Holland & Knight

DOCKET NO. 160033-GU

FILED FEB 12, 2016 DOCUMENT NO. 00838-16 FPSC - COMMISSION CLERK

315 South Calhoun Street, Suite 600 | Tallahassee, FL 32301 | T 850.224.7000 | F 850.224.8832 Holland & Knight LLP | www.hklaw.com

D. Bruce May, Jr. (850) 425-5607 bruce.may@hklaw.com

February 12, 2016

Via Hand Delivery

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

Re:

St. Joe Natural Gas Company, Inc.

Petition for Limited Proceeding to Restructure Rates

Dear Ms. Stauffer:

Enclosed for filing on behalf of St. Joe Natural Gas Company, Inc. are the original and fifteen (15) copies of its Petition for Limited Proceeding to Restructure Rates. Also enclosed is a diskette which contains a copy of the petition in Word along with the appended schedules in Excel.

If you have any questions regarding this filing, please call. Finally, please acknowledge receipt of this filing by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP

Bruce May, Jr.

DBM:kjg Enclosure

cc:

Andrew Maurey (w/Encls.)

J.R. Kelly (w/Encls.)

Stuart Shoaf Ralph Roberson

Anchorage | Atlanta | Austin | Boston | Chicago | Dallas | Denver | Fort Lauderdale | Houston | Jacksonville | Lakeland Los Angeles | Miami | New York | Northern Virginia | Orlando | Portland | San Francisco | Stamford | Tallahassee | Tampa Washington, D.C. | West Palm Beach #39026971 v1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of St. Joe Natural Gas	Docket No.:
Company, Inc. for a limited proceeding	
to restructure rates.	Filed: February 12, 2016
/	

PETITION FOR LIMITED PROCEEDING TO RESTRUCTURE RATES

St. Joe Natural Gas Company, Inc. ("SJNG"), by and through its undersigned counsel and pursuant to Section 366.076, Florida Statutes, and Rule 25-7.0391, Florida Administrative Code, petitions the Commission to conduct a limited proceeding to restructure its rates to address a shortfall in authorized revenues due to the permanent loss of SJNG's largest and only industrial customer. Because SJNG is in need of immediate rate relief to stabilize its financial position, it respectfully requests the Commission to expedite consideration of this request using its proposed agency action procedures. In support of this Petition, SJNG states:

Introduction

1. The name, address and telephone number of the Petitioner are:

St. Joe Natural Gas Company, Inc. Post Office Box 549 Port St. Joe, Florida 32456 (850) 229-8216

2. All pleadings and correspondence in this proceeding should be directed to:

D. Bruce May
Bruce.may@hklaw.com
Tiffany A. Roddenberry
Tiffany.roddenberry@hklaw.com
HOLLAND & KNIGHT LLP
P.O. Drawer 810
Tallahassee, Florida 32302

Stuart Shoaf, President St. Joe Natural Gas Company, Inc. Post Office Box 549 Port St. Joe, Florida 32456

- 3. SJNG is a natural gas distribution utility subject to Commission regulation as a public utility pursuant to Chapter 366, Florida Statutes. SJNG's general offices are located at 301 Long Avenue, Port St. Joe, Florida.
- 4. SJNG currently serves approximately 2,954 residential and commercial customers within the municipalities of Port St. Joe, Mexico Beach, and Wewahitchka, and in unincorporated areas of Gulf County, Florida.
- 5. This Petition is submitted pursuant to Section 366.076, Florida Statutes, which authorizes the Commission to conduct limited proceedings to consider any matter the resolution of which requires adjustment of utility rates. A limited proceeding is appropriate in this case because SJNG is experiencing severe financial hardship due to the permanent loss of its largest and only industrial customer, and thus is in need of immediate rate relief. SJNG is not aware of any disputed issues of material fact.

Background

- 6. SJNG's rates were last considered and established by the Commission in Order No. PSC-08-0436-PAA-GU dated July 8, 2008 ("Rate Order").
- 7. The Commission established SJNG's rates based upon annual revenues of \$285,011 from Arizona Chemical Company ("Arizona") under SJNG's FTS-5 rate class. Rate Order at 30. In setting SJNG's rates and authorizing its revenues the Commission recognized that Arizona was SJNG's only industrial customer in the FTS-5 rate class, and by far its largest customer. The Commission also recognized that the loss of Arizona could have a negative impact on SJNG's financial position and require an adjustment in rates. Rate Order at 31.

