. The average annual therm usage and annual number of bills by class for each LDC from the 090004 Docket filings was used to determine an annual average usage per customer. The average usage per customer was multiplied by the theoretical ECCR rate for each LDC to determine an annual bill impact per customer for each LDC and each applicable rate class. (The Chesapeake experimental fixed charge ECCR rates were adjusted through a similar process).

It should be noted that the AGDF petition does not request any adjustment to the ECCR rates approved by the Commission in Docket 090004. Any cost increase resulting from the proposed rebate adjustments would be considered in the Commission's cost recovery filings to set the 2011 ECCR rates.

2011 PUBLIC UTILITY DATA

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2. Please provide a chart showing, by LDC, the amount recovered each year from the Energy Conservation Cost Recovery proceedings from 2006 through 2010.

AGDF Response:

Attachment 2 to this document provides the requested recovery amounts.

3. Paragraph 16 of the petition discusses a program advocating replacement of electric appliances with gas appliances. Paragraph 17 discusses advocating retention of existing gas appliances. Meanwhile, Rule 25-17.015 (5), Florida Administrative Code, states, "Advertising expense recovered through energy conservation cost recovery shall be directly related to an approved conservation program, shall not mention a competing energy source, and shall not be company image enhancing." Please provide an explanation of how the LDC's intend to assure the Commission they are in compliance with the cost recovery rule pertaining to mention of a competing energy source when advertising the programs discussed in paragraphs 16 and 17 of the petition.

AGDF Response: Since the promulgation of the "no mention of a competing energy source" provision of Rule 25-17.015 (5) in the late 1990's, LDC advertising recovered through the ECCR proceedings has not included references to electricity or other fuel types. Typically, LDC conservation advertising states that rebates are available for the conversion of "non-gas" appliances to natural gas. There is no direct mention of a competing energy source or fuel type. The advertising program content for each LDC is reviewed each year by the Commission's audit staff. Any advertising deemed by the Commission to be not in compliance with the rule would be denied cost recovery.

Residential Appliance Replacement Program	Current	Proposed	Variance	% Increase
Gas Storage Tank Water Heating	\$525	\$500	(\$25)	-5%
Gas High Efficiency Storage Tank Water Heating	\$525	\$550	\$25	5%
Gas Tankless Water Heating	\$525	\$675	\$150	29%
Gas Heating	\$625	\$725	\$100	16%
Gas Cooking	\$100	\$200	\$100	100%
Gas Clothes Drying	\$100	\$150	\$50	50%
Gas Service Reactivation	N/A	\$350	N/A	N/A
Total - All Programs (except Gas Service Reactivation)	\$2,400	\$2,800	\$400	17%
Residential Appliance Retention Program	Current	Proposed	Variance	% Increase
Gas Storage Tank Water Heating	\$350	\$350	\$0	0%
Gas High Efficiency Storage Tank Water Heating	\$350	\$400	\$50	14%
Gas Tankless Water Heating	\$450	\$550	\$100	22%
Gas Heating	\$350	\$500	\$150	43%
Gas Cooking	\$100	\$100	\$0	0%
Gas Clothes Drying	\$100	\$100	\$0	0%
Total - All Programs	\$1,700	\$2,000	\$300	18%
Residential New Construction Program	Current	Proposed	Variance	% Increase
Gas Storage Tank Water Heating	\$350	\$350	\$0	0%
Gas High Efficiency Storage Tank Water Heating	\$350	\$400	\$50	14%
Gas Tankless Water Heating	\$450	\$550	\$100	22%
Gas Heating	\$350	\$500	\$150	43%
Gas Cooking	\$100	\$150	\$50	50%
Gas Clothes Drying	\$100	\$100	\$0	0%
Total - All Programs	\$1,700	\$2,050	\$350	21%
Total Proposed Increase in Rebates - All Programs	\$5,800	\$6,850	\$1,050	18%

Company	2010 Approved Recovery Amount	2010 Approved Rebate Amounts	Theoretical Percentage Increase	2010 Theoretical Rebate Amounts	2010 Theoretical Recovery Amounts	2010 Theoretical Recovery Increase	Theoretical Percentage Increase
Florida Division of Chesapeake Utilities Corp.	\$ 134,035	\$ 188,250	18%	\$ 222,330	\$ 168,115	\$ 34,080	25%
Florida City Gas	\$ 2,074,176	\$ 1,024,708	18%	\$ 1,210,215	\$ 2,259,683	\$ 185,507	9%
Florida Public Utilities Company	\$ 1,580,407	\$ 637,362	18%	\$ 752,747	\$ 1,695,792	\$ 115,385	7%
Indiantown Gas Company	\$ 32,470	\$ 5,100	18%	\$ 6,023	\$ 33,393	\$ 923	3%
Peoples Gas System	\$ 5,319,817	\$ 4,153,004	18%	\$ 4,904,841	\$ 6,071,654	\$ 751,837	14%
St. Joe Natural Gas	\$ 199,187	\$ 116,975	18%	\$ 138,152	\$ 220,364	\$ 21,177	11%
Sebring Gas System, Inc.	\$ 26,799	\$ 6,100	18%	\$ 7,204	\$ 27,903	\$ 1,104	4%

