

Diamond Williams

090539-GU

From: Ann Bassett [abassett@lawfla.com]
Sent: Friday, April 29, 2011 8:59 AM
To: Filings Electronic <Filings@PSC.STATE.FL.US
Cc: Melvin Williams; Shannon Pierce; Floyd Self; David Hope; Henry Gillman; Anna Williams; Martha Brown
Subject: Docket No. 090539-GU
Attachments: 2011-04-29, FCG's Notice of Withdrawal of Request for Confid. Class.pdf

The person responsible for this electronic filing is:

Floyd R. Self
 Messer, Caparello & Self, P.A.
 P.O. Box 15579
 Tallahassee, FL 32317
 (850) 222-0720
fself@lawfla.com

The Docket No. is 090539-GU - Petition for approval of Special Gas Transportation Service agreement with Florida City Gas by Miami-Dade County through Miami-Dade Water and Sewer Department

This is being filed on behalf of Florida City Gas

Florida City Gas' Notice of Withdraw of Requests for Confidential Classification

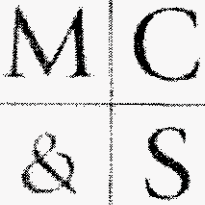
Total Number of Pages is 22

Ann Bassett
 Messer, Caparello & Self, P.A.
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 P.O. Box 15579
 Tallahassee, FL 32317
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 Fax No. 850-224-4359
 Email Address: <abassett@lawfla.com>
 Web Address: <www.lawfla.com>

COM _____
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4/29/2011

DOCUMENT NUMBER-DATE
 02932 APR 29 =
 FPSC-COMMISSION CLERK



MESSER CAPARELLO & SELF, P.A.

Attorneys At Law
www.lawfla.com

April 29, 2011

VIA ELECTRONIC FILING

Ms. Ann Cole, Commission Clerk
Office of Commission Clerk
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

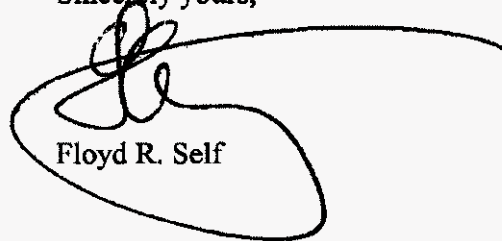
Re: Docket No. 090539-GU

Dear Ms. Cole:

Enclosed for filing on behalf of Florida City Gas is an electronic version of Florida City Gas' Notice of withdrawal of Requests for Confidential Classification in the above referenced docket.

Thank you for your assistance with this filing.

Sincerely yours,



Floyd R. Self

FRS/amb
Enclosure
cc: Shannon O. Pierce, Esq.
Parties of Record

DOCUMENT NUMBER - DATE
02932 APR 29 =
FPSC-COMMISSION CLERK

1 capacity of Miami-Dade's equipment. The derivation of the minimum annual volume
2 was believed by FCG at the time of the original contract to be necessary for Miami
3 Dade to qualify for the discount and provide support for its allocation of O&M costs.

4 4. *Please describe how the loss of Miami-Dade County would impact the general body of*
5 *ratepayers if the contract is not approved.*

6 Response: Under the Contract, if the Commission does not approve the contract as
7 written, the parties will enter into new negotiations to create a contract that can meet
8 Commission approval. It is important for the Company to continue serving Miami-
9 Dade as it provides significant incremental load to Florida City Gas system and its
10 service does allow certain O&M costs to be allocated to Miami Dade that would
11 otherwise have to be recovered by the general body or ratepayers. FCG also has the
12 potential of securing future growth opportunities associated with Miami Dade, as
13 Miami Dade County has six EMD engines at the same location burning diesel oil, and
14 Miami Dade is currently reviewing bids to convert these engines to natural gas.
15 Additionally, service to Miami Dade contributes \$853,392 to FCG's annual margins.
16 Of this, \$744,134 is recovered through the CRA tariff rider and \$109,258 is recovered
17 directly from Miami Dade under the contract rate.

18 5. *What other options does Miami-Dade County have to secure gas, if the contract is not*
19 *approved?*

20 Response: The first option for Miami Dade is to re-enter negotiations with FCG to
21 revise the proposed contract in a manner that will meet the standards for Commission
22 approval. The second option is for Miami Dade to bypass FCG and connect directly to
23 the Florida Gas Transmission line which is located outside its Alexander Orr facilities.
24 The proximity of this transmission line could prompt Miami-Dade to negotiate direct
25 interconnection for its entire account.

