

Writer's E-Mail Address: bkeating@gunster.com

September 3, 2019

VIA E-PORTAL

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20190083-GU: Petition for Rate Increase by Sebring Gas System, Inc.

Dear Mr. Teitzman:

Attached, for electronic filing in the above referenced matter, please find Sebring Gas System's Responses to Staff's Fifth Data Requests.

Thank you for your assistance with this filing. As always, please do not hesitate to contact me if you have any questions whatsoever.

Sincerely,



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

MEK

ATTACHMENTS

cc:// Office of Public Counsel (Kelly/Fall-Fry)



**Sebring Gas System, Inc.
Docket No. 20190083-GU
Responses to Staff's
Fifth Set of Data Requests**

1. Please provide a map of the Utility's service territory showing existing and proposed lines, existing customers, and proposed customers.

Response: Please see attached maps of Company's Sebring, Wauchula and Arcadia distribution systems showing existing and proposed lines, existing territory and the customers served therein and proposed customers.

2. Please refer to MFR Schedule I-2. Please provide further details on the Commission rule violations for notice numbers: SEBGS GS-2117, SEBGS GS-1384, SEBGS GS-1420, and SEBGS GS-1433.

Response: Please see attached Company responses to the Commission regarding the violations for the above-references notice numbers.

3. For each cost identified on Schedule G-1 page 23, please provide the following (if available):
 - a. Bids associated with the Purchase Price or Construction Cost.
 - b. Invoices associated with the Purchase Price or Construction Cost.

Response: The costs shown on Schedule G-1, page 23 are projected costs; therefore, other than the expansion projects for Wauchula and Arcadia, information on which are attached, there are no bids or invoices associated with the other listed assets. The projected costs for the other assets were generally obtained through an informal process. The Company obtained oral information from the appropriate vendors for each asset type. This information was not a formal quote, as most of these assets are either not going to be purchased until several/many months after the preparation of the instant case or require detailed engineering drawings to obtain firm bids. As described in the Direct Testimony of Mr. Bruce Christmas on pages 4 through 7, the results of this informal process form the basis for the projected costs of each plant account.

4. For each cost identified on Schedule G-1 page 26, please provide the following (if available):



- a. Bids associated with the Purchase Price or Construction Cost.
- b. Invoices associated with the Purchase Price or Construction Cost.

Response: The costs shown on Schedule G-1, page 26 are projected costs; therefore, other than the expansion projects for Wauchula and Arcadia, which are attached, there are no bids or invoices associated with the other listed assets. The projected costs for the other assets were generally obtained through an informal process. The Company obtained oral information from the appropriate vendors for each asset type. This information was not a formal quote, as most of these assets are either not going to be purchased until several/many months after the preparation of the instant case or require detailed engineering drawings to obtain firm bids. As described in the Direct Testimony of Mr. Bruce Christmas on pages 8 through 11, the results of this informal process form the basis for the projected costs of each plant account.

5. Please refer to pages 4 and 8 of witness Christmas' direct testimony. For Account 376.1 – Mains – Plastic, witness Christmas provides an estimate of \$551,875 for Historic Base Year + 1 additions and \$773,125 for Projected Test Year additions. For each main size (4", 2", and 1-1/4"), please provide a detailed explanation of how the per foot costs were derived. Also, please provide an explanation of why these costs are reasonable.

Response: The cost per foot for each size of Mains – Plastic were derived from recent experience in the installation of these types of Mains in the Company's distribution system and informal conversations with contractors and material vendors in preparation of the instant case. Contractors provided approximate installation cost-per-foot estimates as follows: 4" PE - \$15.00/foot; 2" PE - \$10.00/foot; and 1 ¼" PE - \$7.00/foot. Material vendors provided the following estimates for PE pipe and fittings: 4" PE - \$6.00/foot; 2" PE - \$4.00/foot; and 1 ¼" PE - \$3.00/foot. Miscellaneous costs, including engineering, design and permitting, inspector services and surveying costs: 4" PE - \$4.00/foot; 2" PE - \$3.50/foot; and 1 ¼" PE - \$2.50/foot. These cost per foot figures are reasonable, as they reflect the best estimates available (without detailed engineering drawings) and current market conditions, given the rural construction areas and recent experience and conversations with vendors of the Company.

6. Please refer to page 4 of witness Christmas' direct testimony. For Account 376.0 – Mains – Steel, witness Christmas provides an estimate of \$425,600 for Historic Base Year + 1 additions. Please provide a detailed explanation of how the cost of \$40/foot was derived. Also, please provide an explanation of why this cost is reasonable.

Response: The \$40/foot cost for 4" Steel Mains was derived in the same manner as the cost per foot figures for Mains – Plastic in Question 5. Contractor - \$25.00/foot;



SEBRING GAS SYSTEM, INC.

Materials - \$10.00/foot and Miscellaneous Costs - \$5.00/foot. The costs are reasonable for the same reasons given above.

For questions 7 – 9, please refer to the testimony filed by witness Christmas, page 6, lines 23 – 26, and page 7, lines 1 – 3.

7. Please provide the breakdown for the projected cost per meter and per regulator. Please provide the information in the following format.

Description	Gas Meter	Gas Regulator
Model		
Meter Cost		
Labor Cost		
Miscellaneous Expense		
Number Purchased		
Total cost of Purchase		

Response: Please see attached schedule which details the requested information for each Gas Meter type and Gas Regulator type projected in the instant case.

8. Please provide an example calculation for the installation of one meter.

Response: A typical meter installation for a TS-1 customer, \$65 as shown on MFR Schedule E-7, Line 2, is calculated as follows: Materials (elbows, unions, galvanized pipe, meter bend, etc) - \$40 plus Labor (1.0 hours) - \$16 plus Overheads (employee benefits, A&G Transfer, etc) - \$9.

9. Please explain how the “typical cost of Meter and Regulator Installations” was derived.

Response: The typical cost of Meter and Regulator Installations was derived by Company experience in performing these tasks historically, using today’s costs for labor, materials and overheads.

Please refer to the testimony filed by witness Christmas, page 7, lines 5 – 17.

10. Witness Christmas testified that various types of equipment would be purchased for two new field employees, which include a line locator, CGI, Sensit Leak Detection Equipment, Electro-fusion Equipment, Socket fusion Equipment, and generator.

a. Please provide a description of how each type of equipment will be utilized by the field employees.

Response:



SEBRING GAS SYSTEM, INC.

1. **Line Locator.** The line locator is used to find the location of underground natural gas facilities so that excavators know where these facilities are. Utilities are required by State law (811 One-Call System) to locate their facilities at no charge.
2. **The CGI is a Combustible Gas Indicator.** This equipment is used to determine if there is a gas leak in an area. This device is not very sensitive, but is effective in determining if a leak exists.
3. **Sensit Leak Detection Equipment.** This equipment is used to pin-point the source of any gas escaping into the atmosphere. It is a very sensitive device.
4. **Electro-fusion Equipment.** This equipment is used to join two sections of PE pipe, either for maintenance or new construction.
5. **Socket-fusion Equipment.** This equipment is also used to join a section of PE pipe with a fitting, such as an elbow, either for maintenance or new construction.
6. **Generator.** The Electro-fusion Equipment and the Socket-fusion Equipment both require a power source, provided by the generator.

b. Please describe how the cost was developed for each type of equipment.

Response: The costs for each piece of equipment was obtained through discussions with the vendors that provide such equipment, adjusted for the expected purchase date of December 2019.

Please refer to the testimony filed by witness Christmas, page 7, lines 18 – 22.

11. Witness Christmas testified that the projected cost for the two Ford trucks (type to be determined) is \$110,000.

a. Please explain how the expected cost of \$55,000 for each truck was derived.

Response: The President of SGS contacted the Ford dealership and discussed the approximate cost, in December 2019, when these vehicles are projected to be purchased, of these 2 trucks, outfitted similarly to the existing Ford vehicles owned by the Company. The best verbal estimate obtained from the Ford dealership was that they should cost about \$55,000 each.

b. Please provide a description of the any equipment that will be included with each truck.

Response: The two (2) new Ford trucks would have similar equipment as the current Ford trucks owned by the Company. Copies of the Loan documents for these vehicles,



SEBRING GAS SYSTEM, INC.

which details the equipment included on each vehicle, have been provided in response to Audit Request Number 14.

- c. Please provide a description, including estimated cost, of the other types of trucks being considered.

Response: All of the Company's vehicles are Fords. The Company did not consider any other type of vehicle and only uses the local dealership.

Please refer to the testimony filed by witness Christmas, page 8, lines 1 – 4.

12. Witness Christmas testified that “Any service lines that are coming due for retirement are expected to be reactivated through the Company's Energy Conservation Cost Recovery Program.”

- a. Please explain what it means to reactivate a line after retirement.

Response: When a service line is retired, it must be physically disconnected from the distribution main. To reactivate a retired service line means that the disconnected service line must be reconnected, including installation of an excess flow valve, if required, pressure tested and placed back into service, in accordance with all applicable regulations.

- b. Please explain how the cost of the reactivation will be recoverable through the Utility's Energy Conservation Cost Recovery Program.

Response: The Company believes that, prior to the retirement of the service line, it will contact the current owner of the residence/business and attempt to gain a commitment to put new natural gas appliances into the structure and re-activate the account, rather than incur the cost related to the retirement of the service line. The payroll costs, advertising costs (if any), and rebates paid to reactivate the account are recoverable expenses under the Company's Commission-approved ECCR program.

- c. Will the service line reactivation be done unilaterally, or upon need?

Response: Service line reactivations are only performed upon written commitments, as described in the Company's tariff, from the customer to utilize the gas service.

Please refer to the testimony filed by witness Christmas, page 10, lines 1 – 5.

13. Witness Christmas testified that Sebring plans to re-build a regulated bypass at its interconnection with Peoples Gas. Please explain why re-build of the regulated bypass is prudent at this time.



SEBRING GAS SYSTEM, INC.

Response: The Company believes that current regulated bypass needs to be replaced with updated equipment. The Company has been maintaining this equipment, in accordance with applicable regulations, but these costs are increasing. The Company, through its approved DIMP plan, has determined that the safety risk of not replacing this equipment is now greater than the cost to replace such equipment. Under its DIMP plan, the Company is therefore, required to perform this replacement as soon as it determines is reasonable.

Please refer to the testimony filed by witness Christmas, page 4, lines 4 – 9.

14. Please provide a copy of the detailed engineering and design study.

Response: Please see detailed engineering and design plans, maps (see response to Question 1) and cost preparation.

Response Provided By:

A handwritten signature in black ink that reads "R B Christmas".

Bruce Christmas
Consultant to the Company

9/01/2019 _____
Date

**SEBRING GAS SYSTEM, INC.
DISTRIBUTION MAINS**

WAUCHULA

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT
MAINS	STEEL	2"	0	\$25.00
		4"	0	\$40.00
		6"	0	\$75.00
MAINS	PLASTIC	1 1/4"	500	\$12.50
		2"	5,000	\$17.50
		4"	10,000	\$25.00
		6"	0	\$40.00

TOTAL MAINS - WAUCHULA

ARCADIA

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT
MAINS	STEEL	2"	0	\$25.00
		4"	10,640	\$40.00
		6"	0	\$75.00
MAINS	PLASTIC	1 1/4"	0	\$12.50
		2"	5,000	\$17.50
		4"	25,000	\$25.00
		6"	0	\$40.00

TOTAL MAINS - ARCADIA

SEBRING

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT
MAINS	STEEL	2"	0	\$25.00
		4"	0	\$40.00
		6"	0	\$75.00
MAINS	PLASTIC	1 1/4"	2,500	\$12.50
		2"	10,000	\$17.50
		4"	2,500	\$25.00
		6"	0	\$40.00

TOTAL MAINS - SEBRING

TOTAL MAINS - STEEL
TOTAL MAINS - PLASTIC
TOTAL MAINS

COST

\$0
\$0
\$0
\$6,250
\$87,500
\$250,000
\$0
\$343,750

COST

\$0
\$425,600
\$0
\$0
\$87,500
\$625,000
\$0
\$1,138,100

COST

\$0
\$0
\$0
\$31,250
\$175,000
\$62,500
\$0
\$268,750

\$425,600

\$1,325,000

\$1,750,600

**SEBRING GAS SYSTEM, INC.
DISTRIBUTION MAINS**

WAUCHULA

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT	COST
MAINS	STEEL	2"	0	\$25.00	\$0
		4"	0	\$40.00	\$0
		6"	0	\$75.00	\$0
MAINS	PLASTIC	1 1/4"	500	\$12.50	\$6,250
		2"	5,000	\$17.50	\$87,500
		4"	10,000	\$25.00	\$250,000
		6"	0	\$40.00	\$0
TOTAL MAINS - WAUCHULA					\$343,750

ARCADIA

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT	COST
MAINS	STEEL	2"	0	\$25.00	\$0
		4"	10,640	\$40.00	\$425,600
		6"	0	\$75.00	\$0
MAINS	PLASTIC	1 1/4"	0	\$12.50	\$0
		2"	5,000	\$17.50	\$87,500
		4"	25,000	\$25.00	\$625,000
		6"	0	\$40.00	\$0
TOTAL MAINS - ARCADIA					\$1,138,100

SEBRING

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT	COST
MAINS	STEEL	2"	0	\$25.00	\$0
		4"	0	\$40.00	\$0
		6"	0	\$75.00	\$0
MAINS	PLASTIC	1 1/4"	2,500	\$12.50	\$31,250
		2"	10,000	\$17.50	\$175,000
		4"	2,500	\$25.00	\$62,500
		6"	0	\$40.00	\$0
TOTAL MAINS - SEBRING					\$268,750

TOTAL MAINS - STEEL	\$425,600
TOTAL MAINS - PLASTIC	\$1,325,000
TOTAL MAINS	\$1,750,600

PERMIT SET FOR ARCADIA NATURAL GAS LINE FDOT S.R. 70 EB (MAGNOLIA STREET) - S

CITY OF ARCADIA, FLORIDA

SECTION 36, 31, 5, 30, TOWNSHIP 37 SOUTH, 38 SOUTH, RANGE 17 WEST

MARCH 2019

UTILITY CONTACT LISTING

FLORIDA POWER AND LIGHT
JOEL BRAY
4215 UP THE GROVE LANE
WEST PALM BEACH, FL 33407
PHONE: 386-586-6403

COMCAST CABLE VISION OF WEST FLORIDA
GONZALO ROJAS
3490 TECHNOLOGY DRIVE
VENICE, FL 34275
PHONE: 941-342-3578

CITY OF ARCADIA
STEVE UNDERWOOD
210 S PARKER AVE
ARCADIA, FL 34266
PHONE: 863-494-4334

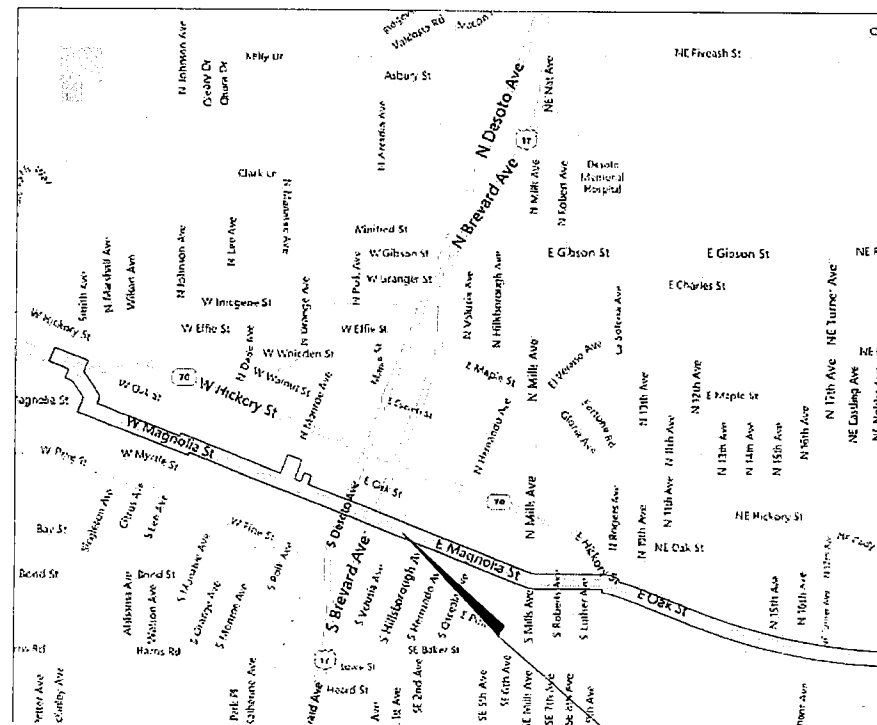
LEVEL 3 COMMUNICATIONS, LLC
NETWORK RELATIONS
1025 EL DORADO BLVD
BROOMFIELD, CO 80021
PHONE: 877-366-8344 (EXT. 2)

CENTURY LINK
JAMES JACKSON
924 MEMORIAL DRIVE
AVON PARK, FL 33825
PHONE: 863-452-3132

PROJECT OWNER AND CONSULTANTS

OWNER/APPLICANT:
SEBRING GAS SYSTEM, INC.
515 S. 6TH AVENUE
WAUCHULA, FL 33813
PHONE: 863-773-4172

CIVIL ENGINEERING CONSULTANT:
KIMLEY-HORN AND ASSOCIATES, INC.
116 SOUTH KENTUCKY AVENUE
LAKELAND, FL 33801
(863) 701-8702



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 by design prepared herein, is an instrument of service, is intended only for the specific project and shall not be used for any other project without the written consent of the engineer.

GENERAL NOTES:

1. UNDERGROUND UTILITIES SHOWN ARE BASED ON READILY AVAILABLE UTILITY PLANS OF RECORD AND SUNSHINE ONE DESIGN LOCATIONS. THE ENGINEER CANNOT GUARANTEE THE EXISTENCE OR NON-EXISTENCE OF ANY UNDERGROUND UTILITIES SHOWN OR NOT SHOWN ON THIS SURVEY. PRIOR TO CONSTRUCTION OR EXCAVATION.
2. EROSION AND SEDIMENTATION CONTROL DEVICES SHALL BE INSTALLED ACCORDING TO THE FLORIDA NATURAL GAS INSPECTOR. ALL DEVICES SHALL BE MAINTAINED SUCH THAT THEY FUNCTION AS INTENDED. CONTROL DEVICES MUST BE PROVIDED AT ALL STORM STRUCTURES ADJACENT TO CONSTRUCTION. AFTER COMPLETION OF THE PROJECT, THE CONTRACTOR SHALL REMOVE ALL EROSION CONTROL DEVICES WHERE A GOOD STAND OF GRASS HAS BEEN ESTABLISHED AND EROSION IS NO LONGER EVIDENT. REMOVAL OF THE REMAINDER OF THE EROSION CONTROL DEVICES SHALL OCCUR AS OTHER AREAS ARE ESTABLISHED. REMOVAL OF THE EROSION CONTROL DEVICES SHALL BE PERMITTED ONLY WITH THE PRIOR APPROVAL OF THE ENGINEER.
3. ALL SOD AREAS DISTURBED BY GRADING, EXCAVATION, AND GENERAL CONSTRUCTION SHALL BE SODDED WITH BAHIA OR RESTORED TO MATCH EXISTING IN ACCORDANCE WITH EROSION AND SEDIMENT CONTROL DETAILS. STABILIZATION SHALL BE PROVIDED WITHIN 3 DAYS OF FINAL GRADING. CONTRACTOR SHALL PROVIDE REMEDIAL WATERING UNTIL SOD IS ESTABLISHED.
4. LOCATIONS OF EXISTING SHOWN UTILITIES ARE APPROXIMATE. CONTRACTOR SHALL BE RESPONSIBLE FOR FIELD VERIFYING EXACT LOCATION, ORIENTATION AND ELEVATION OF EXISTING UTILITIES PRIOR TO EXCAVATION.
5. THE CONTRACTOR SHALL INSTALL THE PROPOSED GAS MAINS AND PROVIDE THE PROPER UNDERGROUND UTILITY CLEARANCES AS OUTLINED IN 49 CFR §192-UNDERGROUND CLEARANCE.
6. TYPICAL DEPTH OF COVER FOR BURIED PIPELINE SHALL BE 3 FEET, UNLESS OTHERWISE SHOWN OR SPECIFIED AND IN ACCORDANCE WITH 49 CFR §192-COVER.
7. THE CONTRACTOR SHALL FURNISH AND INSTALL ALL SHEETING REQUIRED FOR THE INSTALLATION. ALL EXCAVATIONS SHALL BE KEPT WITHIN THE DESIGNATED EASEMENT OR RIGHT OF WAY WIDTHS. EXCAVATION WITHIN PAVED AREAS IS PROHIBITED, UNLESS OTHERWISE SHOWN OR SPECIFIED. SHEETING SHALL BE INSTALLED AS REQUIRED TO PROTECT EXISTING UTILITIES.
8. THE CONTRACTOR SHALL BE RESPONSIBLE FOR COORDINATING WITH THE APPROPRIATE COMPANY ANY ADDITIONAL SUPPORT OF EXISTING POWER POLES AS REQUIRED FOR TRENCH EXCAVATION.
9. THE CONTRACTOR SHALL PROVIDE SILT FENCE AND/OR OTHER CONTROL DEVICES, AS MAY BE REQUIRED, TO CONTROL SOIL EROSION DURING UTILITY CONSTRUCTION. ALL DISTURBED AREAS SHALL BE CLEANED, GRADED, AND STABILIZED WITH GRASSING IMMEDIATELY AFTER THE UTILITY INSTALLATION.
10. ALL EROSION CONTROL DEVICES SHALL BE PROPERLY MAINTAINED DURING ALL PHASES OF CONSTRUCTION UNTIL THE COMPLETION OF ALL CONSTRUCTION ACTIVITIES AND ALL DISTURBED AREAS HAVE BEEN STABILIZED. ADDITIONAL CONTROL DEVICES MAY BE REQUIRED DURING CONSTRUCTION IN ORDER TO CONTROL EROSION AND/OR OFFSITE SEDIMENTATION. ALL TEMPORARY CONTROL DEVICES SHALL BE REMOVED ONCE CONSTRUCTION IS COMPLETE AND THE SITE IS STABILIZED.
11. THE CONTRACTOR MUST TAKE NECESSARY ACTION TO MINIMIZE THE TRACKING OF MUD ONTO THE PAVED ROADWAY CONSTRUCTION AREAS. THE CONTRACTOR SHALL DAILY REMOVE MUD/SOIL FROM PAVEMENT, AS MAY BE REQUIRED.
12. THE CONTRACTOR SHALL RESTORE GRADE TO PRE CONSTRUCTION CONDITION UNLESS OTHERWISE NOTED ON THE DRAWINGS.
13. STOCKPILE LOCATIONS AND LAYDOWN AREAS SHALL BE LOCATED WITHIN THE EXISTING CONSTRUCTION LIMITS AS SHOWN ON THE PLANS OR UNLESS OTHERWISE SHOWN. STAGING AREA MUST BE APPROVED BY THE MUNICIPALITY AND/OR BY THE PROPERTY OWNER, IF APPLICABLE.
14. THE CONTRACTOR SHALL RESTORE SLOPES AND GROUND COVER WITHIN SEVEN (7) WORKING DAYS.
15. THE CONTRACTOR SHALL PLACE 3 TO 4 INCHES OF SAND OR SCREENINGS ON ALL ASPHALT SURFACES THAT ARE AFFECTED BY THE INSTALLATION OF THE PIPELINE.
16. THE CONTRACTOR MAY OPEN CUT GRAVEL AND DIRT DRIVEWAYS. ALL OTHER DRIVEWAYS SHALL BE DIRECTIONAL DRILLED.
17. THE CONTRACTOR SHALL INSTALL CULVERT INLET PROTECTION ON THE UPSTREAM SIDE OF ALL STORM PIPES AND DRIVEWAY CULVERTS IN ACCORDANCE WITH THE EROSION AND SEDIMENT CONTROL DETAILS.

CONSTRUCTION SEQUENCE

1. OBTAIN APPROPRIATE CONSTRUCTION PERMITS
2. INSTALL SEDIMENTATION AND EROSION CONTROL MEASURES
3. CLEAR AND GRUB
4. ROUGH GRADE SITE
5. EXCAVATE AND INSTALL UTILITIES
6. FINISH FINAL GRADING AND SURFACE RESTORATION
7. REMOVE SEDIMENTATION AND EROSION CONTROL MEASURES (S&E MEASURES SHALL REMAIN UNTIL ENTIRE SITE IS APPROPRIATELY REESTABLISHED)

LEGEND

LINETYPES AND SYMBOLS

EXIST. WATER LINE		PROPOSED GAS PIPELINE		PROPERTY/R/W LINE	
EXIST. SANITARY SEWER		PROPOSED VALVE		CENTER LINE	
EXIST. SEWER FORCE MAIN		PROPOSED SPOT CUT AT UTILITY CROSSING		CURB LINE	
EXIST. STORM DRAIN		EASEMENT LINE		EDGE OF PAVEMENT	
EXIST. ELECTRICAL		5' x 5' BORE PITS		EXIST. GROUND PROFI	
EXIST. FIBER OPTIC		EXIST. ELECTRICAL POLE			
EXIST. COMMUNICATIONS LINE		EXIST. LIGHT POLE			
EXIST. GAS TO REMAIN					
EXIST. GAS TO BE ABANDONED					
EXIST. ABANDONED GAS					