- 8. Unfortunately, the possible loss of Arizona foreshadowed by the Commission has materialized. For business reasons entirely outside of SJNG's control, Arizona permanently closed its operations in 2009 and its physical plant has been demolished. As a consequence, SJNG has lost its largest customer which has left it with annual revenues that are at least \$285,011 below those authorized by the Commission in the Rate Order.
- 9. The Company currently has no customers taking service under the FTS-5 rate class and since 2009 has received no revenues from this rate class.
- 10. Because of these developments SJNG has not been able to recover its expenses and earn a fair return on its investment, which adversely affects its substantial interests.
- 11. By this Petition, SJNG seeks relief only to recover the authorized revenues from Arizona under the FTS-5 rate class. Specifically, SJNG requests that \$285,011 in authorized revenue requirements from the FTS-5 class be reallocated to the remaining customer classes. SJNG proposes to reallocate this authorized revenue deficiency of \$285,011 to the remaining customer classes according to the ratio that each class's revenues had to total revenues established in the last rate case, minus Arizona's revenue responsibility.
- 12. SJNG is not requesting review of any changes in total revenue requirements, operating expenses, rate base or cost of capital established in the Rate Order. Rather, it seeks only to have its rates restructured so that it will be able to achieve the revenues that were authorized in that proceeding.
- 13. Attached hereto and made a part hereof is an Appendix containing Schedules 1 through 5. Revenue deficiency calculations and financial comparisons are set forth on Schedules 1 and 2. Return on equity comparisons are set forth on Schedule 3, and proposed rates are calculated and compared with existing rates on Schedules 4 and 5, respectively.

14. The Commission has utilized limited proceedings to "address a specific or significant change that would adversely affect the normal operating income of the utility and are usually narrow in scope." In re: Application for limited proceeding increase in rates in Escambia Cnty. by Peoples Water Serv. Co. of Fla., Order No. PSC-13-0647-PAA-EU (Docket No. 130155-WU; Dec. 5, 2013). More to the point, the Commission has employed the limited proceeding mechanism in section 366.076, Florida Statutes, to address a natural gas utility's shortfall in revenues due to a substantial reduction in sales to its largest industrial customer. In re: Petition of W. Fla. Natural Gas. Co. for a limited proceeding to restructure rates, Order No. 17664 (Docket No. 870277-GU; June 5, 1987). Here the reasons to use the limited proceeding mechanism are even more compelling since SJNG's industrial sales have not just been reduced, they have completely vanished due to the permanent loss of SJNG's only industrial customer. Moreover, SJNG believes that a limited proceeding using the Commission's proposed agency action procedures is the most efficient way to resolve the narrow issues presented and will benefit customers by avoiding the expense of a full and lengthy rate case.

WHEREFORE, SJNG respectfully requests that the Commission:

- (a) address the Petition on an expedited basis in a limited proceeding under section 366.076(1), Florida Statutes, using its proposed agency action procedures;
- (b) approve SJNG's restructured rates as set forth in the Petition and the Schedules appended hereto; and
 - (c) grant such other relief as the Commission deems appropriate.

Respectfully submitted this 12th day of February, 2016.

HOLLAND & KNIGHT LLP

D. BRUCE MAY, JR.

Florida Bar No. 354473

Email: bruce.may@hklaw.com TIFFANY A. RODDENBERRY

Florida Bar No. 092524

Email: tiffany.roddenberry@hklaw.com

HOLLAND & KNIGHT LLP

315 S. Calhoun Street, Suite 600

Tallahassee, Florida 32301 Telephone: (850) 224-7000 Facsimile: (850) 224-8832

Secondary Email: jennifer.gillis@hklaw.com

Attorneys for St. Joe Natural Gas Company, Inc.

ST JOE NATURAL GAS COMPANY REVENUE DEFICIENCY CALCULATION

SCHEDULE 1 PAGE 1 OF 1

				CURRENT
	LAST RATE CASE	12/31/08		REQUEST W/O
	FOR 7/17/08	LESS ARIZONA	DIFFERENCE	RATE RELIEF
Rate Base Average	\$3,024,657	\$3,016,808	(\$7,849)	\$3,016,808
RATE OF RETURN	5.440%	5.454%		5.454%
REQUIRED ROI	\$164,541	\$164,542		\$164,542
OPERATING REVENUES	\$1,616,809	\$1,331,798	(\$285,011)	\$1,331,798
OPERATING EXPENSES				
O&M EXPENSE	\$898,431	\$898,431	\$0	\$898,431
DEPRECIATION & AMORT	\$246,211	\$246,194	(\$17)	\$246,194
TAXES OTHER	\$60,804	\$59,281	(\$1,523)	\$59,281
INCOME TAXES	\$246,822	\$210,784	(\$36,038)	\$210,784
TOTAL OPERATING EXPENSE	\$1,452,268	\$1,414,690	(\$37,578)	\$1,414,690
ACHIEVED NOI	\$164,541	(\$82,893)	(\$247,433)	(\$82,893)
NOI DEFICIENCY	\$0	\$247,434	\$247,433	\$247,434