26 6. *What is the purpose for the new language on Page 11, Article XIII, Miscellaneous,*
27 *paragraph 6, of the new contract? What additional protection does it provide over the*
28 *previously included Force Majeure language?*

29 Response: The previously included Force Majeure language protects both parties
30 from liability as a result of events that are outside the control of the parties. If a Force

1 *Privileged and Confidential*

2 Responses to Question 4

3 Q: *What percentage of FCG total load does the Miami/Dade load subject to this contract represent?*

4 A: *The percentage of FCG total load Miami Dade contract represents is 8.51%.*

5 Q: *What is the potential new load associated with the six EMD engines?*

6 A: *The potential new load associated with the six EMD engines is 128,000 CFH.*

7 Q: *What would it cost Miami/Dade to bypass FCG and connect directly to FGT?*

8 A: *FCG does not have this information.*

9 Q: *What is the dollar amount that of fixed costs would be collected from the other ratepayers if Miami/Dade
10 did bypass FCG?*

11 A: *The amount of fixed costs that would be collected from the other ratepayers if Miami-Dade
12 bypasses FCG is \$324,342, annually.*

13 Q: *Wouldn't the loss of Miami/Dade reduce costs to the remainder of the ratepayers by the amount
14 currently collected through the CRA?*

15 A: *The loss of Miami-Dade would reduce the costs to the remainder of the ratepayers by
16 \$744,134 the amount currently collected through the CRA recovery factor, but this reduction
17 would be offset by the amount of \$109,258 that would have to be collected from the rest of the
18 ratepayers if FCG loses this customer.*

19 Attachment 1

20 Q: *How were the numbers in column 2 derived?*

21 A: *The numbers in column 2 were from the original cost analysis of NUI, the numbers in
22 column 3 were derived by applying the customer cost allocation factor in FPSC Order PSC-04-
23 0128-PAA-GU, Docket No. 030569-GU, for the GS-1250K customer class to FCG's annual
24 expenses. See attached excerpt.*

25 Q: *Does the last column represent the system average cost or the average cost to serve commercial
26 industrial customers similar to Miami/Dade?*

1 capacity of Miami-Dade's equipment. The derivation of the minimum annual volume
2 was believed by FCG at the time of the original contract to be necessary for Miami
3 Dade to qualify for the discount and provide support for its allocation of O&M costs.

- 4 4. *Please describe how the loss of Miami-Dade County would impact the general body of*
5 *ratepayers if the contract is not approved.*

6 Response: Under the Contract, if the Commission does not approve the contract as
7 written, the parties will enter into new negotiations to create a contract that can meet
8 Commission approval. It is important for the Company to continue serving Miami-
9 Dade as it provides significant incremental load to Florida City Gas system and its
10 service does allow certain O&M costs to be allocated to Miami Dade that would
11 otherwise have to be recovered by the general body or ratepayers. FCG also has the
12 potential of securing future growth opportunities associated with Miami Dade, as
13 Miami Dade County has six EMD engines at the same location burning diesel oil, and
14 Miami Dade is currently reviewing bids to convert these engines to natural gas.
15 Additionally, service to Miami Dade contributes \$853,392 to FCG's annual margins.
16 Of this, \$744,134 is recovered through the CRA tariff rider and \$109,258 is recovered
17 directly from Miami Dade under the contract rate.

- 18 5. *What other options does Miami-Dade County have to secure gas, if the contract is not*
19 *approved?*

20 Response: The first option for Miami Dade is to re-enter negotiations with FCG to
21 revise the proposed contract in a manner that will meet the standards for Commission
22 approval. The second option is for Miami Dade to bypass FCG and connect directly to
23 the Florida Gas Transmission line which is located outside its Alexander Orr facilities.
24 The proximity of this transmission line could prompt Miami-Dade to negotiate direct
25 interconnection for its entire account.

- 26 6. *What is the purpose for the new language on Page 11, Article XIII, Miscellaneous,*
27 *paragraph 6, of the new contract? What additional protection does it provide over the*
28 *previously included Force Majeure language?*

29 Response: The previously included Force Majeure language protects both parties
30 from liability as a result of events that are outside the control of the parties. If a Force

1 *Privileged and Confidential*

2
3 Responses to Question 4

4
5 *Q: What percentage of FCG total load does the Miami/Dade load subject to this contract represent?*

6
7 **A: The percentage of FCG total load Miami Dade contract represents is 8.51%.**

8
9 *Q: What is the potential new load associated with the six EMD engines?*

10
11 **A: The potential new load associated with the six EMD engines is 128,000 CFH.**

12
13 *Q: What would it cost Miami/Dade to bypass FCG and connect directly to FGT?*

14
15 **A: FCG does not have this information.**

16
17 *Q: What is the dollar amount that of fixed costs would be collected from the other ratepayers if*
18 *Miami/Dade did bypass FCG?*

19
20 **A: The amount of fixed costs that would be collected from the other ratepayers if Miami-**
21 **Dade bypasses FCG is \$324,342, annually.**

22
23 *Q: Wouldn't the loss of Miami/Dade reduce costs to the remainder of the ratepayers by the amount*
currently collected through the CRA?