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C201

C202

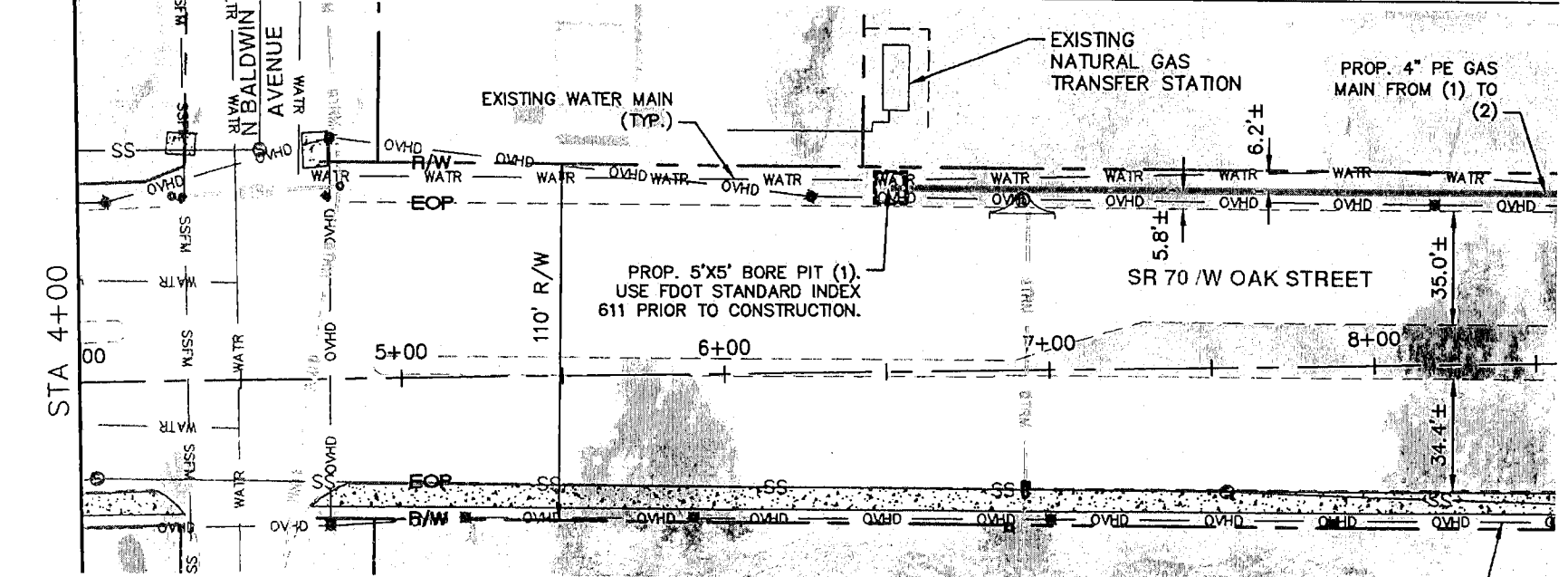
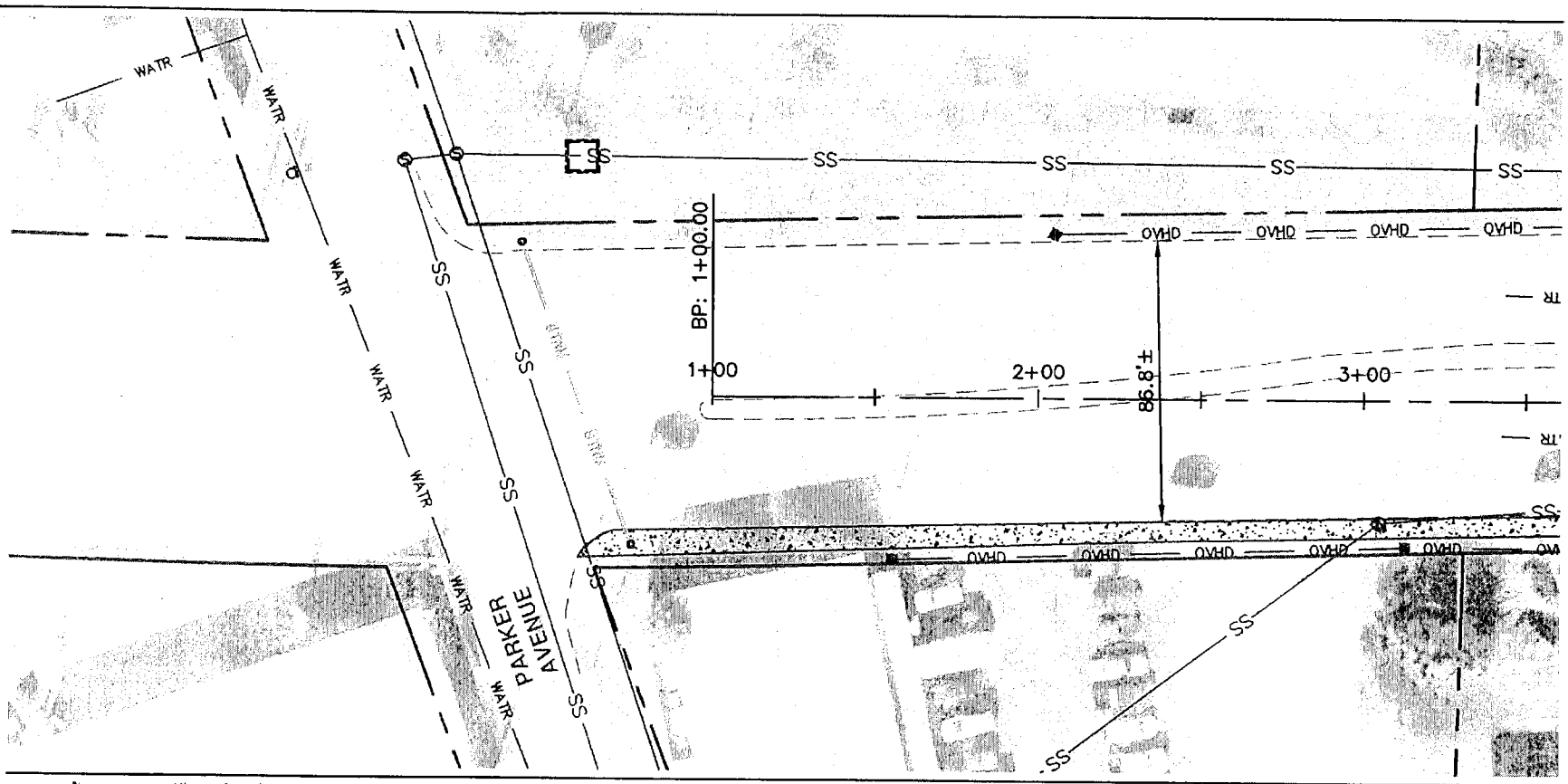
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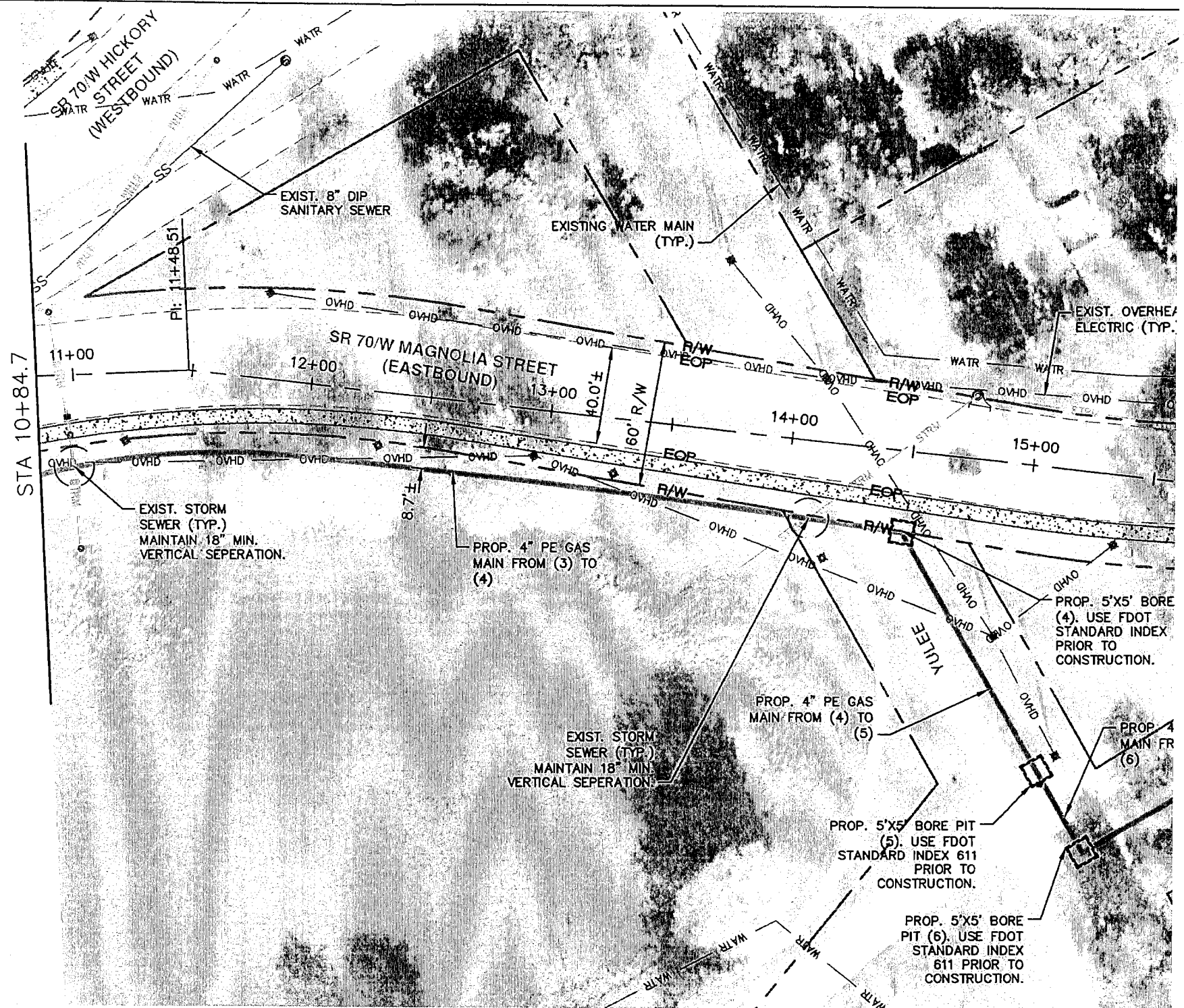
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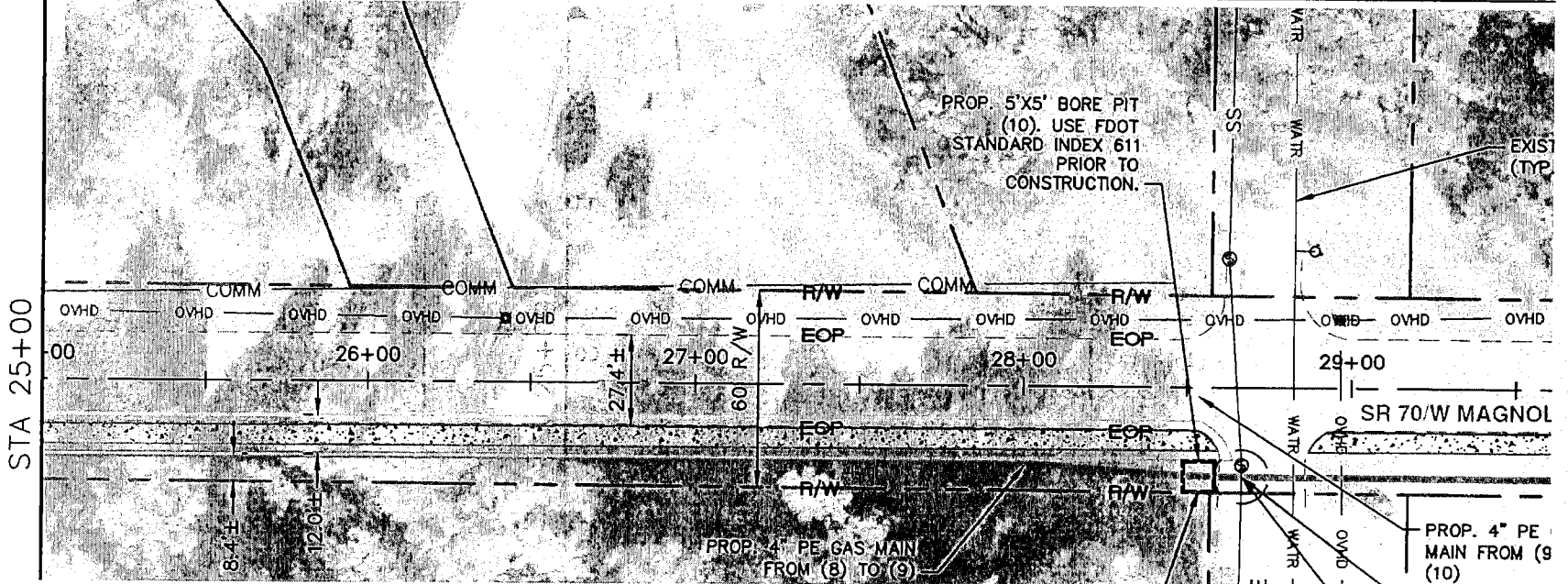
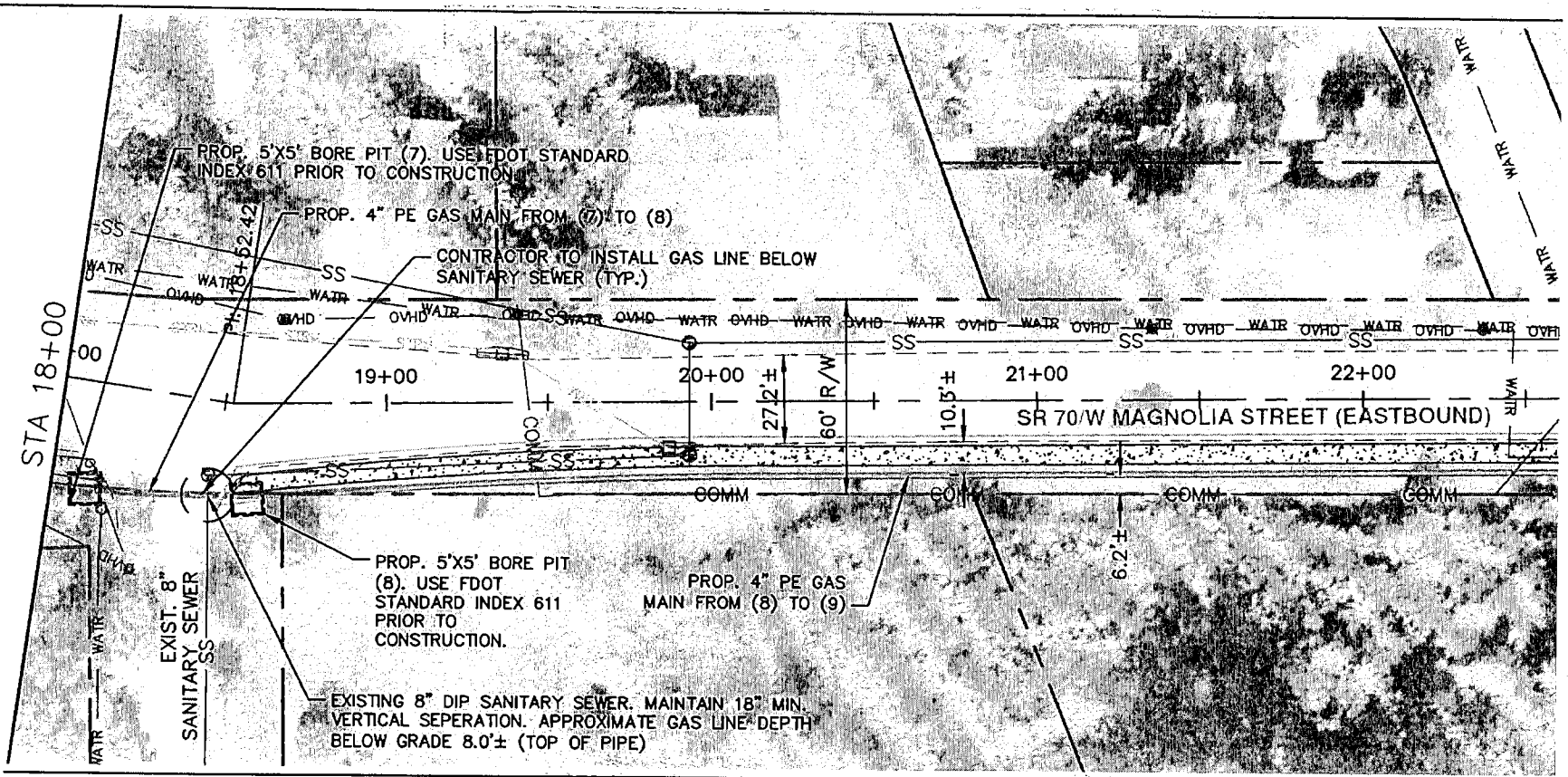
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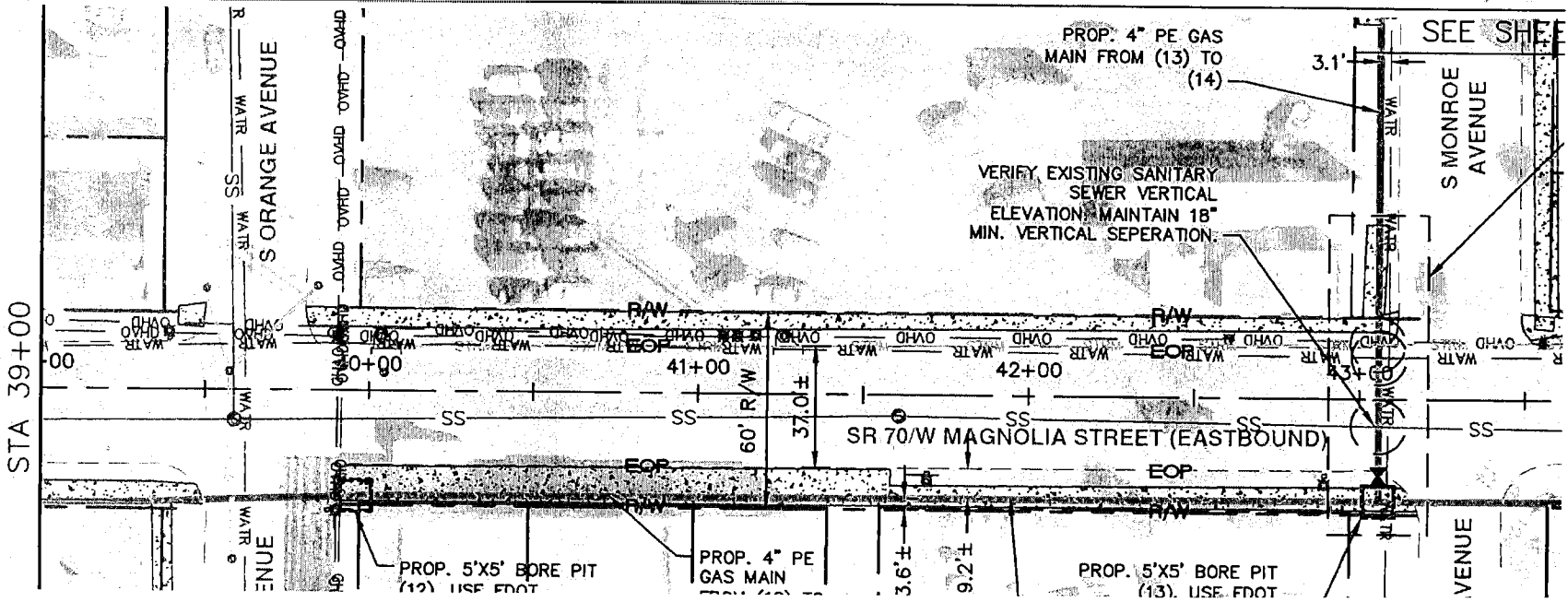
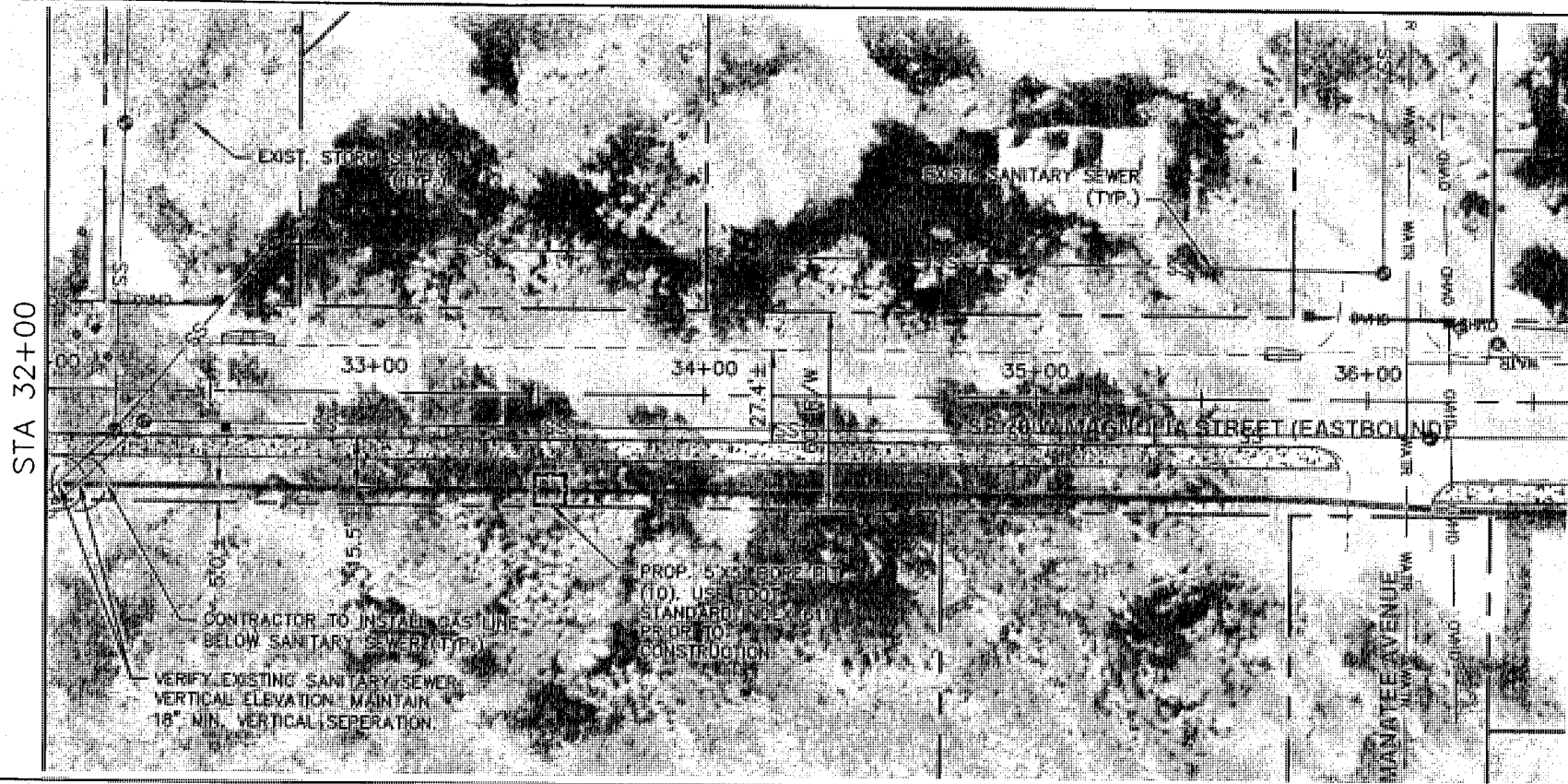
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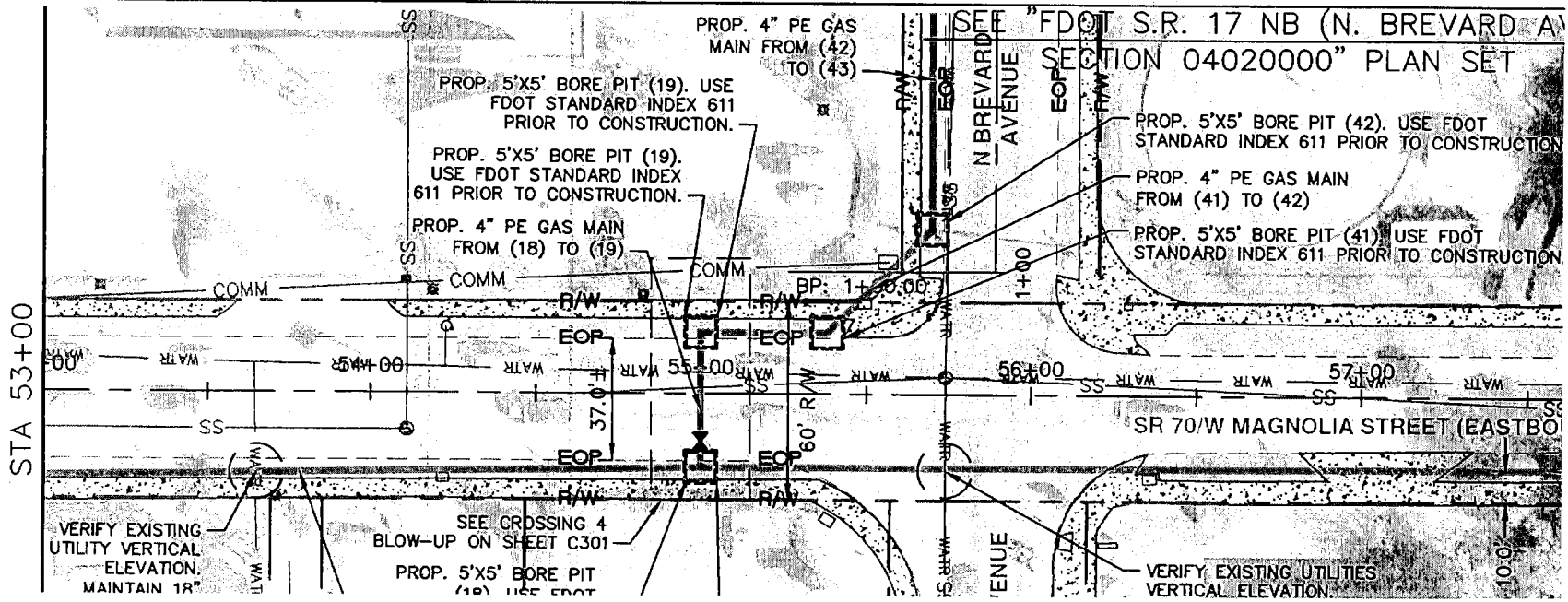
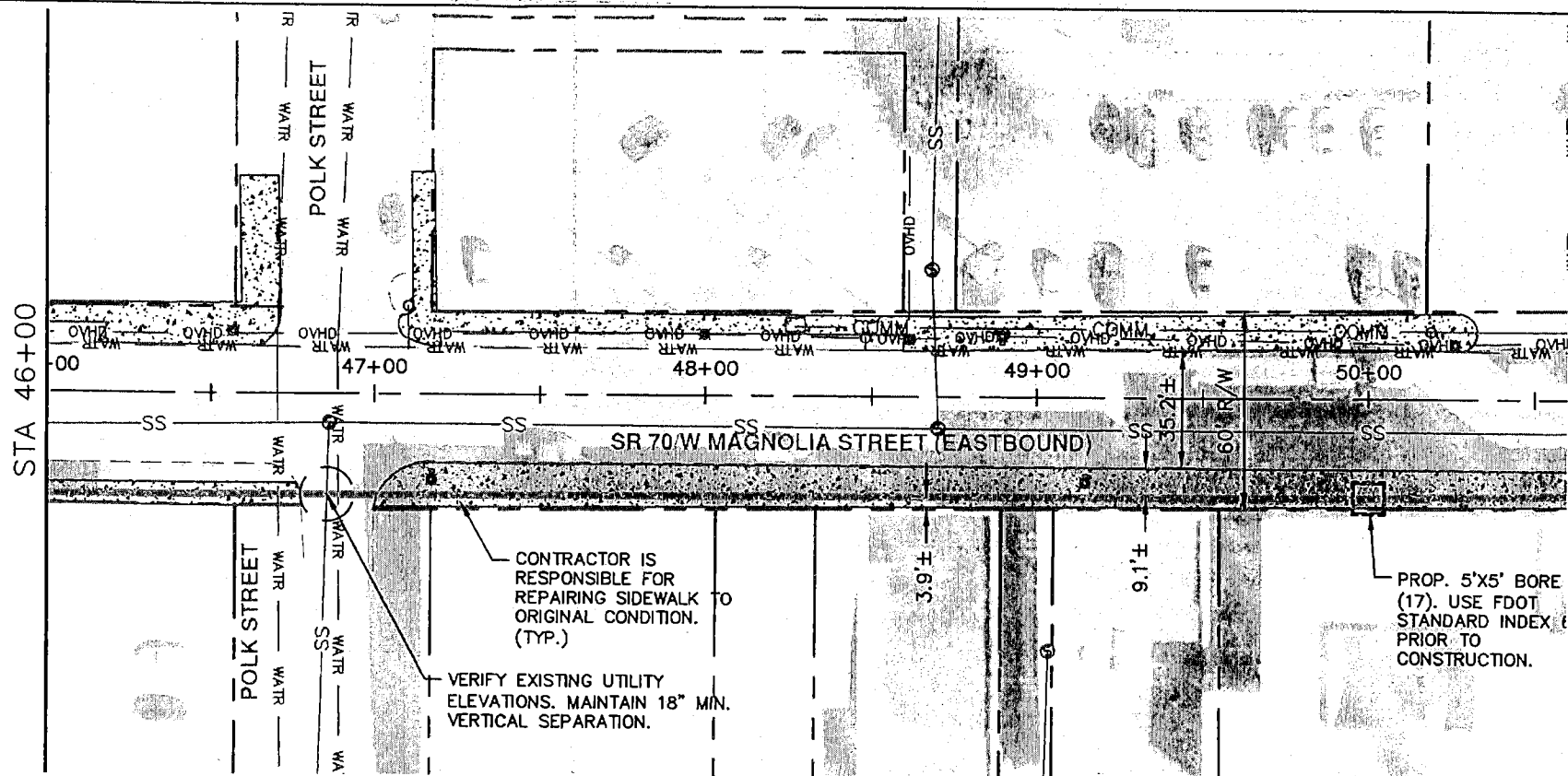
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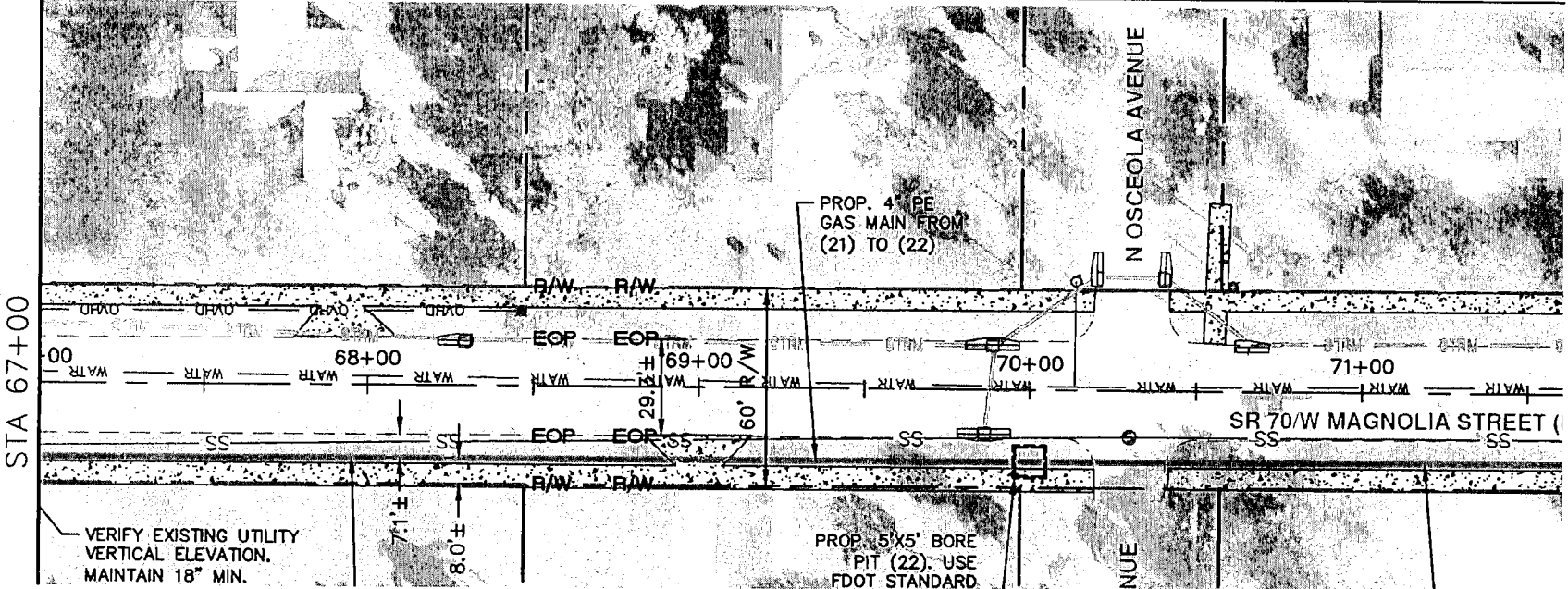
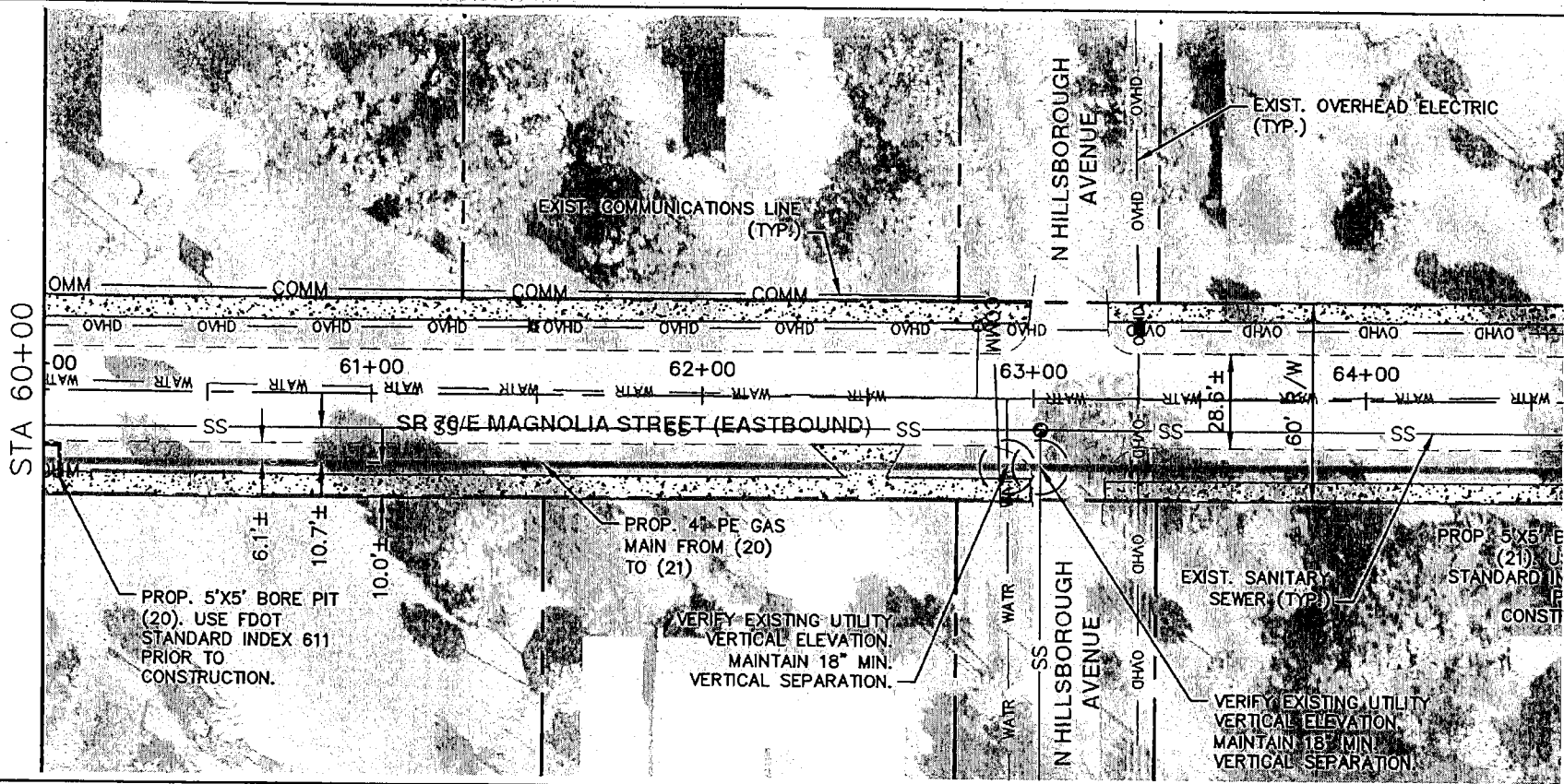
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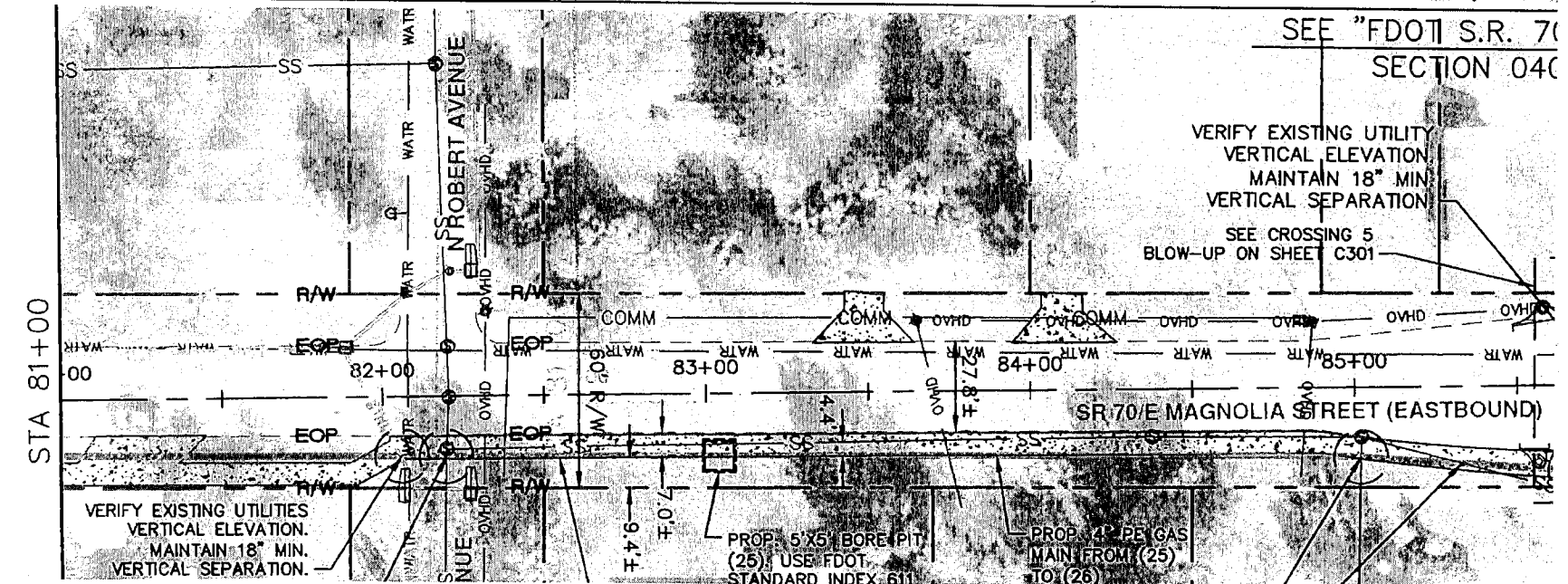
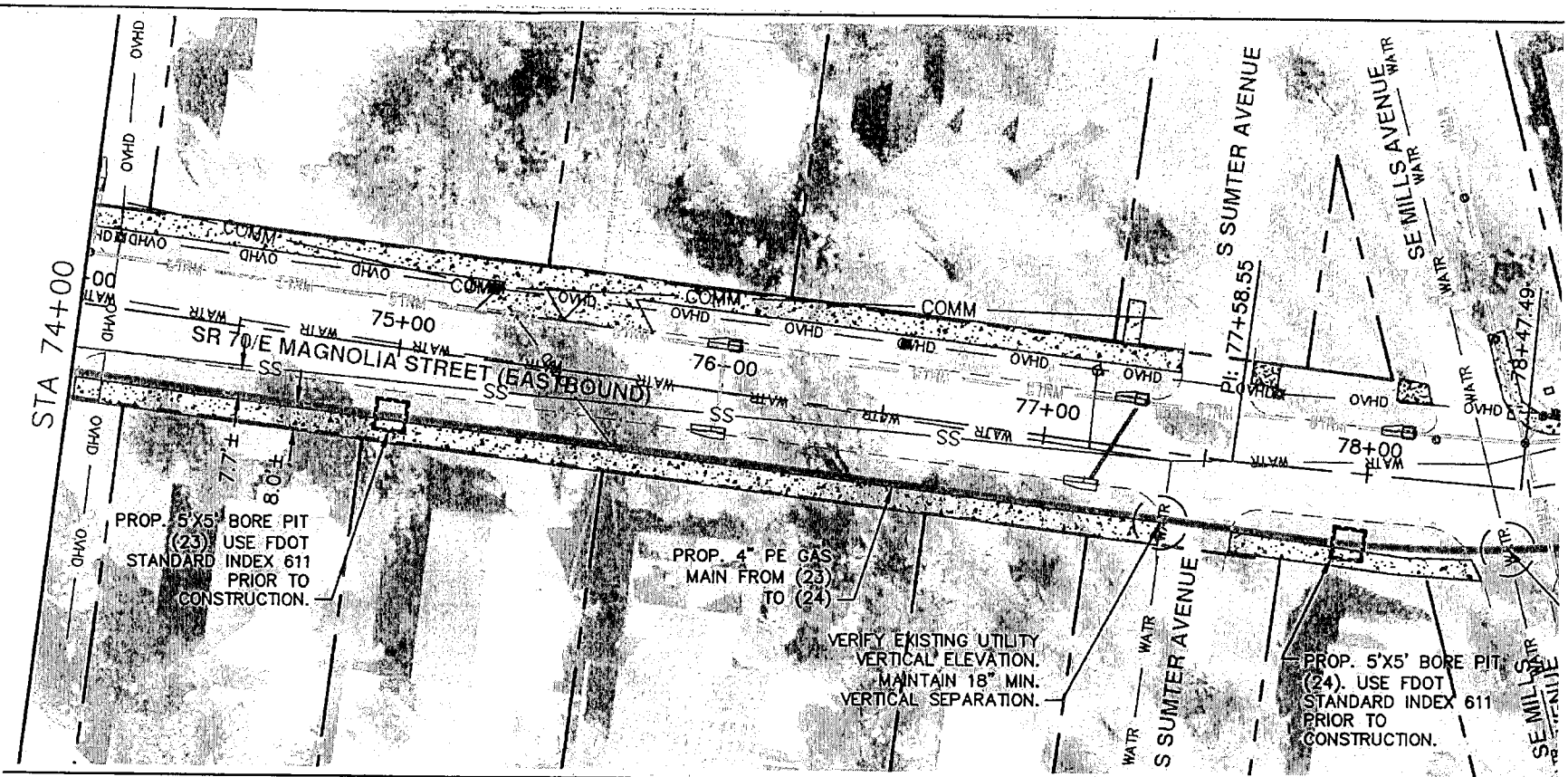
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SEE "FDOT" S.R. 70 SECTION 04C

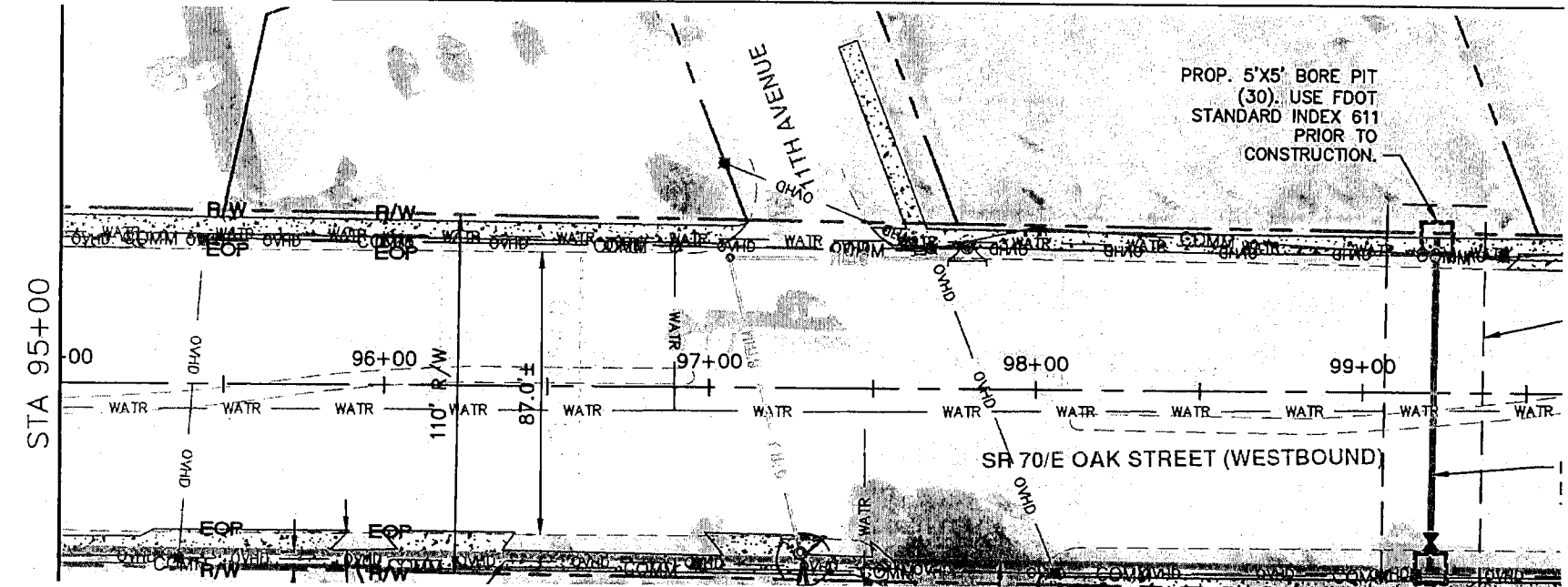
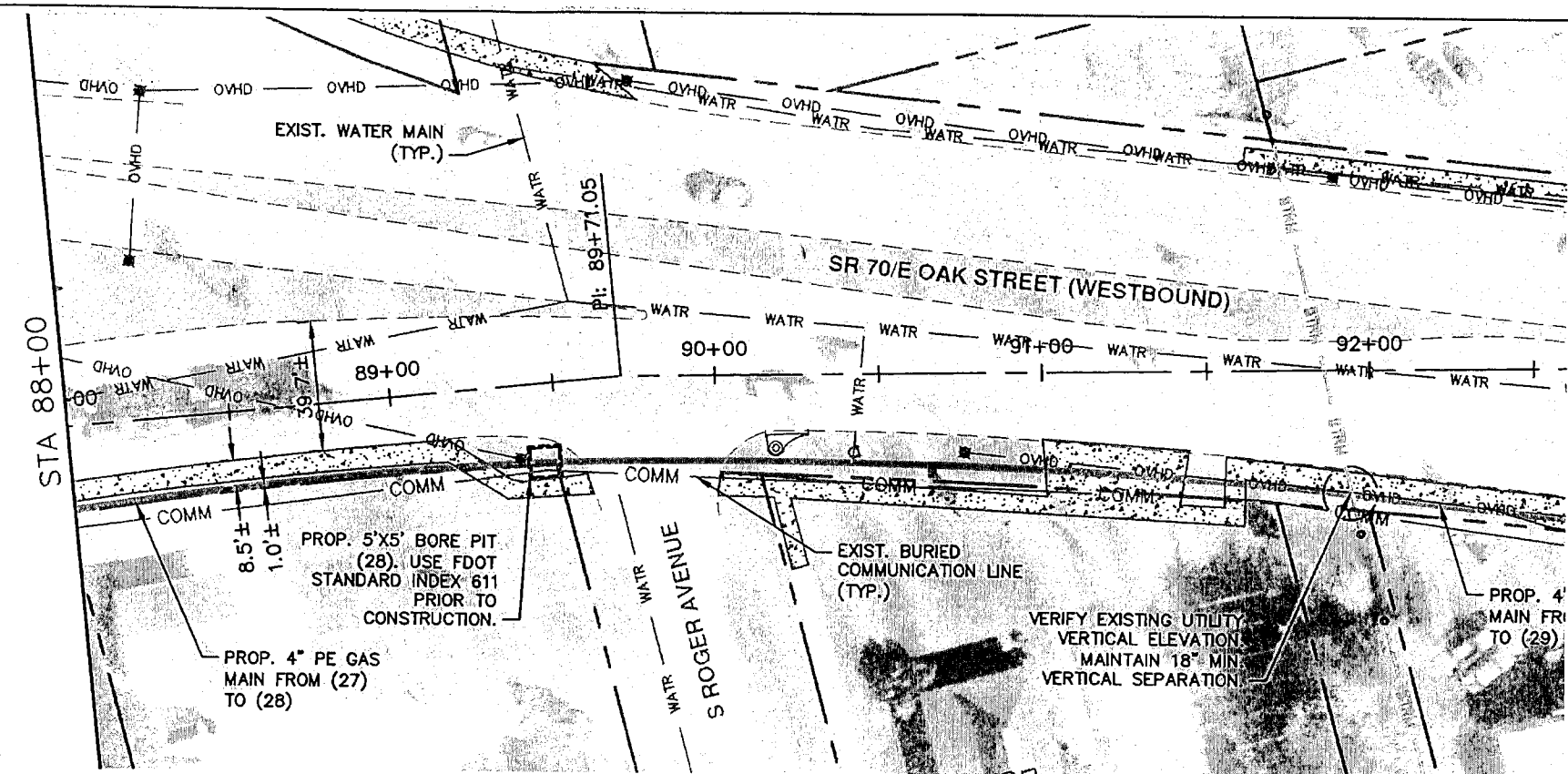
VERIFY EXISTING UTILITY VERTICAL ELEVATION MAINTAIN 18" MIN VERTICAL SEPARATION
 SEE CROSSING 5 BLOW-UP ON SHEET C301

VERIFY EXISTING UTILITIES VERTICAL ELEVATION. MAINTAIN 18" MIN. VERTICAL SEPARATION.

