

REDACTED

Florida City Gas
Confidential Index
Test year Ended 12/31/2008
B Maitre

Confidential Index

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- COM _____
- APA _____
- ECR | _____
- GCL _____
- RAD _____
- SSC _____
- ADM _____
- OPC _____
- CLK _____

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 FPSC-CONFIDENTIAL

CONFIDENTIAL**Question:**

Please ask them to explain why they are only using the beginning of the month prices and not including the gas daily prices to make an average cost. Why should the OSS sales be the only ones to get the benefit of the gas daily pricing.

Please make them aware that they can use the lower of FULLY DISTRIBUTED costs or market.

They may want to figure out what the fully distributed cost is and this would go away.

Response:

FCG has multiple supply needs, including (1) Base Load Gas, which represents a sales and purchase commitment for each day of the entire month and is nominated prior to the beginning of the month, and flows every day during the month, and (2) Swing Gas, which flow only as needed during the month, and is nominated the day before it is needed. Because of the difference in obligations of both the supplier and the purchaser of these two services, they are priced differently. Base load supply is priced at flat first-of-the-month indices as published in *Inside FERC*. The volumes that are purchased by Sequent to meet FCG's base load needs are specifically based on the volumes communicated to Sequent by FCG's Gas Control during bid week prior to the start of the next month. FCG, like most utilities and end-users of gas, cannot predict with certainty their full system requirements in any given month before the month begins; however, in the case of the test month (May 2006), baseload purchases represented approximately 97.5% of its total monthly usage. Thus, to meet its swing gas requirements above and beyond what Gas Control predicted its base load needs to be, Sequent purchases additional gas for the utility on a daily basis in the swing or daily market as requested by Gas Control. For all of the swing requirements, the commodity is priced at flat Gas Daily average as published in *Gas Daily* for that day.

Regarding OSS, Sequent credits the FCG's book with sales made to third parties (off-system sales, or OSS) at the time FCG upstream firm transportation on Florida Gas Transmission is available to make such sales. If such transportation is only available on a daily basis, as in the case of the test month (May 2006), then Sequent will make sales to third parties on a daily basis and make purchases on a daily basis. Sequent makes no profit on gas daily sales directly to FCG.

Source: Request 1 from PY Audit

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9/6/01
HLP
9/7/01

Request

Please provide additional explanation in support of FCG's and Sequent's current gas procurement practices. In particular, explain further market pricing and Sequent's actual cost of gas.

Response

Market Price and Cost of Gas

Through the process of responding to Staff's inquiries about Sequent's actual cost of gas and the market price of gas, we believe it is now important to clarify the definition of these terms. Market price of gas can be simply described as the appropriate Index price associated with the type of purchases made by FCG (baseload and daily swing purchases). For monthly baseload purchases, market price is the price published in the *Inside FERC's Gas Market Report* associated with the appropriate location of delivery. In FCG's case, the locations are Florida Gas Transmission Zone 1, 2, and 3. For daily purchases made by FCG, the market price of gas is the price published in *Platt's Gas Daily* publication on the specific day of gas flow associated with the specific day that FCG placed an order for incremental gas supplies as well as the specific location, Florida Gas Transmission Zone 1, 2, and 3. It is very important to match the Inside FERC price with the baseload volumes for each month to determine the market price for baseload gas and to match the specific Gas Daily price with the specific days and volumes associated with FCG's daily purchases to determine the market price of gas. One cannot average the daily prices with the baseload prices to determine an "average" market price. Simple averages are not accurate representations due to the fact that the appropriate index price must be matched with the quantity of monthly or daily purchases. If all purchases were ordered by FCG on a daily basis, market price would be the appropriate Gas Daily price on the day the gas was ordered for all the volumes. If all purchases were ordered by FCG on a monthly baseload basis, the market price would be the appropriate Inside FERC price for the month in which the gas was ordered.

In the responses to-date, Sequent has analyzed the test month of May 2006. Due to the fact that FCG ordered [redacted] of its total volumes for the month on a baseload basis and only [redacted] of its volumes on a daily swing basis, we focused our earlier efforts on comparing the monthly Index prices (market prices) to Sequent's actual costs of gas for monthly delivery. Our detailed response includes all invoices associated with Sequent's actual purchases for monthly baseload supply. The analysis of this data showed that Sequent's actual costs were [redacted] higher than the market price charged to FCG. Clearly, FCG is receiving the lower of cost or market pricing. In looking at the remaining [redacted] of gas purchased by FCG on a daily basis, an additional daily analysis (*See Attachment III*) shows that Sequent's actual costs on the specific days that FCG ordered incremental daily purchases was [redacted] greater than the costs invoiced to FCG for such daily purchases.

p2

If Sequent were to add its overhead costs to this analysis, Sequent's costs would have been even higher. If we allocated Sequent's overhead costs (salary, general & administrative costs) to FCG on the basis of Sequent's gross margin (See Attachment IV), an additional [REDACTED] of total dollars in costs would have to be allocated to FCG over the entire year of 2006. Sequent's [REDACTED] share of gross margin associated with asset management activity for FCG resulted in [REDACTED] to Sequent in 2006. Sequent's total gross margin in 2006 was [REDACTED]. Consequently, gross margin associated with asset management activity for FCG amounted to [REDACTED] of Sequent's total gross margin. As Sequent's total operating expenses in 2006 were [REDACTED], a calculated allocation to FCG would be [REDACTED].

Translating this [REDACTED] total dollar amount to an increase to the price of gas would amount to an additional [REDACTED] per Dth of gas sold to FCG for every Dth sold to FCG in 2006. This calculation is made by taking the [REDACTED] of annual costs that could be allocated to FCG divided by [REDACTED] Dth sold to FCG by Sequent in 2006. This additional [REDACTED] per Dth, if allocated to FCG's May 2006 invoices would have amounted to an additional [REDACTED] in costs ([REDACTED] Dth) that Sequent would allocate to FCG. Sequent does not allocate any of these costs to FCG. If Sequent did allocate these costs to FCG, total FCG costs in the test month of May 2006 would be [REDACTED] greater than what was invoiced to FCG ([REDACTED] in overhead, [REDACTED] in higher costs for monthly baseload supply, and [REDACTED] in higher costs for daily purchases). Consequently, FCG is receiving the lower of fully distributed costs or market prices.

Natural Gas Industry Fundamentals and FCG's Gas Purchasing

The following description provides an overview of how gas is priced in the natural gas industry as well as a discussion of how gas is ordered by FCG.

Approximately one week prior to the beginning of each month, natural gas market participants initiate their purchase and sales action plans for the upcoming month's business on a first-of-the-month (FOM) basis for baseload supplies (baseload supplies are those which an entity projects its upcoming monthly demand to encompass and requires gas to be purchased and sold for the same quantity at the same price for every day of the month; this is in contrast to swing supplies, which constitute incremental supplies to baseload that are needed on a daily basis after the month begins). This activity cycle is commonly referred to as 'bid week' in the natural gas industry. As a result of that activity, FOM indices begin to develop during "bid week" at points across the natural gas marketplace. These indices, which are published in such periodicals as *Inside FERC*, are indicative of the market-clearing price structures to which buyers and sellers transact and are used as the basis for pricing baseload purchases and sales. Therefore, index may be translated into 'market' pricing. Once the month begins, FOM pricing is no longer available to market participants. Gas pricing is then determined on a daily basis with daily pricing structures (e.g., Gas Daily published pricing), and may constitute pricing that is higher or lower to FOM pricing (See Attachment V, GDD/IFERC Comparison Summary FY 2005 and 2006).

P3

Sequent's monthly gas procurement methodology for the account of FCG encompasses a straightforward process. Prior to the beginning of any given month, FCG communicates its monthly estimated baseload requirements to Sequent. In response to that communication, Sequent then goes into the open market and purchases gas supplies from a variety of sources and vendors that will match the FCG purchase order. As such, the FOM index defines the "market" pricing for monthly baseload supply. Additionally, Sequent will only purchase baseload supply that corresponds to a baseload purchase order by FCG. It is important to note that Sequent does not purchase incremental daily supplies at the time that it makes baseload purchases, in anticipation of the movement of market pricing which may occur after the first of the month. To do so would indicate that Sequent "speculates" on the price of natural gas in the market, which it does not. Simply stated, Sequent matches baseload purchases with baseload requirements for the account of FCG. Also, Sequent may often be required to pay premiums (index-plus) on a particular package of gas in order to secure the volume for FCG. Although Sequent may pay a premium, FCG is only charged on an "index-flat" basis for that specific purchase point by Sequent. As such, Sequent incurs a loss, which may be offset by subsequent asset management activity performed by Sequent during the month, i.e., optimization of any unused FCG firm transportation capacity.

During the month, as FCG experiences incremental or reduced gas demand, the utility communicates that information to Sequent in the form of additional purchases from Sequent or sales back to Sequent. In an effort to fulfill that additional requirement, Sequent will purchase supplies on a daily basis from a variety vendors from the locations specified by FCG. The pricing for all additional daily gas is priced using a Platt's Gas Daily publication price. Sequent's actual cost of daily gas may be modestly above or below this Gas Daily price.

When viewing the principle issue of market vs. cost for the above, it is important to bear in mind key aspects of Sequent's purchase model practices: (a) Sequent aligns purchases with corresponding sales to FCG as requested on both an FOM and daily basis; (b) FCG is not charged a premium over the FOM index price nor the applicable daily index price; and (c) Sequent does not purchase gas supplies in anticipation of either market pricing or FCG non-baseload requirements; Sequent does not speculate in the marketplace.

Given the above, it is not appropriate to 'blend' or average an FOM supply price with that of a daily price. FOM pricing and daily pricing must be kept separate and distinct and may only be compared to actual costs associated with the specific volumes ordered by FCG for monthly baseload and daily swing supplies.

As a final analysis, Sequent wanted to address the issue of how Gas Daily prices compare to Inside FERC prices over the last 2 years (2005 and 2006). This should address Commission Staff's question regarding whether daily prices (Gas Daily) are lower than monthly prices (Inside FERC). The two attached graphs (*See Attachment V*) show that in some months daily prices (blue color) are higher than monthly prices (pink color) and in some months daily prices are lower than monthly prices. We used the location of Florida gas Transmission Zone 1 as the location for this analysis as a large portion of FCG's

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Florida City Gas
 May 2009 Volume Recal
 TYE 12/31/2009
 B Maitre

FGT Contracts - 3608, 5034, and 5364

Description	Qty Receipt	Less FGT Fuel @ 3.56%	Per Staff Qty Delivered	Per company Qty Delivered	Difference
Baseload	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Swing/Fixed	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Injection (Top)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Withdrawal @ CG	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Turbback	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Description	Delivered Qty Receipt	Injection Fuel @ 1.50%	Per Staff Qty Delivered	Per company Qty Delivered	Difference
Injection (Top)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Source: Audit Request 8/filing

Recalculated to ensure mathematical accuracy

44-1
 44-1/1

44-1

44-3

Florida City Gas
 PGA
 Dckt#100003-GU Audit#10-007-4-1
 TYE 12/31/2009
 Title: Volume Recalculation

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MP/D
 7/31/10

44-1

10/12/10
 BSM
 7/2/10

PBC

Florida City Gas
 Volume Reconciliation
 May-09

FGT fuel = 356%

Injection fuel = 1.50%

FGT K#3608
 FGT K#5034
 FGT K#5364
 BuySale

FGT alloc delivery		
	3rd party	FCG
(A)	[REDACTED]	[REDACTED]
(B)	[REDACTED]	[REDACTED]
(C)	[REDACTED]	[REDACTED]

44-1
 1-1

(A), (B), (C) was traced to FGT's
 Scheduled Delivery Report by
 Contract.