24
25 **A: The loss of Miami-Dade would reduce the costs to the remainder of the ratepayers by**
26 **\$744,134 the amount currently collected through the CRA recovery factor, but this**
27 **reduction would be offset by the amount of \$109,258 that would have to be collected from**
28 **the rest of the ratepayers if FCG loses this customer.**

29
30
31
32 Attachment 1

33
34 *Q. How were the numbers in column 2 derived?*

35
36 **A: The numbers in column 2 were from the original cost analysis of NUI, the numbers in**
37 **column 3 were derived by applying the customer cost allocation factor in FPSC Order PSC**
38 **04-0128-PAA-GU, Docket No. 030569-GU, for the GS-1250K customer class to FCG's**
39 **annual expenses. See attached excerpt.**

40
41 *Q: Does the last column represent the system average cost or the average cost to serve commercial*
42 *industrial customers similar to Miami/Dade?*

DOCUMENT NO. 090539-GU
110709 JAN 20 09
FPSC - CONSUMER SERVICE

CONFIDENTIAL

	A	B	C	D	E	F	G
1	Florida City Gas						
2	Competitive Rate Adjustment Calculation						
3							
4	Summary of Shortfall						
5							
6							
7		Shortfall					
8	Customer	1997 to 1998	1998 to 1999	1999 to 2000	2000 to 2001	2001 to 2002	2002 to 2003
9							
10		\$ 67,580.70	\$ 25,857.80	\$ 34,741.47	\$ 10,591.26	\$ 898.26	\$ 900.00
11	Alexander Orr Water Treatment Plant -1	\$ 72,644.49	\$ 258,299.46	\$ 234,880.63	\$ 231,641.74	\$ 298,015.24	\$ 355,763.35
12	Alexander Orr Water Treatment Plant -2	\$ 19,407.16	\$ 73,545.05	\$ 75,701.57	\$ 86,485.37	\$ 95,691.10	\$ 73,692.89
13			\$ 43,441.74	\$ 63,706.39	\$ 64,838.35	\$ 105,925.78	\$ 95,976.31
14							
15	Miami Dade Water Sewer	\$ 52,285.87	\$ 156,431.58	\$ 168,863.53	\$ 207,496.49	\$ 233,833.84	\$ 240,835.09
16							
18						\$ 404.26	\$ 5,038.07
19			\$ 57,224.89	\$ 53,118.82	\$ 61,578.01	\$ 53,185.27	\$ 51,345.43
20			\$ 81,908.58	\$ 81,186.96	\$ 79,378.18	\$ 85,971.51	\$ 3.56
21				\$ 49,421.75	\$ 109,456.01	\$ 168,532.27	\$ 174,597.04
22		\$ 2,846.67	\$ 27,121.34	\$ 18,986.30	\$ -		
23							
24	Total	\$ 214,764.89	\$ 723,630.44	\$ 780,607.42	\$ 851,465.41	\$ 1,042,457.53	\$ 998,151.74
25							
26	CRA Recovery associated with Miami Dade	\$ 144,337.52	\$ 488,276.09	\$ 479,445.73	\$ 525,623.60	\$ 627,944.44	\$ 675,329.40

CONFIDENTIAL

	A	B	C	D	E	F	G
1	Florida City Gas						
2	Competitive Rate Adjustment Calculation						
3							
4	Summary of Shortfall						
5							
6							
7		Shortfall					
8	Customer	1997 to 1998	1998 to 1999	1999 to 2000	2000 to 2001	2001 to 2002	2002 to 2003
9							
10	Parmen Kendall	\$ 67,580.70	\$ 25,657.80	\$ 34,741.47	\$ 10,591.26	\$ 898.26	\$ 900.00
11	Alexander Orr Water Treatment Plant -1	\$ 72,644.49	\$ 258,299.46	\$ 234,880.63	\$ 231,641.74	\$ 298,015.24	\$ 355,763.35
12	Alexander Orr Water Treatment Plant -2	\$ 19,407.16	\$ 73,545.05	\$ 75,701.57	\$ 86,485.37	\$ 95,691.10	\$ 73,692.89
13	Baptist Hospital-1		\$ 43,441.74	\$ 63,706.39	\$ 64,838.35	\$ 105,925.78	\$ 95,976.31
14	Baptist Hospital-2						
15	Miami Dade Water Sewer	\$ 52,285.87	\$ 156,431.58	\$ 168,863.53	\$ 207,496.49	\$ 233,833.84	\$ 240,835.09
16	Ocean Spray						
18	WASA/Black Point					\$ 404.26	\$ 5,038.07
19	Florida Transport (Now Tallowmasters)		\$ 57,224.89	\$ 53,118.82	\$ 61,578.01	\$ 53,185.27	\$ 51,345.43
20	Rainbow Mills (Now Kell Tex)		\$ 81,908.58	\$ 81,186.96	\$ 79,378.18	\$ 85,971.51	\$ 3.56
21	Merritt Square Mall			\$ 49,421.75	\$ 109,456.01	\$ 168,532.27	\$ 174,597.04
22	Preferred Freezer	\$ 2,846.67	\$ 27,121.34	\$ 18,986.30	\$ -		
23							
24	Total	\$ 214,764.89	\$ 723,630.44	\$ 780,607.42	\$ 851,465.41	\$ 1,042,457.53	\$ 998,151.74
25							
26	CRA Recovery associated with Miami Dade	\$ 144,337.52	\$ 488,276.09	\$ 479,445.73	\$ 525,623.60	\$ 627,944.44	\$ 675,329.40