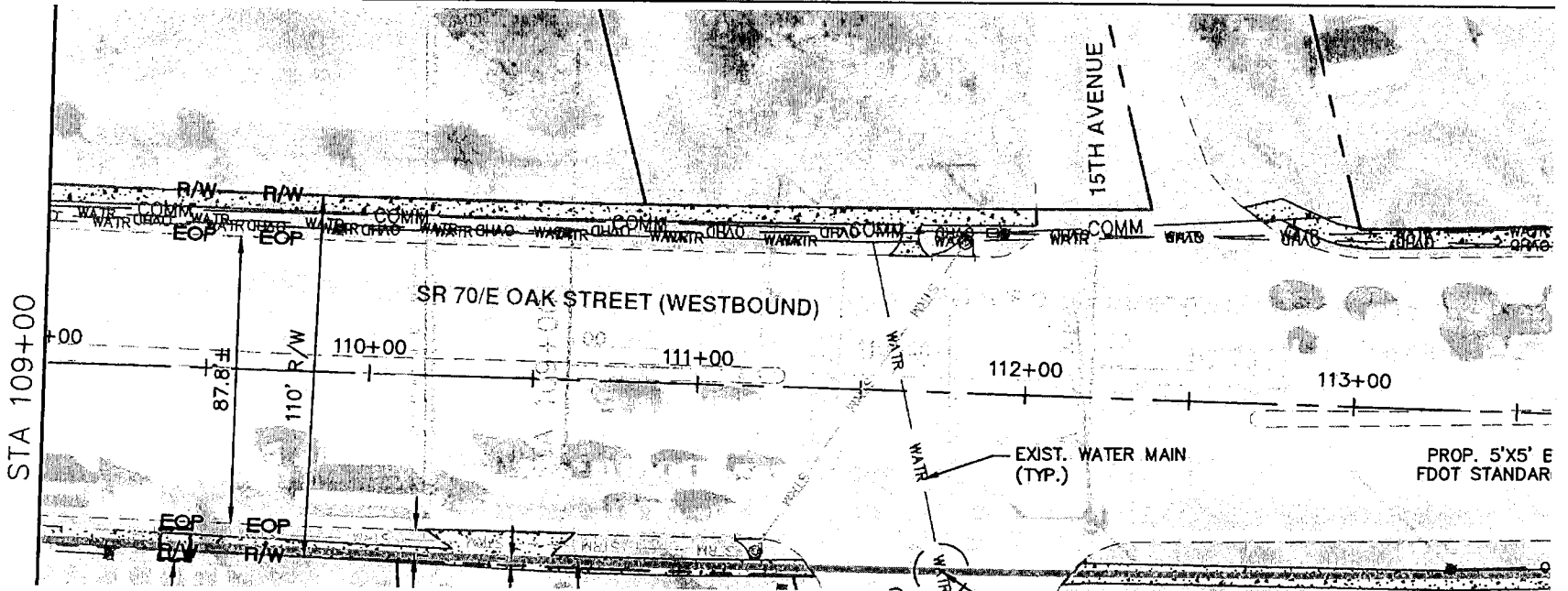
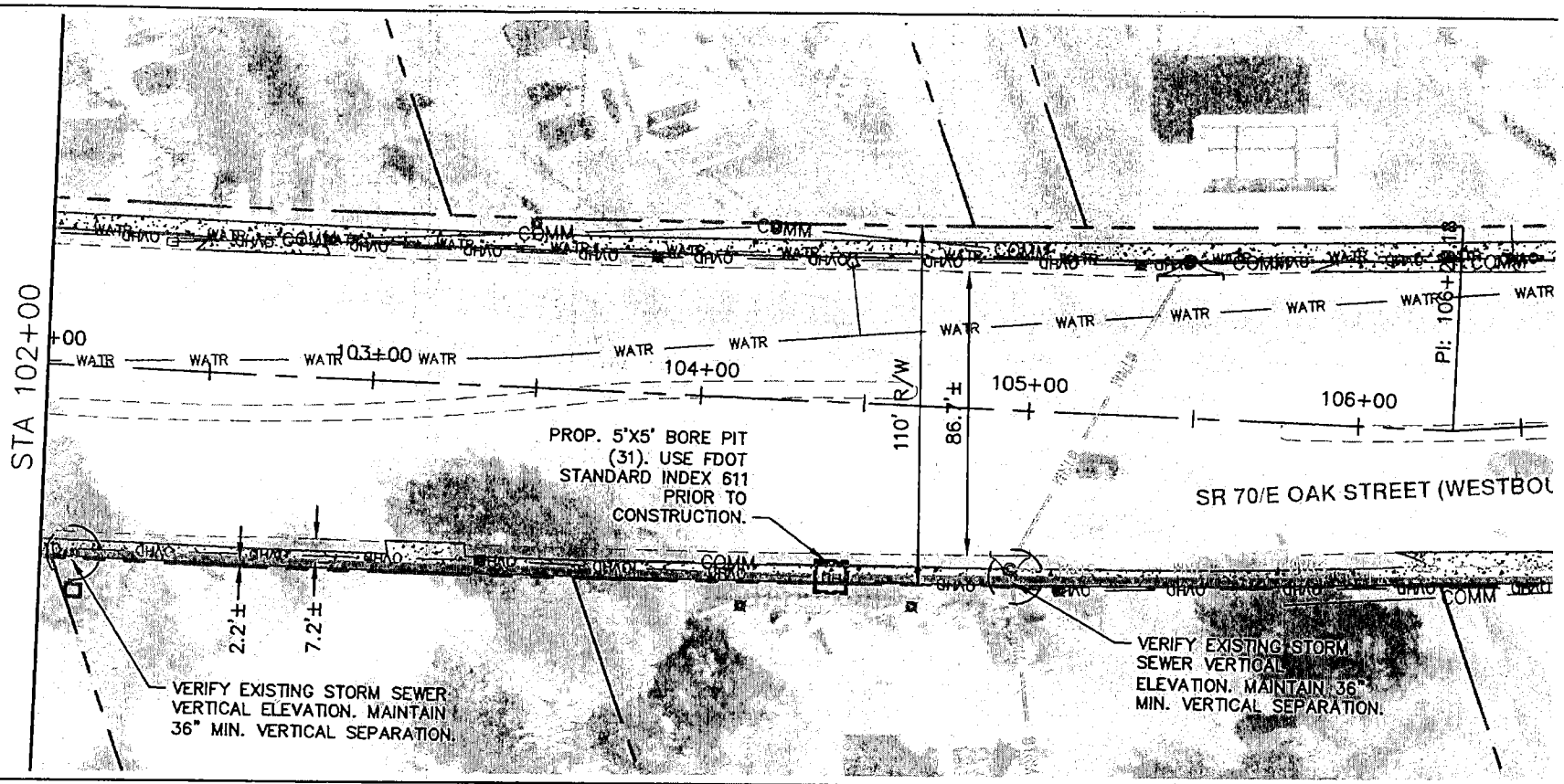
PROP. 5'X5' BORE PIT (25) USE FDOT STANDARD INDEX 611

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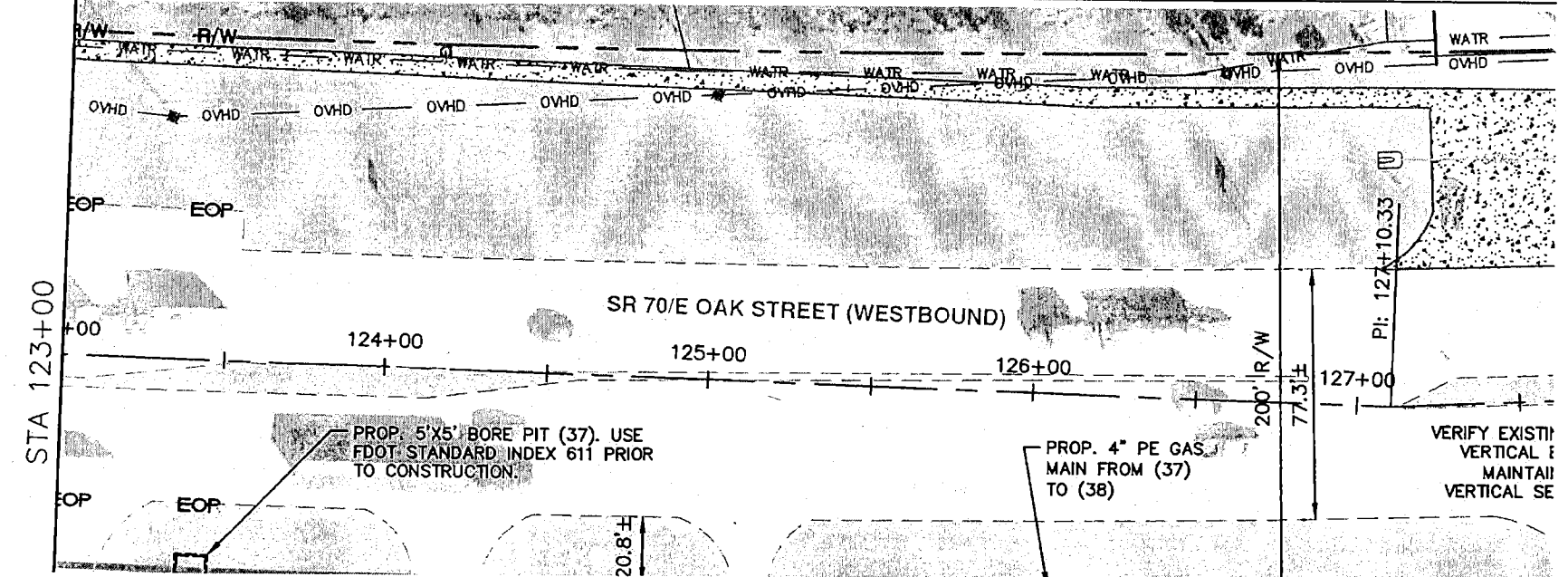
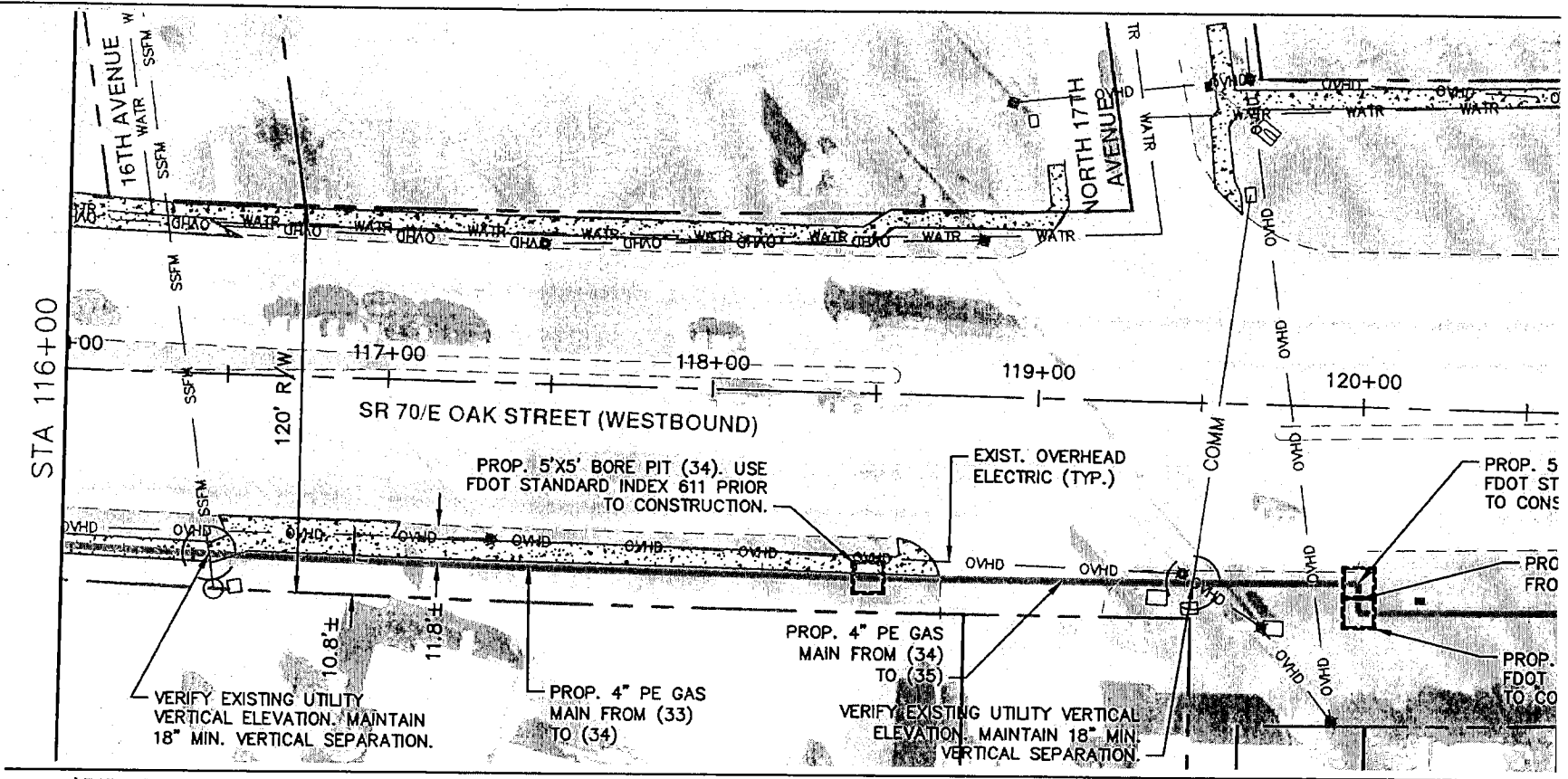
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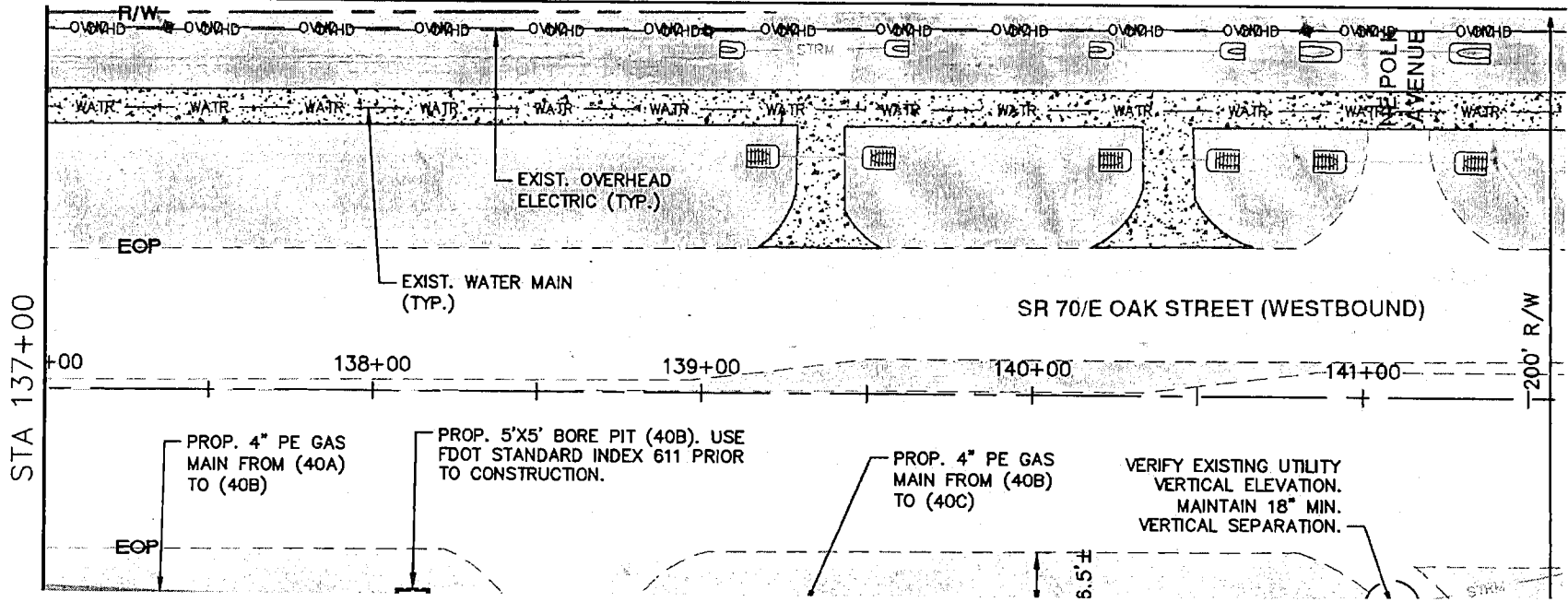
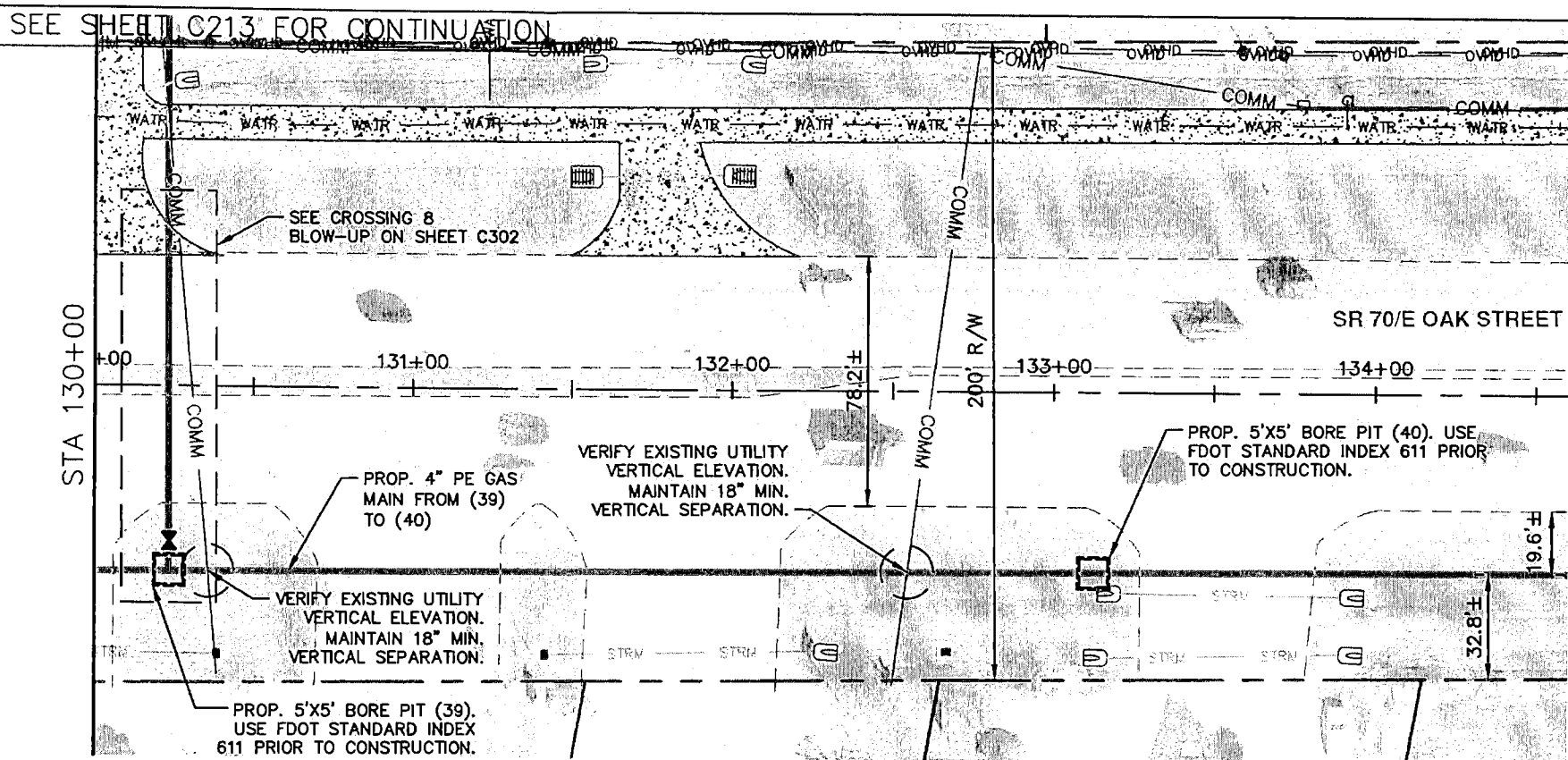
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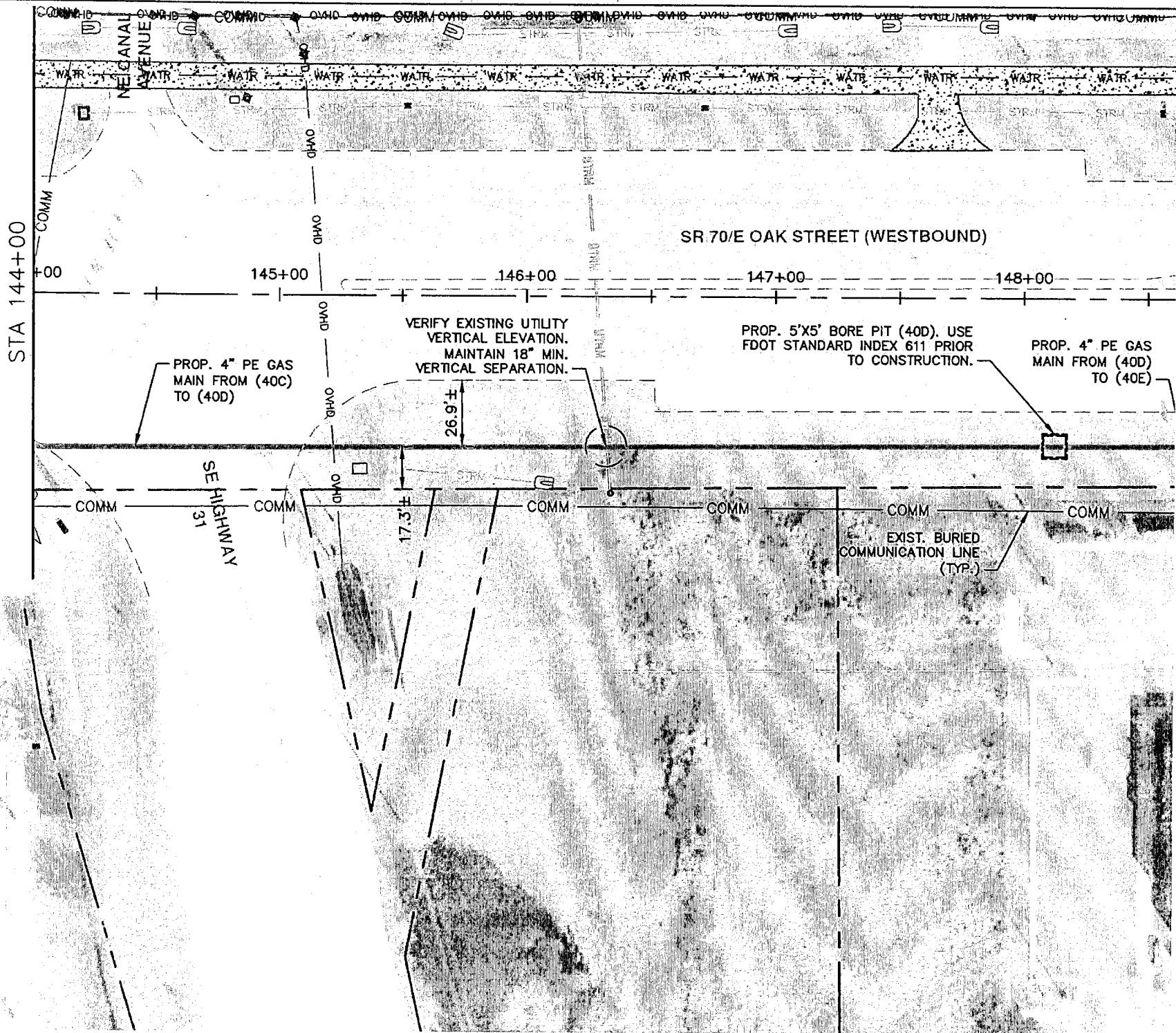
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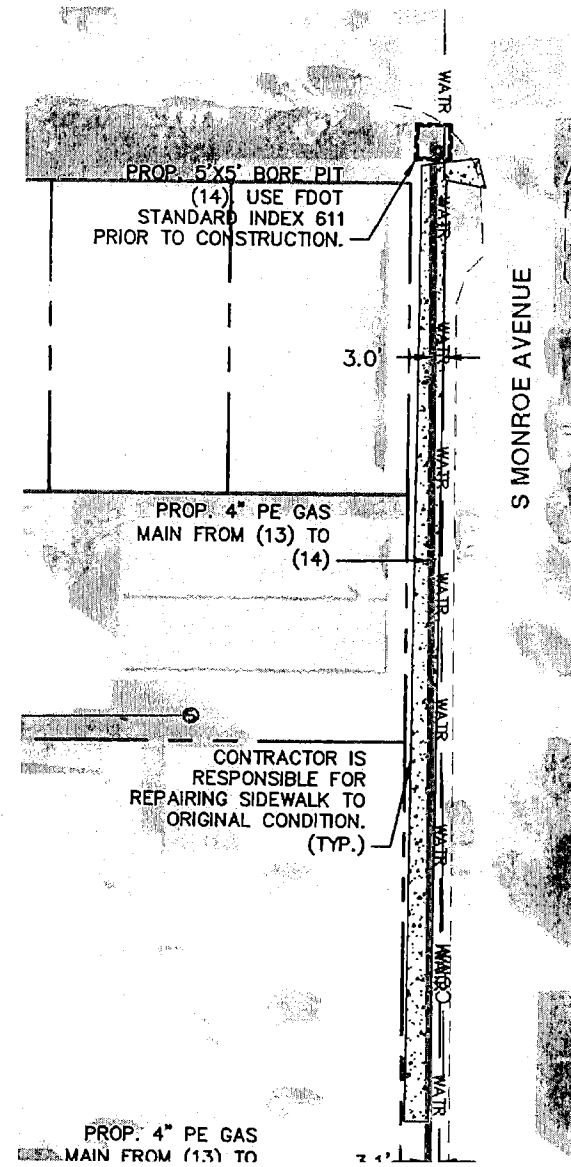
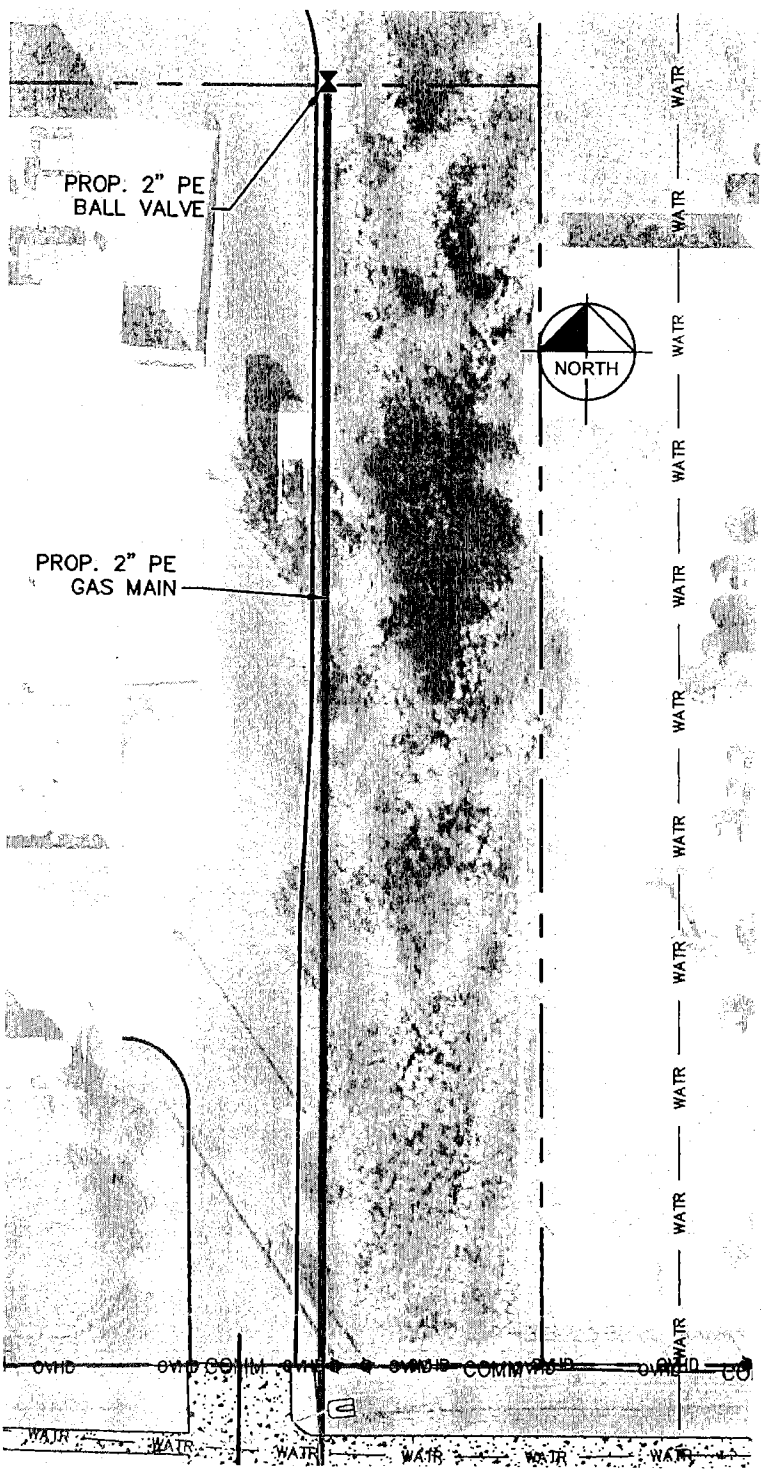
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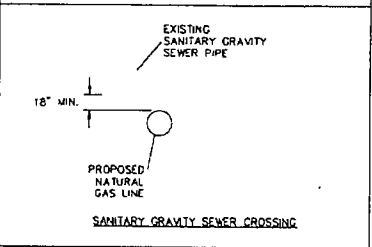
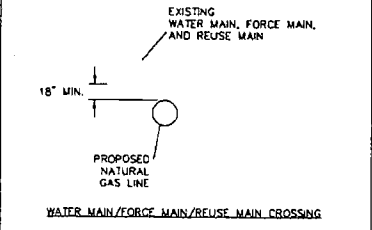
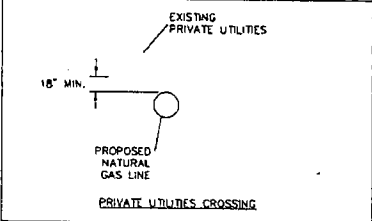
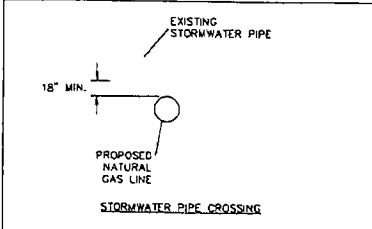
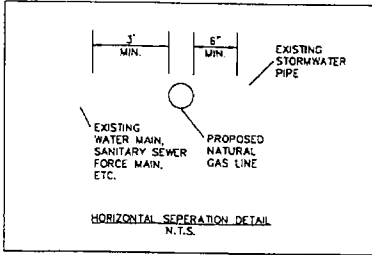
SEE SHEET C211 FOR CONTINUATION