Invoiced (delv):
 Baseload
 Swing
 Inj (Top)
 Wd @ CG
 Turnback

[REDACTED]

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* = Recalculated

Difference

[REDACTED] (44-1)
 [REDACTED] (3-1)

Invoiced (delv):	Baseload	Swing/Fixed	Inj (Top)	Wd @ CG	Turnback
5/1/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/2/09	[REDACTED]	[REDACTED]	-	2,000	[REDACTED]
5/3/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/4/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/5/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/6/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/7/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/8/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/9/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/10/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/11/09	[REDACTED]	[REDACTED]	-	1,000	[REDACTED]
5/12/09	[REDACTED]	[REDACTED]	-	1,000	[REDACTED]
5/13/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/14/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/15/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/16/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/17/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/18/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/19/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/20/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/21/09	[REDACTED]	[REDACTED]	-	-	(1)
5/22/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/23/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/24/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/25/09	[REDACTED]	[REDACTED]	-	-	[REDACTED]
5/26/09	[REDACTED]	[REDACTED]	-	500	[REDACTED]
5/27/09	[REDACTED]	[REDACTED]	2,500	-	[REDACTED]
5/28/09	[REDACTED]	[REDACTED]	2,500	-	[REDACTED]
5/29/09	[REDACTED]	[REDACTED]	2,500	-	[REDACTED]
5/30/09	[REDACTED]	[REDACTED]	2,500	-	[REDACTED]
5/31/09	[REDACTED]	[REDACTED]	2,500	-	[REDACTED]

Fuel
 (44-3)
 3.56%
 1.50%

Delivered = (8) 12,500 (1) 4,500 (9) (1)
 Receipt = (1) 2,145 (2) 64,398 (4) 12,960 (6) 4,666 (3) (1)
 injected = (5) 12,315

Source's AR # 8		44-1
		1-1

Florida City Gas
 Gas Storage Purchase Unit Price Recal
 TYE 12/31/2009
 B Maltre

Deal No	Flow Date		Price Pnt	Type	Price Type	Qty/Day	No. of Days	Total	Price/	
	From	To							Gas Daily	WAC
81747	05/27/09	05/27/09	FGT Z1	Purchase	GDA	2,592	1	2,592 (A)	(B)	(D)
81749	05/28/09	05/28/09	FGT Z1	Purchase	GDA	2,592	1	2,592		
81901	05/29/09	05/31/09	FGT Z1	Purchase	GDA	2,592	3	7,776		
								12,960 (C)		

WAC = Weighted Average Cost

$$(A) \times (B) / (C) = (D)$$

Volume x Price / Total Volume

WAC

Source: A-R # 2A

Florida City Gas
 PG&A
 DCR#10MM03-G11 Audit#10-007-4-1
 TYE: 12/31/2009
 Title: Gas Storage Unit Price Recal

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1000
 7/2/10
 SM
 7/2/10

44-1
 2

Florida City Gas WAC
 May 2009 Swing Deal Ticket Recal
 TYE 12/31/2009
 B Maitre

Florida City Gas
 PGA
 Dckt#100003-GU Audit#10-007-4-1
 TYE 12/31/2009
 Title: Swing Supply WAC Recal

KW 7/2/10
 SM 7/2/10

(44-1)
3-1

Inv Date	Deal Ticket	Zone	Amount	Gas Daily \$	WAC
5/1	81592	3	4,328 (C)	3.3200 (D)	0.2415 (I)
5/2	81593	3	3,723	3.3950	0.2125
5/3	81593	3	3,723	3.3950	0.2125
5/4	81593	3	3,723	3.3950	0.2125
5/5	81594	3	3,111	3.5950	0.1881
5/6	81595	3	3,136	3.7800	0.1993
5/7	81596	3	2,100	3.8300	0.1352
5/8	81597	3	1,307	4.1600	0.0914
5/9	81598	3	1,037	4.3100	0.0752
5/10	81598	3	1,037	4.3100	0.0752
5/11	81598	3	1,037	4.3100	0.0752
5/12	81701	3	3,421	4.4300	0.2548
5/13	81702	3	3,214	4.4900	0.2427
5/14	81703	3	1,811	4.4150	0.1198
5/15	81704	3	2,072	4.0850	0.1423
5/16	81705	3	2,282	4.0900	0.1569
5/17	81705	3	2,282	4.0900	0.1569
5/18	81705	3	2,282	4.0900	0.1569
5/22	81745	3	2,074	3.7300	0.1301
5/23	81928	3	1,464	3.3750	0.0831
5/24	81928	3	1,464	3.3750	0.0831
5/25	81928	3	1,464	3.3750	0.0831
5/26	81928	3	1,464	3.3750	0.0831
5/28	81748	3	1,451	3.6350	0.0887
5/29	81750	3	1,555	3.6100	0.0944
5/30	81750	3	1,555	3.6100	0.0944
5/31	81750	3	1,555	3.6100	0.0944
Total		3	59,470 (B)		3.7532 WP 44-1

Note A

Inv Date	Deal Ticket	Zone	Amount	Negotiated \$	WAC
5/23	81748	1	1,232 (F)	[REDACTED]	[REDACTED] (J)
5/24	81748	1	1,232	[REDACTED]	[REDACTED]
5/25	81748	1	1,232	[REDACTED]	[REDACTED]
5/26	81748	1	1,232	[REDACTED]	[REDACTED]
Total		1	4,928 (G)		WP 44-1
Total			Σ (B) = 64,398		WP 44-1, 44-3/1

Note A Negotiated by financial traders because there were no Gas Daily Price for Zone 1 - WP 44-1/3-2.

Source: Req 2A

WAC = Weighted Average cost

$$(C) \times (D) / (E) = (I)$$

$$(F) \times (G) / (H) = (J)$$

$$\text{Volume} \times \text{Price} / \text{Total Volume} = \text{WAC}$$

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44-1
3

Florida City Gas
 May 2009 Swing Deal Ticket Rec
 TYE 12/31/2009
 B Maitre

Florida City Gas
 PGA
 Dckt#100003-GU Audit#10-007-4-1
 TYE 12/31/2009
 Title: Swing Delivery - Deal Ticket Rec

KW
7/1/20
Bm
7/2/10

44-1
 1-1

44-1/31
 44-1/31

44-1/31
 44-1/31

44-1/31

Inv Date	Swing Delivered	Swing+Fuel @ 3.56%	Deal Ticket	Amount	Difference	Zone
5/1			81592	4326	0	3
5/2			81593	3723	(0)	3
5/3			81593	3723	(0)	3
5/4			81593	3723	(0)	3
5/5			81594	3111	(0)	3
5/6			81595	3136	(0)	3
5/7			81596	2100	(0)	3
5/8			81597	1307	(0)	3
5/9			81598	1037	(0)	3
5/10			81598	1037	(0)	3
5/11			81598	1037	(0)	3
5/12			81701	3421	1	3
5/13			81702	3214	0	3
5/14			81703	1611	0	3
5/15			81704	2072	1	3
5/16			81705	2282	0	3
5/17			81705	2282	0	3
5/18			81705	2282	0	3
5/19						
5/20						
5/21						
5/22			81745	2074	(0)	3
			81746	1232		1
			81928	1464		3
5/23			81928, 81746	2696	(0)	
			81746	1232		1
			81928	1464		3
5/24			81928, 81746	2696	(0)	
			81746	1232		1
			81928	1464		3
5/25			81928, 81746	2696	(0)	
			81746	1232		1
			81928	1464		3
5/26			81928, 81746	2696	(0)	
5/27						
5/28			81748	1451	1	3
5/29			81750	1555	0	3
5/30			81750	1555	0	3
5/31			81750	1555	0	3
Total				64,398	2 = (A)-(B)	

(A)

(B)
 44-1
 3

Immaterial

Source: AR # 2A and 8

(Compares Delivery amount to Deal Tickets by day.

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44-1
 3-1

Florida City Gas
Deal Sheet Rec
TYE 12/31/2009
B Maitre

Deal No	Flow Date		Original Price Pnt	Price Type	Revised Qty	# of Days	Total Volume	Type	Changed Price Pnt	Description	
	From	To									
81747	05/27/09	05/27/09	FGT Z1	GDA	2,592	1		Storage		Bay Gas Storage	
81749	05/28/09	05/28/09	FGT Z1	GDA	2,592	1		Storage		Bay Gas Storage	
81901	05/29/09	05/31/09	FGT Z1	GDA	2,592	3		Storage		Bay Gas Storage	
81928	05/23/09	05/25/09	FGT Z3	GDA	1,464	3		Purchase		Swing Relates to 81746	
81928	05/26/09	05/26/09	FGT Z3	GDA	1,464	1		Purchase		Swing Relates to 81746	
81592	05/01/09	05/01/09	FGT Z1	GDA	4,326	1		Purchase	FGT Z3	Swing	
81593	05/02/09	05/04/09	FGT Z1	GDA	3,723	3		Purchase	FGT Z3	Swing	
81594	05/05/09	05/05/09	FGT Z1	GDA	3,111	1		Purchase	FGT Z3	Swing	
81595	05/06/09	05/06/09	FGT Z1	GDA	3,136	1		Purchase	FGT Z3	Swing	
81596	05/07/09	05/07/09	FGT Z1	GDA	2,100	1		Purchase	FGT Z3	Swing	
81597	05/08/09	05/08/09	FGT Z1	GDA	1,307	1		Purchase	FGT Z3	Swing	
81598	05/09/09	05/11/09	FGT Z1	GDA	1,037	3		Purchase	FGT Z3	Swing	
81701	05/12/09	05/12/09	FGT Z1	GDA	3,421	1		Purchase	FGT Z3	Swing	
81702	05/13/09	05/13/09	FGT Z1	GDA	3,214	1		Purchase	FGT Z3	Swing	
81703	05/14/09	05/14/09	FGT Z1	GDA	1,611	1		Purchase	FGT Z3	Swing	
81704	05/15/09	05/15/09	FGT Z1	GDA	2,072	1		Purchase	FGT Z3	Swing	
81705	05/16/09	05/18/09	FGT Z1	GDA	2,282	3		Purchase	FGT Z3	Swing	
81745	05/22/09	05/22/09	FGT Z1	GDA	2,074	1		Purchase	FGT Z3	Swing	
81748	05/23/09	05/28/09	FGT Z1	GDA	1,232	4		Purchase		Swing	
81748	05/28/09	05/28/09	FGT Z1	GDA	1,451	1		Purchase	FGT Z3	Swing	
81750	05/29/09	05/31/09	FGT Z1	GDA	1,555	3		Purchase	FGT Z3	Swing	
								Total			
								Per actual Cost Schedule			
								Immaterial			

Source: Neg # 24-

44-1
3-1
1

Title: Deal Volume Rec
Dok#: 100003-GU Audit#: 10-007-4-1
TYE 12/31/2009
PGA
Florida City Gas

5
} 12,960
} 64,398
44-1
3-1

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MM 7/12/10
BM 7/18/10

Florida City Gas
 PGA
 Dckt#100003-GU Audit#10-007-4-1
 TYE 12/31/2009
 Title: Swing - FGT Z1 Negotiated Price

W 11/2/10
 5M 7/8/10

PBC
 Attachment I

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Historical Prices

Index: GD-FGT-Z1 Filter Start Date: 05/01/2009 Fr Filter End Date: 05/31/2009 wSu

Add Row Add Rows Delete Rows Update

Reset Date	Start Date	End Date	Yield Basis	Ref Source	Index Location	Price/Rate
05/01/2009 Fr	05/01/2009 Fr			GD	-	3.28500000
05/04/2009 Mo	05/04/2009 Mo			GD	-	3.28000000
05/05/2009 Tu	05/05/2009 Tu			GD	-	3.48000000
05/06/2009 We	05/06/2009 We			GD	-	3.81500000
05/07/2009 Th	05/07/2009 Th			GD	-	3.67500000
05/08/2009 Fr	05/08/2009 Fr			GD	-	3.97000000
05/11/2009 Mo	05/11/2009 Mo			GD	-	4.15500000
05/12/2009 Tu	05/12/2009 Tu			GD	-	4.26500000
05/13/2009 We	05/13/2009 We			GD	-	4.41500000
05/14/2009 Th	05/14/2009 Th			GD	-	4.38000000
05/15/2009 Fr	05/15/2009 Fr			GD	-	4.04500000
05/18/2009 Mo	05/18/2009 Mo			GD	-	4.02000000
05/19/2009 Tu	05/19/2009 Tu			GD	-	4.00000000
05/20/2009 We	05/20/2009 We			GD	-	3.94000000
05/21/2009 Th	05/21/2009 Th			GD	-	3.74500000
05/22/2009 Fr	05/22/2009 Fr			GD	-	3.77000000
05/26/2009 Tu	05/26/2009 Tu			GD	-	3.43000000
05/27/2009 We	05/27/2009 We			GD	-	3.37000000
05/28/2009 Th	05/28/2009 Th			GD	-	3.49500000
05/29/2009 Fr	05/29/2009 Fr			GD	-	3.54000000

GD FGT Z1 = # 3.46300006 - Negotiated by financial traders because there was no Gas Daily Price Published

5/23/09 - 5/26/09

$\frac{44-1}{3}$ $\frac{44-1}{5}$

Amnt appears to be reasonable for the month.