CONFIDENTIAL

	H	I	J	K	L	M	N
1							
2							
3							
4							
5							
6							
7							
8	2003 to 2004	2004 to 2005	2005 to 2006	2006 to 2007	2007 to 2008	2008 to 2009	Total
9							
10	\$ -						\$ 140,369.49
11	\$ 427,083.82	\$ 438,846.41	\$ 460,838.62	\$ 403,414.27	\$ 383,181.15	\$ 275,178.73	\$ 3,839,787.91
12	\$ 117,138.98	\$ 87,737.06	\$ 46,303.90	\$ 74,572.73	\$ 76,754.10	\$ 41,504.70	\$ 868,534.61
13	\$ 56,538.13	\$ 50,494.97	\$ 50,147.92	\$ 43,279.91	\$ 46,943.53	\$ 35,009.38	\$ 656,302.41
14	\$ 6,862.31	\$ 5,029.09	\$ 5,353.14	\$ 5,002.12	\$ 6,218.24	\$ 11,301.65	\$ 39,766.55
15	\$ 207,112.37	\$ 243,699.80	\$ 294,137.37	\$ 286,506.14	\$ 262,791.15	\$ 125,557.46	\$ 2,479,550.69
16	\$ 27,320.32	\$ -	\$ -				\$ 27,320.32
18	\$ 10,344.13	\$ 10,381.87	\$ 18,248.47	\$ 16,704.77	\$ 21,407.91	\$ 11,634.92	\$ 94,164.40
19	\$ 68,788.54	\$ 75,997.75	\$ 78,512.64	\$ 89,874.76	\$ 85,591.96	\$ 64,271.50	\$ 739,489.57
20							\$ 328,448.79
21	\$ 32,729.17		\$ -				\$ 534,736.24
22		\$ -					\$ 48,954.31
23							
24	\$ 953,917.77	\$ 912,186.96	\$ 953,542.06	\$ 919,354.70	\$ 862,888.04	\$ 564,458.34	\$ 9,797,425.30
25							
26	\$ 761,679.30	\$ 780,665.14	\$ 819,528.36	\$ 781,197.91	\$ 744,134.31	\$ 453,875.81	\$ 7,282,037.61

A	B	C	D	E	F	G	H	I	J	K	L
		Per Dec 09 Surveillance Report	Rat	Dec 2009 12 months expenses	Rat	Customer Cost Alloc Factor	Total	Estimated Split of Taxes			
1											
2											
3	Miami Dade Water and Sewer Water Plant - Alexander Orr										
4	Cost of Service and Rate Design										
5											
6	Description	Total									
7											
8	O&M Expenses	\$98,895	*	\$20,383,136	**	0.004842	\$98,895				
9											
10	Depreciation	\$46,393	*	\$9,581,342	**	0.004842	\$46,393				
11											
12	Taxes Other Than Income	\$12,636	*	\$2,609,677	**	0.004842	\$12,636				
13											
14	State Tax @ 5.5%	\$1,663	*	\$2,289,595	**	0.004842	\$11,086	0.15	\$1,663		
15											
16	Federal Tax @ 34.00%	\$9,423	*	\$2,289,595	**	0.004842	\$11,086	0.85	\$9,423		
17											
18		Sub-total		\$168,810			Sub-total of items above				
19											
20	Required Return on Investment ** (Rate base x ROR)	\$28,502		\$387,250	***	0.0736	\$28,502	The capital investment times approved rate of return pg 84 of PSC-04-0128-PAA-GU			
21											
22	Total Incremental Cost of Service	\$197,312					Formula adding sub-total plus ROI				
23											
24	Estimated Annual Volume (therms)	3,600,000				Based on prior three years average consumption					
25											
26	Incremental Cost Rate	\$0.05481				The incremental Cost of Service divided by Estimated Annual volume					
27											
28											
29	Miami Dade Water and Sewer Water Plant -										
30	Hialeah Water Plant and Black Point Cost of Service and Rate Design										
31											
32	Description	Total									
33											
34	O&M Expenses	\$98,895	*	\$18,108,414	**	0.004842	\$87,671				
35											
36	Depreciation	\$46,393	*	\$9,397,578	**	0.004842	\$45,503				
37											
38	Taxes Other Than Income	\$12,636	*	\$2,487,675	**	0.004842	\$12,094				
39											
40	State Tax @ 5.5%	\$1,663	*	\$3,490,872	**	0.004842	\$16,903	0.15	\$2,535		
41											
42	Federal Tax @ 34.00%	\$9,423	*	\$3,490,872	**	0.004842	\$16,903	0.85	\$14,367		
43											
44		Sub-total		\$168,810			Sub-total of items above				
45											
46	Required Return on Investment *** (Rate base x ROR)	\$61,326		\$833,239	***	0.0736	\$61,326	The capital investment times approved rate of return pg 84 of PSC-04-0128-PAA-GU			
47											
48	Total Incremental Cost of Service	\$230,137				Formula adding sub-total plus ROI					
49											
50	Estimated Annual Volume (therms)	2,325,000				Based on prior three years average consumption					
51											
52	Incremental Cost Rate	\$0.09898				The incremental Cost of Service divided by Estimated Annual volume					
53											
54											
55	Approved Rate of Return:	7.36%									
56											
57	* December 2009 12 months expenses using the Surveillance Report calculations (See attached worksheet)										
58	** Approved Customer Cost allocation factors from order PSC-04-0128-PAA-GU dated 2/9/04 pg 95										
59	*** Approved rate of return from order PSC-04-0128-PAA-GU dated 2/9/04 pg 84										