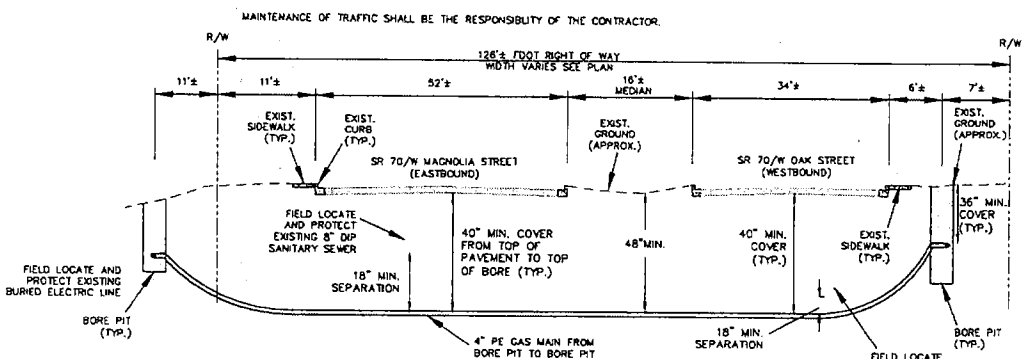
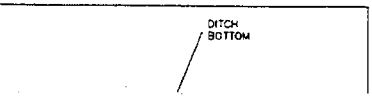
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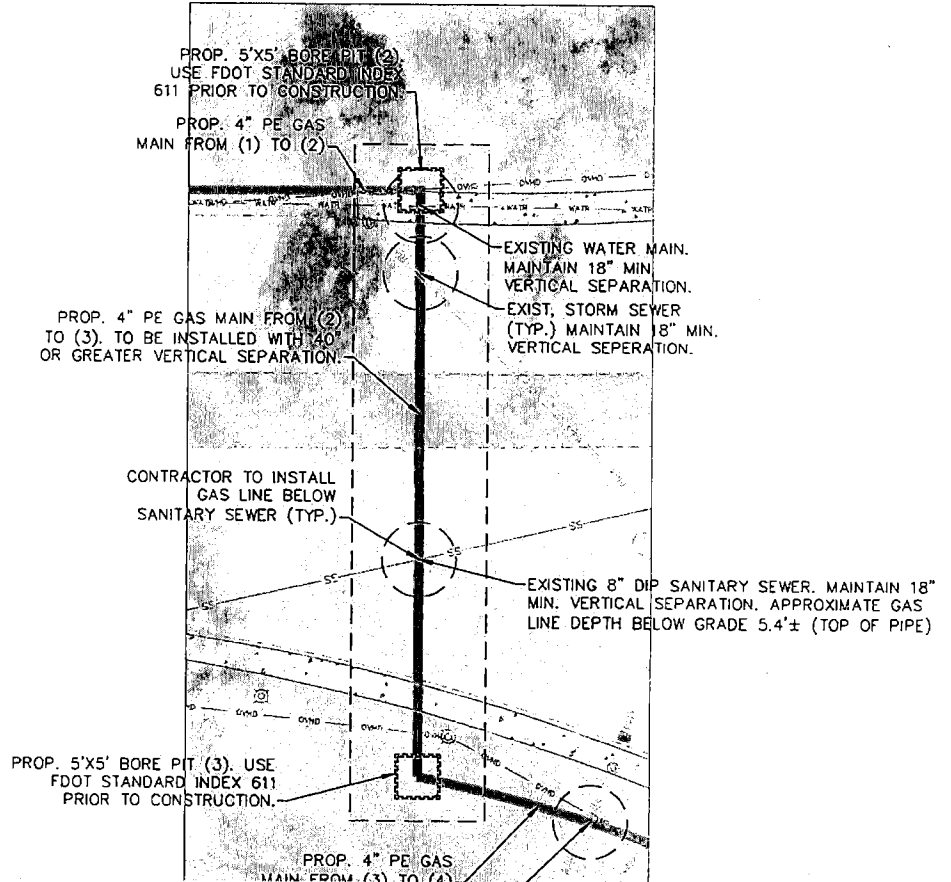


**UTILITY CROSSING
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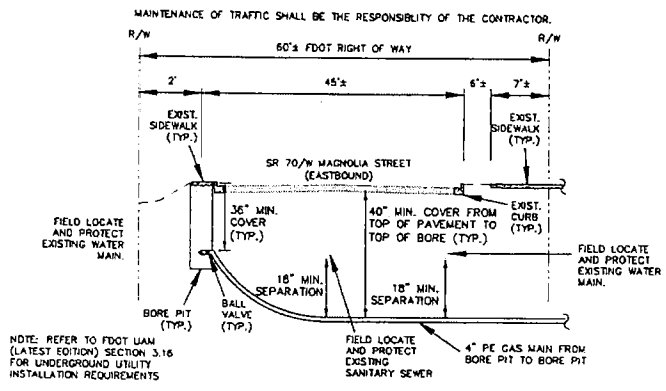


NOTE: REFER TO FDOT UAM (LATEST EDITION) SECTION 3.18 FOR UNDERGROUND UTILITY INSTALLATION REQUIREMENTS

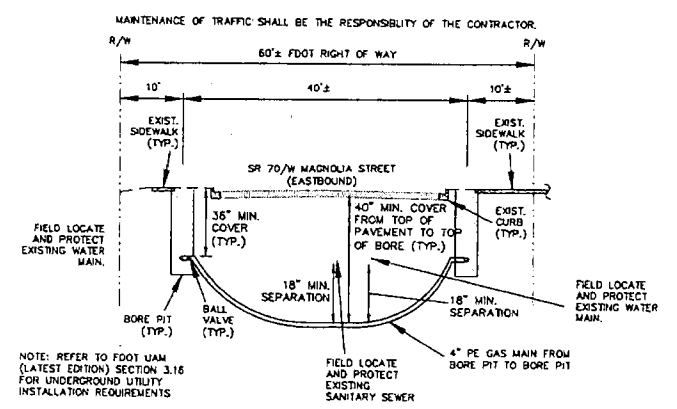
CROSSING 1 - DIRECTIONAL BORE
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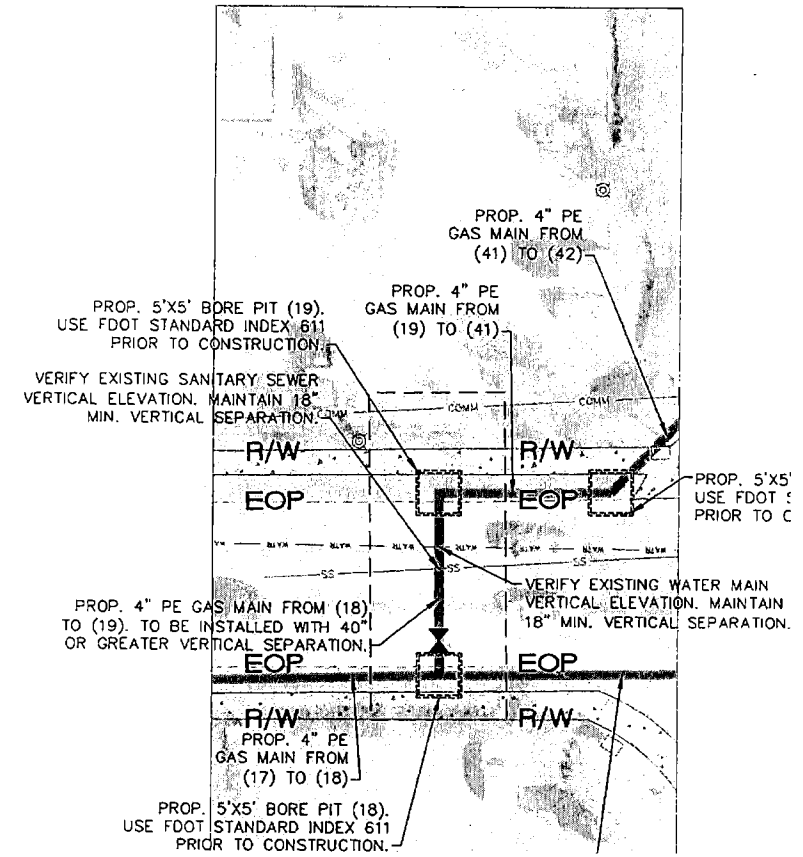
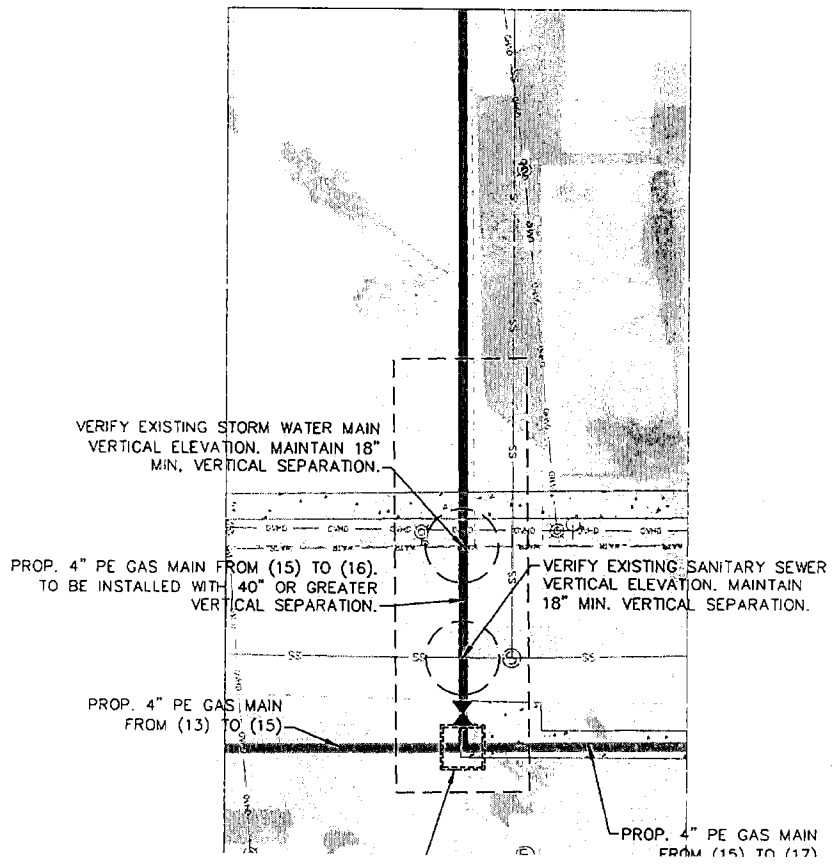
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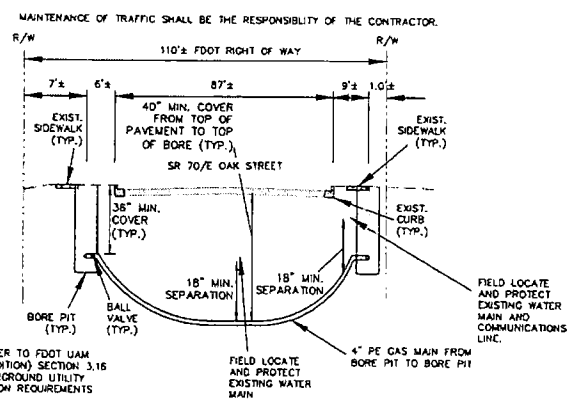
CROSSING 3 - DIRECTIONAL BORE
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CROSSING 4 - DIRECTIONAL BORE
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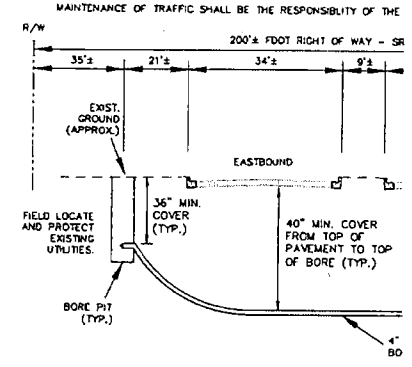


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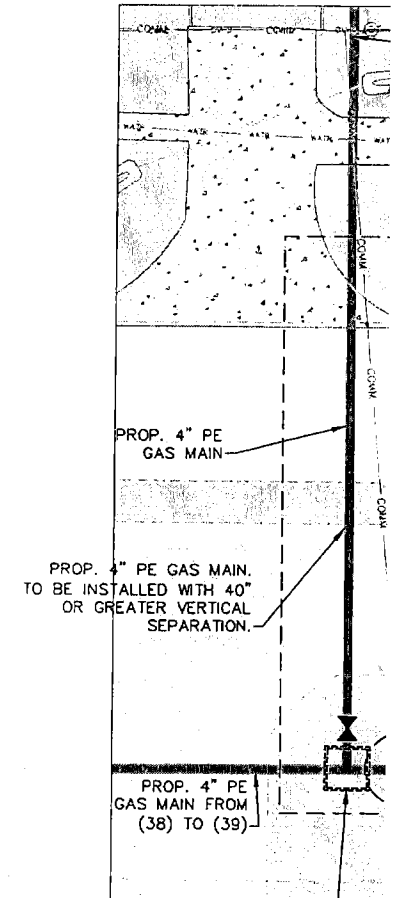
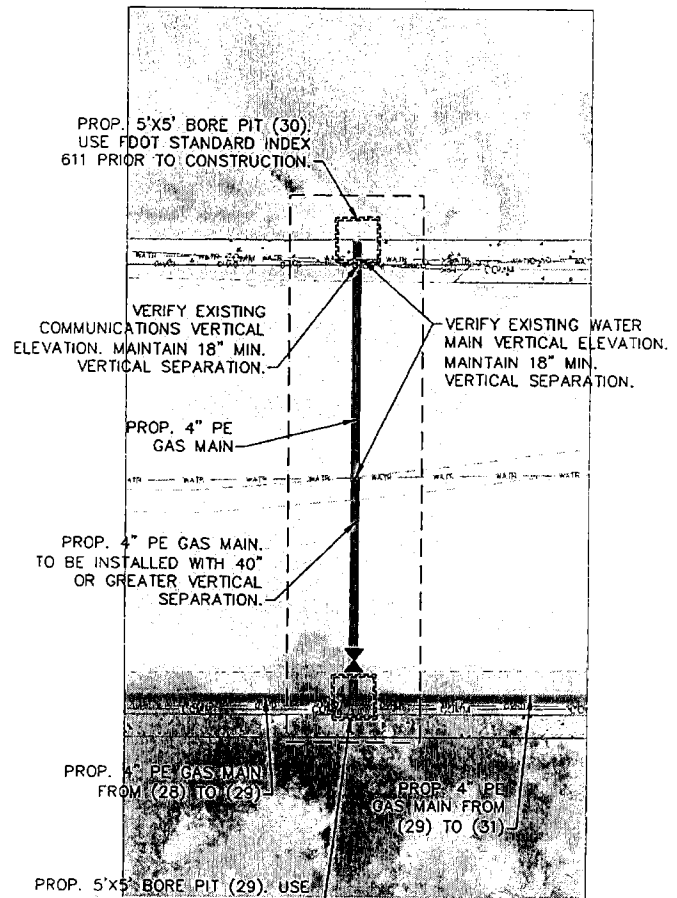


NOTE: REFER TO FDOT UAM
 (LATEST EDITION) SECTION 3.16
 FOR UNDERGROUND UTILITY
 INSTALLATION REQUIREMENTS

CROSSING 7 - DIRECTIONAL BORE
 N.T.S.



CROSSING 8 - DIRECTIONAL BORE
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DOUBLE CROWN MAINTENANCE OF TRAFFIC March 04, 2019 03:25:40pm \\winley-horn.com\Y.L.LAK\AKA_Civil\146301001 - Arcadio Natural Coa\CADD\CONSTR\C400 MAINTENANCE OF TRAFFIC.dwg
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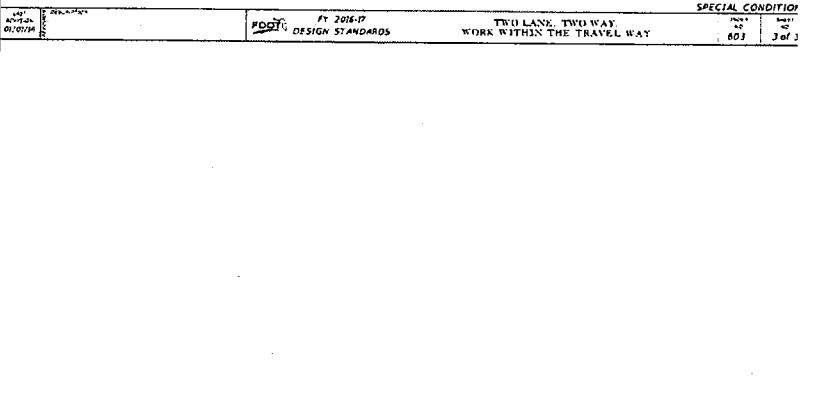
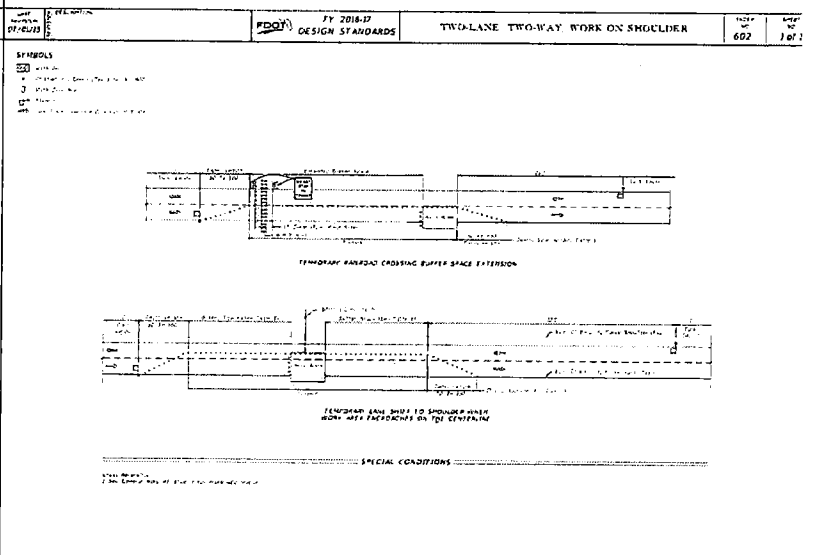
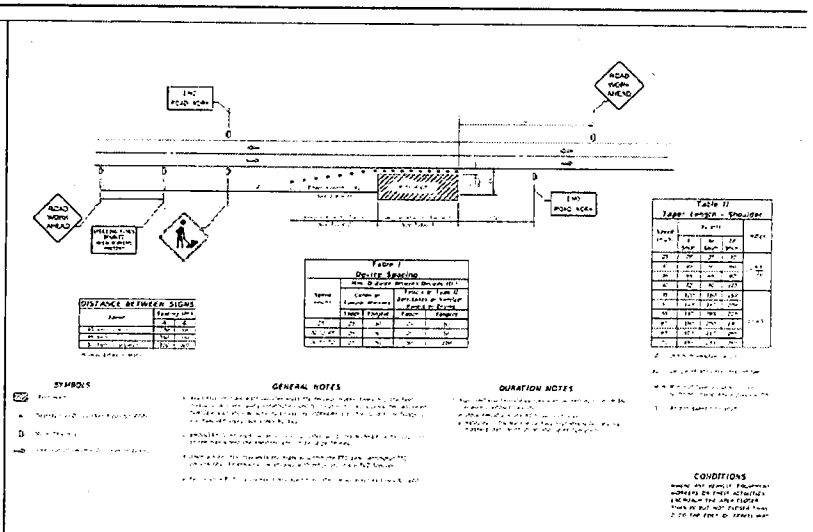
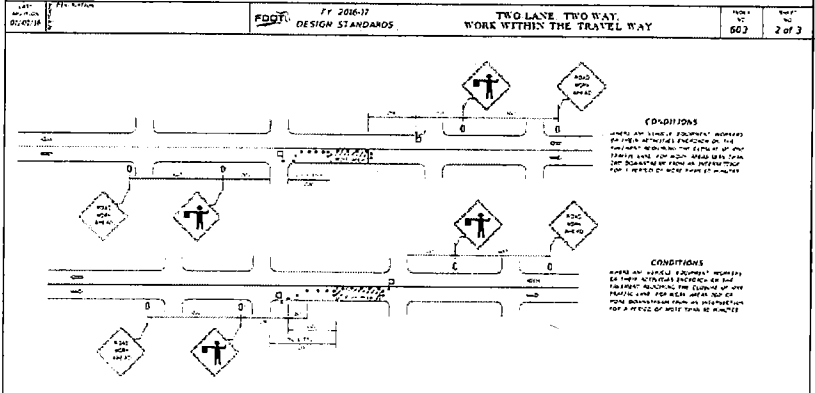
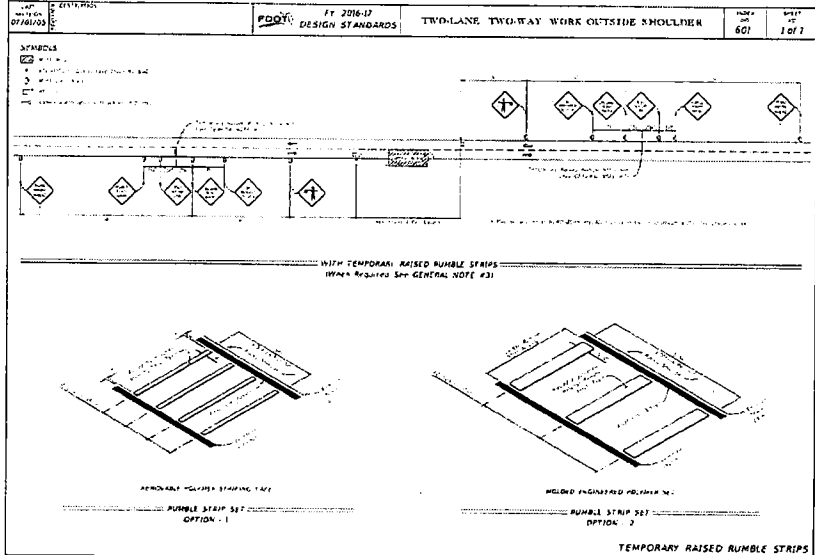
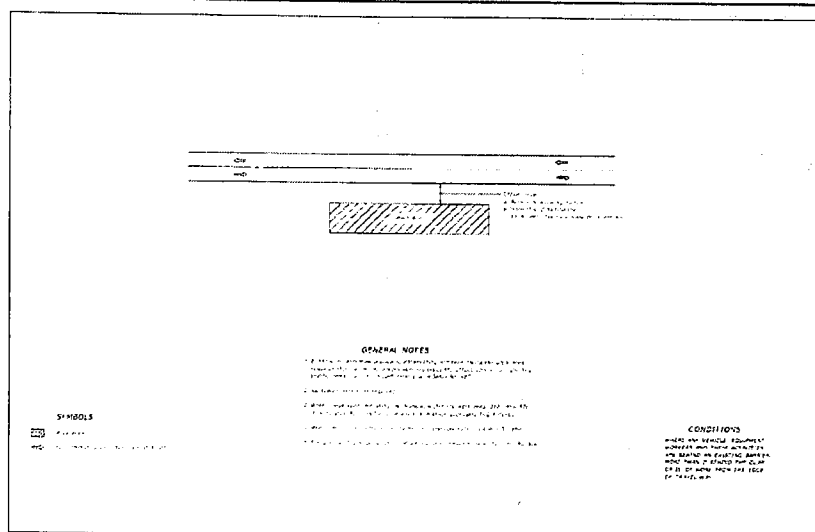


TABLE 11
 TABLE 11: DISTANCE BETWEEN WORK AND TRAFFIC LANE
 TABLE 12: DISTANCE BETWEEN WORK AND TRAFFIC LANE (Continued)

GENERAL NOTES

SYMBOLS

CONDITIONS

TABLE 11

TABLE 12

TABLE 11
 TABLE 11: DISTANCE BETWEEN WORK AND TRAFFIC LANE
 TABLE 12: DISTANCE BETWEEN WORK AND TRAFFIC LANE (Continued)

GENERAL NOTES

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GENERAL NOTES

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TABLE 11
 TABLE 11: DISTANCE BETWEEN WORK AND TRAFFIC LANE
 TABLE 12: DISTANCE BETWEEN WORK AND TRAFFIC LANE (Continued)

GENERAL NOTES

SYMBOLS

CONDITIONS

TABLE 11

TABLE 12

PCL XL error

Subsystem: GE_VECTOR

Error: GEEmptyClipPath Warning: IllegalMediaSize

Sebring Gas System, Inc.
Response to Staff's Fifth Set of Data Requests
Question 14

WAUCHULA

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT	COST
MAINS	STEEL	2"	0	\$25.00	\$0
		4"	0	\$40.00	\$0
		6"	0	\$75.00	\$0
MAINS	PLASTIC	1 1/4"	500	\$12.50	\$6,250
		2"	5,000	\$17.50	\$87,500
		4"	10,000	\$25.00	\$250,000
		6"	0	\$40.00	\$0
TOTAL MAINS - WAUCHULA					\$343,750

ARCADIA

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT	COST
MAINS	STEEL	2"	0	\$25.00	\$0
		4"	10,640	\$40.00	\$425,600
		6"	0	\$75.00	\$0
MAINS	PLASTIC	1 1/4"	0	\$12.50	\$0
		2"	5,000	\$17.50	\$87,500
		4"	25,000	\$25.00	\$625,000
		6"	0	\$40.00	\$0
TOTAL MAINS - ARCADIA					\$1,138,100

SEBRING

PLANT ACCT	TYPE	SIZE	FOOTAGE	COST/FOOT	COST
MAINS	STEEL	2"	0	\$25.00	\$0
		4"	0	\$40.00	\$0
		6"	0	\$75.00	\$0
MAINS	PLASTIC	1 1/4"	2,500	\$12.50	\$31,250
		2"	10,000	\$17.50	\$175,000
		4"	2,500	\$25.00	\$62,500
		6"	0	\$40.00	\$0
TOTAL MAINS - SEBRING					\$268,750

TOTAL MAINS - STEEL	\$425,600
TOTAL MAINS - PLASTIC	\$1,325,000
TOTAL MAINS	\$1,750,600

Sebring Gas System, Inc.
Response to Staff's Fifth Set of Data Requests
Question 7

Rate Classification TS-1	Gas Meter	Gas Regulator
Model	AC - 250	1813B
Meter/Regulator Cost	\$95.00	\$35.00
Labor Cost	N/A *	N/A *
Miscellaneous Expense	N/A *	N/A *
Number Purchased	56	56
Total Cost of Purchase	\$5,320.00	\$1,960.00

* Gas Meters and Regulators are "mass unit" property. No Labor Costs or Miscellaneous Expenses are allowed to be capitalized.

Rate Classification TS-2	Gas Meter	Gas Regulator
Model	AC - 425	1813C
Meter/Regulator Cost	\$270.00	\$50.00
Labor Cost	N/A *	N/A *
Miscellaneous Expense	N/A *	N/A *
Number Purchased	8	8
Total Cost of Purchase	\$2,160.00	\$400.00

* Gas Meters and Regulators are "mass unit" property. No Labor Costs or Miscellaneous Expenses are allowed to be capitalized.

Rate Classification TS-3	Gas Meter	Gas Regulator
Model	AC - 800	1800CPB2
Meter/Regulator Cost	\$820.00	\$250.00
Labor Cost	N/A *	N/A *
Miscellaneous Expense	N/A *	N/A *
Number Purchased	29	29
Total Cost of Purchase	\$23,780.00	\$7,250.00

* Gas Meters and Regulators are "mass unit" property. No Labor Costs or Miscellaneous Expenses are allowed to be capitalized.

Rate Classification TS-4	Gas Meter	Gas Regulator
Model	Rotary 3.5M	1802CPB2
Meter/Regulator Cost	\$1,375.00	\$475.00
Labor Cost	N/A *	N/A *
Miscellaneous Expense	N/A *	N/A *
Number Purchased	14	14
Total Cost of Purchase	\$19,250.00	\$6,650.00

* Gas Meters and Regulators are "mass unit" property. No Labor Costs or Miscellaneous Expenses are allowed to be capitalized.

Rate Classification TS-5	Gas Meter	Gas Regulator
Model	Rotary 9M	1804PFM
Meter/Regulator Cost	\$2,800.00	\$730.00
Labor Cost	N/A *	N/A *
Miscellaneous Expense	N/A *	N/A *
Number Purchased	2	2
Total Cost of Purchase	\$5,600.00	\$1,460.00
* Gas Meters and Regulators are "mass unit" property. No Labor Costs or Miscellaneous Expenses are allowed to be capitalized.		

Mil Jubinsky

From: Jerry Melendy <jmelendy@floridasbestgas.com>
Sent: Tuesday, July 28, 2015 4:20 PM
To: Norman Witman; Mil Jubinsky; Diana Fehling
Subject: PSC Annual Evaluation 2014, second response
Attachments: PSC Annual Evaluation 2014, second response.docx

Attached, please find my responses to the violations found in the annual evaluation.

Jerry Melendy
Sebring Gas System, Inc.

Sebring Gas System (SGS) response to violations found during the Annual Natural Gas Pipeline Safety Evaluation for Sebring Gas System – 2014 SEBGS GS – 1277, and cited on October 7, 2014.

Of the violations found during the annual evaluation, eight were not closed out as of the January 30, 2015.

The eight violations were:

- (1) Number 11: Cathodic Protection, 40% complete
- (2) Number 12: Remedial Action. 40%
- (3) Number 13: Location of Half Cell, 30%
- (4) Number 14: Line Markers, 50%
- (5) Number 16: Inactive Service Lines, 90%
- (6) Number 17: Operations and Maintenance Manual, 0%
- (7) Number 19: Qualification Record Keeping, 10%
- (8) Number 21: General Records, 70%

In April of 2015 I responded to two of the violations. The two violations were Numbers 14 and 16. I have no additional response on these violations at this time.

Response to Violation Number 11: Cathodic Protection

During the Pipeline Safety Evaluation, completed on September 26, 2014, the Engineering Specialist noted that numerous low reads were found. In her report she listed 24 addresses for which she recorded the pipe-to-soil potential readings. The reading ranged from -1.18V to -0.17V. Of the 24 readings noted, 6 were below the acceptable reading of -0.85V. One location was not read due to the fact no test lead was found to the pipe. These addresses were not test stations but rather customer locations where SGS took readings from the risers. Since the

inspection, SGS has added numerous test stations in order for the P/S readings will be done in a uniform and consistent manner. I will comment on these test stations in a latter response.

SGS has done extensive work on the cathodic protection aspect of our business. Below is a list of the addresses listed in the Engineering Specialist's report of 09/18/2014 – 09/19/2014, along with the P/S readings at the time of the inspection and current readings:

Number	Address	P/S Reading 9/15/2014 & 9/19/2014	P/S Reading 7/21/2015
3.	605 S. Pine	-0.69V	-0.73*
5.	95 Mimi	-0.80V	-0.88
13.	Eucalyptus/Poinsettia	-0.78V	-0.91
16.	Hitakee/NE Lakeview	-0.76V	-1.03
17.	3213 Paradise Path	-0.54V	-1.14
18.	3113 Paradise Path	-0.17V	-1.13

For the location #3, 605 Pine Street was -0.73. We added test stations and anodes in this section of main, which is isolated from the rest of the pipeline system, but the P/S readings have not increased to the acceptable level. We continue to search for possible shorts in this area.

Response to Violation Number 12: Remedial Action.

The remedial actions for the cathodic protection of the SGS system have been ongoing since the annual evaluation conducted in 2014, with substantial progress toward correction of deficiencies found. These actions consists of: locating and clearing shorts and holidays on the pipeline; locating and repairing bad coatings on the pipelines; determining the areas of concern and adding anodes; and determining the best locations and installing test stations on the pipeline system to aid in more consistent and organized monitoring of the cathodic protection.

In the original response, I indicated that SGS had installed approximately 25 new CP test stations. Proper documentation of the installation of the test stations and anodes has been added to our files. Our pipeline technicians have attended a cathodic protection class, attained a passing grade and have a proper understanding of how an anode performs.

In addition to the approximately 25 test stations installed, several additional stations have been installed. At this time, there are 30 test stations on our pipeline system.

These test stations are identified by number on the inspection form, with a separate sheet identifying the physical locations of the test stations. We have developed a plan to take P/S

reads on a schedule that complies with the laws, codes and rules governing cathodic protection, that being Sections 192,I-A(1) of Appendix D, CFR and Chapter 25-12.052(2), FAC.

Below is list of the test stations installed on the SGS pipeline system, thus far, including the test Station Number, the Location of the station and the current P/S Reading at that station:

Downtown. Designated by DT

Reads below the acceptable level of -0.85 are highlighted.

Station Number	Location	Current P/S Reading in Volts
DT-10	Kackley/Alley	-1.02
DT-15	Poinsettia/Alley	-1.01
DT-20	Oak/Hickory	-0.92
DT-25	Hickory/Magnolia	-0.88
DT-30	Oak/Eucalyptus	-0.76
DT-35	Eucalyptus/Poinsettia	-0.91
DT-40	Eucalyptus/Franklin	-0.76
DT-45	S. Franklin/Alley	-0.48
DT-50	Poinsettia/S. Franklin	-0.95
DT-55	S. Pine St. (N) -0.73 (S) -0.57	
DT-60	Palm's Parking Lot	-0.66
DT-65	Funeral Home/Alley	-0.95
DT-70	Spruce/Lakeview	-0.70
DT-75	Lakeview/Hemlock	-0.92
DT-80	Milakee (S) -0.94 (N) -0.48	
DT-85	Shontee	-0.51
DT-90	Osceola/2560 Lakeview	-0.60
DT-95	Nancesowee	-0.88
DT-100	2640 Lakeview/Katkalani	-0.97
DT-110	Hitakee	-1.03
DT-115	2710 Lakeview/Stenewahee	-0.93
DT-120	Hiawatha/Lutheran Church	-1.02

Highlands Mobile Village,

Designated by HM

Station Number	Location	Current P/S Reading in Volts
HM-10	1713 Jim Lane	-1.16
HM-20	Jennie Lane	-1.28
HM-30	1708 Jeri Kay	-1.19

Francis I Mobile Home Park, Designated by F1

Station Number	Location	Current P/S Reading in Volts
F1-10	Village Inn	-0.99
F1-20	493 Pauline	-1.02
F1-30	Recreation Hall	-0.97
F1-40	602 Sebring Drive	-0.94
F1-50	212 Clara Street	-0.98
F1-60	88 Von Maxcy	-0.98

Francis II Mobile Home Park, Designated by F2

Station Number	Location	Current P/S Reading in Volts
F2-10	2953 Paradise Path	-1.17
F2-20	2912 Las Vegas	-1.17
F2-30	2941 San Francisco	-1.08
F2-40	Highlands/Paradise Path/Las Vegas	-0.92

Response to Violation Number 13: Location of Half Cell.

All installed anodes have documentation indicating the location of such. All technicians have been instructed in the proper location of the half cell when taking P/S Readings.

Response to Violation Number 14: Line Markers.

Response previously sent.

Response to Violation Number 16: Inactive Service Lines.

Response previously sent.

Response to Violation Number 17: Operations and Maintenance Manual.