Source: Req# 9

$\frac{44-1}{3-2}$

NUI - Florida City Gas Transportation Demand
May-09 31

(4F-3)

Pipeline	Contract #	Contract comments	Service	MDO	Rate Type	Rate	Amount	A/E	
FGT	3608		FTS-2	168,330	Transport Demand Rate			A	
FGT	3608		FTS-2		Special Fuel Surcharge			A	
FGT	5034		FTS-1	640,398	Transport Demand Rate			A	
FGT	5034		FTS-1		Special Fuel Surcharge			A	
FGT	5364		FTS-2	110,670	Transport Demand Rate			A	
FGT	5364		FTS-2		Special Fuel Surcharge			A	
BGSC	0042	Monthly Storage Charge		150,000	Transport Demand Rate			A	
BGSC	0042				Property Tax Allocation			A	
							Total	\$ 507,982.39	(B)

invoices attached

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✓ = Agrees to Invoices from FGT

Per FGT Invoices:

(A) = Received \$ [redacted] in Temporary Relinquishment Credits

(B) = Received \$ [redacted] in Temporary Relinquishment Credits

(44-1/5) - Explanation

(45-2/1)

Source's AR # 8							44-1
							11

Florida City Gas
 PGA
 Dckt#100003-GU Audit#10-007-4-1
 TYE 12/31/2009
 Title: Seq Invoice 23A

Handwritten: $\frac{11}{210}$, $\frac{8m}{7/8/10}$

PBC

Request No. 9

- 1. There is no Zone 1 Gas Daily Midpoint Price for May 23-26, please show and explain how the price of [redacted] was computed for the Swing Volume of 4,928 for the May 2009 Sequent Invoice Gas Daily that aren't published are negotiated and estimated by our financial traders and put into Endur. I would use that rate to invoice FCG. I've attached a print screen of the rate used in Endur. (Attachment I) 44-1/3-1
- 2. The FTS-1 transportation rate of \$0.0362 for Bay Gas Injection on the May 2009 Sequent Invoice does not agree with the schedule of transportation rates provided. Please explain why. I couldn't go back to May 2009 on the EBB to find out the rate at the time but I've attached the May 2009 FGT invoice showing the FTS-1 rate showing 0.0362 (Attachment II) 44-1/6
- 3. The back up for the Demand Charge on the May 2009 Sequent Invoice shows Temporary Relinquishment Credits for Contracts 5034 and 5364. Please explain why the credit was not included in the Demand Charge calculation. These are capacity releases that are reflected on the Annual filings. For the month of May 2009 there were "Temporary Relinquishment Credits" totaling [redacted]. On the filing, we credited [redacted]. (Attachment III) 44-1/4 and 45-2/1

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Source: Reg # 9

											44-1
											5

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FLORIDA GAS TRANSMISSION COMPANY, LLC

A Southern Union/EI Paso Energy Affiliate

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Invoice

DR

Attachment II

Billable Party:	058711344 PIVOTAL UTILITY HOLDINGS, INC. NORENE NAVARRO ONE ELIZABETHTOWN PLAZA UNION NJ 07083	Remit to Party:	00824518 FLORIDA GAS TRANSMISSION COMPANY, LLC P.O. BOX 203142 Houston TX 77218-3142 Payee: 00824518	Stmt D/T:	06/08/2009 12:00 AM
Svc Req Name:	PIVOTAL UTILITY HOLDINGS, INC.	Invoice Date:	June 10, 2009	Payee's Bank Account Number:	[REDACTED]
Svc Req:	058711344	Sup Doc Ind:	INBL	Payee's Bank ABA Number:	[REDACTED]
Svc Req Kl:	5034	Charge Indicator:	BILL ON DELIVERY	Payee's Bank:	[REDACTED]
Svc CD:	FTS1	Prev Inv ID:		Payee's Name:	FLORIDA GAS TRANSMISSION COI
Begin Transaction Date:	5/20/2009	End Transaction Date:	5/20/2009	Contact Name:	JAMES CRAMER
				Contact Phone:	713-988-2090

Invoice Identifier: [REDACTED]
Account Number: [REDACTED]

Please reference your invoice identifier and your account number in your wire transfer.

TT	Req Loc	Req Loc Prop	Req Zn	Location Name	Del Loc	Del Loc Prop	Del Zn	Location Name	Repl Rel Cd	Acct Adj Methd	Chrg Type	Base	Unit Sur	Price Disc	Net	Qty	Amt Due	Seq End	Tran Date
				Transportation Commodity															
01	23703	10240		NGPLJEFFERSON FG			0				COT	0.0345	0.0017	0.0000	0.0362	0	0.00	27	27
				Transportation Commodity															
01	23703	10240		NGPLJEFFERSON FG			0				COT	0.0345	0.0017	0.0000	0.0362	0	0.00	28	31
				Transportation Commodity															
01	183884	82248		BAY GAS (REC) STOR			0				COT	0.0345	0.0017	0.0000	0.0362	0	0.00	02	02
				Transportation Commodity															
01	183884	82248		BAY GAS (REC) STOR			0				COT	0.0345	0.0017	0.0000	0.0362	0	0.00	11	12
				Transportation Commodity															
01	178851	82410		COLUMBIA GULF-LAF			0				COT	0.0346	0.0017	0.0000	0.0362	0	0.00	01	05
				Transportation Commodity															
01	178851	82410		COLUMBIA GULF-LAF			0				COT	0.0346	0.0017	0.0000	0.0362	0	0.00	06	08
				Transportation Commodity															
01	179851	82410		COLUMBIA GULF-LAF			0				COT	0.0345	0.0017	0.0000	0.0362	0	0.00	07	31
				Transportation Commodity															
01	313370	78298		EGAN HUB RECIP/FGT			0				COT	0.0346	0.0017	0.0000	0.0362	0	0.00	01	01

*May 2009
FTS 1 = 0.0362*

Fee schedule on 44-3 shows max for FTS 1 to be 0.0310. The fuel credit of (0.0052) was not applied. Difference would be immaterial.

44-3

441/5

Late Payment Charges are assessed on past due balances after the invoice date. Shippers may voluntarily choose to contribute to GFA. All contribution payments must be clearly and specifically marked as "GRI Contributions", and the GRI Project(s) or Project Area(s) to be funded must be indicated on the payment detail, which should be faced to your Gas Logistics Representative.

Florida City Gas
PGA
Debit#100003-GU Audit#10-007-4-1
TYE 12/31/2009
Title: Bay Gas Rate

*10/21/10
11/1/09
2/6/10*

Source: Reg # 9

44-3

11/2/10
7/2/10

platts

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www.platts.com

PBC

Inside FERC's **Gas Market Report**

May 2009

Prices of Spot Gas Delivered to Pipelines, May 1 (per MMBtu)

	Range	Index	Volume	Deals		Range	Index	Volume	Deals
ANR Pipeline Co.					Onok Gas Transportation LLC				
Louisiana	\$3.28 to \$3.35	\$3.34	174	25	Oklahoma	\$2.66 to \$2.88	\$2.73	130	33
Oklahoma	\$2.64 to \$2.71	\$2.63	174	30	Panhandle Eastern Pipe Line Co.				
CenterPoint Energy Gas Transmission Co.					Texas, Oklahoma (mainline)				
East	\$2.62 to \$2.82	\$2.71	290	69	Questar Pipeline Co.				
Colorado Interstate Gas Co.					Rocky Mountains				
Rocky Mountains	\$2.18 to \$2.41	\$2.30	117	25	Southern Natural Gas Co.				
Columbia Gas Transmission Corp.					Louisiana				
Appalachia	\$3.55 to \$3.62	\$3.58	451	73	Southern Star Central Gas Pipeline Inc.				
Columbia Gulf Transmission Co.					Texas, Oklahoma, Kansas				
Louisiana	\$3.28 to \$3.30	\$3.29	138	24	Tennessee Gas Pipeline Co.				
Mainline	\$3.27 to \$3.31	\$3.29	695	79	Louisiana, 500 leg				
Dominion Transmission Inc.					Louisiana, 800 leg				
Appalachia	\$3.63 to \$3.70	\$3.65	465	84	Texas, zone 0				
El Paso Natural Gas Co.					Texas Eastern Transmission Corp.				
Permian Basin	\$2.57 to \$2.77	\$2.68	481	100	Zone M-1 30-inch (Kosi)				
San Juan Basin	\$2.38 to \$2.61	\$2.50	586	110	East Louisiana zone				
Florida Gas Transmission Co.					West Louisiana zone				
Zone 1	\$3.25 to \$3.29	\$3.28	46	9	East Texas zone				
Zone 2	\$3.32 to \$3.57	\$3.34	64	17	South Texas zone				
Zone 3	\$3.39 to \$3.47	\$3.41	106	20	Texas Gas Transmission Corp.				
Kern River Gas Transmission Co.					Zone 1				
Wyoming	\$2.20 to \$2.53	\$2.30	747	134	Zone SL				
Natural Gas Pipeline Co. of America					Transcontinental Gas Pipe Line Corp.				
Midcontinent zone	\$2.64 to \$2.81	\$2.64	389	73	Zone 1				
Louisiana zone	\$3.12 to \$3.12	\$3.12	10	2	Zone 2				
Texok zone	\$2.93 to \$3.10	\$3.00	866	163	Zone 3				
South Texas zone	\$3.12 to \$3.24	\$3.13	117	13	Zone 4				
Northern Natural Gas Co.					Transwestern Pipeline Co.				
Demarcation	\$2.74 to \$2.99	\$2.82	329	73	Permian Basin				
Ventura, Iowa	\$2.82 to \$3.06	\$2.89	163	35	Trunkline Gas Co.				
Northwest Pipeline Corp.					Louisiana				
Rocky Mountains	\$2.20 to \$2.53	\$2.30	764	140					
Canadian border	\$2.60 to \$2.93	\$2.74	192	44					

The McGraw-Hill Companies

Sources: AR # 5									
44-2									

INTERMEDIATE BUSINESS FORMS, INC. Form: (687) 05a-09a Fax: (687) 05a-09a Email: support@ibf.com

40
2
13
Storage Log # 2A
4H-2



Sequent Energy Management

Sequent Physical Purchases Compared to Index Pricing May 2009

Attachment III
6/26/2010 3:28:13PM
PBL
2

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin Pool	1096622	05-01-2009 ✓	05-31-2009 ✓	① 153,252 ✓	████████	Index	IF-FGT-Z3	⑦	████████
Destin Pool	④ 1138107	05-01-2009 ✓	05-31-2009 ✓	② 53,751	████████	Index	IF-FGT-Z3	████████	████████
The Weighted Average Price for Sequent purchases at Destin ██████████ FOM Index by ██████████									

$$[(1 \times 3/15) + (2 \times 4/5)] - 7 = 6$$

✓ = Traced to Gas Supply Vendor invoices for Natural Gas delivered during May 2009.

X = Traced to Gas Market Report Index Price for May 09.