	A	B	C	D	E	F	G	H	I
1	Miami Dade Water and Sewer Margin Comparison								
2									
3	===== Margin Using GS-1250K Tariff Rate =====								
4	Account	Therms	Margin using 1998 Contract Rate	GS-1250K Customer Charge	GS-1250K Demand Charge	GS-1250K Energy Charge	Total GS-1250K Margin	CRA (Shortfall)	Shortfall %
5									
18	211-0756225-011	2,843,400	\$28,440	\$6,000	\$38,705	\$347,606	\$392,311	\$363,871	
36	211-0756239-011	441,348	\$4,416	\$6,000	\$10,532	\$53,955	\$70,487	\$66,071	
54	211-0754412-011	2,206,524	\$66,192	\$6,000	\$29,671	\$269,748	\$305,418	\$239,226	
72	211-0786676-001	0	\$0	\$6,000	\$7,962	\$0	\$13,962	\$13,962	
73									
74	Total All Accounts	5,491,272	\$99,048				\$782,178	\$683,130	87%



Water & Sewer
P.O. Box 330316 • 3071 SW 38th Avenue
Miami, Florida 33233-0316
T 305-665-7477 F 786-552-8763

Carlos Alvarez, Mayor

miamidade.gov

A B C

December 18, 2009

Mr. Henry P. Linginfelter
President
AGL Resources
Ten Peachtree Place
Atlanta, GA 30309

Re: November 2009 Invoices

<u>Account #</u>	<u>Invoice #</u>	<u>Amount</u>
211-0754412-011	200912-2714-AR531	\$ 5,811.77
211-0756225-011	200912-2715-AR531	\$ 2,085.13
211-0756239-011	200912-2716-AR531	\$ 219.21
211-0786676-001	200912-2718-AR531	\$ 00.00

Dear Mr. Linginfelter,

Miami-Dade County through the Miami-Dade Water and Sewer Department ("Department") has filed with the Florida Public Service Commission ("FPSC") a Petition for Approval of Special Gas Transportation Service Agreement ("Agreement") that was executed by you on behalf of Pivotal Utility Holdings, Inc. d/b/a Florida City Gas ("FCG") and approved by the Board of County Commissioners and executed by the Mayor of Miami-Dade County. The FPSC docket number is 090539-GU.

Pending FPSC issuance of an order addressing the Petition, the County will pay Florida City Gas the charges that the parties agreed to in the executed Agreement and deposit the difference between such charges and the charges recently levied by FCG into an escrow account.

Please note that FCG is prohibited from terminating transportation service to the County under section 10 subsection (6)(d) of Florida City Gas Tariff (sheet 15) which states that FCG is not authorized to terminate service to a customer for "failure to pay for a different class of service".

Sincerely,

John W. Renfrow, P.E.
Director

Cc: Joe Ruiz
Jack Langer
Matthew Feil, Esq.

A B C D E F G

12/16/09
13/16
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INVOICE for the Month of November 2009

FLORIDA CITY GAS
MAJOR ACCOUNTS INVOICE
933 EAST 26TH STREET
HIALEAH, FL 33013

Page: 1
Invoice No: 200912-2714-AR531
Invoice Date: 12/08/2009
Customer Number: 2110754412011
Due Date: 12/28/2009
Rate: GS-1250K
Location: 382

MIAMI DADE WATER SEWER
ACCOUNTS PAYABLE
C/O MIAMI DADE & WATER DEPT
P.O. BOX 330316
MIAMI FL 33293

Service Address:
700 W 2ND AVE (CP)
HIALEAH

AMOUNT DUE: \$ 63,076.68

Please Return This Portion With Your Payment

Amount Remitted

Please Remit To:
By Check:
Florida City Gas
Location 1100
P.O. Box 8720
Atlanta GA 31107-0720

By Wire:
Florida City Gas
Wachovia Bank Atlanta GA
ABA # 06100227
Account # 200003825681

Billing Inquiries:
Telephone: 305/835-3048

Account Number: 2110754412011
Gas Supplier: Interconn Resource Inc
Rate: GS-1250K