The GS-03 Operation & Maintenance Form 03_10, dated 9/16/2014, was used by the Engineering Specialist as a protocol for evaluating the SGS O&M Manual. In the evaluation, 122 deficiencies were found, as compared to three in the prior year.

I have reviewed the deficiencies as indicated in the evaluation report and have added them to or corrected our O&M manual to correct these deficiencies. In addition, I am continuing to study and update the SGS O&M Manual.


Response to Violation Number 19: Qualification Recordkeeping.

I am working on the reply to this violation. Jerry Melendy

Response to Violation Number 21: General Records.

The SGS records have been organized and arranged so compliance can be readily determined. The field staff has been instructed in the proper way to complete compliance documents, per the O&M Manual.

The above responses to the violations were made by Jerry Melendy, Sebring Gas System.


MESSER CAPARELLO
Attorneys At Law
Strategically Positioned in Florida's Capital

November 3, 2014

BY HAND DELIVERY

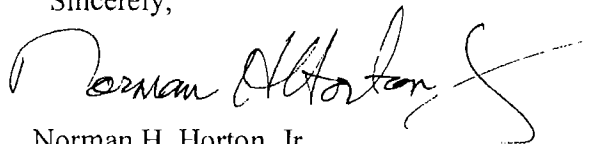
Mr. Rick Moses
Chief – Safety
Division of Engineering
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Dear Mr. Moses:

Attached hereto please find the response of Sebring Gas System, Inc. to your letter of October 7, 2014.

Should you have any questions please do not hesitate to contact me or Mr. Jerry Melendy at Sebring Gas.

Sincerely,



Norman H. Horton, Jr.

NHH/amb
Enclosures

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

1. The Sebring Gas System (operator) failed to perform leakage survey in accordance with the following schedule as a minimum: A gas detector instrument survey shall be conducted at intervals not exceeding 15 months but at least once each calendar year in those portions of an operator's service area, including principal business districts, master meter systems, and places where the public is known to congregate frequently, as required by Chapter 25-12.040(1)(a)(1), Florida Administrative Code.

OPERATOR'S RESPONSE:

After the completion of the evaluation and field inspection, the Operator performed a leak survey on the Operator's gas system.

In compliance with Chapter 25-12.040(1)(a)(1), Florida Administrative Code a leak survey of the portion of the Operator's service area that includes principal business districts and places where the public is known to congregate frequently was completed on October 12, 2014.

The leak survey was performed using a gas detector instrument.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

2. The Sebring Gas System (operator) failed to provide records of gas leaks which are determined to be in the operator's system shall show as a minimum: (the eight requirements as found in the rule). as required by Chapter 25-12.062, Florida Administrative Code.

OPERATOR'S RESPONSE:

The following is a comparison of the minimum documentation requirements between Chapter 25-12.062 FAC, Leak Reports and the Gas Leak and Repair Report of Sebring Gas System:

<u>Chapter 25-12.062</u>	<u>Sebring Gas leak report</u>
(1) Address of suspected leak.	(1) Address
(2) Date and time leak reported.	(2) Date Time Reported
(3) Description of leak reported.	(3) Leak Data Detected by Collecting Probable Source Soil Pressure Leak Cause
(4) Date and time operator personnel dispatched.	(4) Time dispatched
(5) Date and time operator personnel arrived.	(5) Time arrived

Sebring Gas System, Inc.

Continuation Page No. 1 of Response to Violation #2

- | | |
|--|-------------------------------|
| (6) Date and time condition made safe. | (6) Signature used to verify. |
| (7) Location of leak found. | (7) Part of System |
| | Main |
| | Service |
| | Meter Set |
| | Customer piping |
| | Customer appliance |
| (8) Cause of leak | (8) Leak Cause |

The Operator's personnel respond to leak calls as soon as possible, on the day the Operator is notified and considers the Date on the form to be the date of notification, the date of dispatch, the date of arrival and the date the condition is made safe.

The Operator has re-designed the Gas Leak and Repair Report, to comply with the requirements of Chapter 25-12.062, Florida Administrative Code.

In addition to compliance to Chapter 25-12.062, Florida Administrative Code, changes were made to the Operator's Gas Leak and Repair Report that complies with Chapter 25-12.040(2), Florida Administrative Code, as cited in Violation No. 4, and Chapter 25-12.040(3) Florida Administrative Code, as cited in Violation No. 5.


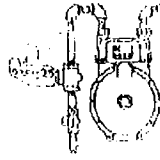
Sebring Gas System, Inc.
Continuation Page No. 2 of Response to Violation #2

The re-designed report is now two pages in length: The first page is the actual report. The second, on the reverse side of the first page, is a copy of Chapter 25-12.042, Investigation of Gas Leak Reports, and Chapter 25-12.040, Florida Administrative Code, Leak Surveys, Procedures and Classification. The second page was added to aid the pipeline personnel in their duties in this task.

The second page of the report is printed on the reverse side of the actual report.

A copy of the two-page report is shown on the following two pages.

Sebring Gas System, Inc.
Continuation Page No. 3 of Response to Violation #2

 SEBRING GAS SYSTEM, INC.							
Gas Leak And Repair Report							
Log Number:		Leak Classification			1	2	3
Reported By:		Address of Suspected Leak:					
Description of Leak:							
Technician Dispatched:		Date & Time Dispatched:		Date & Time Arrived:			
Date and Time Condition Made Safe:				Cause of leak:			
Leak Data							
Detected By:	Collecting:	Location of Leak:		Soil:	Pressure:	Leak Cause:	
Plasma Pak	In Building	Main		Sand	High	Corrosion	
Sewer PVD	Outside	Service		Rock	in	Outside Force	
FGI	In Sew	Service Tap		Clay	Low	Material Failure	
Gas Tracker	In Air	V-Air		Loam		Other	
	Other	Other					
Part of System							
Main	Service	Meter Set	Customer Piping	Customer Appliance			
							
Date & Time Detected: _____ Action Taken: _____ _____ _____ Was residual gas detected in the ground? Yes _____ No _____ For Operations Manager: _____ Leak Requires Re-test: Yes _____ No _____ <div style="text-align: right; margin-top: 20px;"> _____ Technician's Signature </div>							

Sebring Gas System, Inc.

Continuation Page No. 4 of Response to Violation #2

25-12.042 Investigation of Gas Leak Reports.

Gas leaks reported by customers or the general public shall be considered emergencies requiring prompt response with the first priority of protecting life then property. A device capable of detecting the presence of gas shall be used to test the area of the reported leak to determine if a leak actually exists.

25-12.040 Leak Surveys, Procedures and Classification.

(1) Each operator shall perform periodic leakage surveys in accordance with the following schedule as a minimum:

(a) A gas detector instrument survey shall be conducted at intervals not exceeding 15 months but at least once each calendar year in those portions of an operator's service area, including:

1. Principal business districts, master meter systems, and places where the public is known to congregate frequently.

2. Where pipeline facilities, including service lines, are located under surfaces of such construction that little opportunity is afforded for a leak to vent safely.

(b) A gas detector instrument survey to locate leaks throughout areas not included in subsection (a) above shall be conducted at intervals not exceeding three (3) years on bare metallic, galvanized steel, coated tubing pipelines, and five (5) years on the remaining pipeline system, or more frequently if experience indicates.

(2) The following leak classification system shall be used on all leak records and reports:

(a) "Grade 1 Leak" - a leak of gas that represents an existing or probable hazard to persons or buildings. Prompt action to protect life and property and continuous action until conditions are no longer hazardous is required.

(b) "Grade 2 Leak" - a leak that is not a threat to persons or property at the time of detection, but justifies scheduled repair based on potential future hazard. These leaks shall be repaired within 90 days from the date the leak was originally located, unless due to resurvey the leak was determined to be Grade 3 as defined in subsection (c) below. In determining the time period for repair, the following criteria should be taken into consideration:

1. Amount and migration of gas;
2. Proximity of gas to buildings and subsurface structures;
3. Extent of pavement;
4. Soil type and conditions, such as moisture and natural venting.

(c) "Grade 3 Leak" - a leak that is not a threat to persons and property and is not expected to become so. Above ground grade 3 leaks shall be repaired within 90 days from the date the leak was originally located unless the leak is upgraded or does not produce a positive leak indication when a soap and water solution, or its equivalent, is applied on suspected locations at operating pressure. Grade 3 leaks that are underground shall be reevaluated at least once every 6 months until repaired. The frequency of reevaluation shall be determined by the location and magnitude of the leak.

(3) The adequacy of all the repairs on leaks shall be checked by appropriate methods immediately after the repairs are completed. Where there is residual gas in the ground, a follow-up inspection using a gas detector instrument must be made as soon as the gas has had an opportunity to dissipate, but no later than one month for Grade 1 leaks and 6 months for Grade 2 leaks. The date and status of rechecks will be recorded on the leak repair records.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

3. The Sebring Gas System (operator) failed to inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: Onshore - at least once every 3 calendar years, but with intervals not exceeding 39 months. as required by Code of Federal Regulations Part 192, Section 192.48 (a).

OPERATOR'S RESPONSE:

In compliance with the Code of Federal Regulations Part 192, Section 192.481(a), the Operator inspected the portion of its pipeline system that is exposed to atmosphere for evidence of atmospheric corrosion.

This inspection was concluded on October 14, 2014. Remedial action has begun on the system.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

4. The Sebring Gas System (operator) failed to document leak classification system shall be used on all leak records and reports, as required by Chapter 25-12.040(2) Florida Administrative Code.

OPERATOR'S RESPONSE:

The Operator's Gas Leak and Repair Report has been re-designed and presently includes the definition of each class of leak, to aid the technician when determining the proper classification of leaks. A copy of the re-designed Gas Leak and Repair Report is included with the Operator's Response for Violation No, 2, on Continuation Page No. 4 of the response.

The Operator's pipeline personnel have been instructed to document the leak classifications as indicated on the Operator's Gas Leak and Repair Report, meeting the requirement of Chapter 25-12,040(2), Florida Administrative Code.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

5. The Sebring Gas System (operator) failed to check the adequacy of all the repairs of leaks by appropriate methods immediately after the repairs are completed. Where there is residual gas in the ground, a follow-up inspection using a gas detector instrument must be made as soon as the gas has had an opportunity to dissipate but no later than one month for Grade 1 leaks, as required by Chapter 25-12.040(3), Florida Administrative Code.

OPERATOR'S RESPONSE:

Although the adequacy of all the repairs of leaks were checked by appropriate methods immediately after the repairs were made, no documentation to this fact was made on the Operator's Gas Leak and Repair Report. The report has been redesigned to indicate the adequacy of the repairs of leaks and if a follow-up inspection is required, due to residual gas in the ground.

A copy of the re-designed Gas Leak and Repair Report is included with the Operator's Response for Violation No, 2 on Continuation Page No. 3 of the response.

The Operator's pipeline personnel have been reminded to document, on the Operator's Gas Leak and Repair Report, that the adequacy of all the repairs to leaks have been checked by the appropriate methods immediately after the repairs are completed, meeting the requirement of Chapter 25-12,040(3), Florida Administrative Code.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

6. The Sebring Gas System (operator) failed to inspect each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year, as required by Code of Federal Regulations Part 192, Section 192.747(a).

OPERATOR'S RESPONSE:

In the year 2013 and prior, the Operator maintained a Valve Map book of each valve in its system. The number of total valves in the Operator's system in 2013 was 226. This quantity was comprised of valves necessary to the safe operation of the distribution system, and other system valves used for maintenance of the system. Of the 226 valves in the distribution system, 5 are Emergency valves, 23 are Sectionalizing valves and the remaining 198 are System valves, which are not necessary for the safe operation of the system but are for maintenance of the system.

As of Tuesday, October 14, 2014, all Emergency and Sectionalizing valves were checked and serviced as needed.

During the annual evaluation and field inspection, no documentation was found that 54 of the Operator's valves listed in the Valve Map book had been checked and operated. Following the evaluation, research of the data was made by the Operator and it was determined that only 6 of the 54 valves are considered Sectionalizing valves, which fall

Sebring Gas System, Inc.
Continuation Page No. 1 of Response to Violation #6

under the Code of Federal Regulations Part 192, Section 192.747(a).the parameters of the evaluation and field inspection. The remaining valves were found to be System valves used for maintenance activities on the system.

The Operator understands that valves designated as other than emergency or sectionalizing valves should not be in the Valve Map book and that if these other valves are included in the Operator's Valve Map book, they would fall under the requirements of Code of Federal Regulations Part 192, Section 192.747(a).

The Valve Map book has been reviewed and all System maintenance valves have been removed.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

7. The Sebring Gas System (operator) failed to take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve, as required by Code of Federal Regulations Part 192, Section 192.747(b).

OPERATOR'S RESPONSE:

During the evaluation and field inspection, valves numbered 168 and 249 were discovered to have sediment in the valve casings and the valves were determined to be inoperable, due to the sediment.

As of Monday, October 13, 2014, prompt remedial action had been taken and both casings were cleaned of the sediment and the valves were checked and serviced.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

8. The Sebring Gas System (operator) failed to for sectionalizing and other critical valves shall be designated on appropriate records, drawings, or maps used by the operator and shall be referenced to "permanent" aboveground structures or other field ties so the valves can be readily located, as required by Chapter 25-12.022(3), Florida Administrative Code.

OPERATOR'S RESPONSE:

The Operator has reviewed the records of all Sectionalizing valves and has made the necessary corrections to the locations and designated these corrections into the Valve Map Book. In Compliance with Chapter 25-12,033(3), Florida Administrative Code, the valves' locations have been referenced to permanent aboveground structures.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

9. The Sebring Gas System (operator) failed to, for above ground valves, the marking shall appear on the valve body or hand wheel, as required by Chapter 25-12.022(3)(a), Florida Administrative Code.

OPERATOR'S RESPONSE:

During the evaluation and field inspection, the Emergency valves located at the Operator's Dinner Lake gate station were found to not be marked or tagged. As of Monday, October 20, 2014, the Emergency valves were tagged and the valves' criteria and location were entered onto the Operator's Valve Map book, as required by Chapter 25-12.022(3)(a), Florida Administrative Code.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

10. The Sebring Gas System (operator) failed to, for buried valves or valves operated by a key wrench, the marking shall appear in a visible location on the inside of the curb box or standpipe where the cover will not abrade the marking, as required by Chapter 25-12.022(3)(b), Florida Administrative Code.

OPERATOR'S RESPONSE:

During the evaluation and field inspection, two valves were found to not have identification. As of Monday, October 13, 2014, prompt remedial action had been taken and the two valves in question, numbered 113 and 249, had identification tags applied, as required by Chapter 25-12.022(3)(a), Florida Administrative Code.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

11. The Sebring Gas System (operator) failed to maintain an acceptable criteria of negative 850 m V on its buried coated steel pipeline as required by Code of Federal Regulations Part 192, I-A(l) of Appendix D and Chapter 25-12.052(2), Florida Administrative Code.

OPERATOR'S RESPONSE:

Please see the Operator's Response for Violation Number 12 following.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

12. The Sebring Gas System (operator) failed to take remedial action within three months to correct or make substantial progress toward correction of any deficiencies indicated by monitoring as required by Code of Federal Regulations Part 192, Section 192.465(d) and Chapter 25-12.052(6), Florida Administrative Code.

OPERATOR'S RESPONSE:

The Operator reviewed its cathodic protection documentation for the monitoring activity of September, 2014 and the Corrosion Control Survey taken by the Engineering Specialist during the September, 2014 evaluation and field inspection.

From this information, the Operator produced work orders for each location where a low cathodic read (-.85V or below) was found. The work orders instructed the Operator's personnel to install anodes at the various low read locations.

There were work orders for anodes to be installed in ten locations on the gas system. The anode installation was completed on Monday, October 27, 2014, by one Operator Qualified utility personnel and two unqualified individuals. The two unqualified individuals were directed and observed by the qualified utility personnel, as allowed in the Code of Federal Regulations Part 192, Section 192.805(c).

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

13. The Sebring Gas System (operator) failed to follow the placement of the reference half cell in the immediate vicinity of the galvanic anodes, as required by Chapter 25-12.054, Florida Administrative Code.

OPERATOR'S RESPONSE:

The Operator has used wires, welded to its steel pipeline and terminated within certain castings of valves, in order to measure the level of cathodic protection on its gas system.

In order to insure that the placement of a reference half cell is acceptable for gathering electrical measurements, the Operator has indentified locations on the pipeline away from the immediate vicinity of the Operator's galvanic anodes to be used for gathering this information, in compliance with Chapter 25-12.054, Florida Administrative Code.

The Operator has identified the locations for cathodic test stations to be installed and has installed five of these stations. The Operator will install the remainder of the new test stations in its system by the end of November 2014. The Operator anticipates the number of test stations installed will be thirty.

The practice of gathering cathodic reads from anode wires located within system valve castings will be changed to gathering reads from the newly installed test stations.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

14. The Sebring Gas System (operator) failed to provide line markers with the name of the operator and telephone number (including area code) where the operator can be reached at all times, as required by Code of Federal Regulations Part 192, Section 192.707(d)(2).

OPERATOR'S RESPONSE:

As of Friday, October 10, 2014, all mainline markers of the Operator were inspected for the correct *Marker Warning*, as required by CFR Part 192.707(d)(2). New stickers, containing the name of the operator and telephone numbers (including area code) will be installed as required by CFR Part 192, Section 192.707(d)(2), by the end of November 2014.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

15. The Sebring Gas System (operator) failed to identify each customer meter, gas regulating station, or any aboveground gas transporting facility shall be permanently marked to identify the operator's name and phone number. Marking of facilities shall be accomplished by metal signs, line markers, plastic decals, or other appropriate means, as required by Chapter 25-12.050(2), Florida Administrative Code.

OPERATOR'S RESPONSE:

The Operator has surveyed each customer meter, gas regulating station and all aboveground gas transporting facility in its system, and has permanently marked the Operator's name and phone number to the Operator's facilities, as required by Chapter 25-12.050(2), Florida Administrative Code.

The Operator will use plastic decals as the means of indentifying its facilities. The decals will be applied to those transporting facilities in its system by the end of November, 2014.

The Operator has re-designed the Meter Installation form to include documenting that a plastic decal identifying the operator's name phone number has been attached to the meter.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

16. The Sebring Gas System (operator) failed to, after ten years of inactivity, service lines shall be retired and physically abandoned within six months, as required by Chapter 25-12.045(f), Florida Administrative Code.

OPERATOR'S RESPONSE:

During the evaluation and field inspection, the inspector identified 43 service lines that had not had activity for over 10.5 years. The following is status of the service lines:

Total service lines found with no activity:	43
Service lines returned to service:	8
Service lines with dual services: (please see note)	6
Service lines removed:	<u>29</u>
	43

- Note: Dual service lines are service lines that have two customer meters serving two separate customers. If one customer discontinues service and the meter of the discontinued customer is removed, the service must remain to serve the remaining customer.
- After the evaluation and field inspection, the 29 service lines with no activity in 10.5 years were removed from service in compliance with Chapter 25-12.045(f), Florida Administrative Code .

Sebring Gas System, Inc.
Continuation Page No. 1 of Response to Violation #16

- The 29 inactive service lines were removed by Saturday, October 25, 2014.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

17. The Sebring Gas System (operator) failed to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response, as required by Code of Federal Regulations Part 192, Section 192.605(a).

OPERATOR'S RESPONSE:

During the evaluation and field inspection, the inspector found several deficiencies in the Operator's Operation and Maintenance (O&M) Manual, as noted in the GS-03 Operation and Maintenance Form 03_10, included with the evaluation and field inspection documentation.

The Operator is presently reviewing the details of the GA-03 report and will correct the deficiencies found.

The Operator anticipates the review and corrections to be made by December 31, 2014, and respectfully asks for this amount of time for the process to be completed.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

18. The Sebring Gas System (operator) failed to identify those covered tasks and intervals at which evaluation of the individual's qualifications are needed, as required by Code of Federal Regulations Part 192, Section 192.805(g).

OPERATOR'S RESPONSE:

The Operator has adopted the ASME B31Q list of Covered Tasks Certifications provided by EnergyU, an online energy industry training and testing organization. From this list the Operator has chosen covered tasks for implementing the Operator's Pipeline Personnel Qualification Program. These chosen Covered Tasks impact the safety and integrity of the Operator's natural gas system and provides its employees with a safer work place while complying with Code of Federal Regulations Part 192, Section 192.805(g).

The Operator has documented its list of Covered Tasks for which its applicable employees and/or contractors must be qualified.

The Operator's Covered Tasks are in the following sections:

- Corrosion Control
- Valves & Regulating Devices
- Pressure Testing
- Pipe Inspection
- Meter Sets
- Leak Investigation
- Pipe Installation
- Pipe Repair
- Pipeline Tapping

Sebring Gas System, Inc.

Continuation Page No. 1 of Response to Violation #18

- Pipeline Maintenance
- Damage Prevention

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

19. The Sebring Gas System (operator) failed to provide adequate documentation to demonstrate compliance with prior qualification records of individuals who perform covered tasks, as required by Code of Federal Regulations Part 192, Section 192.807(b).

OPERATOR'S RESPONSE:

In compliance with the Code of Federal Regulations Part 192.807(b), the Operator maintains records of qualification of individuals who no longer perform covered tasks and the records of these individuals are held in excess of 5 years. The documentation of these individuals will be available in a more readily accessible format for future evaluations and inspections.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

20. The Sebring Gas System (operator) failed to, after December 16, 2004, observations of on-the-job performance may not be used as the sole method of evaluation, as required by Code of Federal Regulations Part 192, Section 192.809(e).

OPERATOR'S RESPONSE:

The Operator presently has a written qualification program and each person who is performing a Covered Task will be qualified before performing that task. Qualification means the person has been evaluated and can perform the assigned covered task and can recognize and react to abnormal operating conditions.

Evaluations will not rely solely on observations of on-the-job performance, but will also incorporate online training and testing, in-house and outside sources training, written test, oral interviews and/or work performance history.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

21. The Sebring Gas System (operator) failed to provide records to be organized, arranged, or prepared so that the required data is sufficient so that the status of compliance can be readily determined, as required by Chapter 25-12.060(2), Florida Administrative Code.

OPERATOR'S RESPONSE:

During the evaluation and field inspection evidence was found that some records relating to valves, leak repairs, CP activities and patrolling contained errors in the form of incorrect date format, incomplete information, and inaccurate documentation of findings.

In compliance with Chapter 25-12.060(2), Florida Administrative Code, the Operator's records have been organized, arranged and prepared so that the required data will be sufficient so the status of compliance can be readily determined. This has been done, in part, by the re-designing of several forms used to gather data in the field. The re-designed forms have become more "user-friendly" for the technicians who are responsible for gathering data.

In addition to the re-designing of forms, the Operator's personnel have been instructed on the proper procedure of filling out the various forms needed to gather data for the Operator.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the D. Fehling Inspection ended on
10/06/2014.

22. The Sebring Gas System (operator) failed to prepare system maps and related records to readily identify the location and size of all system facilities and keep the records up to date, as required by Chapter 25-12.061, Florida Administrative Code.

OPERATOR'S RESPONSE:

In compliance with Chapter 25-12.061, Florida Administrative Code, the Operator has updated and redrawn its system maps, identifying the location and size of all system facilities and other information pertinent to the safe design of the system. These maps are kept at the Operator's office in Sebring.

SEBRING GAS SYSTEM, INC.
REPLY TO
COMMISSION RULE VIOLATION NUMBER GS-1277-SEBGS

April 21, 2015

VIOLATION NO. 11: CATHODIC PROTECTION

In the evaluation review, the evaluator wrote that we should submit a plan of action on what corrective actions they will perform in order to meet the requirements of the code pertaining to cathodic protection.

TRAINING:

Myself and one pipeline technician attended a cathodic school after the evaluation. Attached are copies of our proof of completion.

The technicians have been instructed in the proper way to take and record pipe-to-soil potential cathodic reads and have purchased wire reels for locates to be preformed away from anodes.

OUTSIDE SERVICES:

Sebring Gas System (SGS) has hired the services of Southern Cathodic Protection that has the necessary tools and knowledge to guide us through the process of compliance. Over two visits of approximately one week in the field each, several discrepancies were found and corrected. We will continue to employ their services until our entire system is in compliance.

FUTURE:

SGS will continue to monitor the condition of our steel underground gas mainline, and will conduct remedial action, as required in Section 192, I-A(1) of Appendix D, CFR and Chapter 25-12.052(2), FAC, also documented in the SGS Operations & Maintenance Manual.

Submitted by:


Jerry Melendy, Jr.

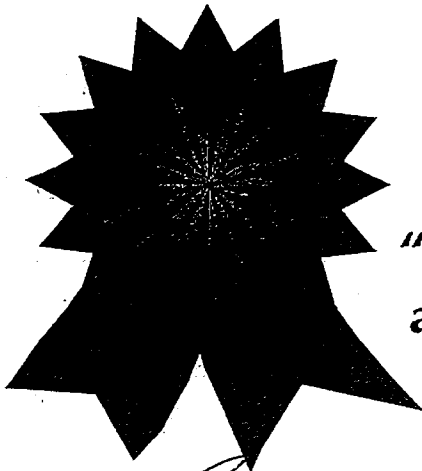
Sebring Gas System, Inc.


Southern Cathodic Protection Company

certifies that

Cameron Menzie

has successfully completed their
"Basic Corrosion Course" by daily attendance
and a passing grade on the final examination



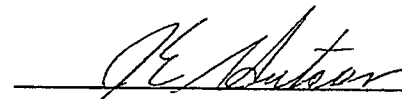


SCPC President
John L. Piazza II, P.E.
NACE Corrosion Specialist

11/4 - 7/2014

Date

Southern Cathodic
PROTECTION



SCPC Vice President Pipeline Services
J.E. (Buddy) Hutson
Primary Instructor


Southern Cathodic Protection Company

certifies that

Jerry Melendy

has successfully completed their
"Basic Corrosion Course" by daily attendance
and a passing grade on the final examination

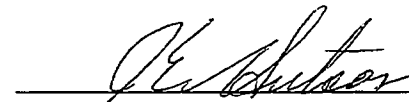




SCPC President
John L. Piazza II, P.E.
NACE Corrosion Specialist

11/4 - 7/2014

Date
SCP
Southern Cathodic
PROTECTION



SCPC Vice President Pipeline Services
J.E. (Buddy) Hutson
Primary Instructor

Mil Jubinsky

From: Jerry Melendy <jmelendy@floridasbestgas.com>
Sent: Monday, April 20, 2015 1:07 PM
To: Mil Jubinsky
Subject: Emailing: SGS Voilation No. 14 Line Markers
Attachments: SGS Voilation No. 14 Line Markers.pdf

Ms. Jubinsky:

Attached please find my reply to Violation No. 14.

Sebring Gas System (SGS) continues to work on clearing out the remaining seven violations.

I will send a detailed update on the progress on these violations this week.

Jerry Melendy, Jr.
President
Sebring Gas System, Inc.

SEBRING GAS SYSTEM, INC.
REPLY TO
COMMISSION RULE VIOLATION NUMBER GS-1277-SEBGS

VIOLATION NO. 14: LINE MARKERS

Before the original response to Violation NO. 14 was made, SGS personnel were dispatched to locate all mainline markers and correct the deficiencies, which included incorrect telephone area codes and worn or missing decals. Although many markers were brought up to compliance, several were not, due to the fact a thorough plan was not made.

After the field inspection found noncompliance markers, SGS instigated a plan. The plan included:

- Instructions for patrolling mainline markers, including a sample of a map of a section of our service area.
- A copy of section maps of our entire mainline.
- A form for documentation of proof of patrolling the mainline.
- Service work orders for documentation of the technicians' findings.

Old markers were replaced and all markers were brought into compliance.

Following this response is a copy of our mainline marker patrolling plan, with a sampling of the service work orders created.

INSTRUCTIONS FOR PATROLLING MAINLINE MARKERS

Each person will be issued maps to be used when patrolling the mainline for markers. When a mainline marker is found, walk to the maker and make sure:

- Both labels are securely attached and legible.
- The SGS label has all required information on it (area code, etc.).
- The marker is vertical and level.
- No weeds to obstruct the marker.

On the map, identify the location of the marker by writing a code. An example is on page 2 of these instructions. The following codes are to be used:

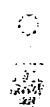
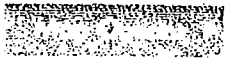
- Code 1: The marker and the labels are good and the marker is in compliance.
- Code 2: A label installed, the marker was made to be upright and/or weeds were removed. The maker is in compliance.
- Code 3: A work order is required to correct the deficiency. An explanation of the deficiency is noted.
- Code 4: It is recommended that a mainline marker be installed at this location indicated on the map.

On the map, write down the number of mainline markers located on the map.

Sebring Gas

Current Residents & Local Business Customers

ACTIVE
RESIDENTS

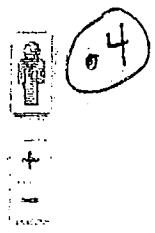


Wendy's

Jones
Oil & Tire

Che
Check
Drive
Restauri

Budget Inn



4

Clara St

Clara St

Clara St

200

2

Renaud St

Renaud St

Anglenwood St

Tiger Trail Rd

Tiger Trail Rd

Francis St

Francis St

Cherokee St

Sebring Dr

Se

✓

SEBRING GAS SYSTEM, INC.
MAINLINE MARKER IDENTIFICATION

MAP NUMBER	ISSUED TO	DATE OF ISSUE	DATE COMPLETED	NUMBER OF MARKERS	REMEDIAL NEEDED?
FRANCIS 1, A & B	CORRELL	2-3-15	2-24-15	6	N
DOWNTOWN 1	Cameron	2-9-15		3	2
DOWNTOWN 2	Cameron	2-9-15		5	2
DOWNTOWN 3	Cameron	2-9-15		2	2
DOWNTOWN 4	Cameron	2-9-15		3	2
DOWNTOWN 5	"	"		2	2
DOWNTOWN 6	"	"		2	2
DOWNTOWN 7	"	"		3	2
DOWNTOWN 8	"	"			
DOWNTOWN 9	"	"	2-16-15	1	N
DOWNTOWN 10	"	"	2-16-15	1	N
DT #11	"	2-16-15	2-24-15	6	N
DT #12					
DT #13	"	"	"	4	N
DT #14	"	"	"	3	2
DT #15	"	"	"	2	2
DT #16	"	"	"	1	N
DT #17	"	2-20	"	2	2
DT #18	"	2-20	"	3	2
DT #19	"	2-20	"	1	2
DT #20	CORRELL	2-17-15			
DT #21	↓	↓			
DT #23	↓	↓	2-26-15	2	
DT #25	CORRELL	2-16-15	2-16-15	3	N/A
DT #26	↓	↓	↓	1	N/A
DT #27	↓	↓	↓	1	N/A
DT #28	↓	↓	↓	0	N/A
DT #29	↓	↓	↓	2	N/A
DT #30	↓	↓	↓	4	N/A
DT #31	CORRELL	2-18-15	2	3	N/A
DT #32	↓	↓			
DT #33	↓	↓		0	N/A
DT #34 MELENDY	CORRELL	2-10-15	2-10-15	0	N
DT #36	MELENDY	2-10-15	2-10-15	1	N
DT #37	MELENDY	2-10-15	2-10-15	1	N
DT #38	MELENDY	2-10-15	2-10-15	3	3-15-15 #37
DT #39	MELENDY	2-10-15	2-10-15	2	1-NEED DEETS.
DT #42	MELENDY	2-10-15	2-10-15	4	N
DT #43					

NO MAP
NO MAP

100
1063

DT #44	MELENDY	2-10-15	2-10-15	SAME AS	JACKSON HEIGHTS
Jackson Heights	MELENDY	2-6-15	2-10-15		
Longview A & B	MELENDY	2-5-15	2-6-15	2	NO
Fairmont Drive					
Francis 2 A	MELENDY	2-9-15	2-9-15	9	REQUEST 3 NEW MARKERS
Ohrts 1 & 2	MELENDY	2-5-15	2-6-15	7	NO
TOTAL MARKERS					

1. _____
 2. _____
 3. _____
 4. _____
 5. _____
 6. _____
 7. _____
 8. _____
 9. _____
 10. _____
 11. _____
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 48. _____
 49. _____
 50. _____

SEBRING GAS SYSTEM, INC.
3515 US HWY 27, SOUTH
SEBRING, FL 33870
863-385-0194

SERVICE WORK ORDER

DATE: 11 / 24 / 2014

NO: 141

ACCT#:

NAME: SEBRING GAS SYSTEM

ADDRESS: PEAR ST & SWEENEY'S

CITY: SEBRING

SERVICE

REQUESTED: INSTALL NEW MAINLINE MARKER BETWEEN THESE AREAS

AND METERS

SERVICE

PERFORMED:

Installed new mainline marker
at above location, installed offset sticker

METER NO.#:

METER READING:

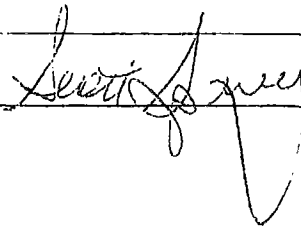
BEGIN TIME: 3:30

END TIME: 3:40

DATE COMPLETED: 12-2-14

SPECIAL INSTRUCTIONS:

TECHNICIAN SIGNATURE:



SEBRING GAS SYSTEM, INC.
3515 US HWY 27, SOUTH
SEBRING, FL 33870
863-385-0194

SERVICE WORK ORDER

DATE: 11 / 24 / 2014

NO: 136

ACCT#:

NAME: SEBRING GAS SYSTEM

ADDRESS: MARKER AT BESSIE WATSON RD & MLK

CITY: SEBRING

SERVICE

REQUESTED: MARKER NEEDS ID STICKER

AND METERS

SERVICE

PERFORMED: *Installed new SGS ID sticker*

METER NO. #:

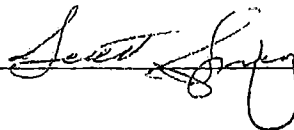
METER READING:

BEGIN TIME: 3:00 END TIME: 3:15

DATE COMPLETED: *11-24-14*

SPECIAL INSTRUCTIONS:

TECHNICIAN SIGNATURE:



SEBRING GAS SYSTEM, INC.
3515 US HWY 27, SOUTH
SEBRING, FL 33870
863-385-0194

SERVICE WORK ORDER

DATE: 11 / 05 / 2014

NO: 115

ACCT#:

NAME: SEBRING GAS SYSTEM

ADDRESS: ALL SEBRING AIRPORT AREA

CITY: SEBRING

SERVICE

REQUESTED: INSTALL CAUTION AND SGS STICKER ON

MAIN LINE MARKERS

SERVICE

PERFORMED: *INSTALLED SGS STICKERS ON MAINLINE MARKERS*

AND EVERY METER IN AREA

METER NO. #:

METER READING:

BEGIN TIME:

END TIME:

DATE COMPLETED: *11-13-14*

SPECIAL INSTRUCTIONS:

TECHNICIAN SIGNATURE:

[Handwritten Signature]

SEBRING GAS SYSTEM, INC.
3515 US HWY 27, SOUTH
SEBRING, FL 33870
863-385-0194

SERVICE WORK ORDER

DATE: 11 / 05 / 2014

NO: 117

ACCT#:

NAME: SEBRING GAS SYSTEM

ADDRESS: AT 98 & 27 GOING N TOWARD HIGHLANDS REGIONAL

CITY: SEBRING

SERVICE

REQUESTED: INSTALL CAUTION AND SGS STICKER ON

MAIN LINE MARKERS

SERVICE

PERFORMED: *installed SGS stickers on all mainline markers*

AND METERS IN AREA

METER NO. #:

METER READING:

BEGIN TIME:

END TIME:

DATE COMPLETED: *11-17-14*

SPECIAL INSTRUCTIONS.