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20

Print Date: 24-May-2010
User Name: marechig
File Path: I:\SEM\cloneplaystar\FO_FCG_Purchases.rpt

Florida City Gas
PGA
Dckt#100003-GU Audit#10-0074-1
TYE 12/31/2009
Title: May 09 Price Comparison

M/21/10
5/23/10

INVENTORY BUSINESS FORMS, INC.
Phone: (407) 939-4000
Fax: (407) 939-4000
Email: inventory@ibforms.com

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Baseload = (A) + (B) + (C)

$\Sigma(X) = 189,173$

$(X)/(W) = 3.5194 > 3.41$

Market: Sequent
Term: November 2008 - April 2009

REVISION 3
Indicates Revisions

May-09

IF FGTZ3 \$3.4100 X (7)
Premium = [REDACTED]
Baseload = 4,200 IF + .005
Swing = [REDACTED]

[REDACTED] declared a Force Majeure effective May 10, 2009

	Nominated/ Allocated	Total	Baseload Amount	2-WAY KEEPWHOLE Volume	Amount	Excess Volume	Amount
5/1/2009	4,683	4,200	\$14,532.00 (X)	0	\$0.00	483	[REDACTED]
5/2/2009	5,110	4,200	\$14,532.00 (X)	0	\$0.00	910	[REDACTED]
5/3/2009	5,110	4,200	\$14,532.00 (X)	0	\$0.00	910	[REDACTED]
5/4/2009	5,110	4,200	\$14,532.00 (X)	0	\$0.00	910	[REDACTED]
5/5/2009	5,501	4,200	\$14,532.00 (X)	0	\$0.00	1,301	[REDACTED]
5/6/2009	5,501	4,200	\$14,532.00 (X)	0	\$0.00	1,301	[REDACTED]
5/7/2009	5,501	4,200	\$14,532.00 (X)	0	\$0.00	1,301	[REDACTED]
5/8/2009	4,498	4,200	\$14,532.00 (X)	0	\$0.00	298	[REDACTED]
5/9/2009	4,009	4,200	\$14,532.00 (X)	(191)	\$0.00 (X)	0	[REDACTED]
5/10/2009	1,749		\$0.00		\$0.00	1,749	[REDACTED]
5/11/2009	1,417		\$0.00		\$0.00	1,417	[REDACTED]
5/12/2009	21		\$0.00		\$0.00	21	[REDACTED]
5/13/2009	21		\$0.00		\$0.00	21	[REDACTED]
5/14/2009	21		\$0.00		\$0.00	21	[REDACTED]
5/15/2009	21		\$0.00		\$0.00	21	[REDACTED]
5/16/2009	0		\$0.00		\$0.00	0	[REDACTED]
5/17/2009	0		\$0.00		\$0.00	0	[REDACTED]
5/18/2009	0		\$0.00		\$0.00	0	[REDACTED]
5/19/2009	0		\$0.00		\$0.00	0	[REDACTED]
5/20/2009	0		\$0.00		\$0.00	0	[REDACTED]
5/21/2009	0		\$0.00		\$0.00	0	[REDACTED]
5/22/2009	0		\$0.00		\$0.00	0	[REDACTED]
5/23/2009	2,145		\$0.00		\$0.00	2,145	[REDACTED]
5/24/2009	2,149		\$0.00		\$0.00	2,149	[REDACTED]
5/25/2009	2,149		\$0.00		\$0.00	2,149	[REDACTED]
5/26/2009	2,149		\$0.00		\$0.00	2,149	[REDACTED]
5/27/2009	860		\$0.00		\$0.00	860	[REDACTED]
5/28/2009	860		\$0.00		\$0.00	860	[REDACTED]
5/29/2009	860		\$0.00		\$0.00	860	[REDACTED]
5/30/2009	860		\$0.00		\$0.00	860	[REDACTED]
5/31/2009	860		\$0.00		\$0.00	860	[REDACTED]
TOTAL	81,165	37,800	\$190,788.00	(191)	(\$162.35)	23,556	\$85,310.94

21

(6) x (7) = (8)
(3) + (8) = (9)
(1) x (2) = (3)
(4) + (5) = (1)

✓ = Agreed to Gas Charges
X = Agreed to Gas Volume

Florida City Gas
PGA
Doc#100003-GU Audit#10-007-4-1
TYE 12/31/2009
Title: Pca #1138107

1/2/10
BGM

Florida City Gas
 PGA
 Dckt#100003-GU Audit#10-007-4-1
 TYE 12/31/2009
 Title: Deal # 1138107

KW
 1/2/10
 Bm
 7/2/10

PBC

Request No. 4

Please explain how the volume and purchased price was derived for the second entry on the Sequent Physical Purchase Compared to Index Pricing May 2009 schedule. The amount can not be traced to the back up provided.

Mariner Energy invoice shows the total dth invoiced on Destin pipeline. They provided a detail which breaks down the baseload, gas daily and keepwhole. Please see attached to see how the baseload matches Sequent Physical Purchase Compared to Index Pricing May 2009 schedule.

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Sources AR# 4

P

PBC

FLORIDA GAS TRANSMISSION COMPANY, LLC
MARKET AREA TRANSPORTATION RATES
Effective May 1, 2009
RATES IN \$/MMBTU

<u>RATE SCHEDULE</u>	Maximum Rates	Max. Incl. Surcharges
FTS-1		
Reservation	38.55 (C)	40.55 = 2 (C) 44-1/4
Usage	44-1/6 3.45 (A)	3.10 = 2 (A) 44-1
FTS-2		
Reservation	76.90	76.90 44-1/4
Usage	0.70 (B)	0.35 = 2 (B) 44-1
SFTS	80.55	84.20
NNTS	4.95	4.95
ITS-1	59.80	59.45
PNR	59.80	59.97
<u>SURCHARGES</u>		
Capital Surcharge - FTS-1 (reservation)		2.00 (C)
Capital Surcharge - SFTS		4.00
ACA	44-1/6	0.17 (A), (B)
Unit Fuel Surcharge		(0.52) ↓
Purchased Power Surcharge		0.00
Fuel		3.56% 44-1/1
Quantities received & delivered in Market Area:		
Unit Fuel Surcharge		0.00
Fuel -		
Forwardhauls - 0.25% per compressor station, subject to minimum of 0.25%, up to		3.56%
Backhauls		0.25%

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	Source: AR # 7	44-3
--	----------------	------

pbc

FCG Purchase Report Code Description

Query Criteria:

The report retrieves physical deals for a given date range -in particular the report was run for May 2009- for the following pipelines:

- Cypress Natural Gas LLC
- Destin
- Florida Gas Transmission Company
- High Island Operating System
- Northern Natural Gas Company (only MOPS/Matagorda locations)
- Southern Natural Gas Company (only MOPS/Matagorda locations)
- UTOS
- Bay Gas Storage
- MOPS - NNG

In addition, the following rules must be met:

1. It must be a purchase
2. The deal has activity during the whole month
3. The purchase price is either Nymex or Inside Ferc -neither Fixed nor Gas Daily deals are taken into account-

Gas Dailies are removed.

It compares the weighted average paid price in a given location to the price of the corresponding Florida Gas zone.

Exclusions:

The report excludes the following locations(pipeline):

- NGPL Vermillion (Florida Gas Transmission)
- CS #8 Zachary (Florida Gas Transmission)
- CS #11 Mount Vernon (Florida Gas Transmission)
- WC 205 (Northern Natural Gas)

As well as the following deals:

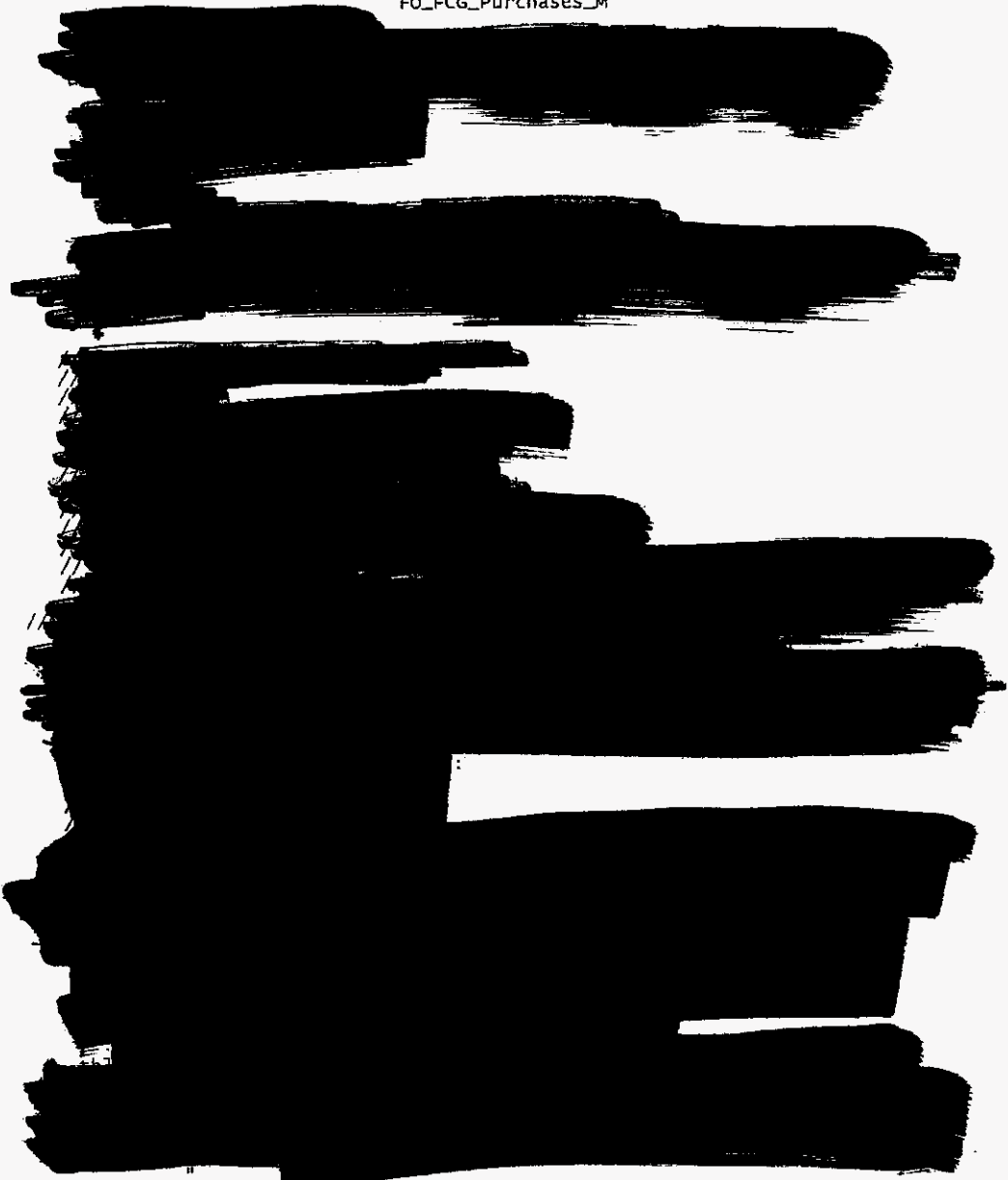
167245,199413,200213,218302,297358,392000,392001,351241,390121,371470,389147,395122,397589,403153,406512,406528,

429538,437296,451813,472691,475438,478212,486294,489498,517728,517729,559003,573168,573276,587359

Deals with pipelines Northern Natural Gas or Southern Natural Gas are compared to Inside Ferc's FGT Zone 1, and deals with locations having ANR Louisiana as their FOM index are compared to Inside Ferc's FGT Zone 2, and to Inside Ferc's FGT Zone 3 for locations using Transco Zone 4 as FOM index.

Source: AR # 2A

pl



p3

+
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[REDACTED CONTENT]