OK [Signature]
\$0.03 = 5,811.99

Line	Date of Service	Description	Quantity	UOM	Rate	Amount
TRANSPORTATION SERVICE						
1		Service Charge		EA	0.00	0.00
2		Board Rate		EA	111.00	0.00
3		Monthly Rate	193,731.00	TWD	0.00	0.00
4		CC&S Rate	193,731.00	TWD	0.00	0.00
5		CC&S Rate	193,731.00	TWD	0.00	0.00

SUBTOTAL: 11,174.31
OVERSIC INVOICE 200911-2670-AR531
OVERSIC INVOICE 200910-2405-AR531

TOTAL AMOUNT DUE: 11,174.31

PLEASE INCLUDE YOUR CUSTOMER NUMBER ON YOUR REMITTANCE TO ENSURE PROPER CREDIT.
MAKE CHECKS PAYABLE TO "FLORIDA CITY GAS"
PRODUCER FACTOR 10

Miami-Dade Water & Sewer Dept.
Water Production Division

EW101-730102-732020-WS13022-16002
12-9-09 CP

WASD Line Plant 194,181 There
193,190 CEFX 1-26

A B C D E F G

INVOICE for the Month of November 2009

**FLORIDA CITY GAS
MAJOR ACCOUNTS INVOICE
933 EAST 26TH STREET
MIAMI, FL 33013**

**ALEXANDER ORR JR WTR TRMT
P.O BOX 330318 ATT. ACCTB. PA
MIAMI FL 33233**

Services Address:
6309 SW 87TH AVE (CP)
MIAMI

Page: 1
Invoice No: 200912-2715-AR531
Invoice Date: 12/08/2009
Customer Number: 2110766225011
Dtl Date: 12/28/2009
Rate: 08-1250K
Location: 362

AMOUNT DUE: \$ 54,671.33

Please Return This Portion With Your Payment

<p>Please Remit To: By Check: Florida City Gas Location 1153 P.O. Box 6720 Atlanta GA 31107-0720</p>	<p>By Wire: Florida City Gas Wachovia Bank Atlanta GA ABA # 081000227 Account # 2000032A26581</p>
---	--

Billing Inquiries: Telephone: 305/835-3648

Account Number: 2110766225011
Gas Supplier: Interconn Resources Inc
Rate: 08-1250K

Line	Date of Service	Description	Quantity	UNIT	Rate	Amount
		TRANSPORTATION SERVICE				
1		Service Charge			0.00000	0.00
1		Demand Rate	21,120.00	TRM	1.14800	24,148.80
3		Margin Rate	197,022.00	TRM	0.13325	26,268.32
1		BOBT Rate	186,012.00	TRM	0.00000	0.00
3		CPA Rate	186,012.00	TRM	0.00000	0.00
SUBTOTAL:						54,671.33
GRAND TOTAL INVOICE 200912-2715-AR531						54,671.33

TOTAL AMOUNT DUE: 54,671.33

PLEASE INCLUDE YOUR CUSTOMER NUMBER ON YOUR REMITTANCE TO ENSURE PROPER CREDIT.
MAKE CHECKS PAYABLE TO "FLORIDA CITY GAS"
Pressure Factor 10

**Miami-Dade Water & Sewer Dept.
Water Production Division**

EW101-730102-722020 - W573013-16001
12-9-09 CP

[Signature]

WASD LINE RENT = 289,392 PERMS
147,540 REF Y-106

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OK [Signature]
2,085.13

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A B C D

Florida City Gas - Gas Volume Worksheet

12/07/2008 Gas Volume Worksheet for ALEXANDER ORR
 Billing Month: 11/1/2008

Acct.No.: 2110756225011
 Rate Schedule: GS-1250K

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Day	Usage (In MCF)		Usage (In DTH)	
	Total Measured	BTU Factor	Total Measured	
01	819.0	1.08	888.14	
02	201.0	1.08	217.08	
03	0.0	1.03	0	
04	0.0	1.08	0	
05	103.0	1.08	111.24	
06	774.0	1.08	836.44	
07	785.0	1.08	847.56	
08	819.0	1.08	884.14	
09	825.0	1.08	891.60	
10	823.0	1.08	888.84	
11	822.0	1.08	887.76	
12	808.0	1.08	872.64	
13	835.0	1.08	901.80	
14	831.0	1.08	897.48	
15	830.0	1.08	896.40	
16	814.0	1.08	879.00	
17	773.0	1.08	835.80	
18	887.0	1.08	957.96	
19	740.0	1.08	800.40	
20	742.0	1.08	801.36	
21	881.0	1.08	951.48	
22	886.0	1.08	956.88	
23	893.0	1.08	964.44	
24	835.0	1.08	901.80	
25	886.0	1.08	956.88	
26	843.0	1.08	910.44	
27	889.0	1.08	960.12	
28	875.0	1.08	944.00	
29	837.0	1.08	903.96	
30	838.0	1.08	905.04	
	19,871.0		20,851.28	