TECHNICIAN SIGNATURE: *[Signature]*

SEBRING GAS SYSTEM, INC.
3515 US HWY 27, SOUTH
SEBRING, FL 33870
863-385-0194

SERVICE WORK ORDER

DATE: 11 / 05 / 2014

NO: 121

ACCT#:

NAME: SEBRING GAS SYSTEM

ADDRESS: OHRT'S MHP ALL AREA

CITY: SEBRING

SERVICE

REQUESTED: INSTALL CAUTION AND SGS STICKER ON

ALL METERS

SERVICE

PERFORMED:

INSTALLED SGS STICKERS ON ALL RISERS AND

METERS

METER NO.#:

METER READING:

BEGIN TIME:

END TIME:

DATE COMPLETED: *11-19-14*

SPECIAL INSTRUCTIONS:

TECHNICIAN SIGNATURE:

Carroll

SEBRING GAS SYSTEM, INC.
3515 US HWY 27, SOUTH
SEBRING, FL 33870
863-385-0194

SERVICE WORK ORDER

DATE: 11 / 05 / 2014

NO: 118

ACCT#:

NAME: SEBRING GAS SYSTEM

ADDRESS: INTERSECTON OF HIGHLANDS AVE & US 27 GOING NE TO
FRANCIS II

CITY: SEBRING

SERVICE

REQUESTED: INSTALL CAUTION AND SGS STICKER ON

MAIN LINE MARKERS

SERVICE

PERFORMED: *INSTALLED SGS STICKERS ON ALL MAINLINE*

MARKERS

METER NO. #:

METER READING:

BEGIN TIME:

END TIME:

DATE COMPLETED: *11-19-14*

SPECIAL INSTRUCTIONS:

TECHNICIAN SIGNATURE:



SEBRING GAS SYSTEM, INC.
3515 US HWY 27, SOUTH
SEBRING, FL 33870
863-385-0194

SERVICE WORK ORDER

DATE: 01 / 09 / 2015

NO: 146

ACCT#:

NAME: SEBRING GAS SYSTEM

ADDRESS: 50 CLARA STREET

CITY: SEBRING

SERVICE

REQUESTED: RESET MAIN LINE MARKER

SERVICE

PERFORMED: Dig up & re-install 4" Pe main

line marker & re-sticker

PIPE TO SOIL POTENTIAL BEFORE:

PIPE TO SOIL POTENTIAL AFTER:

BEGIN TIME: 9:00 am END TIME: 9:15 am

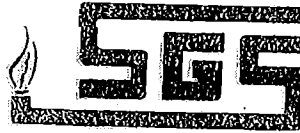
DATE COMPLETED: 2-11-15

SPECIAL INSTRUCTIONS:

REMEDIAL ACTION NEEDED? YES NO X

TECHNICIAN SIGNATURE:

[Handwritten Signature]
JK



SEBRING GAS SYSTEM, INC.

Labor And Material

Date: 2-11-15 Type Work: New Construction Maintenance Equipment Rental:

Labor: NO. Men: 1 NO. Hours: 1/2

Location and Maintenance Required: 50 Clark St. Francisco CA

Atmospheric Corrosion Control Inspection . Was any portion of above ground pipeline that is exposed to the atmosphere inspected?

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	NO

 (CFR 192.477)

Action Taken: N/A

External Corrosion Control Inspection: Any portion of buried pipeline that is exposed during maintenance will be inspected to ensure the pipe coating and pipe is in good condition

<input type="checkbox"/>	Yes
<input type="checkbox"/>	NO

 (CFR 192.469)

Action Taken: N/A

Maintenance Performed:

Materials Used

Inspector [Signature]



Labor And Material

Date: 11-20-14

Type Work: New Construction

Maintenance

X

Location and Maintenance Required: US 24 SOUTH WEST SIDE TO FRANCES I

Maintenance Performed: INSTALLED STICKERS ON ALL METERS, REPAIR AND MAINTENANCE MARKERS

Labor: 1 Men 6.5 Hours

Equipment Rental:

Materials Used

Qty

ITEMS REMOVED FROM INVENTORY DURING MAINTENANCE

Materials removed :

Cost

TRANSFER ALL CHARGES

ACCOUNT CODE :

TOTAL CHARGES :

Remarks:

Inspector:

SEBRING GAS SYSTEM, INC.
REPLY TO
COMMISSION RULE VIOLATION NUMBER GS-1277-SEBGS

VIOLATION NO. 16: INACTIVE SERVICE LINES

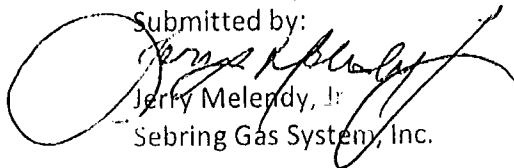
April 21, 2015

In the year 2014, nineteen inactive services were removed by SGS. The removed services were:

	Date Removed	Address
1	10/03/2014	2150 Lakeview Drive
2	10/03/2014	908 Ridgewood Drive, Lot 41
3	10/03/2014	908 Ridgewood Drive, Lot 37
4	10/06/2014	210 Clara
5	10/06/2014	50 Clara
6	10/06/2014	3016 Desoto Road
7	10/06/2014	1809 Pye Drive
8	10/12/2014	Ally behind Nancesowee Hotel
9	10/15/2014	1738 Jim Lane
10	10/15/2014	107 Eva Street
11	10/16/2004	221 Francis Street
12	10/16/2014	220 Francis Street
13	10/20/2014	243 Orange Street
14	10/21/2014	3103 Las Vegas
15	10/22/2014	333 Tigertail Street
16	10/22/2014	320 Francis Street
17	10/25/2014	546 Von Maxcy
18	10/25/2014	520 Von Maxcy
19	10/25/2014	524 Von Maxcy

On the following pages are copies of the work orders and the Abandonment of Facilities form used by SGS personnel when removing inactive service lines within six months after ten years of inactivity.

Submitted by:


Jerry Melendy, Jr.
Sebring Gas System, Inc.



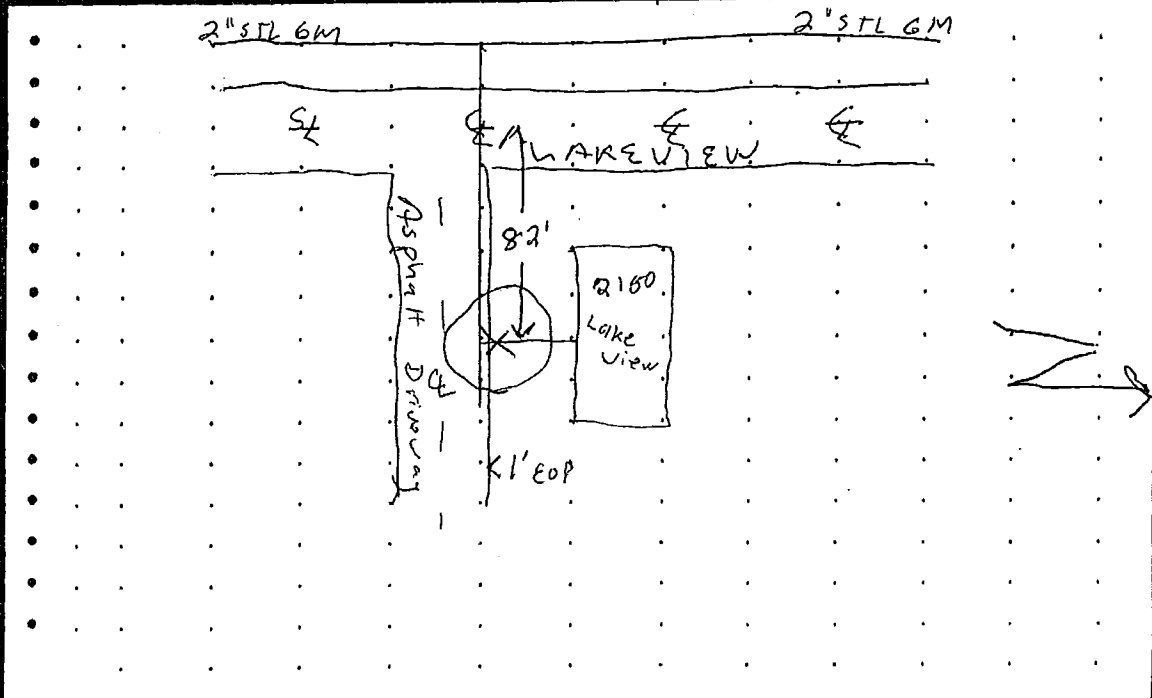
Abandonment Of Facilities

Location: 2150 Lakeview Dr. Date: 10-3-14

Line Size: 1/2" Main: Service: Steel: Plastic:

Condition Of Pipe: Good Fair Poor Length Abandoned: 8'

Reason For Abandonment: Not in use 10 year Cap



Remarks: Removed Riser at same time

Inspector: *Scott Spivey*



Abandonment Of Facilities

Location: 908 Ridgewood Dr LOT 41

Date: 10-3-14

Line Size: 1/2"

Main:

Service: X

Steel:

Plastic: X

Condition Of Pipe:

Good

X

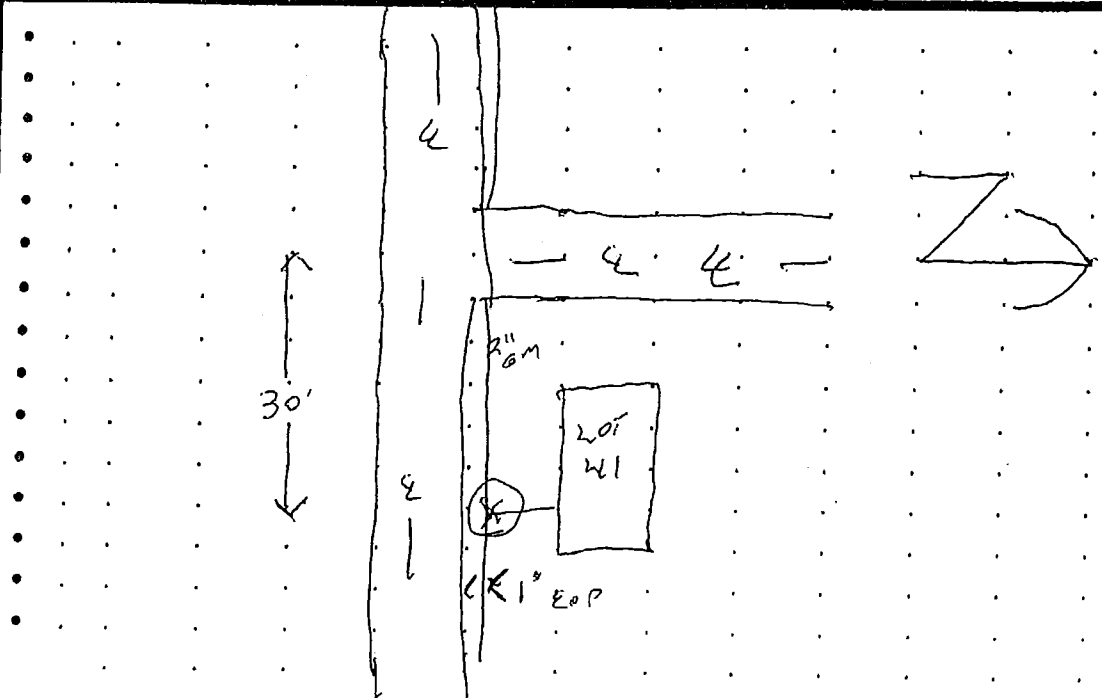
Fair

Poor

Length Abandoned: 8'

8'

Reason For Abandonment: 10 year Cap



Remarks: Removed Riser as well same time

Inspector: *Scott Gray*



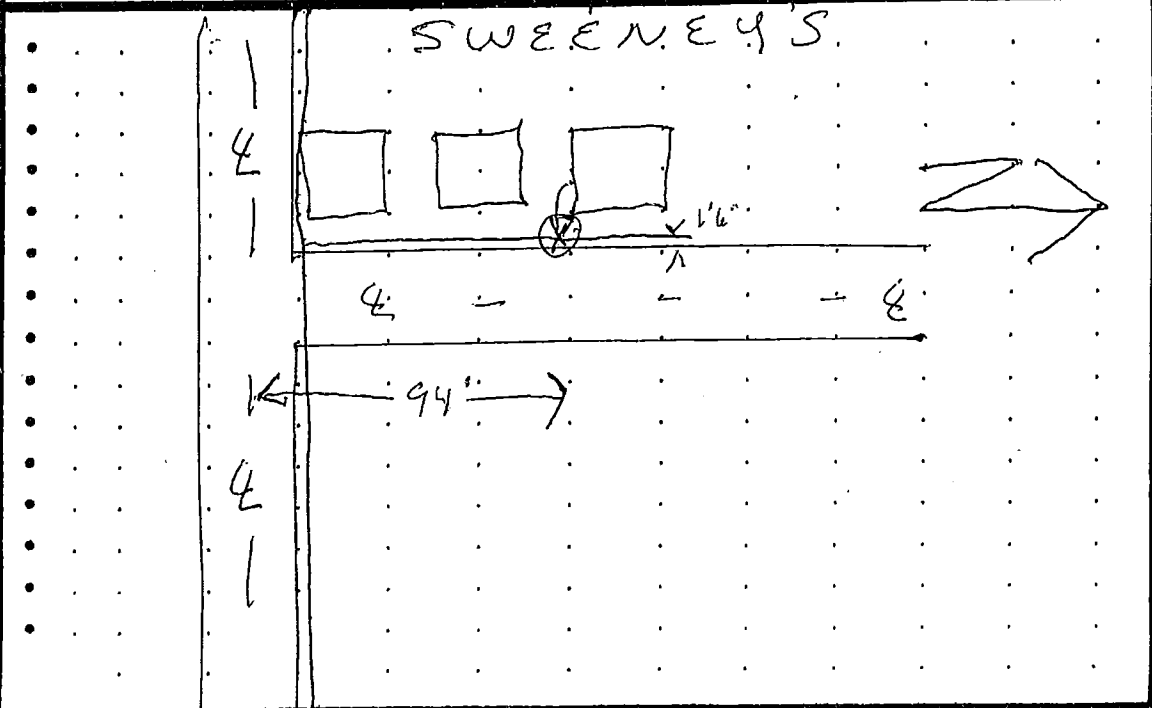
Abandonment Of Facilities

Location: *908 Ridgewood Dr Lot 37* Date: *10-3-14*

Line Size: $\frac{1}{2}$ " Main: Service: Steel: Plastic:

Condition Of Pipe: Good Fair Poor Length Abandoned: *10'*

Reason For Abandonment: *10 year Cap*



Remarks: _____

Inspector: *[Signature]*

SEBRING GAS SYSTEM, INC.
 3515 US Hwy 27 S
 SEBRING, FL 33870
 Telephone 863/385-0194

TICKET NUMBER

1

DATE

ACCOUNT NUMBER

220302101

NAME					TELEPHONE	CALL TKR	CALL TIME	DATE PROMISED	AM/PM	CR. LIMIT	
SERVICE ADDRESS 210 Clara					SERVICE REQUESTED Gvt + Cap						
MAILING ADDRESS											
CITY STATE ZIP											
FWDING ADDRESS					METER NO.						
FWDING CITY STATE, ZIP					METER READING						
TECHNICIAN 1	TECHNICIAN 2	TRUCK NO.	MILES START	MILES END	TIME DISP.	TIME START	TIME END	NO. CHG. CODE	O.T. HOURS	INCOMP.	PART (✓) NEEDED
Scott	Keith	908				9:30	10:30				
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME	WORK PERFORMED						
					Shut down Leg bled off gas, Removed stem, Plugged hole, Soaped fitting, No leaks detected						
PART NO.	QTY.	DESCRIPTION	AMOUNT								
	1	3/4" Cook plug									
		Steel Service									
		Debit 380.08									
		Credit 380.00									
		59.66									
TOTAL MATERIAL											
53056 EXPLAINED: SYSTEM OPERATION SERVICE WORK DONE					<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO					
CALL BEFORE YOU DIG					TECHNICIAN'S SIGNATURE			DATE 10-6-14			
Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.					CUSTOMER'S SIGNATURE			DATE			

ORIGINAL
 SEE BACK FOR IMPORTANT
 SAFETY INFORMATION



Abandonment Of Facilities

Location: 210 Clara Francis J

Date: 10-6-14

Line Size: 3/4

Main:

Service: X

Steel: X

Plastic:

Condition Of Pipe:

Good X

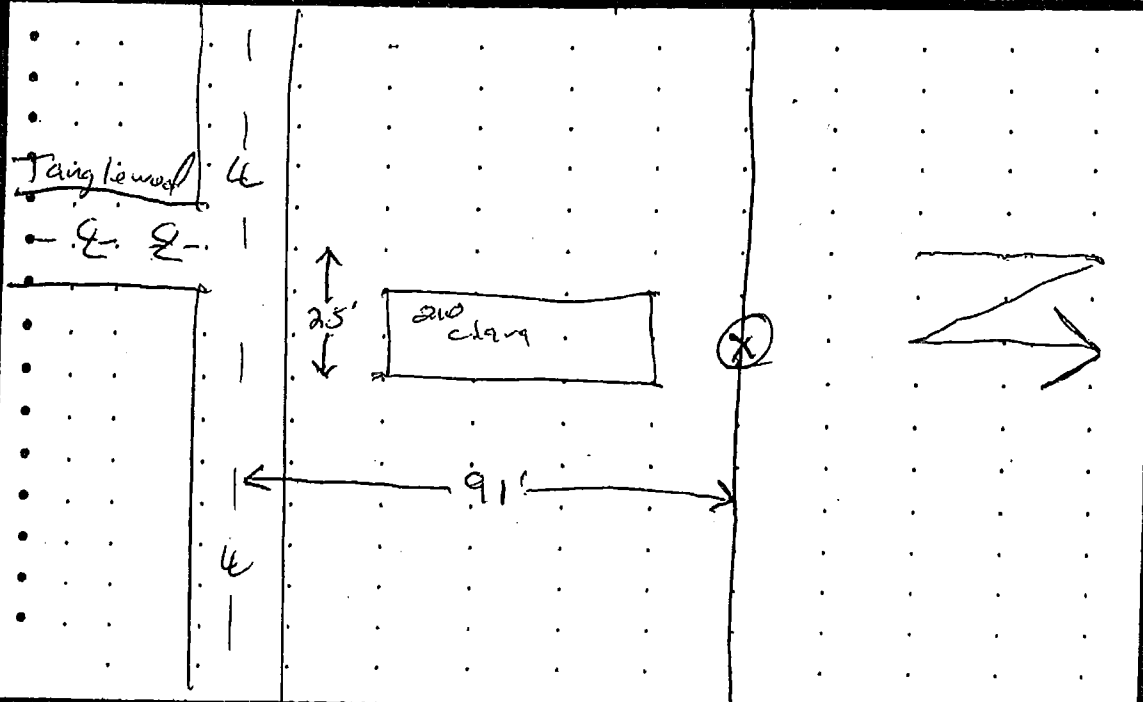
Fair

Poor

Length Abandoned: 3'

Reason For Abandonment:

10 year cap



Remarks:

Removed stem plugged main
Soap Test no leaks Detected

Inspector:

[Signature]



Abandonment Of Facilities

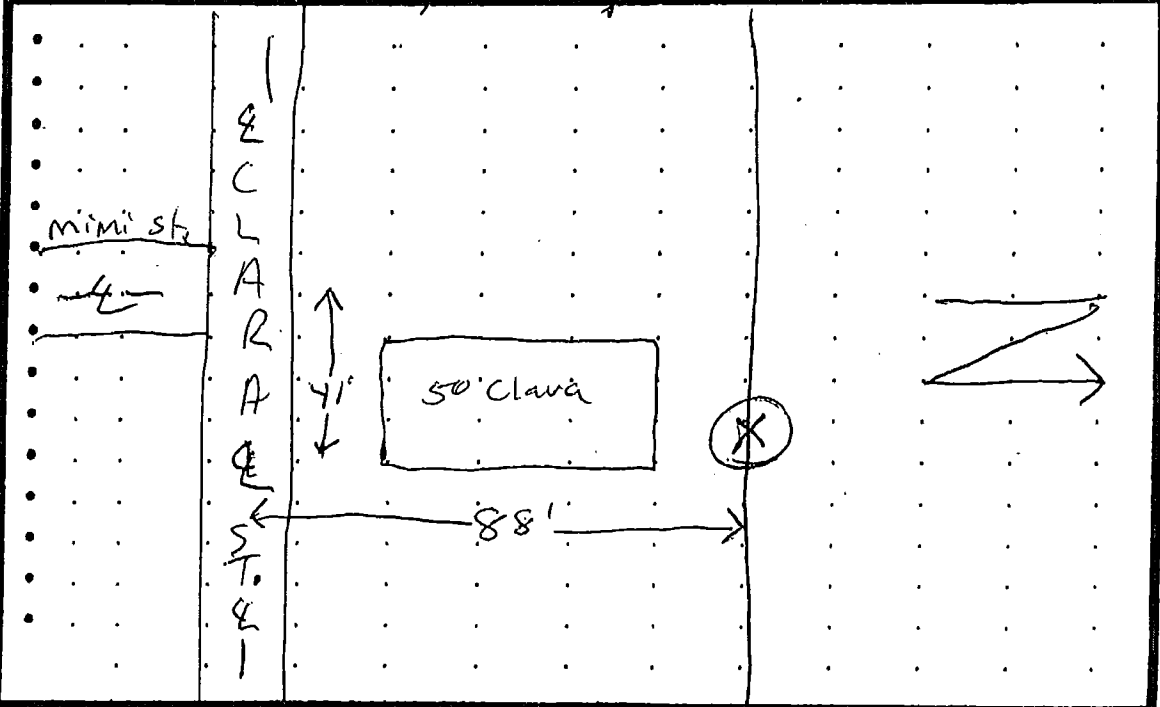
Location: 50 Clara Francis I

Date: 70-6-14

Line Size: 3/4" Main: Service: X Steel: X Plastic:

Condition Of Pipe: Good X Fair Poor Length Abandoned: 31

Reason For Abandonment: 10 year Cap



Remarks: Removed stem behind mobile plugged with 3/4" plug Soap test NO leaks Detected

Inspector: *[Signature]*

SEBRING GAS SYSTEM, INC.
3515 US Hwy 27 S
SEBRING, FL 33870
Telephone 863/385-0194

TICKET NUMBER [] DATE []

ACCOUNT NUMBER 231030161

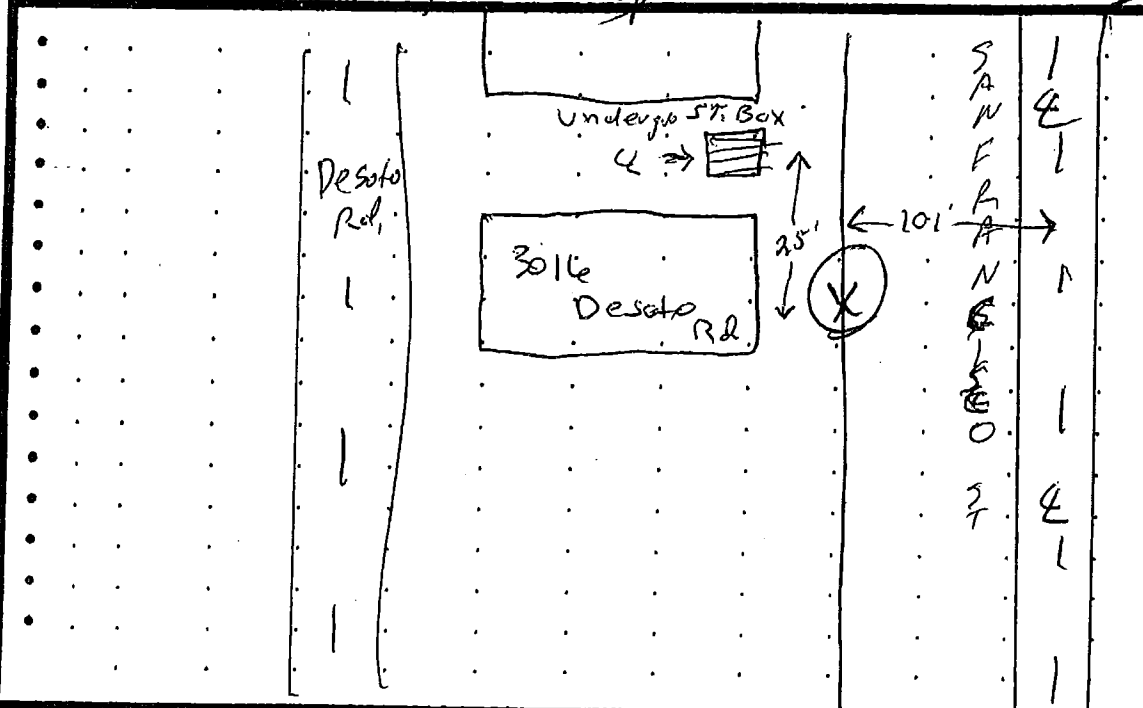
NAME		TELEPHONE	CALL TKR	CALL TIME	DATE PROMISED	AM/PM	CR. LIMIT
SERVICE ADDRESS <u>3016 Desoto Rd</u>		SERVICE REQUESTED <u>Cut + Cap</u>					
MAILING ADDRESS							
CITY STATE ZIP							
FWDING ADDRESS		METER NO.					
FWDING CITY STATE, ZIP		METER READING					
TECHNICIAN 1 <u>Scott</u>	TECHNICIAN 2 <u>Keith</u>	TRUCK NO. <u>908</u>	MILES START	MILES END	TIME DISP.	TIME START <u>11:00</u>	TIME END <u>12:00</u>
NO. CHG. CODE	O.T. HOURS	INCOMP.	PART(S) NEEDED				
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME	WORK PERFORMED		
PART NO. QTY. DESCRIPTION AMOUNT					<u>Shut down bay Bled off Gas</u> <u>Removed stem cut + threaded stem, Soap + Tape up. Soaped fitting</u> <u>No Leaks detected</u>		
<u>1 3/4" Galv. Cap</u>							
<u>Steel Service</u>							
<u>Debit 380.08</u>							
<u>Credit 380.00</u>							
<u>59.66</u>							
TOTAL MATERIAL					SUB TOTAL		
					TAX		
					TOTAL DUE		
					AMOUNT RECEIVED		
<p>It is agreed and understood by the parties that all equipment and parts which are sold pursuant hereto shall NOT become fixtures or part of the real estate where they are placed. Said parts and equipment shall at all times remain personal property and the title thereto shall remain in the seller until payment in full is received. Buyer hereby agrees that all parts and equipment may be repossessed in the event of non-payment.</p> <p>I have authority to order the work as outlined above. I agree to pay all costs and reasonable attorney's fees if this invoice is placed in the hands of an attorney for collection. Any deposits paid herewith will be refunded 14 days from date services discontinued.</p>							
53057		EXPLAINED: SYSTEM OPERATION SERVICE WORK DONE		<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	TECHNICIAN'S SIGNATURE <u>Scott</u> DATE <u>10-6-14</u>	
CALL BEFORE YOU DIG				<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	CUSTOMER'S SIGNATURE _____ DATE _____	
Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.							

ORIGINAL
SEE BACK FOR IMPORTANT
SAFETY INFORMATION



Abandonment Of Facilities

Location: 3016 Desoto Rd.						Date: 10-6-14	
Line Size: 3/4"	Main:	Service: ✓	Steel: X	Plastic:			
Condition Of Pipe:	Good X	Fair	Poor	Length Abandoned:		3'	
Reason For Abandonment: 10 year cap →							



Remarks: Had to thread out stem and install cap. Soap test no leaks detected

Inspector: *Scott [Signature]*

SEBRING GAS SYSTEM, INC.
 3515 US Hwy 27 S
 SEBRING, FL 33870
 Telephone 863/385-0194

TICKET NUMBER DATE _____

ACCOUNT NUMBER 432418091

NAME					TELEPHONE	CALL TKR	CALL TIME	DATE PROMISED	AM/PM	CR. LIMIT																
SERVICE ADDRESS <i>1809 Pye Drive</i>					SERVICE REQUESTED																					
MAILING ADDRESS					<i>Cut + Cap</i>																					
CITY STATE ZIP					METER NO.																					
FWDING ADDRESS					METER READING																					
TECHNICIAN 1	TECHNICIAN 2	TRUCK NO.	MILES START	MILES END	TIME DISP.	TIME START	TIME END	NO. CHG. CODE	O.T. HOURS	INCOMP.	PART (1) NEEDED															
<i>Scott</i>	<i>Keith</i>	<i>908</i>				<i>2:00</i>	<i>4:00</i>																			
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME	WORK PERFORMED																					
		<i>Soap</i>			<i>Shut down way (No one on), Removed stem Soaped fitting No Leaks detected</i>																					
PART NO.	QTY.	DESCRIPTION	AMOUNT																							
		<i>Steel plug</i>																								
		<i>Steel Service</i>																								
		<i>Dr't</i>	<i>380.08</i>																							
		<i>Credit</i>	<i>380.00</i>																							
			<i>59.66</i>																							
TOTAL MATERIAL					<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>DESCRIPTION</td> <td>CODE</td> <td>AMOUNT</td> </tr> <tr> <td colspan="3" style="text-align: center;">SUB TOTAL</td> </tr> <tr> <td colspan="3" style="text-align: center;">TAX</td> </tr> <tr> <td colspan="3" style="text-align: center;">TOTAL DUE</td> </tr> <tr> <td colspan="3" style="text-align: center;">AMOUNT RECEIVED</td> </tr> </table>							DESCRIPTION	CODE	AMOUNT	SUB TOTAL			TAX			TOTAL DUE			AMOUNT RECEIVED		
DESCRIPTION	CODE	AMOUNT																								
SUB TOTAL																										
TAX																										
TOTAL DUE																										
AMOUNT RECEIVED																										

It is agreed and understood by the parties that all equipment and parts which are sold pursuant hereto shall NOT become fixtures or part of the real estate where they are placed. Said parts and equipment shall at all times remain the personal property and the title thereto shall remain in the seller until payment in full is received. Buyer hereby agrees that all parts and equipment may be repossessed in the event of non-payment. I have authorized the order the work as outlined above, I agree to pay all costs and reasonable attorney's fees if this invoice is placed in the hands of an attorney for collection. Any deposits paid herewith will be refunded 14 days from date service discontinued.

53058 EXPLAINED: SYSTEM OPERATION YES NO
 SERVICE WORK DONE YES NO

TECHNICIAN'S SIGNATURE *Scott Keith* DATE *10-6-14*

CUSTOMER'S SIGNATURE _____ DATE _____

CALL BEFORE YOU DIG
 Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.

ORIGINAL
 SEE BACK FOR IMPORTANT
 SAFETY INFORMATION



Abandonment Of Facilities

Location: 1809 Pve Drive

Date: 10-6-14

Line Size: 3/4"

Main:

Service: X

Steel: X

Plastic:

Condition Of Pipe:

Good X

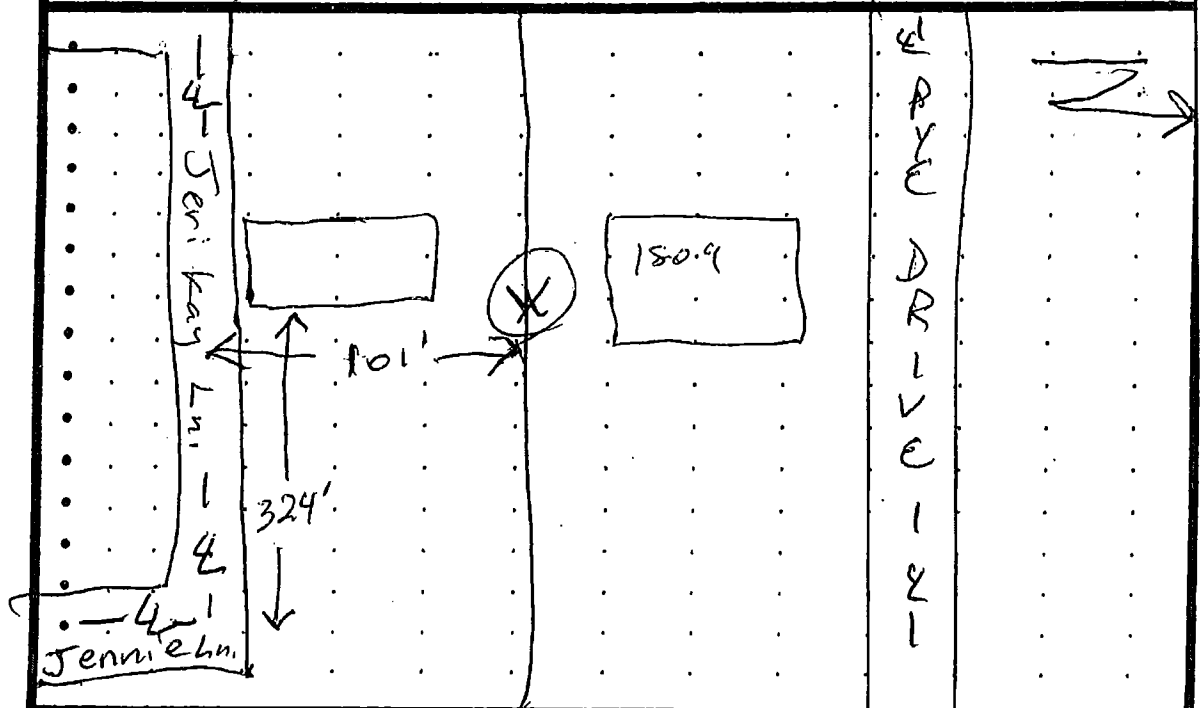
Fair

Poor

Length Abandoned:

31

Reason For Abandonment:



Remarks: removed stem behind mobile
shutdown leg NO ONE ON
Soaped plug NO Leaks detected

Inspector:

[Signature]

SEBRING GAS SYSTEM, INC.

3515 US Hwy 27 S
SEBRING, FL 33870
Telephone 863/385-0194

TICKET NUMBER 4 DATE 12/10/11

ACCOUNT NUMBER

NAME <u>City of Sebring</u>					TELEPHONE	CALL TKR <u>WAT</u>	CALL TIME	DATE PROMISED	AM/PM	CR. LIMIT	
SERVICE ADDRESS <u>alley Behind</u>					SERVICE REQUESTED <u>Abandon Facility</u>						
MAILING ADDRESS <u>Newcomb Hotel</u>					METER NO.						
CITY STATE ZIP					METER READING						
FWDING ADDRESS					METER NO.						
FWDING CITY STATE, ZIP					METER READING						
TECHNICIAN 1 <u>Stet</u>	TECHNICIAN 2 <u>Rob</u>	TRUCK NO.	MILES START	MILES END	TIME DISP.	TIME START <u>8:30</u>	TIME END <u>9:00</u>	NO. CHG. CODE	O.T. HOURS	INCOMP.	PART (S) NEEDED
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME	WORK PERFORMED <u>Abandoned Riser</u> <u>+ Cap line as expected</u> <u>July 1, 2000</u>						
PART NO.	QTY.	DESCRIPTION			AMOUNT						
	<u>1</u>	<u>1/2" Cap</u>									
		<u>PE Pipe 1/2"</u>									
	<u>1</u>	<u>Do abandon</u>									
		<u>in GL for</u>									
		<u>plastic Service</u>									
		<u>Debit</u>			<u>380.09</u>						
		<u>Credit</u>			<u>380.01</u>						
<u>391.85 per plastic</u>											
<u>Service</u>											
TOTAL MATERIAL											

SUB TOTAL		
TAX		
TOTAL DUE		
AMOUNT RECEIVED		

It is agreed and understood by the parties that all equipment and parts which are sold pursuant hereto shall NOT become fixtures or part of the real estate where they are placed. Said parts and equipment shall at all times remain personal property and the title thereto shall remain in the seller until payment in full is received. Buyer hereby agrees that all parts and equipment may be repossessed in the event of non-payment. I have authorized to order the work as outlined above. I agree to pay all costs and reasonable attorney's fees if this invoice is placed in the hands of an attorney for collection. Any deposits paid herewith will be refunded 14 days from date services discontinued.

