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April 18, 2018

**E-Portal**

Ms. Carlotta Stauffer, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 20180043-GU – Petition for approval of Area Extension Plan Rate Extension Agreement with United States Sugar Corporation, by Florida City Gas.**

Dear Ms. Stauffer:

Attached for filing in the referenced docket, please find Florida City Gas's Supplemental Amendatory Petition providing clarifications requested by Staff.

Thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,



Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for approval of Area Extension Plan Rate Extension Agreement with United States Sugar Corporation, by Florida City Gas	Docket No. 20180043-GU  Filed: April 18, 2018
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**SUPPLEMENTAL AMENDATORY PETITION FOR APPROVAL OF  
AREA EXTENSION PROGRAM (“AEP”) RATE  
EXTENSION AGREEMENT**

Florida City Gas (“FCG” or “Company”), by and through its undersigned attorneys, hereby submits this Supplemental Amendatory Petition, which revises portions of the Company’s Petition filed on February 20, 2018, initiating this proceeding (“February 20<sup>th</sup> Petition”). The Company adopts and incorporates the February 20<sup>th</sup> Petition, except to the limited extent set forth herein. By its February 20<sup>th</sup> Petition, the Company has requested, pursuant to Sections 366.04, 366.05 and 366.06, Florida Statutes, and in accordance with Rules 25-9.034, Florida Administrative Code, and 28-106.201, Florida Administrative Code, that the Florida Public Service Commission (“Commission”) approve a Rate Extension Agreement between the Company and United States Sugar Corporation (“U.S. Sugar”) regarding the AEP surcharge applicable to the Glades project. By this Supplemental Amendatory Petition, the Company amends Paragraphs 12, 15, 22, and 23 of the February 20<sup>th</sup> Petition as follows:

Paragraph 12: After numerous discussions with U.S. Sugar to better understand the impact the recalculated rate would have on their business, as well as other customers taking service on this line, the Company and U.S. Sugar reached a mutually beneficial agreement that will further extend the AEP for U.S. Sugar and its affiliates, while also reducing the Company’s risk of significant stranded investment.

Paragraph 15: The reset surcharge will be extended through November 2027 for U.S. Sugar and its affiliates that are Glades customers on the Glades AEP Project, which represents an additional 3-year extension of the AEP surcharge.

Paragraph 22: The Rate Extension Agreement represents a fair and reasonable solution that minimizes unexpected financial hardship to the customer because it avoids a significant jump in the AEP, while further extending the amortization period for this large customer for whom the project was primarily designed. It also allows the Company to recover a reasonable amount of its investment in the Glades AEP Project.

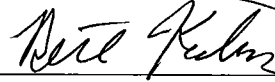
Paragraph 23: FCG has reached out to all of the other customers on the Glades AEP regarding the new AEP rate. Of the 38 customers on the project, FCG was not able to reach a manager for two customers, but left FCG contact information with the business. Of the other 36 with whom FCG communicated, all indicated that they understood the basis for the increase in the AEP rate. Several customers expressed appreciation for the Company's efforts to keep the AEP rate as low as possible.

All other provisions of the February 20<sup>th</sup> Petition are otherwise reaffirmed in all respects.

WHEREFORE, Florida City Gas hereby respectfully requests that the Commission approve the Rate Extension Agreement with U.S. Sugar Corporation.

Florida City Gas

Respectfully submitted this 18th day of April, 2018, by:



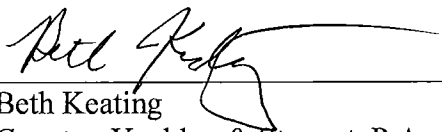
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Beth Keating, Esquire  
Gunster Law Firm  
215 South Monroe Street  
Suite 601  
Tallahassee, FL 32301  
*Attorneys for Florida City Gas*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by Electronic Mail this 18<sup>th</sup> day of April, 2018.

<p>Walter Trierweiler Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 wtrierwe@psc.state.fl.us</p>	
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By:   
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