ps

//

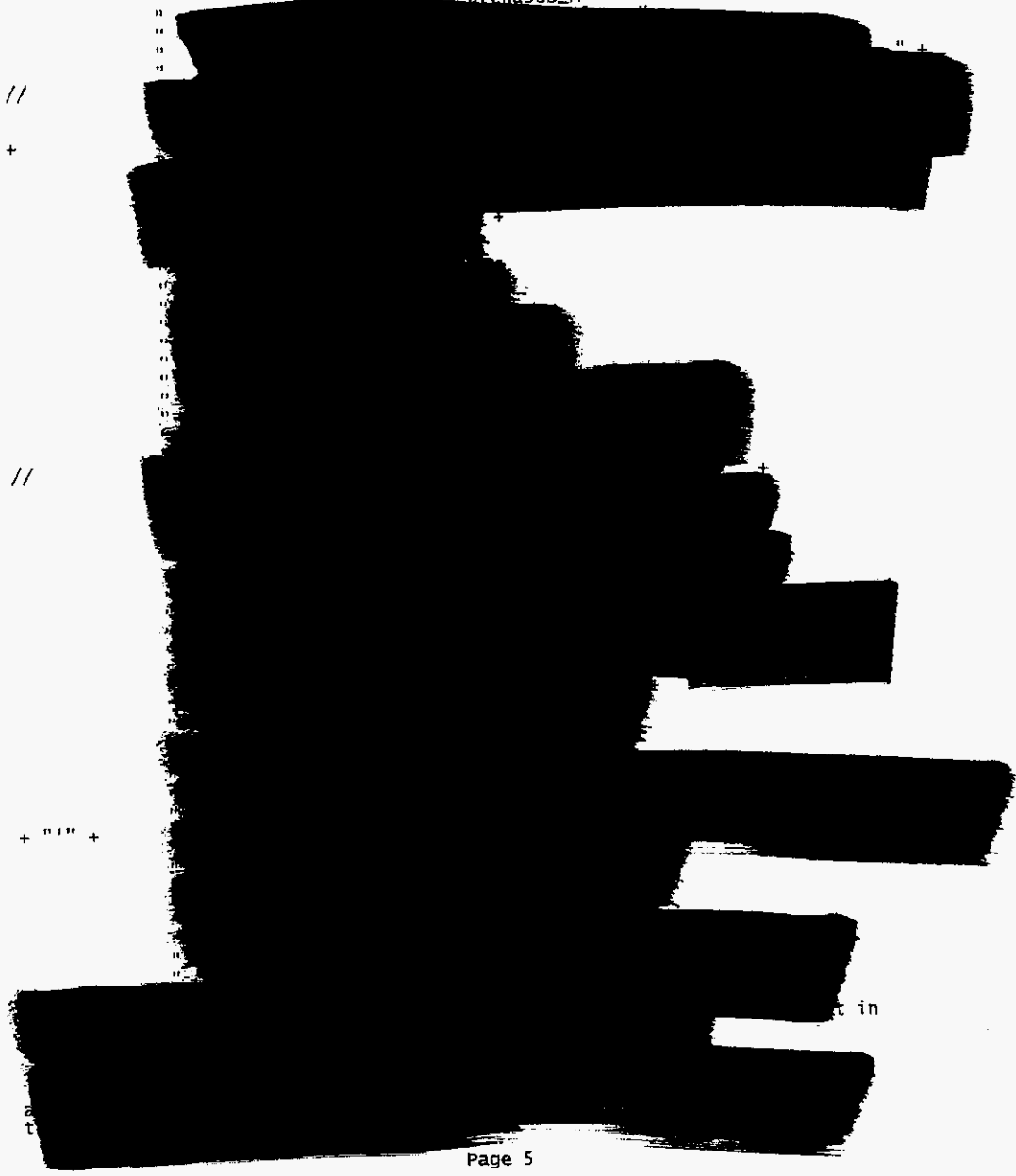
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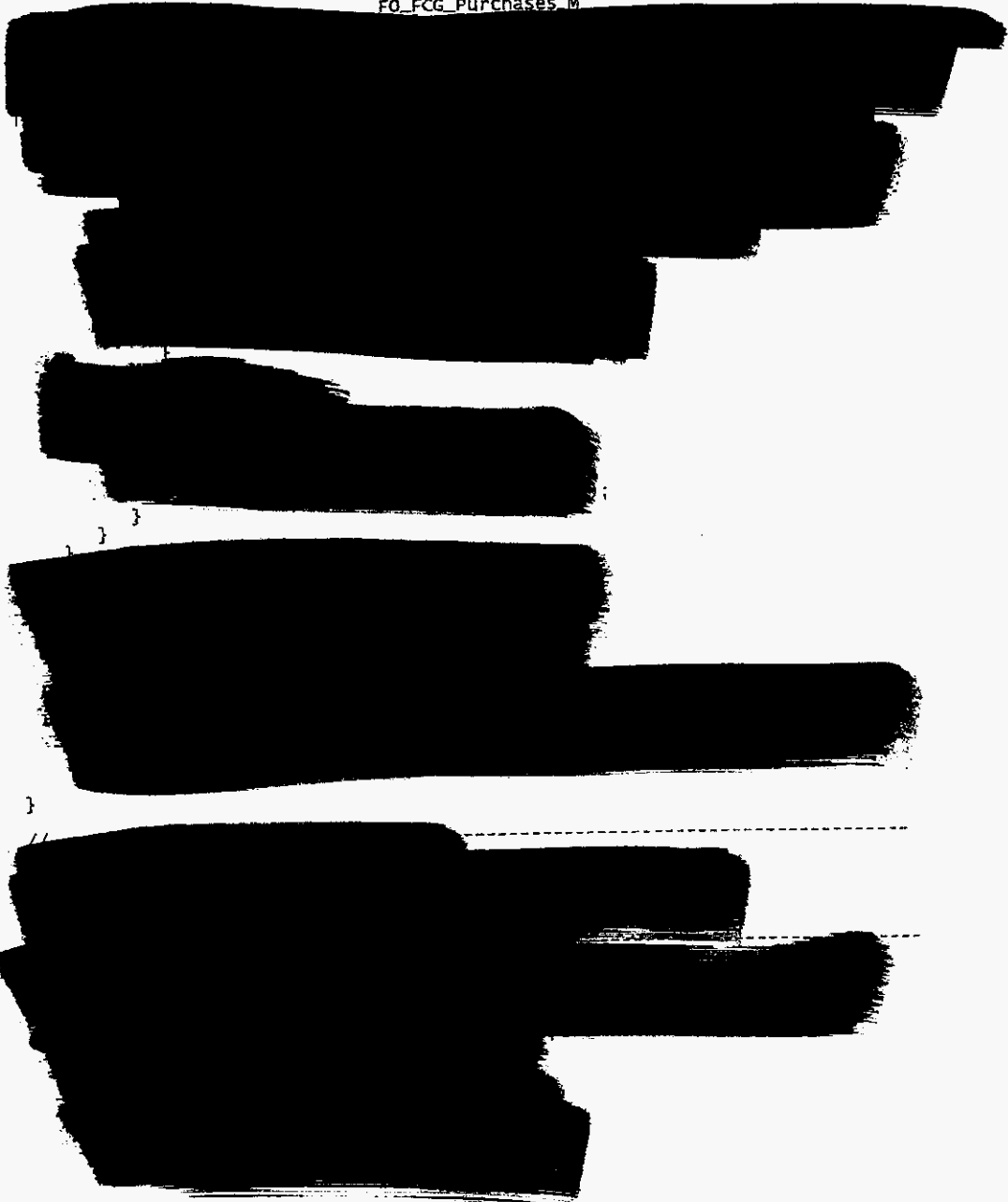


pb



7
D.

87



P8

Sequent Physical Purchases Compared to Index Pricing
January 2009

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

① x ② = ③
ABC

Location	Deal#	Start Date	End Date	Actual Flow Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin				①					② ③
Destin Pool	996350	01-01-2009	01-31-2009	188,000	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Destin is [REDACTED] FOM Index by \$ [REDACTED]									
Florida Gas Transmission Company									
Zone 1									
MOPS 631 REFUGIO (FGT)	1043003	01-01-2009	01-31-2009	155,000	[REDACTED]	Index	IF-FGT-Z1	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Zone 1 is [REDACTED] FOM Index by [REDACTED]									

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Total Difference

01/09	[REDACTED]
02/09	[REDACTED]
03/09	[REDACTED]
04/09	[REDACTED]
* 05/09	[REDACTED]
06/09	[REDACTED]
07/09	[REDACTED]
08/09	[REDACTED]
09/09	[REDACTED]
10/09	[REDACTED]
11/09	[REDACTED]
12/09	[REDACTED]
Total	[REDACTED]

* May tested on 44-2/1

FOM Price higher than Sequent for the yr.

PI



Sequent Physical Purchases Compared to Index Pricing February 2009

6/16/2010
3:13:40PM

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin Pool	996350	02-01-2009	02-28-2009	168,098	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Destin [REDACTED] FOM Index by [REDACTED]									
Florida Gas Transmission Company									
Zone 1									
MOPS 631 REFUGIO (FGT)	1066164	02-01-2009	02-28-2009	56,952	[REDACTED]	Index	IF-FGT-Z1	[REDACTED]	[REDACTED]
CS #7 Eunice	1070780	02-01-2009	02-28-2009	33,652	[REDACTED]	Index	IF-FGT-Z1	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Zone 1 [REDACTED] FOM Index by [REDACTED]									

pc

Endur Date: 14-Jun-2010
User Name: marochig
File Path: I:\SEM\stone\crystal\FQ_FCG_Purchases.rpt

**Sequent Physical Purchases Compared to Index Pricing
March 2009**

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin Pool	996350	03-01-2009	03-31-2009	166,838	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Destin is [REDACTED] FOM Index by [REDACTED]									
Florida Gas Transmission Company									
Market Area									
C.G. FGT	1108927	03-01-2009	03-31-2009	548	[REDACTED]	Index	IF-FGT-Z2	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Market Area is [REDACTED] FOM Index by [REDACTED]									



Sequent Physical Purchases Compared to Index Pricing April 2009

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin									
Destin Pool	996350	04-01-2009	04-30-2009	132,784	[REDACTED]	Index	IF-FGT-Z3	3.6500	[REDACTED]
Destin Pool	1095822	04-01-2009	04-30-2009	150,000	[REDACTED]	Index	IF-FGT-Z3	3.6500	[REDACTED]
The Weighted Average Price for Sequent purchases at Destin [REDACTED] FOM Index by [REDACTED]									

pt

Endur Date: 14-Jun-2010
User Name: marachig
File Path: I:\SEM\done\p\ystal\FO_FCG_Purchases.rpt



Sequent Physical Purchases Compared to Index Pricing May 2009

Adrian Brant III
5/26/2010
3:28:13PM
(2)

inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin	1085622	05-01-2009	05-31-2009	153,252	A	Index	IF-FGT-Z3		
Destin Pool	1138107	05-01-2009	05-31-2009	53,781	B	Index	IF-FGT-Z3		
Destin Pool									
The Weighted Average Price for Sequent purchases at Destin FOM Index by									

✓ = Agreed to the Platts Index
on the Gas Market Report

ps



Sequent Energy Management

**Sequent Physical Purchases Compared to Index Pricing
June 2009**

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin									
Destin Pool	1095622	08-01-2009	08-30-2009	148,736	[REDACTED]	Index	IF-FGT-Z3	3.6200	[REDACTED]
Destin Pool	1138107	08-01-2009	08-30-2009	58,980	[REDACTED]	Index	IF-FGT-Z3	3.6200	[REDACTED]
The Weighted Average Price for Sequent purchases at Destin is [REDACTED] FOM Index by [REDACTED]									
Florida Gas Transmission Company									
Market Area									
C.G. FGT	1189872	08-01-2009	08-30-2009	945	[REDACTED]	Index	IF-FGT-Z2	3.5500	[REDACTED]
The Weighted Average Price for Sequent purchases at Market Area is [REDACTED] FOM Index by [REDACTED]									

ps

Endur Date: 14-Jun-2010
User Name: marechig
File Path: I:\SEM\done\crystal\FO_FCG_Purchases.rpt



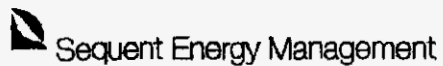
Sequent Physical Purchases Compared to Index Pricing July 2009

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Dest#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin									
Destin Pool	1098622	07-01-2009	07-31-2009	154,345	██████	Index	IF-FGT-Z3	4.1300	████████████████████
Destin Pool	1138107	07-01-2009	07-31-2009	135,908	██████	Index	IF-FGT-Z3	4.1300	████████████████████
The Weighted Average Price for Sequent purchases at Destin is ██████ FOM Index by ██████									
Florida Gas Transmission Company									
Market Area									
C.G. FGT	1200046	07-01-2009	07-31-2009	124	██████	Index	IF-FGT-Z2	3.9800	████████████████████
The Weighted Average Price for Sequent purchases at Market Area is ██████ FOM Index by ██████									

67

Endur Date: 14-Jun-2010
 User Name: marchig
 File Path: I:\SEM\donep\crystal\FO_FCO_Purchases.rpt



6/15/2010
3:16:25PM

Sequent Physical Purchases Compared to Index Pricing August 2009

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin									
Destin Pool	1095622	08-01-2009	08-31-2009	154,776	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
Destin Pool	1138107	08-01-2009	08-31-2009	114,358	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]

The Weighted Average Price for Sequent purchases at Destin is above FOM index by [REDACTED]

41

PS

Endur Date: 14-Jun-2010
User Name: marechig
File Path: I:\SEM\clonop\crystal\FO_FCG_Purchases.rpt

**Sequent Physical Purchases Compared to Index Pricing
September 2009**

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin									
Destin Pool	1095822	09-01-2009	09-30-2009	150,000	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
Destin Pool	1138107	09-01-2009	09-30-2009	55,524	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Destin is [REDACTED] FOM Index by [REDACTED]									

99

Endur Date: 14-Jun-2010
User Name: mareohig
File Path: I:\SEM\klinep\crystal\FQ_FCG_Purchases.rpt

**Sequent Physical Purchases Compared to Index Pricing
October 2009**

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin									
Destin Pool	1085622	10-01-2009	10-31-2009	154,423	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
Destin Pool	1138107	10-01-2009	10-31-2009	21	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Destin is [REDACTED] FOM Index by \$ [REDACTED]									

P10

Endur Date: 14-Jun-2010
User Name: marachig
File Path: I:\SEM\clone\crystal\FOM_FCG_Purchases.rpt