37 MONTHLY BALANCING

38 Total Volume in CCF: 198,710.0 Total Volume in Therms: 208,512.0
 39 Average BTU Factor: 1.03

A B C D E F G

INVOICE for the Month of November 2009

FLORIDA CITY GAS
MAJOR ACCOUNTS INVOICE
933 EAST 25TH STREET
HIALEAH, FL 33013

Page: 1
Invoice No: 200912-2716-AR531
Invoice Date: 12/08/2009
Customer Number: 2110758239011
Due Date: 12/28/2009
Rate: GS-1280K
Location: 362

ALEXANDER ORR WTR PLANT
Accounts Payable
P.O. BOX 330316
MIAMI FL 33333

Service Address:
6800 SW 87TH AVE (GEN.)
MIAMI

AMOUNT DUE: \$ 16,673.52

Please Return This Portion With Your Payment

Amount Remitted

Please Remit To:

By Check:
Florida City Gas
Location 1160
P.O. Box 5720
Atlanta GA 31107-0720

By Wire:
Florida City Gas
Wachovia Bank Atlanta GA
ABA # 061000227
Account # 200002826991

Billing Inquiries:
Telephone: 305/836-3646

Account Number: 2110758239011
Gas Supplier: Interconn Resources Inc
Rate: GS-1280K

Line	Date of Service	Description	Quantity	UNIT	Rate	Amount
TRANSPORTATION SERVICE						
1		Service Charge			0.0000	0.00
2		Demand Rate	2756270	MB	0.0000	0.00
3		Margin Rate	11,530.00	MB	0.0000	0.00
4		20% B-to	11,530.00	MB	0.0000	0.00
5		GTA Rate	11,530.00	MB	0.0000	0.00
SUBTOTAL:						0.00
OVERDUE INVOICE 200911-2638-AR531						787.00
OVERDUE INVOICE 200909-2196-AR531						1,031.52
OVERDUE INVOICE 200703-0074-AR531						375.75
TOTAL AMOUNT DUE:						16,174.27

PLEASE INCLUDE YOUR CUSTOMER NUMBER ON YOUR REMITTANCE TO ENSURE PROPER CREDIT.
MAKE CHECKS PAYABLE TO "FLORIDA CITY GAS"
Pressure Factor 10

Miami-Dade Water & Sewer Dept.
Water Production Division

EW101-730106-722020-WS73011-16001
12-9-09 CP

WASD
GEN. READINGS = 24522 @ 7.406 = 21,989 THRU

TOM BOARDMAN CHIEF

Handwritten notes on the left margin: 49, 40, 41, 43, 44, 45, 46, and other illegible scribbles.

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A B C D

Florida City Gas - Gas Volume Worksheet

12/07/2009 Gas Volume Worksheet for ALEXANDER ORR
 Billing Month: 11/1/2009

Acct.No.: 2110758238011
 Rate Schedule: GS-1250K

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Day	Usage (in MCF)		Usage (in DTH)	
	Total Measured	BTU Factor	Total Measured	
01	57.0	1.06	60.42	
02	85.0	1.06	90.10	
03	87.0	1.06	92.22	
04	99.0	1.06	104.64	
05	110.0	1.06	116.60	
06	55.0	1.06	58.30	
07	48.0	1.06	48.78	
08	81.0	1.06	85.88	
09	78.0	1.06	82.68	
10	78.0	1.06	83.74	
11	78.0	1.06	82.58	
12	104.0	1.06	110.24	
13	80.0	1.06	84.80	
14	30.0	1.06	31.80	
15	32.0	1.06	33.62	
16	75.0	1.06	78.50	
17	72.0	1.06	76.32	
18	48.0	1.06	47.70	
19	63.0	1.06	63.78	
20	78.0	1.06	82.68	
21	50.0	1.06	53.00	
22	74.0	1.03	76.44	
23	55.0	1.03	61.48	
24	72.0	1.06	76.32	
25	86.0	1.06	90.10	
26	80.0	1.06	83.80	
27	53.0	1.06	56.18	
28	81.0	1.06	85.88	
29	68.0	1.06	72.54	
30	82.0	1.06	86.72	
6	2,068.0		2,182.08	

37 MONTHLY BALANCING

38 Total Volume in CCF: 20,680.0 Total Volume in Therms: 21,820.8 ✓
 39 Average BTU Factor: 1.03

A B C D

INVOICE for the Month of November 2009

FLORIDA CITY GAS
MAJOR ACCOUNTS INVOICE
933 EAST 25TH STREET
HIALEAH, FL 33013

Page: 1
Invoice No: 200912-2718-AR531
Invoice Date: 12/08/2009
Customer Number: 2110786676001
Due Date: 12/28/2009
Rate: GS-1250K
Location: 362

WASA/BLACK POINT
C/O MIAMI DADE WATER & SEWER DEPART
ATTN. ACCOUNTS PAYABLE
P.O. BOX 330316
MIAMI FL 33233

Service Address:
8950 SW 232ND ST
MIAMI

CREDIT AMOUNT: (\$) 336.29

Please Return This Portion With Your Payment

\$ Amount Remitted

Please Remit To:

