### **Eric Fryson**

From:Keating, Beth [BKeating@gunster.com]Sent:Friday, March 30, 2012 4:38 PMTo:Filings@psc.state.fl.usSubject:Docket No. 090522

Attachments: 20120330163726965.pdf

Attached for filing in the referenced docket file, please find an electronic copy of the Final Report required by Order No. PSC-10-0158-PAA-GU. As always, please don't hesitate to let me know if you have any questions or concerns.

a. Person responsible for this electronic filing:

Beth Keating *Gunster, Yoakley & Stewart, P.A.* 215 S. Monroe St., Suite 618 Tallahassee, FL 32301 <u>bkeating@gunster.com</u> Direct Line: (850) 521-1706

b. Docket No. 090522-GU - Petition for extension of waiver of service line abandonment provisions of Rule 25-12.045, F.A.C., by Florida Natural Gas Association.

c. On behalf of: Florida Natural Gas Association

d. There are a total pages: 16

e. Description: Final Report



Beth Keating | Attorney Governmental Affairs 215 S. Monroe Street, Suite 601 Tallahassee, FL 32301 P 850-521-1706 C 850-591-9228 gunster.com | View my bio

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3/30/2012



Writer's Direct Dial Number: (850) 521-1706 Writer's E-Mail Address: bkeating@gunster.com

March 30, 2012

### VIA ELECTRONIC FILING - FILINGS@PSC.STATE.FL.US

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

In re: Docket No. 090522-GU - In re: Petition for extension of waiver of service line abandonment provisions of Rule 25-12.045, F.A.C., by Florida Natural Gas Association.

Dear Ms. Cole:

Attached for electronic filing, please find the final report required by Order No. PSC-10-0158-PAA-GU, issued March 22, 2010.

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

Sincerely,

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

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215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1804 p 850-521-1980 f 850-576-0900 GUSSLERCOMAR 30 ≌ Fort Lauderdale | Jacksonville | Miami | Palm Beach | Stuart | Tallahassee | Vero Beach | West Palm Beach FPSC-COMMISSION CLERK

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for extension of waiver of service line abandonment provisions of Rule 25-12.045, F.A.C., by Florida Natural Gas Association.

### Final Report

The following summarizes the collection of data from calendar years 2010 and 2011 in accordance with Order No. PSC-10-0158-PAA-GU granting the Florida Natural Gas Association members waivers to parts of Rule 25-12.045 on March 22, 2010.

Ten natural gas utility companies, including the two largest LDCs Peoples Gas System and Florida City Gas, provided data on an average of 659,101 service lines in 2010. Companies collected information on reported leaks or actual leaks found to have occurred on these service lines depending on the utilities customer information systems (CIS) or operational records. This data could have been derived from call center records or actual leak records retained by the individual utility.

Of the 663,286 total services reported, 585,260 were recorded as active and 73,842 as inactive. There were a total of 3,562 leaks recorded, 3,149 on active lines and 413 on inactive lines. Leak calls or reported leaks - as a percentage of the total - were about 0 .5% for active lines and 0.6% for inactive lines. There were seven times as many leaks on active lines as there were on inactive lines.

In 2010, 57,057 of the lines had been inactive for less than 60 months while 11,478 had been inactive for more than 60 months and 5,307 were undetermined. Of these inactive lines, 307 of the lines that were inactive less than 60 months had a leak record associated with it, while 77 leak records were connected to lines inactive greater than 60 months. There were 29 service lines which could not be accurately determined. Leak calls as a percentage of the total were 0.5% for those inactive less than 60 months and 0.7% for those inactive greater than 60 months.

The same respondents provided data in 2011 on an average annual total of 671,955 service lines. Of these, 587,854 were reported as active while 84,101 were inactive. There were 2,747 leaks recorded, 2,426 on active lines and 321 on inactive lines. Leak calls or reported leaks as a percentage of the total represented 0.4% for active and 0.4% for inactive, but, again, there were 10 times as many reported leaks on active lines as there were inactive.

In 2011, 59,035 lines had been inactive for less than 60 months, while 14,348 had been inactive for more than 60 months. There were 10,718 service lines that could not be determined. Of these

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inactive lines, those inactive less than 60 months, 214 of them had a leak record. As for lines inactive greater than 60 months, there were 63 that have leak records associated with them. Again, there were 44 lines that could not be accurately defined. In all three cases, leak calls as a percentage of the total were 0.4%.

For the two year period, 29,022 service lines were recorded as reactivated by LDCs. Slightly more than half, or 15,504, had been listed as inactive for less than 18 months. There were 11,452 service lines that had been inactive more than 18 months but less than 60 months that were reactivated and 1,960 were over 60 months inactive when they were reactivated. A total of 106 were not defined.