Sequent Physical Purchases Compared to Index Pricing November 2009

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin Pool	1288140	11-01-2009	11-30-2009	38,471	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
The Weighted Average Price for Sequent purchases at Destin is [REDACTED] FOM Index by [REDACTED]									

PII

Endur Date: 14-Jun-2010
User Name: marechig
File Path: I:\SEM\donepicrystal\FQ_FCG_Purchases.rpt

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Source: AR # 632A

44-11
1-1

45

P12



Sequent Energy Management

Sequent Physical Purchases Compared to Index Pricing December 2009

Inside Ferc First-Of-Month (FOM) Index Price for Monthly Baseload Transactions

Location	Deal#	Start Date	End Date	Volume	Sequent Purchase Price	NYMEX or Index	FOM Index	FOM Price	Difference
Destin									
Destin	1266140	12-01-2009	12-31-2009	19,180	[REDACTED]	Index	IF-FGT-Z3	[REDACTED]	[REDACTED]
Destin Pool									
The Weighted Average Price for Sequent purchases at Destin is [REDACTED] FOM Index by [REDACTED]									

6/15/2010
3:18:25PM

Florida City Gas
PGA
Dok#100003-GU Audit#10-007-4-1
TYE 12/31/2009
Title: Sequent/Index Comparison

YWH/ALD
5/23/10

Endur Date: 14-Jun-2010
User Name: marachig
File Path: I:\BEM\donep\crystal\FO_FCG_Purchases.rpt

FLORIDA CITY GAS
MAY 2009 - ACTUAL VS MARKET
TYE 12/31/2009
B MAITRE

Price	Zone	Pipeline	Volume	Actual Cost	Buy/Sell	Counterparty	Actual WAC	Market WAC	Difference
[REDACTED]	1	FTG	52,142	[REDACTED]	Buy	SEM-LE	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	1	FTG	18,307	[REDACTED]	Buy	SEM-LE	[REDACTED]	[REDACTED]	[REDACTED]
WAC	1		70,449	[REDACTED]			[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	2	FTG	93,713	[REDACTED]	Buy	SEM-LE	[REDACTED]	[REDACTED]	[REDACTED]
WAC	2		93,713	[REDACTED]			[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	3	FTG	12,500	[REDACTED]	Buy	SEM-LE	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	3	FTG	269,981	[REDACTED]	Buy	SEM-LE	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	3	FTG	66,309	[REDACTED]	Buy	SEM-LE	[REDACTED]	[REDACTED]	[REDACTED]
WAC	3		348,770	[REDACTED]			[REDACTED]	[REDACTED]	[REDACTED]

44-1

Market Price	Zone	Volume	Market WAC	Market Price	Zone	Volume	Market WAC
3.2800	3	60,091	3.0314	3.4100	3	71,260	1.8588
3.4830	3	4,928	0.2825	3.7832	3	59,470	1.7210
WAC	3	65,019	3.2939	WAC	3	130,730	3.5798

Source: Rep # 2A

CONFIDENTIAL

Florida City Gas
PGA
Dckt#100003-GU Audit#10-0074-1
TYE 12/31/2009
Title: Actual vs Market Cost

WAC = Weighted Avg Cost
 $(A) \times (B) / (C) = (D)$
Price X Volume / Total Volume
= WAC

144
7/12/10
67M
7/9/10

44-5

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Attachment I *PBC*

FCG Transportation Report - May 2009

Buy/Sell	Counterparty	Pipeline	Volume	Net Notnl Value / Actual Cost
Buy			517,598	\$ [REDACTED]
	PIVOTAL FLA CITY GAS - LE		4,886	\$ -
	Bay Gas Storage		(A) 4,886	\$ -
SEM - LE			512,932	\$ [REDACTED]
	Florida Gas Transmission Company		512,932	\$ (P2) [REDACTED] (45-2/1)
Sell			(508,745)	\$ [REDACTED]
	PIVOTAL FLA CITY GAS - LE		(290,545)	\$ [REDACTED]
	Bay Gas Storage		(B) (12,500)	\$ [REDACTED]
	Florida Gas Transmission Company		(278,046)	\$ [REDACTED]
SEM - LE			(218,200)	\$ [REDACTED]
	Florida Gas Transmission Company		(218,200)	\$ (P2) [REDACTED] (45-2/1)
Grand Total			8,853	\$ [REDACTED]

$\Sigma (A) = (285,879)$
 $\Sigma (B) = 1,027,154.74$ } (P2)

Source: Key # 2A

Florida City Gas
 PGA
 Doc#100003-GU Audit#10-007-4-1
 TYE 12/31/2009
 Title: *Actual Gas Cost*

1/18/10
6:00
7/9/10

44-5

41
42
43
44-5
1

Attachment I (1A)



Transportation Monthly Detail Report - Natural Gas
AFF_AMT_NUL_FCG as of 06/26/2009

6/29/2009
5:11:19PM

Deal	Buy/Sell	Counterparty	Contract Dates	Curve Name	Index Name	Pipeline	Deal Wtd Price	MTM Wtd Price	Volume	Net Notbl Value / Actual Cost	Physical/Financial	Portfolio
May-2009	AFF_AMT_NUL_FCG											
750405	Sell	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z1	GD-FGT-Z2	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
750405	Sell	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z1	GD-FGT-Z1	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
750405	Sell	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z3	GD-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
843045	Buy	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z3	GD-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
853282	Buy	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	GD-FGT-Z3	GD-FGT-Z3	Bay Gas Storage					PHYSICAL	AFF_AMT_FCG_BaseLoad
853707	Buy	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	GD-FGT-Z3	IF-FGT-Z3	Bay Gas Storage					PHYSICAL	AFF_AMT_FCG_BaseLoad
855712	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	GD-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
976382	Sell	SEM - LE	05-01-2009 - 05-31	LD-FGT-Z2CG	GD-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042166	Buy	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z1	IF-FGT-Z1	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042167	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	IF-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042167	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	IF-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042167	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	IF-FGT-Z2	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042167	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	GD-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042167	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	GD-FGT-Z1	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042169	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	GD-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042169	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	IF-FGT-Z1	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042169	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	IF-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042170	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	IF-FGT-Z1	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1042170	Sell	PIVOTAL FLA CITY GA	05-01-2009 - 05-31	LD-FGT-Z2CG	GD-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1053619	Buy	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z3	GD-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1053619	Buy	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z1	GD-FGT-Z1	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1084570	Sell	SEM - LE	05-01-2009 - 05-31	LD-FGT-Z2CG	IF-FGT-Z2	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1094456	Buy	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z2	IF-FGT-Z2	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad
1149103	Buy	SEM - LE	05-01-2009 - 05-31	GD-FGT-Z3	IF-FGT-Z3	Florida Gas Transmissio					PHYSICAL	AFF_AMT_FCG_BaseLoad

(A) GD = Gas Daily + Transp + Fuel
IF = Monthly Contract

CityGas Cost 0.55
Sequent Cost Σ 0.3
Σ 0.3

AFF_AMT_NUL_FCG Physical Total (14 deals): 5,853 49,362.70
AFF_AMT_NUL_FCG Financial Total (0 deals):
AFF_AMT_NUL_FCG Total (14 deals): 5,853 49,362.70

Sequent Energy Management Confidential

User Name: bran
Endur System Date: 29-Jun-2009
File Name: T:\openlink\TRADE6\krystal\APT_Transport_Mthly_04_Rpt.rpt

Page 1 of 1

Florida City Gas
PGA
Doc#100003-GU Audit#10-007-4-1
TYE 12/31/2009
Title: Activated Gas Cost
KW
7/18/10
6PM
7/19/10

PBC

CONFIDENTIAL

Florida City Gas
 Purchase Gas Recovery Audit
 Dkt # 100003-GU, AC# 10-007-4-1
 TYE 12/31/2009
 Title: Daily Purchase Cost Comparison

KW
7/26/10
BM
7/22/10

Comparison of Sequent Daily Purchase Cost to FCG Daily Purchase Cost

Total Sequent Daily Purchase				FCG Daily Ordered				Difference Value			
Day	Volume	Price	Amount	Day	Volume	Price	Amount	Day	Volume	Price	Amount
1	5,141		\$ [REDACTED]	1	4,326		[REDACTED]	1	4,326		[REDACTED]
1	8,837		\$ [REDACTED]								
	13,978		\$ [REDACTED]								
2	699		\$ [REDACTED]	2	3,723		[REDACTED]	2	3,723		[REDACTED]
2	10,916		\$ [REDACTED]								
	11,615		\$ [REDACTED]								
3	-		\$ [REDACTED]	3	3,723		[REDACTED]	3	3,723		\$ [REDACTED]
3	10,842		\$ [REDACTED]								
	10,842		\$ [REDACTED]								
4	-		\$ [REDACTED]	4	3,723		[REDACTED]	4	3,723		\$ [REDACTED]
4	10,842		\$ [REDACTED]								
	10,842		\$ [REDACTED]								
5	-		\$ [REDACTED]	5	3,111		[REDACTED]	5	3,111		[REDACTED]
5	3,588		\$ [REDACTED]								
	3,588		\$ [REDACTED]								
6	-		\$ [REDACTED]	6	3,136		[REDACTED]	6	3,136		[REDACTED]
6	11,907		\$ [REDACTED]								
	11,907		\$ [REDACTED]								
7	-		\$ [REDACTED]	7	2,100		[REDACTED]	7	2,100		[REDACTED]
7	10,352		\$ [REDACTED]								
	10,352		\$ [REDACTED]								
8	-		\$ [REDACTED]	8	1,307		[REDACTED]	8	1,307		[REDACTED]
8	8,433		\$ [REDACTED]								
	8,433		\$ [REDACTED]								
9	-		\$ [REDACTED]	9	1,037		[REDACTED]	9	1,037		[REDACTED]
9	9,808		\$ [REDACTED]								
	9,808		\$ [REDACTED]								
10	-		\$ [REDACTED]	10	1,037		[REDACTED]	10	1,037		[REDACTED]
10	9,809		\$ [REDACTED]								
	9,809		\$ [REDACTED]								
11	-		\$ [REDACTED]	11	1,037		[REDACTED]	11	1,037		[REDACTED]
11	9,809		\$ [REDACTED]								
	9,809		\$ [REDACTED]								
12	-		\$ [REDACTED]	12	3,421		[REDACTED]	12	3,421		\$ [REDACTED]
12	9,811		\$ [REDACTED]								
	9,811		\$ [REDACTED]								
13	-		\$ [REDACTED]	13	3,214		[REDACTED]	13	3,214		[REDACTED]
13	9,913		\$ [REDACTED]								
	9,913		\$ [REDACTED]								
14	0		\$ [REDACTED]	14	1,611		[REDACTED]	14	1,611		[REDACTED]
14	10,395		\$ [REDACTED]								
	11,327		\$ [REDACTED]								
	10,545		\$ [REDACTED]								
15	-		\$ [REDACTED]	15	2,072		[REDACTED]	15	2,072		[REDACTED]
15	11,327		\$ [REDACTED]								
	11,327		\$ [REDACTED]								
16	-		\$ [REDACTED]	16	2,282		[REDACTED]	16	2,282		\$ [REDACTED]
16	11,021		\$ [REDACTED]								
	11,021		\$ [REDACTED]								
17	-		\$ [REDACTED]	17	2,282		[REDACTED]	17	2,282		[REDACTED]
17	11,021		\$ [REDACTED]								
	11,021		\$ [REDACTED]								
18	-		\$ [REDACTED]	18	2,282		[REDACTED]	18	2,282		[REDACTED]
18	11,021		\$ [REDACTED]								
	11,021		\$ [REDACTED]								

Source: AL #10
 Calculation accuracy was done on W/P 44-6/1. 44-6 p1
 Overage is actually [REDACTED] its immaterial.