Company	Rate Schedule	Approved Rate (cents/therm)	Percentage Increase	Theoretical Rate (cents/therm)	Number of Bills	Total Usage	Average Annual Usage per Consumer	Average ECCR Charge Annual	Theoretical ECCR Charge Annual	Theoretical Annual Impact per Consumer Bill	
Florida Division of Chesapeake Utilities Corp.	FTS-A	2.324	25%	2.915	37,304	322,102	103.6 \$	2.41 \$	3.02 \$	0.61	
	FTS-B	1.879	25%	2.357	25,334	371,711	176.1 \$	3.31 \$	4.15 \$	0.84	
	FTS-1	1.652	25%	2.072	87,069	1,877,387	258.7 \$	4.27 \$	5.36 \$	1.09	
	FTS-2	0.905	25%	1.135	16,432	1,540,539	1125.0 \$	10.18 \$	12.77 \$	2.59	
	FTS-3	0.595	25%	0.746	5,364	2,283,253	5107.9 \$	30.39 \$	38.12 \$	7.73	
	FTS-4	0.450	25%	0.564	1,896	2,392,910	15145.0 \$	68.15 \$	85.48 \$	17.33	
	FTS-5	0.392	25%	0.492	372	987,764	31863.4 \$	124.90 \$	156.66 \$	31.76	
	FTS-6	0.345	25%	0.433	204	1,008,729	59337.0 \$	204.71 \$	256.76 \$	52.05	
	FTS-7	0.221	25%	0.277	276	3,172,854	137950.2 \$	304.87 \$	382.39 \$	77.52	
	FTS-8	0.197	25%	0.247	192	4,336,209	271013.1 \$	533.90 \$	669.64 \$	135.75	
	FTS-9	0.161	25%	0.202	144	6,121,996	510166.3 \$	821.37 \$	1,030.21 \$	208.84	
	FTS-10	0.153	25%	0.192	36	2,405,252	801750.7 \$	1,226.68 \$	1,538.57 \$	311.90	
	FTS-11	0.131	25%	0.164	36	4,972,443	1657481.0 \$	2,171.30 \$	2,723.37 \$	552.07	
	FTS-12	0.111	25%	0.139	24	7,164,270	3582135.0 \$	3,976.17 \$	4,987.15 \$	1,010.98	
		(dollars/bill)									
	FTS-A Exp	\$ 0.20	25%	\$ 0.25	37,304	322,102	103.6 \$	2.40 \$	3.01 \$	0.61	
	FTS-B Exp	\$ 0.28	25%	\$ 0.35	25,334	371,711	176.1 \$	3.36 \$	4.21 \$	0.85	
	FTS-1 Exp	\$ 0.36	25%	\$ 0.45	87,069	1,877,387	258.7 \$	4.32 \$	5.42 \$	1.10	
	FTS-2 Exp	\$ 0.76	25%	\$ 0.95	16,432	1,540,539	1125.0 \$	9.12 \$	11.44 \$	2.32	
	FTS-3 Exp	\$ 2.53	25%	\$ 3.17	5,364	2,283,253	5107.9 \$	30.36 \$	38.08 \$	7.72	
Florida City Gas	GS-1, GS-100	GS-220	6.112	9%	6.659	95,461	16,123,766	168.9 \$	10.32 \$	11.25 \$	0.92
		GS-600	3.073	9%	3.348	1,057	923,984	874.2 \$	26.86 \$	29.27 \$	2.40
		GS-1200	1.903	9%	2.073	2,527	8,223,642	3254.3 \$	61.93 \$	67.47 \$	5.54
		GS-6000	1.559	9%	1.698	2,212	26,450,057	11957.5 \$	186.42 \$	203.09 \$	16.67
		GS-25000	1.526	9%	1.662	326	13,927,432	42722.2 \$	651.94 \$	710.25 \$	58.31
		GS-60000	1.495	9%	1.629	70	7,102,740	101467.7 \$	1,516.94 \$	1,652.61 \$	135.67
		Gas Lights	3.043	9%	3.315	197	22,800	115.7 \$	3.52 \$	3.84 \$	0.31
		GS-120000	1.182	9%	1.288	47	7,572,445	161115.9 \$	1,904.39 \$	2,074.71 \$	170.32
		GS-250000	1.046	9%	1.140	23	10,264,201	446269.6 \$	4,667.98 \$	5,085.47 \$	417.49
Florida Public Utilities Company	Residential	5.658	7%	6.071	564,544	11,449,000	243.4 \$	13.77 \$	14.77 \$	1.01	
	Comm. Small	2.506	7%	2.689	43,259	12,425,500	3446.8 \$	86.38 \$	92.68 \$	6.31	
	Comm Large	2.184	7%	2.343	15,622	28,815,000	22134.2 \$	483.41 \$	518.70 \$	35.29	