Companies during this moratorium period have promoted a variety of marketing programs directed towards reconnection incentives to gain back lost customers. In many cases, however, the continued slump in the economy and home sales continues to be a factor with inactive accounts.

Over the two year period, the percentage of leak calls or actual leaks reported remained essentially the same for both active and inactive lines and there appears to be no indication that because a line has been inactive for a given period of time that there exists a higher probability that a leak will occur. Utility companies are required by both federal and state regulations to maintain inactive service lines in the same manner and with the same inspection and operating requirements as active lines.

As for the question of costs associated with the abandonment and the reactivation costs of inactive lines, the many variables tied to the abandonment costs (such as urban or rural location, paved or unpaved surfaces, road crossings, permit and traffic control expenses and other factors) make it somewhat difficult to establish an average cost for this activity; however, from polling the member LDCs, we have learned that abandonment costs can vary widely between the companies, with variations as little \$100 to more than several thousand dollars. In the case of reactivating an inactive line, the expense can be significantly less because no excavation is required. In most cases, all that is required of the company is to verify that the customer fuel lines are properly inspected, then to ensure that the meter is reconnected, and finally, to initiate a turn on in accordance with the company's procedures.

# 2010-2011 Cut & Cap Moratorium Summary

## **Companies Responding**

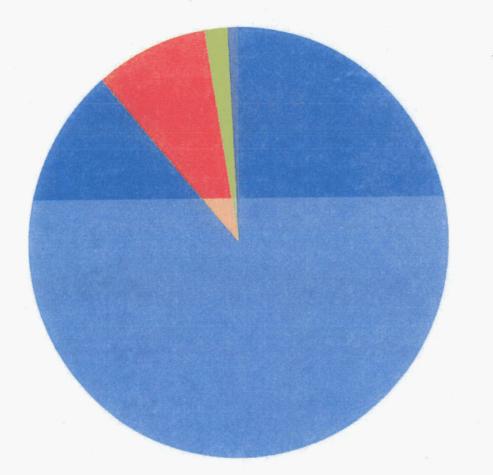
- AGL/Florida City Gas
- FPU/CFG
- Live Oak
- Okaloosa Gas
- Reedy Creek
- City of Sunrise
- City of Tallahassee
- Energy Services of Pensacola
- Clearwater Gas System
- TECO

### 2010 Data Summary

- Total Service Lines 659,101 (12mo. Avg.)
- Total Active Services 585,260 (12mo. Avg.)
- Total Inactive Services 73,842 12.62%
  - 18 to 60 months
  - > 60 months
  - undefined

73,842 1 57,057 11,478 5,307

# 2010 Service Lines



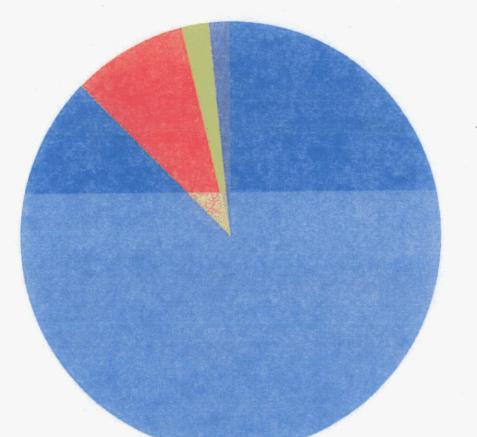
Active Services
 Inactive < 60 mo.</li>
 Inactive > 60 mo.
 Inactive (unknown)

### 2011 Data Summary

- Total Service Lines 671,954 (12mo. Avg.)
- Total Active Services 587,854 (12mo. Avg.)
- Total Inactive Services 84,101 12.52%
  - 18 to 60 months 59,035
  - > 60 months 14,348
  - undefined

14,348 10,718

## 2011 Service Lines

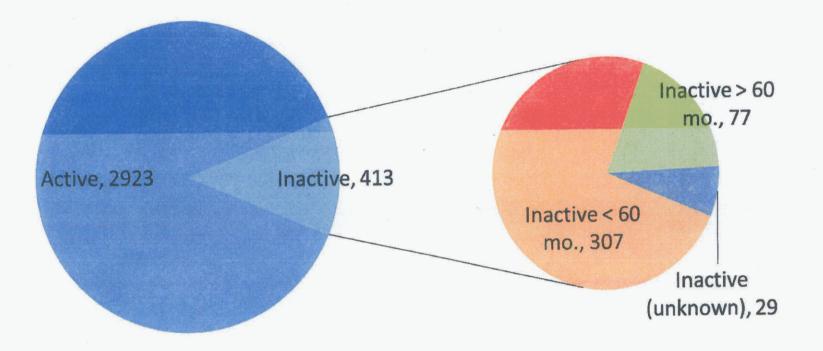


Active
 Inactive < 60 mo.</li>
 Inactive > 60 mo.
 Inactive (unknown)