53415 EXPLAINED: SYSTEM OPERATION YES NO
SERVICE WORK DONE YES NO

TECHNICIAN'S SIGNATURE _____ DATE _____

CUSTOMER'S SIGNATURE _____ DATE _____

CALL BEFORE YOU DIG
Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.

INVENTORY
SEE BACK FOR IMPORTANT
SAFETY INFORMATION



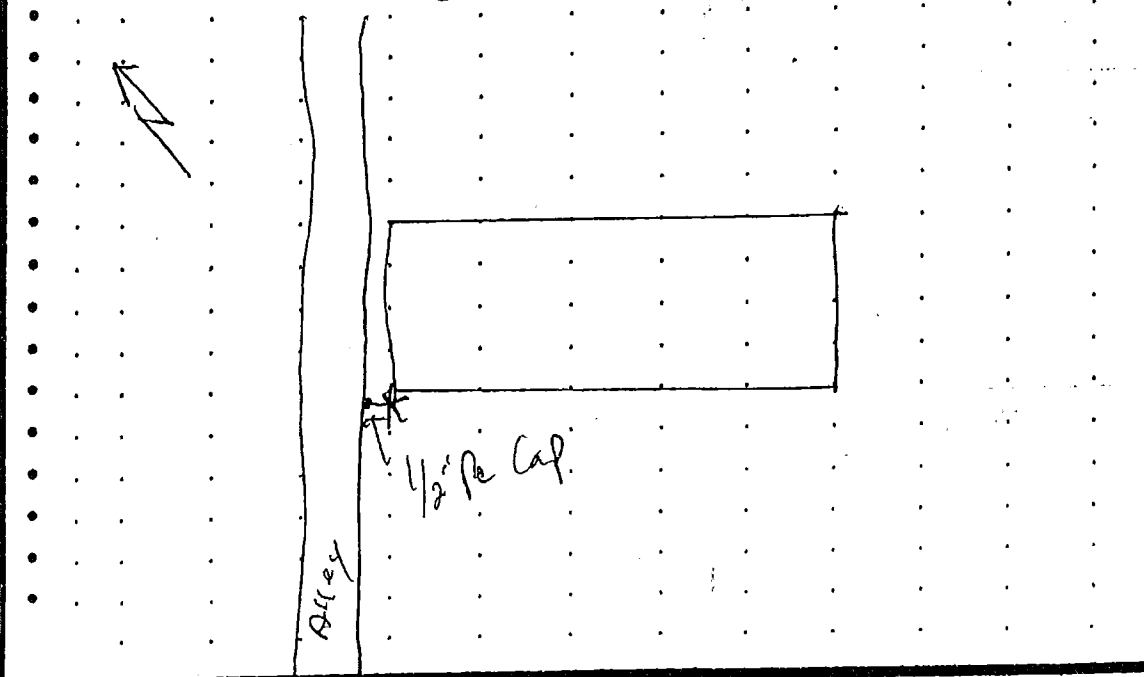
Abandonment Of Facilities

Location: Lind's Books (Alley) Date: 10-13-14

Line Size: 1/2" Main: Service: Steel: Plastic:

Condition Of Pipe: Good Fair Poor Length Abandoned: 5'

Reason For Abandonment: Doing Foundation work



Remarks: Customer Request Remove Riser

Inspector: Scott [Signature]

10 / 15 / 2014

TICKET NUMBER

[Blank]

DATE

SEBRING GAS SYSTEM, INC.

3515 US Hwy 27 S

SEBRING, FL 33870

Telephone 863/385-0194

ACCOUNT NUMBER

432800253

NAME PICKED UP		TELEPHONE KAT	CALL TRK	CALL TIME 10/15/14	DATE PROMISED	AM/PM	CR. LIMIT
SERVICE ADDRESS 1738 JIM LANE		SERVICE REQUESTED REMOVE RISER CUT AND CAP LINE ABANDON SERVICE					
MAILING ADDRESS							
CITY STATE ZIP SEBRING, FL 33870							
FWDING ADDRESS		METER NO. MT#795305		43-665			
FWDING CITY STATE, ZIP		METER READING		TS-1			
TECHNICIAN 1 Scott Paul	TECHNICIAN 2 Paul	TRUCK NO. 908	MILES START	MILES END	TIME DISP.	TIME START 8:30	TIME END 9:45
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME	WORK PERFORMED		
Soap					Prev Reading 8365		
					Curr Reading		
					Blow off Gas. Blow down leg. Remove steam (empty tank) plugged line. Soap taped coat fittings + pipe. Re cite customers <u>All</u>		
PART NO.	QTY.	DESCRIPTION	AMOUNT				
	1	3/4" Galv Plug					
	5'	2" Covey tapercoat					
Steel Service							
Debit 380.08							
Credit 380.00							
			\$59.66.				
SUB TOTAL							
TAX							
TOTAL DUE							
AMOUNT RECEIVED							
TOTAL MATERIAL							

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53635

EXPLAINED: SYSTEM OPERATION SERVICE WORK DONE

YES NO
 YES NO

TECHNICIAN'S SIGNATURE

[Signature]

DATE 10/15/14

CUSTOMER'S SIGNATURE

DATE

CALL BEFORE YOU DIG
Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.

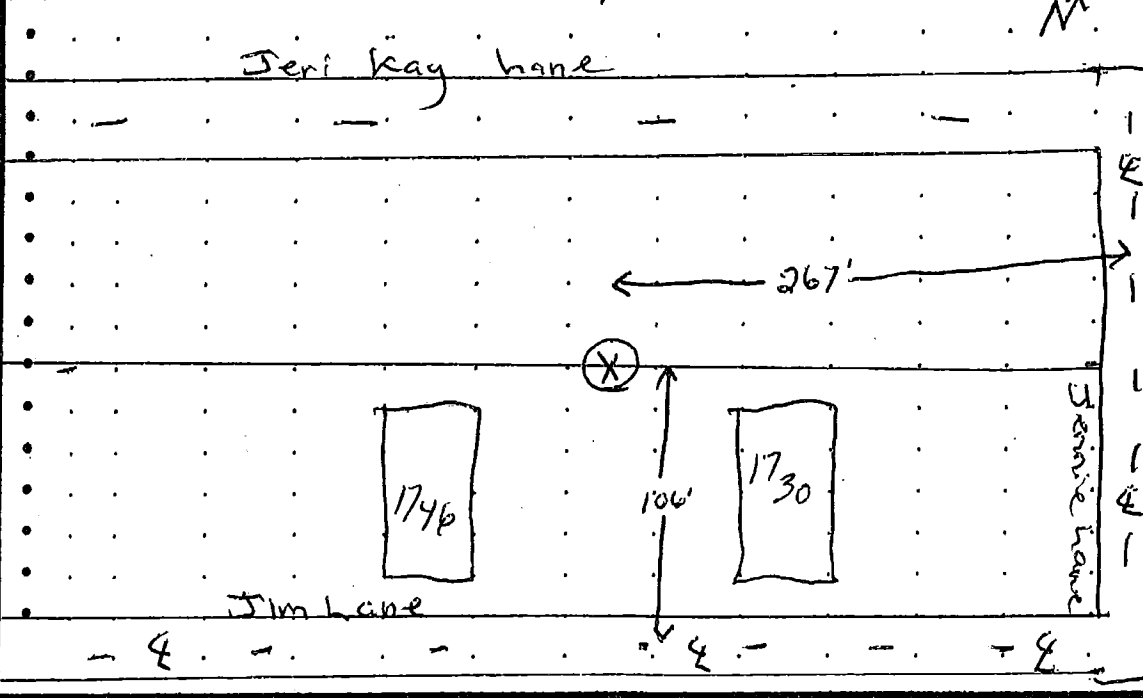
ORIGINAL
SEE BACK FOR IMPORTANT
SAFETY INFORMATION!



Abandonment Of Facilities

Location: 1738 Jim Lane						Date: 10-15-14	
Line Size: 1"	Main:	Service: X	Steel: X	Plastic:			
Condition Of Pipe:		Good <input checked="" type="checkbox"/>	Fair	Poor	Length Abandoned: 3'		

Reason For Abandonment: 10 year cap



Remarks:

Inspector: *[Signature]*



Abandonment Of Facilities

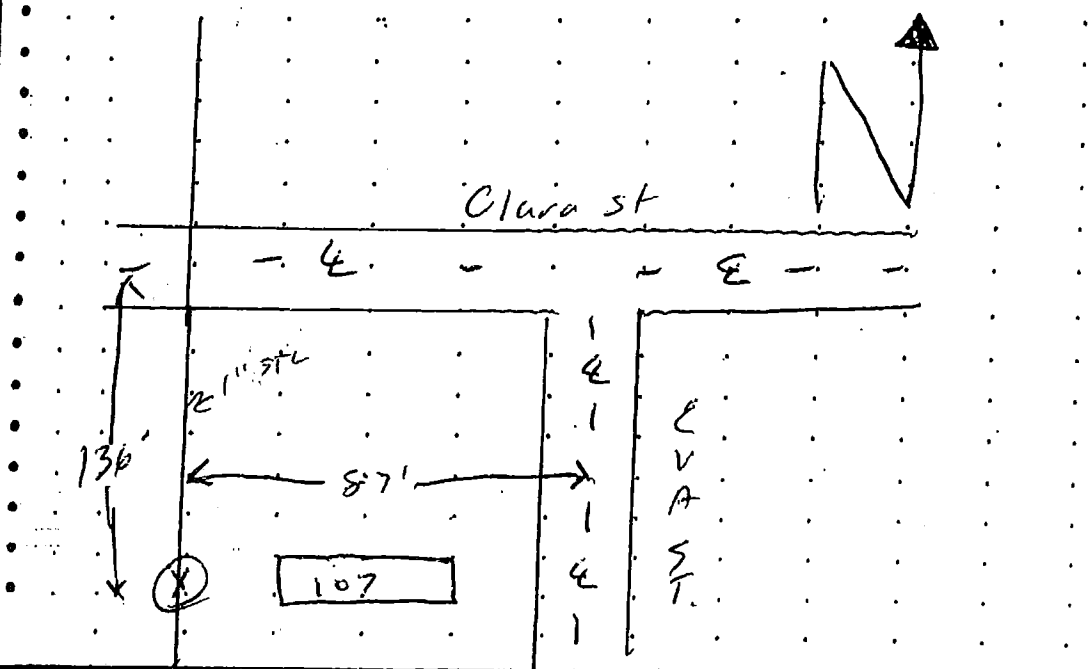
Location: 107 EVA ST

Date: 10-16-14

Line Size: 3/4" Main: Service: X Steel: X Plastic:

Condition Of Pipe: Good X Fair Poor Length Abandoned: 31

Reason For Abandonment: 10 year CGO



Remarks:

Inspector: Scott A. [Signature]



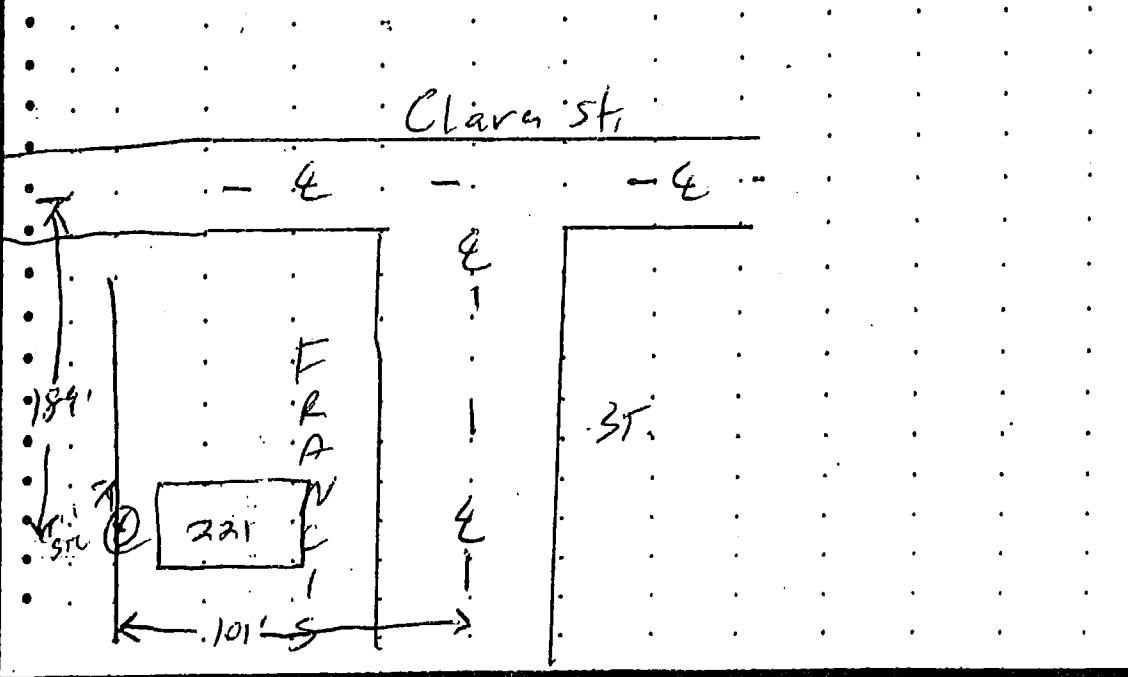
Abandonment Of Facilities

Location: 221 Francis St. Date: 10-16-14

Line Size: 3/4" Main: Service: Steel: Plastic:

Condition Of Pipe: Good Fair Poor Length Abandoned: 3'

Reason For Abandonment: 10 year Cap



Remarks: _____

Inspector: _____

10 / 15 / 2014

TICKET NUMBER [] DATE []

SEBRING GAS SYSTEM, INC.

99-235

3515 US Hwy 27 S

SEBRING, FL 33870

Telephone 863/385-0194

ACCOUNT NUMBER

221202201

NAME WALLACE HIND (F)			TELEPHONE 3828376	CALL TRK KAT	CALL TIME	DATE PROMISED 10/15/14	AM/PM 14	CR. LIMIT			
SERVICE ADDRESS 220 FRANCIS ST			SERVICE REQUESTED ABANDON FACILITY CUT & CAP RISER AT MAIN								
MAILING ADDRESS											
CITY STATE ZIP ONTARIO CANADA, K7A5B											
FWDING ADDRESS			METER NO. P/U#--923299		22--						
FWDING CITY STATE, ZIP			METER READING		TS-1						
TECHNICIAN 1 Scott	TECHNICIAN 2 Paul	TRUCK NO. 908	MILES START	MILES END	TIME DISP. 9:00	TIME START 9:45	NO. CHG. CODE	O.T. HOURS	INCOMP.	PART (%) NEEDED	
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME							
			WORK PERFORMED								
			Prev Reading 728								
			Curr Reading								
			shut down leg, removed stem, installed plug.								
			Turn gas back on.								
			check, Soap test plug								
			no leaks detected								
			Relite all customers affected								
PART NO.	QTY.	DESCRIPTION					AMOUNT				
			Debit 380.08								
			Credit 380.00								
			59.66								
			TOTAL MATERIAL								
53638			EXPLAINED:		SYSTEM OPERATION		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> NO <input type="checkbox"/> NO		
CALL BEFORE YOU DIG			Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.								
TECHNICIAN'S SIGNATURE								DATE 10-16-14			
CUSTOMER'S SIGNATURE								DATE			

SUB TOTAL

TAX

TOTAL DUE

AMOUNT RECEIVED

It is agreed and understood by the parties that all equipment and parts which are sold pursuant hereto shall NOT become fixtures or part of the real estate where they are placed. Said parts and equipment shall at all times remain personal property and the title thereto shall remain in the seller until payment in full is received. Buyer hereby agrees that all parts and equipment may be repossessed in the event of non-payment. I have authority to order the work as outlined above. I agree to pay all costs and reasonable attorney's fees if this invoice is placed in the hands of an attorney for collection. Any deposits paid herewith will be refunded 14 days from date services discontinued.

ORIGINAL SEE BACK FOR IMPORTANT SAFETY INFORMATION



Abandonment Of Facilities

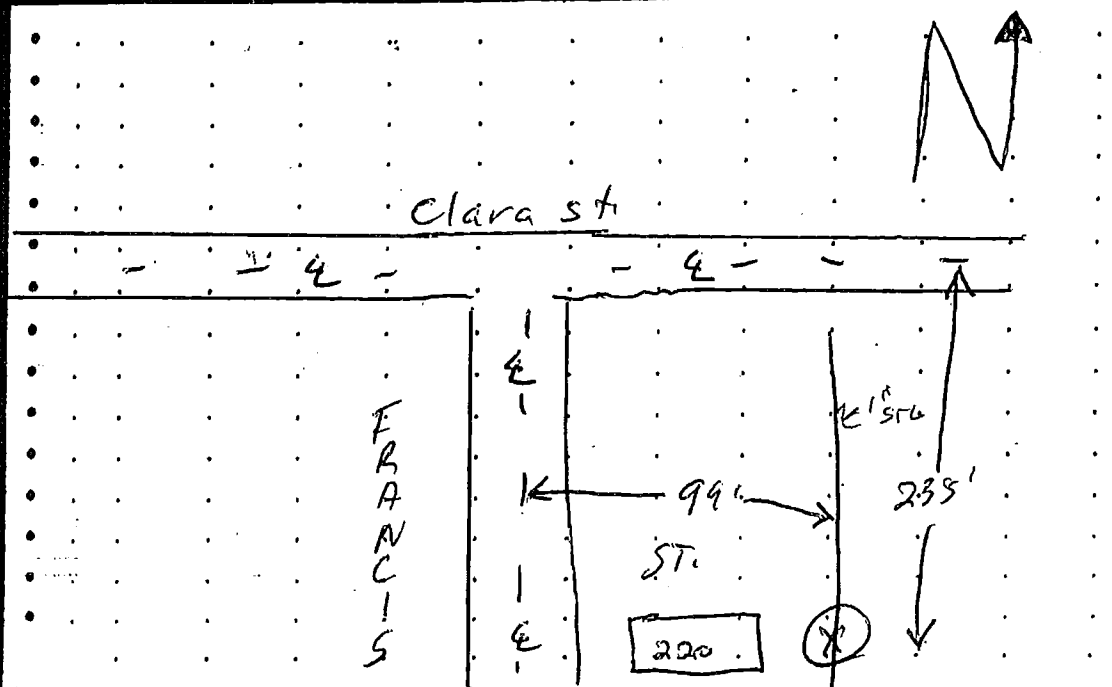
Location: 220 Francis St

Date: 10-16-14

Line Size: 3/4 Main: Service: X Steel: X Plastic:

Condition Of Pipe: Good X Fair Poor Length Abandoned: 3'

Reason For Abandonment: 10 year cap



Remarks:

Inspector: *Scott Gray*

SEBRING GAS SYSTEM, INC.
 3515 US Hwy 27 S
 SEBRING, FL 33870
 Telephone 863/385-0194

TICKET NUMBER DATE 10/15/14
 ACCOUNT NUMBER

NAME <u>vacant</u>		TELEPHONE	CALL TRK	CALL TIME	DATE PROMISED	AM/PM	CR. LIMIT
SERVICE ADDRESS <u>243 Orange St</u>		SERVICE REQUESTED <u>abandon facility</u>					
MAILING ADDRESS		<u>cut + cap Riser at</u>					
CITY STATE ZIP <u>Sebring</u>		<u>main - remove Riser</u>					
FWDING ADDRESS		METER NO.					
FWDING CITY STATE, ZIP		METER READING					
TECHNICIAN 1 <u>Scott</u>	TECHNICIAN 2 <u>Rich</u>	TRUCK NO. <u>908</u>	MILES START	MILES END	TIME DISP.	TIME START <u>8:30</u>	TIME END <u>10:30</u>
NO. CHG. CODE	O.T. HOURS	INCOMP.	PART (✓) NEEDED				
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME	WORK PERFORMED <u>Shut down Gas log</u>		
					<u>Blowed down Riser.</u>		
					<u>Removed 2 Risers, 1 on</u>		
					<u>Back Apt Garage, 1 on</u>		
					<u>Main House, with Meter</u>		
					<u>Cut + thread 1" STL at</u>		
					<u>main 1" Cap with + Tape Coat</u>		
PART NO.	QTY.	DESCRIPTION		AMOUNT	DESCRIPTION		
		2" STL 6.0M			CODE		
		RISER			AMOUNT		
		ORANGE ST.					
		12'					
		1" STL					
		← 13' →					
Debit		380.08					
Credit		380.00					
		59.66		Steel Service			
SUB TOTAL							
TAX							
TOTAL DUE							
AMOUNT RECEIVED							
TOTAL MATERIAL							

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53389 EXPLAINED: SYSTEM OPERATION YES NO
 SERVICE WORK DONE YES NO

TECHNICIAN'S SIGNATURE Scott [Signature] DATE 10-20-14
 CUSTOMER'S SIGNATURE _____ DATE _____

CALL BEFORE YOU DIG
 Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.

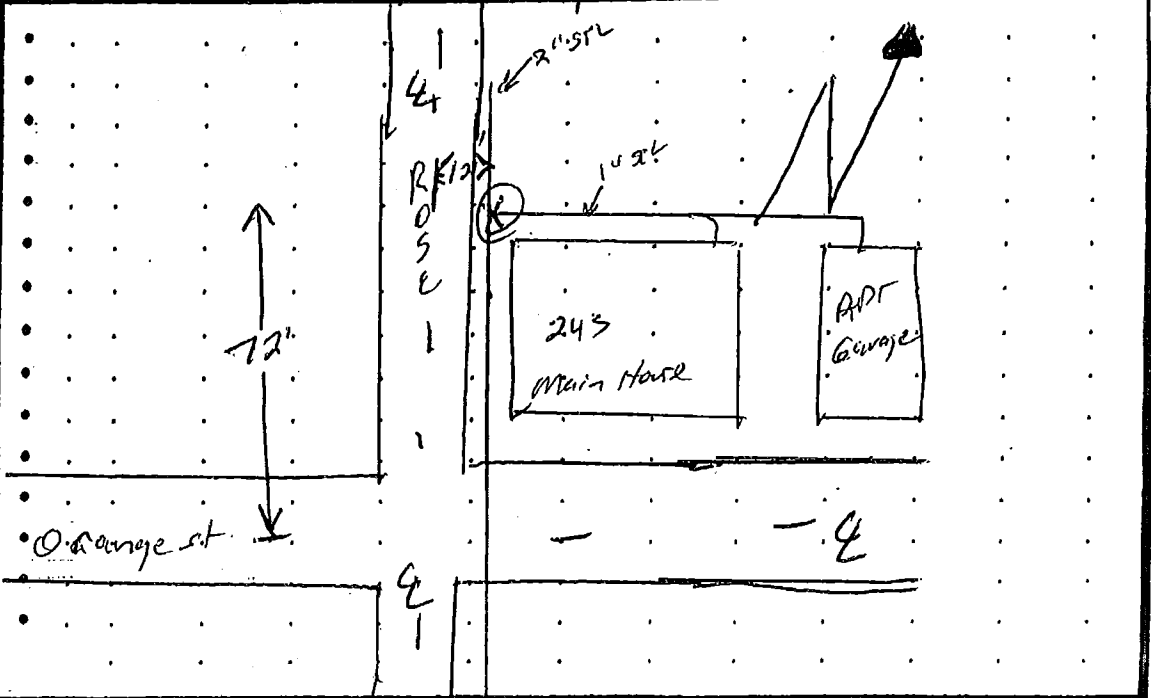
ORIGINAL
 SEE BACK FOR IMPORTANT
 SAFETY INFORMATION



Abandonment Of Facilities

Location: 243 Orange St						Date: 10-30-14	
Line Size: 1"	Main:	Service: <input checked="" type="checkbox"/>	Steel: <input checked="" type="checkbox"/>	Plastic:			
Condition Of Pipe:		Good <input checked="" type="checkbox"/>	Fair	Poor	Length Abandoned: 160'		

Reason For Abandonment: **10 year cap**



Remarks:

Inspector: *Scott Gray*



Abandonment Of Facilities

Location: 3103 Las Vegas Blvd

Date: 10-21-14

Line Size: 3/4"

Main:

Service:

Steel:

Plastic:

Condition Of Pipe:

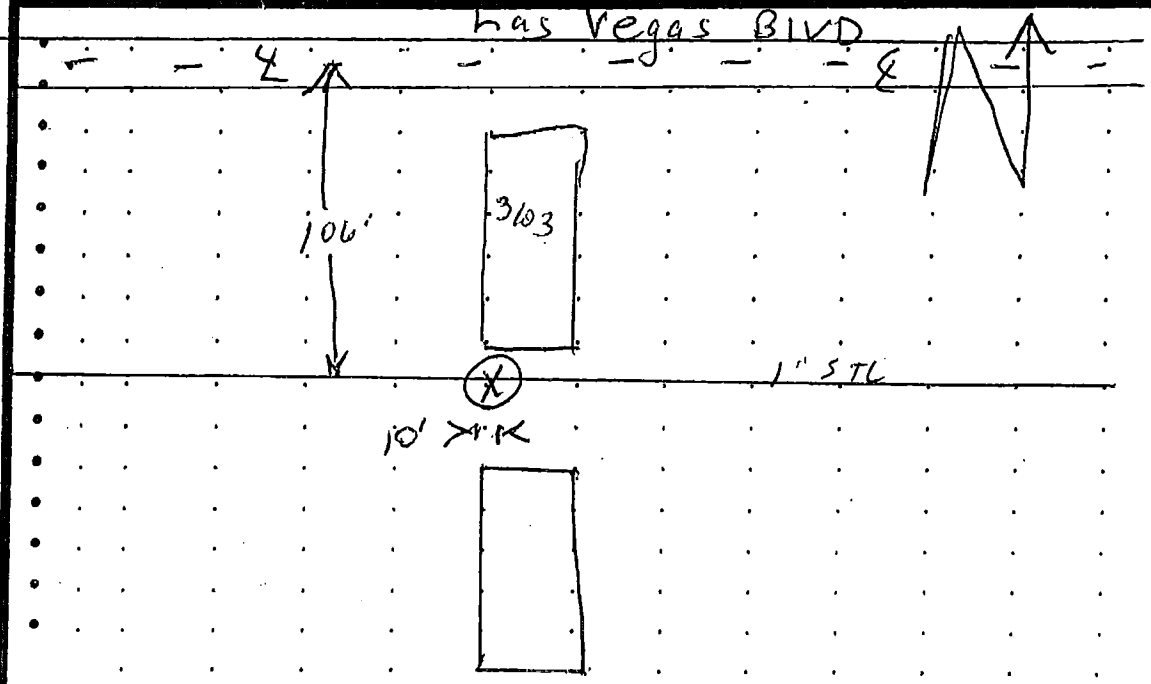
Good

Fair

Poor

Length Abandoned: 3'

Reason For Abandonment: 10 year cap



Remarks:

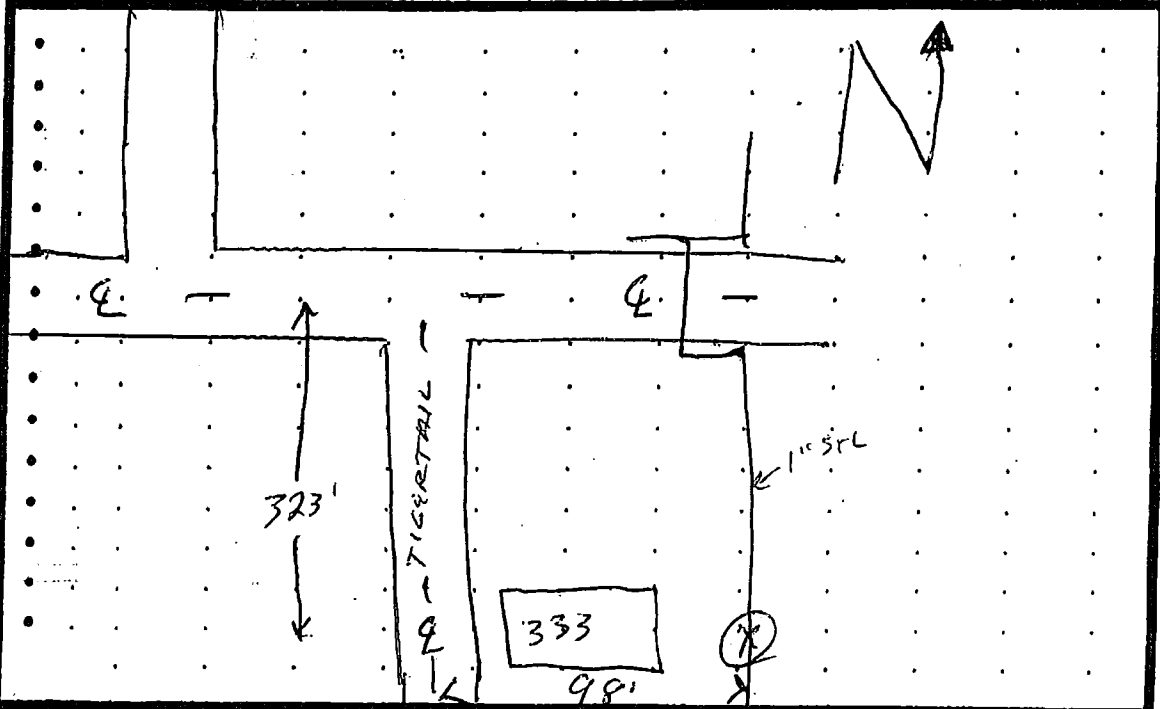
Inspector: *Scott J. [Signature]*



Abandonment Of Facilities

Location: 333 Tiger tail					Date: 10-22-14	
Line Size: 3/4"	Main:	Service: X	Steel: X	Plastic:		
Condition Of Pipe:	Good X	Fair	Poor	Length Abandoned:	3'	

Reason For Abandonment:



Remarks:

Inspector: *Scott Spring*

10 / 20 / 2014

TICKET NUMBER

[Empty Box]

DATE

SEBRING GAS SYSTEM, INC.

3515 US Hwy 27 S

SEBRING, FL 33870

Telephone 863/385-0194

ACCOUNT NUMBER

221203205

NAME JOHN HILL (F)/picked up		TELEPHONE 3828016	CALL TKR	CALL TIME	DATE PROMISED 10/20/14	AM/PM 4	CR. LIMIT
SERVICE ADDRESS 320 FRANCIS ST		SERVICE REQUESTED ABANDON SERVICE					
MAILING ADDRESS		CUT & CAP RISER AT MAIN					
CITY STATE ZIP SEBRING, FL 33870							
FWDING ADDRESS		METER NO. P/U#--999472		22--342			
FWDING CITY STATE, ZIP		METER READING		TS-1			
TECHNICIAN 1 Scott	TECHNICIAN 2 Cruz	TRUCK NO. 908	MILES START	MILES END	TIME DISP.	TIME START 8:30	TIME END 10:00
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME	WORK PERFORMED		
					Prev Reading 6055		
					Curr Reading		
					Turn off Gas, Blow down Riser, Remove Riser, Plug line, Turn on Gas, Soap Blow, No leaks detected. Brush tee + main. Tape coat main + tee		
PART NO.	QTY.	DESCRIPTION		AMOUNT			
		Subway Dr					
		T i g g i n g					
		L					
		333					
		320					
		98					
Debit 380.08							
Credit 380.00							
59.66 Steel Service							
TOTAL MATERIAL							
53706							
EXPLAINED: SYSTEM OPERATION SERVICE WORK DONE							
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO							
TECHNICIAN'S SIGNATURE					DATE 10-20-14		
CUSTOMER'S SIGNATURE					DATE		

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ORIGINAL
SEE BACK FOR IMPORTANT
SAFETY INFORMATION



Abandonment Of Facilities

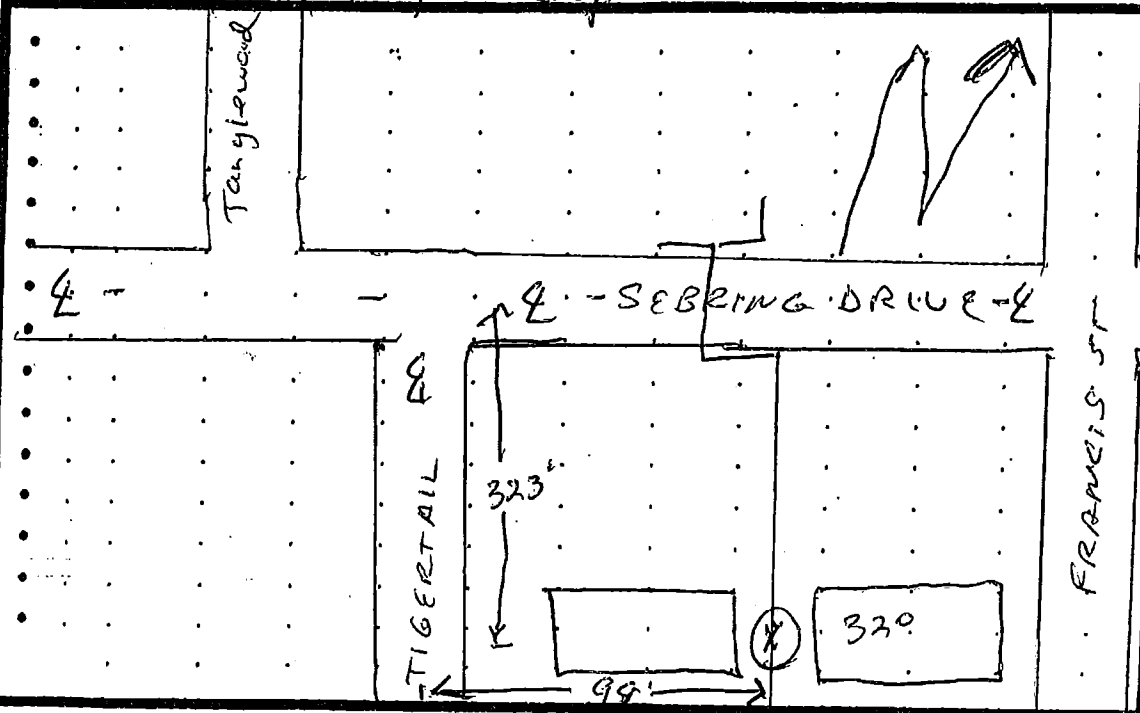
Location: 320 Francis St.

Date: 10-22-14

Line Size: 1/4 Main: Service: X Steel: X Plastic:

Condition Of Pipe: Good X Fair Poor Length Abandoned: 31

Reason For Abandonment: 10 year Cap



Remarks:

Inspector: *[Signature]*

10 / 22 / 2014

TICKET NUMBER

DATE

SEBRING GAS SYSTEM, INC.