Indiantown Gas Company	TS-1	5.836	3%	6.002	8,568	164,000	229.7 \$	13.40 \$	13.79 \$	0.38
	TS-2	1.012	3%	1.041	300	83,800	3352.0 \$	33.92 \$	34.89 \$	0.96
	TS-3	0.000	3%	0.000	-	-	0.0 \$	- \$	- \$	-
	TS-4	0.448	3%	0.461	24	4,960,000	2480000.0 \$	11,110.40 \$	11,426.32 \$	315.92
Peoples Gas System	RS & RS-SG	4.100	14%	4.679	3,612,204	55,950,032	185.9 \$	7.62 \$	8.70 \$	1.08
	SGS	2.619	14%	2.989	110,642	5,816,478	630.8 \$	16.52 \$	18.86 \$	2.33
	GS-1 & CS-SG	1.156	14%	1.319	195,406	74,790,375	4592.9 \$	53.09 \$	60.60 \$	7.50
	GS-2	0.835	14%	0.953	74,497	115,543,913	18611.8 \$	155.41 \$	177.37 \$	21.96
	GS-3	0.692	14%	0.790	9,940	80,057,030	96648.3 \$	668.81 \$	763.33 \$	94.52
	GS-4	0.519	14%	0.592	1,568	42,835,234	327820.7 \$	1,701.39 \$	1,941.84 \$	240.45
	GS-5	0.381	14%	0.435	1,344	75,578,233	674805.7 \$	2,571.01 \$	2,934.36 \$	363.35
	NGVS	0.672	14%	0.767	140	195,793	16782.3 \$	112.78 \$	128.72 \$	15.94
	CSLS	0.607	14%	0.693	800	730,131	10952.0 \$	66.48 \$	75.87 \$	9.40
St. Joe Natural Gas	RS-1	36.761	11%	40.669	10,877	94,643	104.4 \$	38.38 \$	42.46 \$	4.08
	RS-2	22.721	11%	25.137	11,397	230,389	242.6 \$	55.12 \$	60.98 \$	5.86
	RS-3	16.899	11%	18.696	10,460	412,760	473.5 \$	80.02 \$	88.53 \$	8.51
	GS-1	15.146	11%	16.756	2,436	104,557	515.1 \$	78.01 \$	86.30 \$	8.29
	GS-2	7.672	11%	8.488	409	203,349	5966.2 \$	457.73 \$	506.39 \$	48.66
	FTS-4	2.969	11%	3.285	12	399,462	399462.0 \$	11,860.03 \$	13,120.92 \$	1,260.90
Sebring Gas System, Inc.	TS-1	9.975	4%	10.386	4,020	35,817	106.9 \$	10.66 \$	11.10 \$	0.44
	TS-2	5.041	4%	5.249	773	30,316	470.6 \$	23.72 \$	24.70 \$	0.98
	TS-3	3.525	4%	3.670	745	282,945	4557.5 \$	160.65 \$	167.27 \$	6.62
	TS-4	2.871	4%	2.989	321	413,048	15441.0 \$	443.31 \$	461.58 \$	18.27

Response:

Company	2006	2007	2008	2009	2010
Florida Division of Chesapeake Utilities Corp.	\$ 1,267,288	\$ 1,418,898	\$ 1,134,053	\$ 648,410	\$ 134,035
Florida City Gas	\$ 2,128,540	\$ 1,584,801	\$ 1,531,955	\$ 3,204,167	\$ 2,074,176
Florida Public Utilities Company	\$ 2,590,855	\$ 2,473,607	\$ 2,075,704	\$ 1,830,752	\$ 1,580,407
Indiantown Gas Company	N/A	N/A	\$ 41,050	\$ 7,378	\$ 32,470
Peoples Gas System	\$ 5,782,968	\$ 13,192,023	\$ 2,575,021	\$ 4,047,089	\$ 5,319,817
Peoples Gas System - West Florida	\$ 3,177,498	N/A	N/A	N/A	N/A
St. Joe Natural Gas	\$ 9,459	\$ 6,997	\$ 89,072	\$ 125,428	\$ 199,187
Sebring Gas System, Inc.	N/A	N/A	\$ 30,451	\$ 8,837	\$ 26,799