By Check:
Florida City Gas
Location 1190
P.O. Box 5720
Atlanta GA 31107-0720

By Wire:
Florida City Gas
Wachovia Bank Atlanta GA
ABA # 061000227
Account # 2000032626891

Billing Inquiries:
Telephone: 305/835-3648

Account Number: 2110786676001
Gas Supplier: Interconn Resources Inc
Rate: GS-1250K

Line	Date of Service	Description	Quantity	UOM	@ Rate	Amount
TRANSPORTATION SERVICE						
1		Service Charge	0.00	EA	0.00000	500.00
2		Demand Rate	1,546.00	TWH	0.28900	475.65
3		Margin Rate	0.00	TWH	0.13235	0.00
4		RCCR Rate	0.00	TWH	0.00000	0.00
5		CRA Rate	0.00	TWH	0.01039	0.00
SUBTOTAL:						975.65
CREDIT 200910-2563-AR531						(1,513.98)
TOTAL AMOUNT DUE :						(538.33)

PLEASE INCLUDE YOUR CUSTOMER NUMBER ON YOUR REMITTANCE TO ENSURE PROPER CREDIT.
MAKE CHECKS PAYABLE TO "FLORIDA CITY GAS"
Pressure Factor 10

Handwritten notes on the left margin including '11/13', 'CREDIT', 'WASA/BLACK POINT', 'C/O MIAMI DADE WATER & SEWER DEPART', 'ATTN. ACCOUNTS PAYABLE', 'P.O. BOX 330316', 'MIAMI FL 33233', 'Service Address: 8950 SW 232ND ST MIAMI', 'CREDIT AMOUNT: (\$ 336.29)', 'Please Return This Portion With Your Payment', 'Please Remit To:', 'By Check:', 'Florida City Gas', 'Location 1190', 'P.O. Box 5720', 'Atlanta GA 31107-0720', 'By Wire:', 'Florida City Gas', 'Wachovia Bank Atlanta GA', 'ABA # 061000227', 'Account # 2000032626891', 'Billing Inquiries:', 'Telephone: 305/835-3648', 'Account Number: 2110786676001', 'Gas Supplier: Interconn Resources Inc', 'Rate: GS-1250K', 'Line Date of Service Description Quantity UOM @ Rate Amount', 'TRANSPORTATION SERVICE', '1 Service Charge 0.00 EA 0.00000 500.00', '2 Demand Rate 1,546.00 TWH 0.28900 475.65', '3 Margin Rate 0.00 TWH 0.13235 0.00', '4 RCCR Rate 0.00 TWH 0.00000 0.00', '5 CRA Rate 0.00 TWH 0.01039 0.00', 'SUBTOTAL: 975.65', 'CREDIT 200910-2563-AR531 (1,513.98)', 'TOTAL AMOUNT DUE : (538.33)', 'PLEASE INCLUDE YOUR CUSTOMER NUMBER ON YOUR REMITTANCE TO ENSURE PROPER CREDIT.', 'MAKE CHECKS PAYABLE TO "FLORIDA CITY GAS"', 'Pressure Factor 10'

A B C D
Florida City Gas - Gas Volume Worksheet

12/07/2009 Gas Volume Worksheet for WASA BLACK POINT
 Billing Month: 11/1/2009

Acct.No.: 2110786678001
 Rate Schedule: GS-1250K

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Day	Usage (In MCF)		BTU Factor	Usage (In DTH)	
	Total Measured			Total Measured	
01	0.0		1.08	0	
02	0.0		1.08	0	
03	0.0		1.08	0	
04	0.0		1.08	0	
05	0.0		1.08	0	
06	0.0		1.08	0	
07	0.0		1.08	0	
08	0.0		1.08	0	
09	0.0		1.08	0	
10	0.0		1.08	0	
11	0.0		1.08	0	
12	0.0		1.08	0	
13	0.0		1.08	0	
14	0.0		1.08	0	
15	0.0		1.08	0	
16	0.0		1.08	0	
17	0.0		1.08	0	
18	0.0		1.08	0	
19	0.0		1.08	0	
20	0.0		1.08	0	
21	0.0		1.08	0	
22	0.0		1.08	0	
23	0.0		1.08	0	
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25	0.0		1.08	0	
26	0.0		1.08	0	
27	0.0		1.08	0	
28	0.0		1.08	0	
29	0.0		1.08	0	
30	0.0		1.08	0	
	0.0			0.00	

MONTHLY BALANCING

Total Volume in CCF: 0.0 Total Volume in Therms: 0.0
 Average BTU Factor: 1.08

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail and/or U.S. Mail this 29th day of April, 2011.

Anna Williams, Esq.
Martha Brown, Esq.
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Mr. Melvin Williams
Florida City Gas
955 East 25th Street
Hialeah, FL 33013

Shannon O. Pierce
AGL Resources, Inc.
Ten Peachtree Place, 15th Floor
Atlanta, GA 30309

Henry N. Gillman, Esq.
David Stephen Hope, Esq.
Miami-Dade County
111 NW First Street, Suite 2800
Miami, FL 33128-1993



Floyd R. Self