### 2010 Leak Calls/Reported Leaks

.506% 3,336 659,102 Total All Services 2,923 .499% 585,260 Active Services 413 .559% 73,842 Total Inactive .538% 307 57,057 - < 60 mo. 77 .671% 11,478 - > 60 mo. .546% 5,307 29 undefined

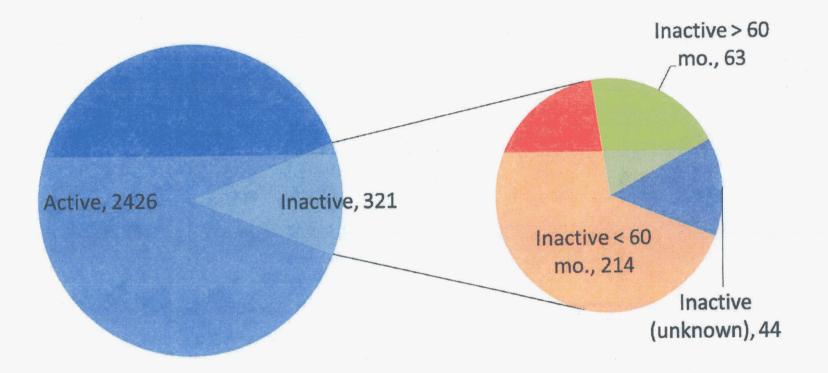
# 2010 Leak Calls/Reported Leaks



## 2011 Leak Calls/Reported Leaks

- Total all Services 671,955 2,747 .409%
- Active Services 587,854 2,426 .413%
- Total Inactive 84,101 321 .382%
  - < 60 mo. 59,035 214 .362%
  - > 60 mo. 14,348 63 .439%
  - undefined 10,718 44 .411%

# 2011 Leak Calls/ReportedLeaks



### Active/Inactive Leak Call Comparison

<ul> <li>2010 Active services</li> </ul>	2,923	.499%
<ul> <li>2010 Inactive services</li> </ul>	413	.559%
<ul> <li>2011 Active services</li> </ul>	2,426	.413%
<ul> <li>2011 Inactive services</li> </ul>	321	.382%
<ul> <li>Combined Active</li> </ul>	5,349	.456%
<ul> <li>Combined Inactive</li> </ul>	734	.465%

Combined Inactive

### 2010-2011 Reactivations

Total Reactivations Reported 29,022

 Inactive < 18 mo.</li>
 Inactive >18 mo.
 Inactive >18 mo.
 Inactive >60 mo.
 Inactive > 60 mo.
 Inactive > 10 mo.

### 2010 CUT 'N CAP - Monthly Moratorium Report Sumitted by : Company MASTER Report Date

Janurary 30, 2012	Contact email:	
	Contact Phone #:	

Mar /	Apr	May	Jun	Jui	Aug	Sep	Oct	Nov	Dec	Average
			583,599	583,504	583,988	583,845	585,629	587,884	591,056	585,260
				61,745	76,102	62,041	61,463	59,937	58,049	61,241
				11 717	11,991	12,290	12,495	12,720	12,901	11,478
			and the second second				4,220	4.221	4,219	5,307
and the second second second		Contraction of the second					Contract of the local division of the local		666 225	653,286
	58,017 10,372 5,476	58,017 59,051 10,372 10,775 5,476 5,754	58,017         59,051         60,094           10,372         10,775         11,131           5,476         5,754         5,753	58,017         59,051         60,094         60,957           10,372         10,775         11,131         11,474           5,476         5,754         5,753         5,753	58,017         59,051         60,094         60,957         61,745           10,372         10,775         11,131         11,474         11,717           5,476         5,754         5,753         5,777	50.77         50.76         60.957         61.745         76,102           10,372         10,775         11,131         11,474         11,717         11,991           5,476         6,784         6,753         5,773         5,776         5,776	Solit         Solitis         Solitit         Solitis         Solitis	5,5/7         50/7         51/7         50/7         51/7         50/7         51/7         50/7         51/7         50/7         51/7 <t< td=""><td>55.876         365.295         365.495         365.495         365.495         366.495         <th< td=""><td>55.876         365.286         369,737         509,737         509,737         509,737         509,037         50,049           10,372         10,775         11,131         11,474         11,777         11,991         12,290         12,495         12,720         12,901           5,476         5,784         6,783         5,753         5,777         5,776         5,776         4,220         4,221         4,214</td></th<></td></t<>	55.876         365.295         365.495         365.495         365.495         366.495 <th< td=""><td>55.876         365.286         369,737         509,737         509,737         509,737         509,037         50,049           10,372         10,775         11,131         11,474         11,777         11,991         12,290         12,495         12,720         12,901           5,476         5,784         6,783         5,753         5,777         5,776         5,776         4,220         4,221         4,214</td></th<>	55.876         365.286         369,737         509,737         509,737         509,737         509,037         50,049           10,372         10,775         11,131         11,474         11,777         11,991         12,290         12,495         12,720         12,901           5,476         5,784         6,783         5,753         5,777         5,776         5,776         4,220         4,221         4,214