19	-	\$	[REDACTED]
19	12,792		[REDACTED]
	<u>12,792</u>		[REDACTED]
20	-		[REDACTED]
20	12,084		[REDACTED]
	<u>12,084</u>		[REDACTED]
21	-		[REDACTED]
21	1,198		[REDACTED]
	<u>1,198</u>		[REDACTED]
22	2,075		[REDACTED]
22	10,876		[REDACTED]
	<u>12,951</u>		[REDACTED]
23	2,598		[REDACTED]
23	10,174		[REDACTED]
	<u>12,772</u>		[REDACTED]
24	2,598		[REDACTED]
24	10,174		[REDACTED]
	<u>12,772</u>		[REDACTED]
25	2,598		[REDACTED]
25	10,174		[REDACTED]
	<u>12,772</u>		[REDACTED]
26	2,598		[REDACTED]
26	10,674		[REDACTED]
	<u>13,272</u>		[REDACTED]
27	-		[REDACTED]
27	1,140		[REDACTED]
	<u>1,140</u>		[REDACTED]
28	-		[REDACTED]
28	2,083		[REDACTED]
	<u>2,083</u>		[REDACTED]
29	-	\$	[REDACTED]
29	2,980	\$	[REDACTED]
	<u>2,980</u>	\$	[REDACTED]
30	-	\$	[REDACTED]
30	2,980	\$	[REDACTED]
	<u>2,980</u>	\$	[REDACTED]
31	-	\$	[REDACTED]
31	2,980	\$	[REDACTED]
	<u>2,980</u>	\$	[REDACTED]

19	-	[REDACTED]
20	-	[REDACTED]
21	-	[REDACTED]
22	2,075	[REDACTED]
23	2,696	[REDACTED]
24	2,696	[REDACTED]
25	2,696	[REDACTED]
26	2,696	[REDACTED]
27	-	[REDACTED]
28	1,451	[REDACTED]
29	1,555	[REDACTED]
30	1,555	[REDACTED]
31	1,555	[REDACTED]

19	-	[REDACTED]
20	-	[REDACTED]
21	-	[REDACTED]
22	2,075	[REDACTED]
23	2,696	[REDACTED]
24	2,696	[REDACTED]
25	2,696	[REDACTED]
26	2,696	[REDACTED]
27	-	[REDACTED]
28	1,451	[REDACTED]
29	1,555	[REDACTED]
30	1,555	[REDACTED]
31	1,555	[REDACTED]

289,200

44-6
2 - 288,268
932

64,388

44-1

44-6p2

PBC

CONFIDENTIAL

Florida City Gas
 Purchase Gas Recovery Audit
 Dkt # 100003-GU, AC# 10-007-4-1
 TYE 12/31/2009
 Title: Comparison Schedule Recal

KW 7/26/10
 BM
 7/22/10

Comparison of Sequent Daily Purchase Cost to FCG Daily Purchase Cost

Total Sequent Daily Purchase				FCG Daily Ordered				Difference Value			
Day	Volume	Price	Amount	Day	Volume	Price	Amount	Day	Volume	Price	Amount
1	5,141		\$								
1	8,837		\$	1	4,326		\$	1	4,326		\$
	13,978		\$								
2	899		\$	2	3,723		\$	2	3,723		\$
2	10,916		\$								
	11,615		\$								
3	-		\$	3	3,723		\$	3	3,723		\$
3	10,842		\$								
	10,842		\$								
4	-		\$	4	3,723		\$	4	3,723		\$
4	10,842		\$								
	10,842		\$								
5	-		\$	5	3,111		\$	5	3,111		\$
5	3,588		\$								
	3,588		\$								
6	-		\$	6	3,136		\$	6	3,136		\$
6	11,907		\$								
	11,907		\$								
7	-		\$	7	2,100		\$	7	2,100		\$
7	10,352		\$								
	10,352		\$								
8	-		\$	8	1,307		\$	8	1,307		\$
8	8,433		\$								
	8,433		\$								
9	-		\$	9	1,037		\$	9	1,037		\$
9	9,808		\$								
	9,808		\$								
10	-		\$	10	1,037		\$	10	1,037		\$
10	9,809		\$								
	9,809		\$								
11	-		\$	11	1,037		\$	11	1,037		\$
11	9,809		\$								
	9,809		\$								
12	-		\$	12	3,421		\$	12	3,421		\$
12	9,811		\$								
	9,811		\$								
13	-		\$	13	3,214		\$	13	3,214		\$
13	9,913		\$								
	9,913		\$								
14	0		\$	14	1,611		\$	14	1,611		\$
14	10,395		\$								
	10,395		\$								
15	-		\$	15	2,072		\$	15	2,072		\$
15	11,327		\$								
	11,327		\$								
16	-		\$	16	2,282		\$	16	2,282		\$
16	11,021		\$								
	11,021		\$								
17	-		\$	17	2,282		\$	17	2,282		\$
17	11,021		\$								
	11,021		\$								
18	-		\$	18	2,282		\$	18	2,282		\$
18	11,021		\$								
	11,021		\$								
19	-		\$	19	-		\$	19	-		\$
19	12,792		\$								
	12,792		\$								

Source:
 AP # 10

Checked the accuracy of the comparison schedule.

44-6
 1 pl

20	-	[REDACTED]
20	12,084	[REDACTED]
	<u>12,084</u>	[REDACTED]
21	-	[REDACTED]
21	1,198	[REDACTED]
	<u>1,198</u>	[REDACTED]
22	2,075	[REDACTED]
22	10,876	[REDACTED]
	<u>12,951</u>	[REDACTED]
23	2,598	[REDACTED]
23	10,174	[REDACTED]
	<u>12,772</u>	[REDACTED]
24	2,598	[REDACTED]
24	10,174	[REDACTED]
	<u>12,772</u>	[REDACTED]
25	2,598	[REDACTED]
25	10,174	[REDACTED]
	<u>12,772</u>	[REDACTED]
26	2,598	[REDACTED]
26	10,674	[REDACTED]
	<u>13,272</u>	[REDACTED]
27	-	[REDACTED]
27	1,140	[REDACTED]
	<u>1,140</u>	[REDACTED]
28	-	[REDACTED]
28	2,083	[REDACTED]
	<u>2,083</u>	[REDACTED]
29	-	[REDACTED]
29	2,980	[REDACTED]
	<u>2,980</u>	[REDACTED]
30	-	[REDACTED]
30	2,980	[REDACTED]
	<u>2,980</u>	[REDACTED]
31	-	[REDACTED]
31	2,880	[REDACTED]
	<u>2,880</u>	[REDACTED]
	<u>288,268</u>	[REDACTED]

44-6
2

20	-	[REDACTED]
21	-	[REDACTED]
22	2,074	[REDACTED]
23	2,696	[REDACTED]
24	2,696	[REDACTED]
25	2,696	[REDACTED]
26	2,696	[REDACTED]
27	-	[REDACTED]
28	1,451	[REDACTED]
29	1,555	[REDACTED]
30	1,555	[REDACTED]
31	1,555	[REDACTED]
	<u>64,398</u>	[REDACTED]

44-1

20	-	[REDACTED]
21	-	[REDACTED]
22	2,074	[REDACTED]
23	2,696	[REDACTED]
24	2,696	[REDACTED]
25	2,696	[REDACTED]
26	2,696	[REDACTED]
27	-	[REDACTED]
28	1,451	[REDACTED]
29	1,555	[REDACTED]
30	1,555	[REDACTED]
31	1,555	[REDACTED]
		[REDACTED]

44-6
1 p 2

PBC

CONFIDENTIAL

Florida City Gas
Purchase Gas Recovery Audit
Dkt # 100003-GU, AC# 10-007-4-1
TYE 12/31/2009
Title: Deal 1053619

10/12/10
BM
7/22/10

1053619				1053619			
Day	Volume	Price	Amt	Day	Volume	Price	Amt
1	5,141		\$ [REDACTED]	1	8,837		\$ [REDACTED]
2	699		\$ [REDACTED]	2	10,916		\$ [REDACTED]
3	0		\$ -	3	10,842		\$ [REDACTED]
4	0		\$ -	4	10,842		\$ [REDACTED]
5	0		\$ -	5	3,588		\$ [REDACTED]
6	0		\$ -	6	11,907		\$ [REDACTED]
7	0		\$ -	7	10,352		\$ [REDACTED]
8	0		\$ -	8	8,433		\$ [REDACTED]
9	0		\$ -	9	9,808		\$ [REDACTED]
10	0		\$ -	10	9,809		\$ [REDACTED]
11	0		\$ -	11	9,809		\$ [REDACTED]
12	0		\$ -	12	9,811		\$ [REDACTED]
13	0		\$ -	13	9,913		\$ [REDACTED]
14	0		\$ -	14	10,395		\$ [REDACTED]
15	0		\$ -	15	11,327		\$ [REDACTED]
16	0		\$ -	16	11,021		\$ [REDACTED]
17	0		\$ -	17	11,021		\$ [REDACTED]
18	0		\$ -	18	11,021		\$ [REDACTED]
19	0		\$ -	19	12,792		\$ [REDACTED]
20	0		\$ -	20	12,084		\$ [REDACTED]
21	0		\$ -	21	1,198		\$ [REDACTED]
22	2,075		\$ [REDACTED]	22	10,876		\$ [REDACTED]
23	2,598		\$ [REDACTED]	23	10,174		\$ [REDACTED]
24	2,598		\$ [REDACTED]	24	10,174		\$ [REDACTED]
25	2,598		\$ [REDACTED]	25	10,174		\$ [REDACTED]
26	2,598		\$ [REDACTED]	26	10,674		\$ [REDACTED]
27	0		\$ -	27	1,140		\$ [REDACTED]
28	0		\$ -	28	2,083		\$ [REDACTED]
29	0		\$ -	29	2,980		\$ [REDACTED]
30	0		\$ -	30	2,980		\$ [REDACTED]
31	0		\$ -	31	2,980		\$ [REDACTED]
			(A) 18,307				(A) 269,961
			(B) [REDACTED]				(B) \$ [REDACTED]

44-5
1 p2

$$\begin{aligned} \sum (A) &= 288,268 \\ \sum (B) &= [REDACTED] \end{aligned} \left. \begin{array}{l} \\ \end{array} \right\} \begin{array}{l} \text{WP 44-6} \\ \text{WP 44-6/1} \end{array}$$

Source: AR # 10

Compiled from the Endura System

44-6
1.

**Sequent Energy Management
FCG Book
Twelve months ended March 31, 2009**

Month	Aggregate Net Margin	Annual Value Allocation		Net Amount FCG-PGA
		FCG Agent 50%	FCG-PGA 50%	
April 2008	\$ $\frac{45-1}{1}$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
May 2008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
June 2008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
July 2008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
August 2008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
September 2008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
October 2008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
November 2008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
December 2008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
January 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
February 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
March 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]

(ZPS)

Source: Reg # 10

CONFIDENTIAL

PBC

Florida City Gas
PGA
Dckt#100003-GU Audit#10-007-4-1
TYE 12/31/2009
Title: O&S Revenues - SGT's Profit
Shareholder - 2009

WJL
1/19/12

Sequent Energy Management
 FCG Book Value
 April 2008

ppb

	<u>Volume</u>	<u>Dollars</u>	
Sales			
Revenue from sale to FCG			
Florida Gas Transmission	(354,994)	[REDACTED]	
Total revenue from sale to FCG			\$ [REDACTED]
Revenue from Asset Management Sales			
Florida Gas Transmission	(41,669)	[REDACTED]	
Capacity Release			
Total revenue from Asset Management Sales			\$ [REDACTED]
Total Sales			\$ [REDACTED]
Cost of Sales			
Gas Cost			
Florida Gas Transmission	412,528	[REDACTED]	
Total Gas Cost			\$ [REDACTED]
Transportation Cost			
Florida Gas Transmission		[REDACTED]	
Bay Gas Storage			
Total Transport Cost			\$ [REDACTED]
Total Cost of Sales			\$ [REDACTED]
Total Realized Physical			\$ [REDACTED]
Realized Financial			\$ [REDACTED]
Total Realized FCG Book Value			\$ [REDACTED]
Unrealized Losses, net			\$ [REDACTED]
Total Aggregate net margin FCG book value			\$ [REDACTED]

CONFIDENTIAL

Florida City Gas
 PGA
 Dckt#100003-GU Audi#10-007-4-1
 TYE 12/31/2009
 Title: OSS Schedule 428

M/K
Bm
7/9/10

45-1

Source: Reg #10

45-1
10/1

Sequent Energy Management
 FCG Book Value
 May 2008

	<u>Volume</u>	<u>Dollars</u>	
Sales			
Revenue from sale to FCG			
Florida Gas Transmission	(341,288)	██████████	
Total revenue from sale to FCG		\$ ██████████	
Revenue from Asset Management Sales			
Florida Gas Transmission	(68,283)	██████████	
Capacity Release		██████████	
Total revenue from Asset Management Sales		\$ ██████████	
Total Sales			\$ ██████████
Cost of Sales			
Gas Cost			
Florida Gas Transmission	425,675	██████████	
Total Gas Cost		\$ ██████████	
Transportation Cost			
Florida Gas Transmission		██████████	
Bay Gas Storage		██████████	
Total Transport Cost		\$ ██████████	
Total Cost of Sales			\$ ██████████
Total Realized Physical			\$ ██████████
Realized Financial			\$ ██████████
Total Realized FCG Book Value			\$ ██████████
Unrealized Losses, net			\$ ██████████
Total Aggregate net margin FCG book value			\$ ██████████ (45-1)