3515 US Hwy 27 S

SEBRING, FL 33870

Telephone 863/385-0194

ACCOUNT NUMBER

220705463

NAME	PICKED UP	TELEPHONE	KAT	CALL TKR	CALL TIME	10/22/14	DATE PROMISED	AM/PM	CR. LIMIT
------	-----------	-----------	-----	----------	-----------	----------	---------------	-------	-----------

SERVICE ADDRESS	546 VON MAXCY ST	SERVICE REQUESTED	ABANDON FACILITY
MAILING ADDRESS		SERVICE REQUESTED	CUT & CAP RISER AT MAIN

CITY STATE ZIP	SEBRING, FL 33870	METER NO.	P/U METER 926634
----------------	-------------------	-----------	------------------

FWDING ADDRESS		METER READING	TS-1
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TECHNICIAN 1	TECHNICIAN 2	TRUCK NO.	MILES START	MILES END	TIME DISP.	TIME START	TIME END	NO. CHG. CODE	D.T. HOURS	INCOMP.	PART (?) NEEDED
--------------	--------------	-----------	-------------	-----------	------------	------------	----------	---------------	------------	---------	-----------------

Scott Dale 908 2:00 3:30

OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME

PART NO.	QTY.	DESCRIPTION	AMOUNT
	1	BL Iron Plug 3/4"	
	1	1" Tape coat	
TOTAL MATERIAL			

WORK PERFORMED

Prev Reading 7023
 Curr Reading
 Shut down leg of GM.
 Blow down Riser Remove
 Riser, Plug line Turn gas
 back on, Soap test plug
 No leaks detected
 Tape + Backfill - Re life
 Customer

DESCRIPTION	CODE	AMOUNT

SUB TOTAL	
TAX	
TOTAL DUE	
AMOUNT RECEIVED	

It is agreed and understood by the parties that all equipment and parts which are sold pursuant hereto shall NOT become fixtures or part of the real estate where they are placed. Said purchased equipment shall at all times remain the property of the seller and the title thereto shall remain in the seller until payment in full is received. Buyer hereby agrees that all parts and equipment may be repossessed in the event of non-payment. I have authority to order the work as outlined above. I agree to pay all costs and reasonable attorney's fees if this invoice is placed in the hands of an attorney for collection. Any deposits paid herewith will be refunded 14 days from date services discontinued.

53710 EXPLAINED: SYSTEM OPERATION YES NO
 SERVICE WORK DONE YES NO

CALL BEFORE YOU DIG
 Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.

TECHNICIAN'S SIGNATURE Scott Dale DATE 10-25-14
 CUSTOMER'S SIGNATURE _____ DATE _____

ORIGINAL
 SEE BACK FOR IMPORTANT
 SAFETY INFORMATION



Abandonment Of Facilities

Location: 546 Von Marcy

Date: 10-25-14

Line Size: 3/4

Main:

Service:

Steel:

Plastic:

Condition Of Pipe:

Good

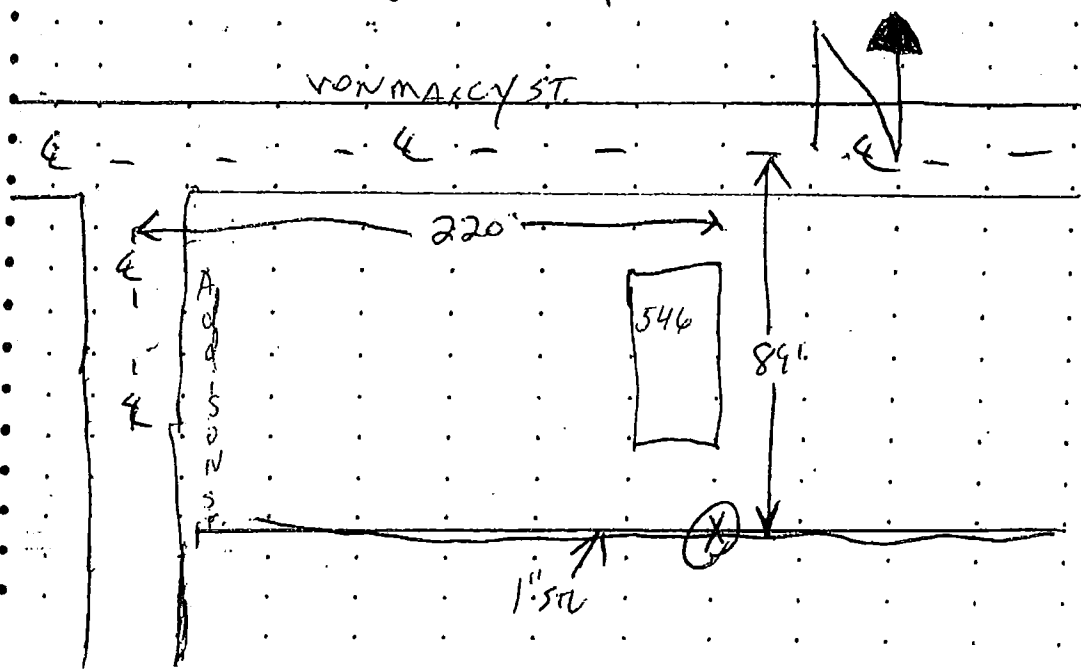
Fair

Poor

Length Abandoned: 3'

Reason For Abandonment:

10 year cap



Remarks:

Inspector:

Scott Spry

10 / 20 / 2014

TICKET NUMBER

[Empty Box]

DATE

BERRING GAS SYSTEM, INC.

3512 US HWY 27 E

SEBRING, FL 33872

Telephone 888/325-2194

ACCOUNT NUMBER

53705

NAME PICKED UP		TELEPHONE KAT	CALL TKR	CALL TIME 9/20/14	DATE PROMISED	AWPM	CR. LIMIT
SERVICE ADDRESS 550 VON MAXCY ST		SERVICE REQUESTED ABANDON FACILITY OUT & CAP PRESS AT MAIN					
MAILING ADDRESS		METER NO. 970 METER983292					
CITY STATE ZIP SEBRING, FL 33873		METER READING 79-1					
FWDING ADDRESS		METER NO.					
FWDING CITY STATE, ZIP		METER READING					
TECHNICIAN 1 Scott	TECHNICIAN 2 Dale	TRUCK NO. 98	MILES START	MILES END	TIME DISP.	TIME START 8:30	TIME END 12:00
OP. PRESS.	LOCK-UP PRESSURE	TEST PRESSURE	START TIME	END TIME	WORK PERFORMED		
					Prev Reading 504 Curr Reading Shut down line of G.P. Blow down River, Remove River Dig line Tap in Sough 1/2" dia. hole with all. Re file		
PART NO.	QTY.	DESCRIPTION		AMOUNT	DESCRIPTION	CODE	AMOUNT
		Debit 380.08					
		Credit 230.00					
		59.16		Steel			
				Saw			
TOTAL MATERIAL					SUB TOTAL		
					TAX		
					TOTAL DUE		
					AMOUNT RECEIVED		
It is agreed and understood by the parties that all equipment and parts which are sold pursuant hereto shall NOT become fixtures or part of the real estate where they are placed. Said parts and equipment shall at all times remain personal property and the title thereto shall remain in the seller until payment in full is received. Buyer agrees that all parts and equipment may be repossessed in the event of non-payment. I have authority to order the work as outlined above. I agree to pay all costs and reasonable attorney's fees if this invoice is placed in the hands of an attorney for collection. Any deposits paid herewith will be refunded 14 days from date services discontinued.							
53705		EXPLAINED: SYSTEM OPERATION SERVICE WORK DONE		<input type="checkbox"/> YES	<input type="checkbox"/> NO	TECHNICIAN'S SIGNATURE	
CALL BEFORE YOU DIG		Please help protect the gas utility against accidental outages from damaged gas lines by calling at least 48 hours before you dig or drill, toll free 1-800-432-4770. We will locate gas line for you free of charge.		<input type="checkbox"/> YES	<input type="checkbox"/> NO	DATE	
				CUSTOMER'S SIGNATURE		DATE	

CUSTOMER COPY
SEE BACK FOR IMPORTANT
SAFETY INFORMATION



Abandonment Of Facilities

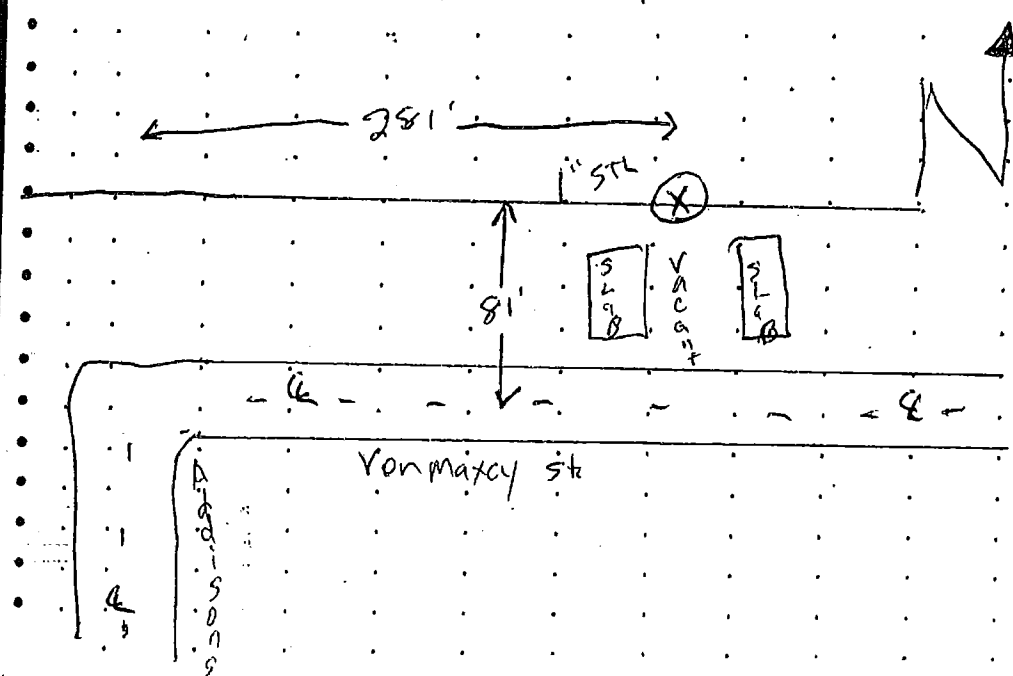
Location: 570 Vonmaxcy St

Date: 10-25-14

Line Size: 3/4" Main: Service: X Steel: X Plastic:

Condition Of Pipe: Good X Fair Poor Length Abandoned: 3'

Reason For Abandonment: 10 year Cap



Remarks:

Inspector

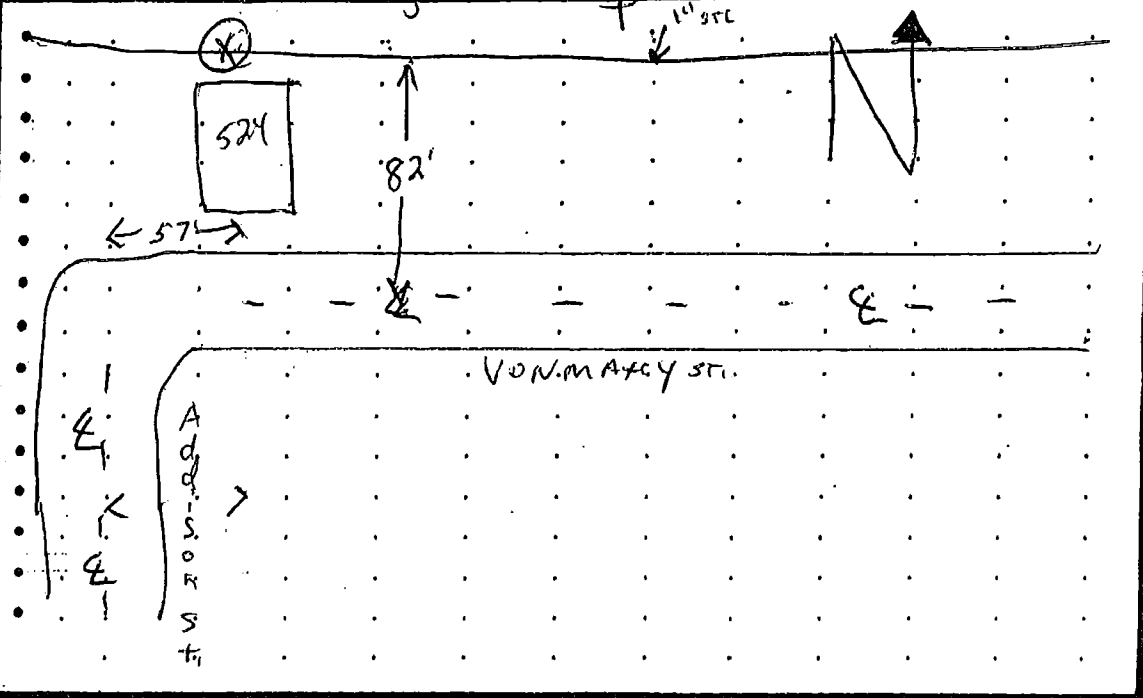
514
512



Abandonment Of Facilities

Location: 524 Von Maxcy St					Date: 10-25-14	
Line Size: 7/8"	Main:	Service: X	Steel: X	Plastic:		
Condition Of Pipe:	Good X	Fair	Poor	Length Abandoned:	3'	

Reason For Abandonment: 10 year Cap



Remarks:

Inspector: *[Signature]*

COMMISSIONERS:
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JULIE I. BROWN
DONALD J. POLMANN
GARY F. CLARK
ANDREW GILES FAY

STATE OF FLORIDA



OFFICE OF THE GENERAL COUNSEL
KEITH C. HETRICK
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

August 12, 2019

Beth Keating
Gunster Law Firm
215 South Monroe St., Ste. 601
Tallahassee, FL 32301
bkeating@gunster.com

STAFF'S FIFTH DATA REQUEST

via e-mail

RE: Docket No. 20190083-GU – Application for rate increase in Highlands, Hardee, and Desoto Counties, by Sebring Gas System, Inc.

Dear Ms. Keating:

By this letter, the Commission staff requests that Sebring Gas System, Inc. (Sebring or Utility) provide responses to the following data requests:

1. Please provide a map of the Utility's service territory showing existing and proposed lines, existing customers, and proposed customers. 1277
2. Please refer to MFR Schedule I-2. Please provide further details on the Commission rule violations for notice numbers: SEBGS GS-2117, SEBGS GS-1384, SEBGS GS-1420, and SEBGS GS-1433.
3. For each cost identified on Schedule G-1 page 23, please provide the following (if available):
 - a. Bids associated with the Purchase Price or Construction Cost.
 - b. Invoices associated with the Purchase Price or Construction Cost.
4. For each cost identified on Schedule G-1 page 26, please provide the following (if available):
 - a. Bids associated with the Purchase Price or Construction Cost.
 - b. Invoices associated with the Purchase Price or Construction Cost.

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LISA POLAK EDGAR
RONALD A. BRISÉ
JULIE I. BROWN
JIMMY PATRONIS

STATE OF FLORIDA



DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850) 413-6910

Public Service Commission

October 14, 2015

Mr. Jerry H. Melendy, Jr, President
Sebring Gas System
3515 Highway 27 South
Sebring, FL 33870

RE: Annual Gas Distribution Line Safety Evaluation - 2015 - SEBGS - Sebring Gas System

Dear Mr. Melendy:

Mr. Norman Witman, Engineering Specialist, completed a line safety evaluation during October 2015, of the physical facilities and records of the Sebring Gas System. The evaluation consisted of review and verification of related documents, field tests and interviews with employees. The system was found in satisfactory compliance with state and federal natural gas distribution safety rules in the areas evaluated.

Operational personnel have been advised of the safety evaluation. Please review the attached report for possible improvements. Enclosed is the evaluation report with additional information and attachments. If there are questions regarding this report, please call Mr. Witman at 305.513.7824 or me at 850.413.6582.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rick Moses".

Rick Moses
Chief, Bureau of Safety

RM: mj
Enclosure

cc: Tom Ballinger, Director, Division of Engineering
Norman Witman, Engineering Specialist

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DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850) 413-6910

Public Service Commission

October 17, 2016

Mr. Jerry H. Melendy, Jr.
President
Sebring Gas System
3515 Highway 27 South
Sebring, FL 33870-5452

Re: Annual Natural Gas Pipeline Safety Evaluation – 2016 SEBGS GS-1384 – Sebring Gas System

Dear Mr. Melendy:

Mr. Moise Degand, Engineering Specialist, completed an evaluation of the physical facilities and records of the Sebring Gas System on September 23, 2016. Mr. Degand's evaluation consisted of review and verification of related documents, field tests, and interviews with employees. The pipeline safety evaluation detected one violation:

1. Title 49 CFR Part 192, Section 192.285 (b) (2) (iii) – Plastic pipe: Qualifying persons to make joints.

A Notification of Gas Pipeline Safety Violation **GS-1384 SEBGS** is enclosed for failure to comply with State and Federal natural gas safety rules. Your written response to the violation notice is required by November 16, 2016. Response to this notice is to address the corrective measures, and the proposed actions to prevent any recurrences. Failure to take corrective action may result in a penalty of \$25,000 per day for each day that the violation exists, up to \$500,000 for related violations as provided in *368.061, F.S.* Please address the reply to my attention.

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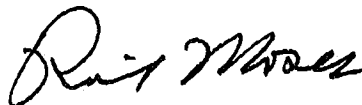
Mr. Jerry H. Melendy, Jr.

Page 2

October 17, 2016

Operational personnel have been informed of the findings regarding the safety evaluation. Please find enclosed Mr. Degand's evaluation report with additional information and attachments. If there are any questions regarding this evaluation and report, you may contact Mr. Degand at 305.513.7820 or me at 850.413.6582.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Moses". The signature is written in a cursive style with a large initial "R".

Rick Moses
Chief, Bureau of Safety

RM: wd
Enclosures

cc: Tom Ballinger, Division Director
Moise Degand, Engineering Specialist

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: October 10, 2016

TO: Rick Moses, Chief, Bureau of Safety, Division of Engineering, Tallahassee

FROM: Moise Degand, Engineering Specialist I, Division of Engineering, Miami

RE: Annual Pipeline Safety Evaluation
Sebring gas System – (SEBGS)

Issue

Is SEBGS operating its natural gas system in accordance with Title 49 Code of Federal Regulations (CFR), Parts 40, 191, 192, 199, and the Rules of the Florida Public Service Commission, Chapter 25-12, Florida Administrative Code (F.A.C.)?

Recommendation

Staff recommends that a notice of rule violation be issued to the management of Sebring Gas System for violation of the following regulation:

1. Title 49 CFR Part 192, Section 192.285 (b) (2) (iii) – Plastic pipe: Qualifying persons to make joints.

Discussion

On September 23, 2016, a pipeline safety evaluation was completed of the facility and records of Sebring Gas System. The Commission's engineering staff makes annual evaluations of the facilities under the control of each operator to determine compliance with state and federal safety rules and regulations applicable to pipeline facilities and the transportation of natural gas within the state of Florida.

Both the Florida Public Service Commission and PHMSA forms cited below were utilized during this inspection:

- Gas Distribution System DIMP Implementation Inspection, PHMSA Form-24
- GS-03 Operation and Maintenance
- GS-05 Pressure Regulation
- GS-06 Odorization
- GS-13 Summary
- GS-04 Corrosion Survey
- Canal Crossings/Meters/Multi-Meters
- GS-14 Valves
- Operator Qualification Field Inspection Protocol 9, PHMSA Form-15
- Operator Qualification Headquarters Inspection, PHMSA Form-14
- Pipeline Drug and Alcohol Questions, PHMSA Form-13
- Public Awareness Program Effectiveness Inspection, PHMSA Form-21

Operator Qualification

All employees who performed covered tasks were qualified and unqualified employees were directed and observed by qualified employees. Revisions of qualified employees' records were conducted and concluded to be in compliance with the Pipeline Safety Regulations. The employees were trained to recognize and react to abnormal operating conditions when occurred.

However, operator's Qualification plan doesn't have provisions that require all contractor and subcontractor individuals be evaluated and qualified prior to performing covered tasks, unless the covered task is performed by a non-qualified individual under the direction and observation of a qualified individual. Nor its plan requires company official to verify other entities that perform covered task(s) on its behalf are addressed under their OQ program and that individuals from such other entities performing covered tasks on its behalf are evaluated and qualified consistent its program requirements.

During the previous year and up to current date, operator has not used any contractor or subcontractor or individuals from other entities to perform work on its pipeline facilities.

According to the operator's records for the qualification of plastic joiners, only two straps were tested for saddle and butt fusions.

Leaks/Leak Surveys

According to the operator's records, all leaks found in their system were corrected within compliance with FPSC rule 25-12.062 Leak Report as well as 25-12.040(2) Leak Surveys, Procedures and Classification. Operator continues to conduct periodic leak surveys of their pipelines in accordance with the federal and state regulations. Form GS-08, for leakage survey in the field, was not used because no field leakage survey was conducted during this inspection.

Meters/Multi-Meters

Twenty-two meters were observed in the field, and they were all identified with the operator's ID. Twenty-six multi-meters were observed at different locations, and they were all identified with the operator's ID. A few of the multi-meters did not have markings indicating the building or part of the building they provided natural gas to, but were later marked during the inspection.

Cathodic Protection

Eighteen locations were inspected in the field, the recorded read for South Pine North DT 55 was -0.78V, Spruce / Lakview DT 70 was -0.77V and South Franklin (Palm Tree) DT45 was -0.68V. Operator already had measures in place to either retire those test points or a remedial action plan to bring those voltages to compliance. The other reads were satisfactory. The operator's records indicate that all the test points were inspected within compliance.

Odorization

By the Natural Gas Safety Rules of The Florida Public Service Commission, operators shall, at least 12 times a year, at intervals not exceeding forty-five days, sample gas distributed at places downstream of all injection points to assure the presence of odorant in a concentration that is readily detectable at a gas and air mixture of one-fifth of the lower explosive limit. Four locations were tested in the field, and the readily detectable levels for all two locations were satisfactory. Upon the revision of records, it was concluded that the operator is in accordance with the commission rules.

Regulators

One gate station was inspected in the field. No over or under pressurization was detected in the system. Both the worker and monitor of Dinner Lake gate station passed the lock up test. The operator's records indicate that the station was inspected within compliance.

DIMP Implementation

Field personnel appear to understand their responsibilities and promptly report information for correcting deficiencies. Office and field personnel have the right attitude, values, norms, and beliefs regarding safety and seem to be committed to a culture of safe operation of the system. The distribution integrity management plan was reviewed using PHMSA Form-24, and the implementation appeared satisfactory.

Drug and Alcohol

Employees are randomly tested throughout the year and when there is reasonable suspicion behavior observed by a supervisor or post incidents. Sebring Gas System uses Quest Diagnostic Incorporated as their primary drug and alcohol testing facility in Overland Park, Kansas as their approved laboratory. Supervisors have received one hour training on both drug and alcohol on how to determine if there is probable drug use or alcohol misuse. Information of the company's policy regarding the use of prohibited drugs was displayed in a common area bulletin board.

Operating and Maintenance, and Emergency Plans

The operating and maintenance, and emergency plans were reviewed using FPSC Form GS-03 and appeared to be satisfactory.

All fifteen critical/key/emergency valves were annually inspected and in operating condition upon reviewing operators records as well as while conducting field inspections

Public Awareness

The public awareness plan was reviewed using PHMSA Form-21, and the implementation was in compliance with the federal rules and regulations.

Conclusion

This evaluation was completed on September 23, 2016, and found a violation of the following rule:

1. Title 49 CFR Part 192, Section 192.285 (b) (2) (iii) – Plastic pipe: Qualifying persons to make joints, which states:
 - (b) The specimen joint must be:
 - (2) In the case of a heat fusion, solvent cement, or adhesive joint;
 - (iii) Cut into at least three longitudinal straps, each of which is:
 - (A) Visually examined and found not to contain voids or discontinuities on the cut surfaces of the joint area; and
 - (B) Deformed by bending, torque, or impact, and if failure occurs, it must not initiate in the joint area.

According to the operator's records, for the qualification of plastic joiners, only two straps were tested for saddle and butt fusions.

The violation and findings were communicated to Mr. Jerry Melendy, Mr. Jim Correll, and Mr. Cameron Menzie of Sebring Gas System

MD

Attachments

Cc: Wendi Denison
Subject: Sebring Gas System Annual Evaluation

December 5, 2016

Mr. Rick Moses
Chief, Bureau of Safety
Florida Public Service Commission
Tallahassee, FL

Re: Annual Natural Gas Pipeline Safety Evaluation – 2016 SEBGS GS-1384 –
Sebring Gas System

Dear Mr. Moses:

I have collected specimens of heat fusion joints to PE gas pipe by persons qualified to make such fusions for Sebring Gas System. The specimen joints were cuts in longitudinal straps in widths of a minimum of one inch. There are three straps of each fusion made by the qualified personnel. The straps are identified by a tag indicated the date completed, signed by the qualified personnel.

Sebring Gas System is in compliance with Title 49 CFR Part 192, Section 192.285 (b) (2) (iii).

Jerry H. Melendy, Jr.

Sebring Gas Systems, Inc.
3515 US Hwy 27 South
Sebring, FL 33870-5452
(863) 385-0194

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STATE OF FLORIDA



DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850)413-6910

Public Service Commission

December 28, 2017

Mr. Jerry H. Melendy, Jr., President
Sebring Gas
3515 Highway 27 South
Sebring, FL 33870-5452

Re: Annual Natural Gas Pipeline Safety Evaluation – 2017 SEBGS GS-1420 – Sebring Gas System

Dear Mr. Melendy:

Ms. Marcelina Alvarez, Engineering Specialist, completed an evaluation of the physical facilities and records of the Sebring Gas System on December 28, 2017. The evaluation consisted of review and verification of related documents, field tests, and interviews with employees. The pipeline safety evaluation identified two violations:

1. Chapter 25-12.055 (2), F.A.C. – Odorization of Gas
2. Chapter 25-12.082, F.A.C. – Construction Notice

This notification of gas pipeline safety violation **2017 SEBGS GS-1420** is for failure to comply with State and Federal natural gas safety rules. Your written response to the violation notice is required by January 27, 2018. Response to this notice is to address the corrective measures, and the proposed actions to prevent any recurrences. Failure to take corrective action may result in a penalty of \$25,000 per day for each day that the violation exists, up to \$500,000 for related violations as provided in *Section 368.061, F.S.* Please address the reply to my attention.

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Mr. Melendy
Page 2
December 28, 2017

Operational personnel have been informed of the findings regarding the safety evaluation. Please find enclosed Ms. Alvarez's evaluation report with additional information and attachments. If there are any questions regarding this evaluation and report, you may contact Ms. Alvarez at 305.513.7817 or me at 850.413.6582.

Sincerely,



Rick Moses
Chief, Bureau of Safety

RM:wd
Enclosure

cc: Tom Ballinger, Division Director
Marcelina Alvarez, Engineering Specialist

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: December 28, 2017
TO: Rick Moses, Chief, Bureau of Safety, Division of Engineering, Tallahassee
FROM: Marcelina Alvarez, Engineering Specialist, Division of Engineering, Miami
RE: Annual Pipeline Safety Evaluation - Sebring Gas System (SEBGS)

Issue

Is SEBGS operating its natural gas system in accordance with Title 49 Code of Federal Regulations (CFR), Parts 40, 191, 192, 199, and the Rules of the Florida Public Service Commission, Chapter 25-12, Florida Administrative Code (F.A.C.)?

Recommendation

Staff recommends that a notice of rule violation be issued to the management of Sebring Gas for violations of the following regulations:

1. Rules of the Florida Public Service Commission Chapter 25-12.055 (2), F.A.C. – Odorization of Gas
2. Rules of the Florida Public Service Commission Chapter 25-12.082, F.A.C. – Construction Notice

Discussion

The Commission's engineering staff makes annual evaluations of the facilities under the control of each operator to determine compliance with state and federal safety rules and regulations applicable to pipeline facilities and the transportation of natural gas within the state of Florida. The annual evaluation of the Sebring natural gas distribution system operated by Sebring Gas was undertaken during the month of December 2017.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the M. Alvarez Inspection completed on
12/28/2017.

1. According to the Sebring Gas System, Inc. (Operator)'s records in 2016, there were six locations for odorization testing along the system, and the Operator conducted twelve odorization test, one every month. However, the interval between the months of July and August exceeded the forty-five-day requirement. In July, testing at all locations was conducted on July 7, 2016, and in August, testing all locations was conducted on August 30, 2016.

OPERATOR'S RESPONSE:

The Operator conducted six locations during the month of August 2016. Of the six locations tested, four were testing in compliance with Chapter 25-12.055(2) Florida Administrative Code and two locations were tested fifty and fifty-one days from the test conducted in July 2016, in violation of the above referenced Code. The personnel assigned with the task of conducting the tests left for military training on August 5, 2016 and his supervisor did not know the tests were not conducted. When it was learned, the supervisor conducted the tests of the two remaining locations.

The Operator has revised its method of documenting the odorization testing to conduct the tests in a timely manner. The revised method includes creating a chart showing the dates of the odorization testing as a guide and reminder of the future required testing dates.

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by the M. Alvarez Inspection completed on
12/28/2017.

2. The review of the operator's records indicates that a pipeline meeting the criteria of a major construction pipeline facility was constructed in January 2016. The pipeline was constructed of 2-inch pipe and was 2,000-feet in length. However, the operator did not give Notice to the Commission on the construction of the pipeline.

OPERATOR'S RESPONSE:

The Operator's owner and supervisors failed to remember to notify the Commission of the required Construction Notice, as stated in Chapter 25-12.082, Florida Administrative Code, and will make changes in its practices to do so in the future.

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STATE OF FLORIDA



DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850) 413-6910

Public Service Commission

December 28, 2018

Mr. Jerry H. Melendy, Jr., President
Sebring Gas System
3515 Highway 27 South
Sebring, FL 33870-5452

Re: Annual Natural Gas Pipeline Safety Evaluation – 2018 SEBGS GS-1433 – Sebring Gas System

Dear Mr. Melendy:

Mr. Rafael Bohorquez, Engineering Specialist, completed an evaluation of the physical facilities and records of Sebring Gas System's distribution system on December 28, 2018. Mr. Bohorquez's evaluation consisted of review and verification of related documents, field tests, and interviews with employees. The pipeline safety evaluation detected two violations:

1. Title 49 CFR Part 192, Section 192.807 (a) (3) – Recordkeeping.
2. Title 49 CFR Part 192, Section 192.739 (a) – Pressure limiting and regulating stations: Inspection and testing.

This notification of gas pipeline safety violation **2018 SEBGS GS-1433** is for failure to comply with State and Federal natural gas safety rules. Your written response to the violation notice is required by **January 27, 2019**. Response to this notice is to address the corrective measures, and the proposed actions to prevent any recurrences. Failure to take corrective action may result in a penalty of \$25,000 per day for each day that the violation exists, up to \$500,000 for related violations as provided in *368.061, F.S.* Please address the reply to my attention.

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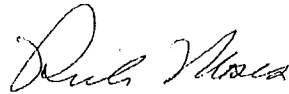
Mr. Jerry Melendy, Jr.

Page 2

December 28, 2018

Please find enclosed Mr. Bohorquez 's evaluation report with additional information and attachments. Operational personnel have been advised of the safety evaluation but have not received this full report. Please forward to the necessary operational personnel within your organization. If there are any questions regarding this evaluation and report, you may contact Mr. Bohorquez at 305.513.7820 or me at 850.413.6582.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rick Moses".

Rick Moses
Chief, Bureau of Safety

RM:wd
Enclosures

cc: Tom Ballinger, Director, Division of Engineering
Rafael Bohorquez, Engineering Specialist

Sebring Gas System, Inc.
Response to Requirements to Correct Violations of
The Florida Public Service Commission's Safety Rules
as determined by Mr. Rafael Bohorquez's Inspection completed on
12/28/2018.

1. Title 49 CFR Part 192, Section 192.605 (a) – Procedural manual for operations, maintenance, and emergencies.
 - a. According to the operator's records, procedural manuals were not reviewed in 2016 and 2017.

Operator's Response:

SEBGS reviewed the Operations and Maintenance Manual (OM) in 2016 and 2017; however, the records of the reviews were removed from the OM after the review on March 30, 2018. SEBGS' procedure in the past was to have one page in the OM documenting the date the policies were reviewed. After the field inspector approved the contents of the OM, the company would remove the page and replace it with a new page for the next review. SEBGS will begin to retain records of the previous reviews beginning with 2018.

DISTRIBUTION

WORKER



District Regulator Station Inspection

Location DINNER LAKE GATE Date 12/27/18

Regulator Make MOONEY Type Pilot Size 2" Orifice Size 1"

Pressure Rating Inlet 90 PSI Outlet 30 PSI

MAOP of System 60 PSI Lock up Pressure 36 PSI

Was The Regulators Stroked (To Full Open)? YES

Monitoring Regulator Setting 34 PSI Worker Regulator Setting 30 PSI

General Condition of Station

	Yes	No
Atmospheric Corrosion	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Support Piping Rigid	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Station Guards	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Clean of Weeds	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Corrections made: NONE

Remarks:

Inspector [Signature]

DISTRIBUTION

MONITOR



District Regulator Station Inspection

Location DINNER LAKE GATE Date 12/27/18
 Regulator Make MOONEY Type PILOT Size 2" Orifice Size 1"
 Pressure Rating Inlet 90 psi Outlet 34 psi
 MAOP of System 60 psi Lock up Pressure 38 psi
 Was The Regulators Stroked (To Full Open)? YES
 Monitoring Regulator Setting 34 psi Worker Regulator Setting 30 psi

General Condition of Station

	Yes	No
Atmospheric Corrosion	_____	_____
Support Piping Rigid	_____	_____
Station Guards	_____	_____
Clean of Weeds	_____	_____

Corrections made: NONE

Remarks: _____

Inspector



SEBRING GAS SYSTEM, INC.

Valve Inspection Report

Valve Number: DL-1

Date: 12/27/18

Valve Box: Yes
No

Valve Number Tag: Yes
No

Area Cleaned: Yes
No

Road/Sidewalk Marked "GV"
Yes No

Valve Operated to Full Open/ Close Position:

Yes No

Valve Lubricated: Yes
No

Type Valve: Steel PE

Valve Size: 3"

Repairs Required: NONE

Repairs Performed: NONE

Inspector: [Signature]



SEBRING GAS SYSTEM, INC

Valve Inspection Report

Valve Number: DL-2

Date: 12/27/8

Valve Box: Yes
No

Valve Number Tag: Yes
No

Area Cleaned: Yes
No

Road/Sidewalk Marked "GV"
Yes No

Valve Operated to Full Open/ Close Position:

Yes No

Valve Lubricated: Yes
No

Type Valve: Steel PE

Valve Size: 3"

Repairs Required: NONE

Repairs Performed: NONE

Inspector: 



SEBRING GAS SYSTEM, INC.

Valve Inspection Report

Valve Number: SL-3

Date: 12/27/18

Valve Box: Yes
No

Valve Number Tag: Yes
No

Area Cleaned: Yes
No

Road/Sidewalk Marked "GV"
Yes No

Valve Operated to Full Open/ Close Position:
Yes No

Valve Lubricated: Yes
No

Type Valve: Steel PE

Valve Size: 2"

Repairs Required: NONE

Repairs Performed: NONE

Inspector: 

COMMISSIONERS:
ART GRAHAM, CHAIRMAN
JULIE I. BROWN
DONALD J. POLMANN
GARY F. CLARK
ANDREW GILES FAY

STATE OF FLORIDA



DIVISION OF ENGINEERING
TOM BALLINGER
DIRECTOR
(850) 413-6910

Public Service Commission

January 29, 2019

Mr. Jerry H. Melendy, Jr., President
Sebring Gas
3515 Highway 27 South
Sebring, FL 33870-5452

RE: Annual Natural Gas Pipeline Safety Evaluation – 2018 SEBGS GS-1433 – Sebring Gas System

Dear Mr. Melendy:

Mr. Karl Chen, Engineering Specialist Supervisor, completed a progress evaluation on January 28, 2019, to determine if necessary action has been taken to correct gas pipeline safety violation notice **2018 SEBGS GS-1433**, which was issued on December 28, 2018. Sebring Gas responded to the violation notice on January 25, 2019. Mr. Chen reports that the violations have been brought into compliance; therefore, the violation notice has been closed.

Enclosed you will find Mr. Chen's progress evaluation report with additional information. If there are any questions regarding this report, please contact Mr. Chen at 305.513.7827 or me at 850.413.6582.

Sincerely,

A handwritten signature in cursive script that reads "Rick Moses".

Rick Moses
Chief, Bureau of Safety

RM:wd
Enclosure

cc: Tom Ballinger, Director, Division of Engineering
Karl Chen, Engineering Specialist Supervisor

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