Leak Call, Service Lines ACTIVE Service Lines Inactive (un Inactive (60 Inactive (un Total

Service Lines	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
Service Lines	245	233	249	213	224	230	239	274	297	291	424	230	3,149	0.538%
		22	36	29	29	18	19	29	17	36	26	20	307	0.538%
under 60 months)	26			20	7	8	6	8	9	10	6	. 1	77	0.671%
60 & over months)	5	5	9	2	2	3	2	3	3	4	4	5	29	0.546%
inknown)	1	0	294	247	262	259	266	314	326	341	460	256	3,562	0.537%
al Service Leak Calls	277	260	294	2.41	202	200						State and the state of the stat	1.4.1.1.1.1.1.1.1	1.

Reactivations	
Inactive (under 18 months)	
Inactive (18 to 59 months)	
Inactive (over 59 months)	
Inactive (unknown)	
Total Reactivates	

-	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
-		741	750	685	574	958	733	754	612	743	900	979	9,252
-	723		458	352	323	594	364	365	331	387	487	676	5,313
	499	477			43	49	47	59	52	56	83	103	776
-	83	95	59	47	40			2	2			1	36
	2	2	18	1	-	4	11	4	4	1 107	1.074	1 750	
	1,307	1,315	1,285	1,085	1,040	1,605	1,145	1,180	997	1,187	1,471	1,759	15,376

### 2011 CUT 'N CAP - Monthly Moratorium Report

Company	MASTER Report	\$	umitted by :	
Date	January 30, 2012	0	Contact email:	
	And the second second	0	Contact Phone #:	

Total Service Lines	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average
	586,410	587,735	588,190	587,112	586,825	588,426	586,228	586,652	586,884	588,951	590,705	592,128	587,854
ACTIVE Service Lines		56,889	57,523	65,407	58,844	59,325	59,806	59,627	59,306	58,198	56,897	55,862	59,035
Inactive (under 60 months) Inactive (60 & over months)	57,735	13,318	13,565	13,886	14,184	14,394	14,597	14,720	14,925	15,040	15,178	15,287	14,348
	13,083		10,464	10,897	10.897	10,897	10,938	10,938	10,938	10,571	10,571	10,671	10,718
Inactive (unknown)	10,464	10,454	and the second second	and the second se	670,750	671,042	671,569	671,937	672,053	672,760	673,351	673,848	671,954
Total Service Lines	667,692	668,406	669,742	680,302	870,750	6/1,042	011,009 1	011,831	012,000	OT ALL OF	alalaat [		

Lash Call Camilas Lines	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
Leak Call, Service Lines		162	208	202	245	240	206	195	212	219	183	160	2,426	0.413%
ACTIVE Service Lines	194	13	200	19	11	9	15	21	20	16	13	22	214	0.362%
Inactive (under 60 months) Inactive (60 & over months)	20	13	7	5	4	8	8	8	5	4	3	4	63	0.439%
Inactive (ou & over monuns)	3	3	5	8	4	2	4	5	4	3	2	1	44	0.411%
Total Service Leak Calls	231	181	247	234	264	257	233	229	241	242	201	187	2,747	0.409%

Reactivations	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Inactive (under 18 months)	519	479	540	432	483	547	494	571	458	603	569	557	6,252
	492	467	548	416	455	450	479	493	. 460	580	637	652	6,139
Inactive (18 to 59 months) Inactive (over 59 months)	79	94	112	74	95	117	80	94	93	106	122	118	1,184
	10	4	22	2	2	6	3	3	14	2	2	6	71
Inactive (unknown) Total Reactivates	1,095	1,044	1.222	924	1,035	1,120	1,056	1,161	1,025	1,291	1,330	1,343	13,846