2

Sequent Energy Management
 FCG Book Value
 June 2008

	<u>Volume</u>	<u>Dollars</u>	
Sales			
Revenue from sale to FCG			
Florida Gas Transmission	(281,018)	██████████	
Total revenue from sale to FCG		\$ ██████████	
Revenue from Asset Management Sales			
Florida Gas Transmission	(170,468)	██████████	
Capacity Release		██████████	
Total revenue from Asset Management Sales		\$ ██████████	
Total Sales			\$ ██████████
Cost of Sales			
Gas Cost			
Florida Gas Transmission	467,258	██████████	
Total Gas Cost		\$ ██████████	
Transportation Cost			
Florida Gas Transmission		██████████	
Bay Gas Storage		██████████	
Total Transport Cost		\$ ██████████	
Total Cost of Sales			\$ ██████████
Total Realized Physical			\$ ██████████
Realized Financial			\$ ██████████
Total Realized FCG Book Value			\$ ██████████
Unrealized Losses, net			\$ ██████████
Total Aggregate net margin FCG book value			\$ ██████████

45-1

93

Sequent Energy Management
 FCG Book Value
 July 2008

	<u>Volume</u>	<u>Dollars</u>	
Sales			
Revenue from sale to FCG			
Florida Gas Transmission	(287,937)	██████████	
Total revenue from sale to FCG		██████████	
Revenue from Asset Management Sales			
Florida Gas Transmission	(124,025)	██████████	
Capacity Release		██████████	
Total revenue from Asset Management Sales		\$ ██████████	
Total Sales			\$ ██████████
Cost of Sales			
Gas Cost			
Florida Gas Transmission	427,705	██████████	
Total Gas Cost		\$ ██████████	
Transportation Cost			
Florida Gas Transmission		██████████	
Bay Gas Storage		██████████	
Total Transport Cost		\$ ██████████	
Total Cost of Sales			\$ ██████████
Total Realized Physical			\$ ██████████
Realized Financial			\$ ██████████
Total Realized FCG Book Value			\$ ██████████
Unrealized Losses, net			\$ ██████████
Total Aggregate net margin FCG book value			\$ ██████████

45-1

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Sequent Energy Management
 FCG Book Value
 August 2008

	<u>Volume</u>	<u>Dollars</u>
Sales		
Revenue from sale to FCG		
Florida Gas Transmission	(231,395)	
Total revenue from sale to FCG		
Revenue from Asset Management Sales		
Florida Gas Transmission	(286,975)	
Capacity Release		
Total revenue from Asset Management Sales		
Total Sales		
Cost of Sales		
Gas Cost		
Florida Gas Transmission	537,880	
Total Gas Cost		
Transportation Cost		
Florida Gas Transmission		
Bay Gas Storage		
Total Transport Cost		
Total Cost of Sales		
Total Realized Physical		
Realized Financial		
Total Realized FCG Book Value		
Unrealized Losses, net		
Total Aggregate net margin FCG book value		

Sequent Energy Management
 FCG Book Value
 September 2008

	<u>Volume</u>	<u>Dollars</u>
Sales		
Revenue from sale to FCG		
Florida Gas Transmission	(247,416)	[REDACTED]
Total revenue from sale to FCG		\$ [REDACTED]
Revenue from Asset Management Sales		
Florida Gas Transmission	(164,537)	[REDACTED]
Capacity Release		[REDACTED]
Total revenue from Asset Management Sales		\$ [REDACTED]
Total Sales		\$ [REDACTED]
Cost of Sales		
Gas Cost		
Florida Gas Transmission	427,168	[REDACTED]
Total Gas Cost		\$ [REDACTED]
Transportation Cost		
Florida Gas Transmission		[REDACTED]
Bay Gas Storage		[REDACTED]
Total Transport Cost		\$ [REDACTED]
Total Cost of Sales		\$ [REDACTED]
Total Realized Physical		\$ [REDACTED]
Realized Financial		\$ [REDACTED]
Total Realized FCG Book Value		\$ [REDACTED]
Unrealized Losses, net		\$ [REDACTED]
Total Aggregate net margin FCG book value		\$ [REDACTED] 45-1

nd

Sequent Energy Management
 FCG Book Value
 October 2008

	<u>Volume</u>	<u>Dollars</u>
Sales		
Revenue from sale to FCG		
Florida Gas Transmission	(331,714)	
Total revenue from sale to FCG		
Revenue from Asset Management Sales		
Florida Gas Transmission	(173,375)	
Capacity Release		
Total revenue from Asset Management Sales		
Total Sales		
Cost of Sales		
Gas Cost		
Florida Gas Transmission	523,244	
Total Gas Cost		
Transportation Cost		
Florida Gas Transmission		
Bay Gas Storage		
Total Transport Cost		
Total Cost of Sales		
Total Realized Physical		
Realized Financial		
Total Realized FCG Book Value		
Unrealized Losses, net		
Total Aggregate net margin FCG book value		

67

Sequent Energy Management
 FCG Book Value
 November 2008

	<u>Volume</u>	<u>Dollars</u>	
Sales			
Revenue from sale to FCG			
Florida Gas Transmission	(330,969)	██████████	
Total revenue from sale to FCG		\$ ██████████	
Revenue from Asset Management Sales			
Florida Gas Transmission	(30,596)	██████████	
Capacity Release		██████████	
Total revenue from Asset Management Sales		\$ ██████████	
Total Sales			\$ ██████████
Cost of Sales			
Gas Cost			
Florida Gas Transmission	373,095	██████████	
Total Gas Cost		\$ ██████████	
Transportation Cost			
Florida Gas Transmission		██████████	
Buy Gas Storage		██████████	
Total Transport Cost		\$ ██████████	
Total Cost of Sales			\$ ██████████
Total Realized Physical			\$ ██████████
Realized Financial			\$ -
Total Realized FCG Book Value			\$ ██████████
Unrealized Losses, net			\$ -
Total Aggregate net margin FCG book value			\$ ██████████ 45-1

92

Sequent Energy Management
 FCG Book Value
 December 2008

	<u>Volume</u>	<u>Dollars</u>
Sales		
Revenue from sale to FCG		
Florida Gas Transmission	(421,137)	
Total revenue from sale to FCG		
Revenue from Asset Management Sales		
Florida Gas Transmission	(10,950)	
Capacity Release		
Total revenue from Asset Management Sales		
Total Sales		
Cost of Sales		
Gas Cost		
Florida Gas Transmission	446,414	
Total Gas Cost		
Transportation Cost		
Florida Gas Transmission		
Bay Gas Storage		
Total Transport Cost		
Total Cost of Sales		
Total Realized Physical		
Realized Financial		
Total Realized FCG Book Value		
Unrealized Losses, net		
Total Aggregate net margin FCG book value		

Sequent Energy Management
 FCG Book Value
 January 2009

	<u>Volume</u>	<u>Dollars</u>
Sales		
Revenue from sale to FCG		
Florida Gas Transmission	(455,641)	
Total revenue from sale to FCG		
Revenue from Asset Management Sales		
Florida Gas Transmission	(218,885)	
Capacity Release		
Total revenue from Asset Management Sales		
Total Sales		
Cost of Sales		
Gas Cost		
Florida Gas Transmission	695,369	
Total Gas Cost		
Transportation Cost		
Florida Gas Transmission		
Bay Gas Storage		
Total Transport Cost		
Total Cost of Sales		
Total Realized Physical		
Realized Financial		
Total Realized FCG Book Value		
Unrealized Losses, net		
Total Aggregate net margin FCG book value		

210

Sequent Energy Management
 FCG Book Value
 February 2009

	<u>Volume</u>	<u>Dollars</u>
Sales		
Revenue from sale to FCG		
Florida Gas Transmission	(403,417)	[REDACTED]
Total revenue from sale to FCG		\$ [REDACTED]
Revenue from Asset Management Sales		
Florida Gas Transmission	(133,946)	[REDACTED]
Capacity Release		[REDACTED]
Total revenue from Asset Management Sales		\$ [REDACTED]
Total Sales		\$ [REDACTED]
Cost of Sales		
Gas Cost		
Florida Gas Transmission	553,792	[REDACTED]
Total Gas Cost		\$ [REDACTED]
Transportation Cost		
Florida Gas Transmission		[REDACTED]
Bay Gas Storage		[REDACTED]
Total Transport Cost		\$ [REDACTED]
Total Cost of Sales		\$ [REDACTED]
Total Realized Physical		\$ [REDACTED]
Realized Financial		\$ [REDACTED]
Total Realized FCG Book Value		\$ [REDACTED]
Unrealized Losses, net		\$ [REDACTED]
Total Aggregate net margin FCG book value		\$ [REDACTED] 45-1

p11

Sequent Energy Management
 FCG Book Value
 March 2009

	<u>Volume</u>	<u>Dollars</u>
Sales		
Revenue from sale to FCG		
Florida Gas Transmission	(175,173)	██████████
Total revenue from sale to FCG		\$ ██████████
Revenue from Asset Management Sales		
Florida Gas Transmission	(53,280)	██████████
Capacity Release		
Total revenue from Asset Management Sales		\$ ██████████
Total Sales		\$ ██████████
Cost of Sales		
Gas Cost		
Florida Gas Transmission	441,828	██████████
Total Gas Cost		\$ ██████████
Transportation Cost		
Florida Gas Transmission		██████████
Bay Gas Storage		
Total Transport Cost		\$ ██████████
Total Cost of Sales		\$ ██████████
Total Realized Physical		\$ ██████████
Realized Financial		\$ ██████████
Total Realized FCG Book Value		\$ ██████████
Unrealized Losses, net		
Total Aggregate net margin FCG book value		\$ ██████████ 45-1

912

**Sequent Energy Management
FCG Book
Twelve months ended March 31, 2010**

Month	Aggregate Net Margin	Annual Value Allocation		Net Amount FCG-PGA
		FCG Agent 50%	FCG-PGA 50%	
April 2009	\$ [REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]
May 2009	\$ <u>44-5</u> [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
June 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
July 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
August 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
September 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
October 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
November 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
December 2009	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
January 2010	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
February 2010	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
March 2010	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]

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Source: Key # 10
 ✓ = Traced to OSS Revenue Schedules
 A = Recalculated for mathematical accuracy
 The month of May 2009 was tested on WP 44-5.

Florida City Gas
 PGA
 Doc#100003-GU Audit#10-007-4-1
 TYE 12/31/2009
 Title: 50% Profit Sharing - 2010
 OSS Revenue
 7/9/10
 Bm
 7/9/10

R-G

**Sequent Energy Management
FCG Book Value
May 2009**

	<u>Volume</u>	<u>Dollars</u>	
Sales			
Revenue from sale to FCG Florida Gas Transmission	Ⓐ (279,021)	[REDACTED]	
Total revenue from sale to FCG		\$ [REDACTED]	
Revenue from Asset Management Sales Florida Gas Transmission Capacity Release	Ⓜ (218,200)	[REDACTED]	
Total revenue from Asset Management Sales		\$ [REDACTED]	
Total Sales		\$ [REDACTED]	
Cost of Sales			
Gas Cost Florida Gas Transmission	Ⓜ 512,932	[REDACTED]	
Total Gas Cost		\$ [REDACTED]	
Transportation Cost Florida Gas Transmission Bay Gas Storage		[REDACTED]	
Total Transport Cost		\$ [REDACTED]	
Total Cost of Sales		\$ [REDACTED]	
Total Realized Physical		\$ [REDACTED]	
Realized Financial		\$ [REDACTED]	
Total Realized FCG Book Value		\$ [REDACTED]	
Unrealized Losses, net		\$ [REDACTED]	
Total Aggregate net margin FCG book value		\$ [REDACTED]	

Attachment II

Ⓜ - 1

Ⓐ = 204,600 - Base load
62,107 - Swing
12,315 - Bay Gas

279,021 - Total

Ⓜ - 1 p2

Ⓜ - 1

Ⓜ - 1

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Florida City Gas
PGA
Ded#100003-GU Audit#10-007-4-1
TYE 12/31/2009
Title: Net Margin Calculation

1/12/10
RM
2/2/10

Log # 207
45.2
1