ST JOE NATURAL GAS COMPANY FINANCIAL COMPARISON AT 7/17/08 WITHOUT ARIZONA CHEMICAL

	DESCRIPTION	LAST RATE CASE FOR 7/17/08	LAST RATE CASE LESS ARIZONA	NOTE	REQUEST W/O RATE RELIEF
	DESCRIPTION	101/1/1/08	LESS ANIZONA	14012	VV/O NATE NEEDS
OPERAT	ING REVENUES				
	RES. / COMM.	\$1,331,798	\$1,331,798		\$1,331,798
	Arizona Chemical	\$285,011	\$0_		\$0
	TOTALS	\$1,616,809	\$1,331,798		\$1,331,798
OPERATI	ING EXPENSES				
O&M EX	PENSE				
	DISTRIBUTION	\$366,865	\$366,865		\$366,865
	CUSTOMER ACCOUNTS	\$151,616	\$151,616		\$151,616
	SALE5 EXPENSE	\$5,459	\$5,459		\$5,459
	A & G EXPENSE	\$374,491	\$374,491		\$374,491
	TOTALS	\$898,431	\$898,431		\$898,431
DEPRECIA	ATION & AMORTIZATION				
	TOTALS	\$246,211	\$246,194 < n	vote 1	\$246,194
TAXES O	THER THAN INCOME				
	TOTALS	\$60,804	\$59,281 < n	lote 2	\$59,281
TOTAL O	PERATING EXPENSES	\$1,205,446	\$1,203,906		\$1,203,906
NET OPE	RATING INCOME BIT	\$411,363	\$127,891		\$127,891
INCOME	TAXES	\$246,822	\$210,784 < n	lote 3	\$210,784
NOI		\$164,541	(\$82,893)		(\$82,893)
1.	Arizona Acct No. 385 Accu	m Depr. 2008		\$669	
	Arizona Acct No. 385 Accu	-		\$652	
	Less Arizona Retirement A	•	***************************************	\$17	
2.	Less Arizona Chemical - Ta	xes Other Than Income - Revenue	e	\$1,523	
3.	Less Arizona Chemical Inco		\$36,038		

ST JOE NATURAL GAS COMPANY REVENUE LOSS FY ENDING 12/31/15

SCHEDULE 2
PAGE 2 OF 2

ARIZONA CHEMICAL

LAST RATE CASE CURRENT FORCAST TOTAL \$285,011 \$0 \$285,011

ST JOE NATURAL GAS COMPANY RETURN ON EQUITY COMPARISONS

SCHEDULE 3

PAGE 1 OF 1

	LAST RATE CASE	CURRENT 2008	CURRENT REQUEST	CURRENT REQUEST
	07/17/08	FORCAST	W/O RATE RELIEF	W/ RATE RELIEF
EQUITY	\$2,179,903	\$2,179,903	\$2,179,903	\$2,179,903
NOI	\$164,542	(\$82,893)	(\$82,893)	\$164,542
INTEREST EXP	\$11,834	\$11,834	\$11,834	\$11,834
RETURN ON EQUITY	7.01%	-4.35%	-4.35%	7.01%

ST JOE NATURAL GAS COMPANY CALCULATION OF PROPOSED RATES 2008 Rate Case Data

SCHEDULE 4

PAGE 1 OF 3

	Total	RS1	RS2	RS3	GS1	GS2	GS/FTS4
PROPOSED TOTAL TARGET REVENUES	\$1,616,809	\$319,593	\$417,769	\$547,808	\$119,271	\$123,726	\$88,642
LESS OTHER OPERATING REVENUES	\$103,746	\$37,702	\$32,631	\$31,376	\$2,037	\$0	\$0
LESS: CUSTOMER CHARGE REVENUES							
PROPOSED CUSTOMER CHARGES		\$13	\$16	\$20	\$20	\$70	\$2,000
TIMES NUMBER OF BILLS	36,900	12,737	11,056	10,056	2,611	428	12
EQUALS CUSTOMER CHARGE REVENUE	\$649,777	\$165,581	\$176,896	\$201,120	\$52,220	\$29,960	\$24,000
LESS PER THERM TARGET REVENUES							
EQUALS PER THERM TARGET REVENUES	\$863,286	\$116,310	\$208,242	\$315,312	\$65,014	\$93,766	\$64,642
DIVIDED BY NUMBER OF THERMS	1,488,982	89,736	239,198	432,770	97,612	221,568	408,098
EQUALS PER THERM RATES		\$1.29614	\$0.87058	\$0.72859	\$0.66605	\$0.42319	\$0.15840
PER THERM RATE ROUNDED		\$1.29614	\$0.87058	\$0.72859	\$0.66605	\$0.42319	\$0.15840

Per-Therm Revenue (Rnded)

Calculation of Proposed Rates reflects all data as used in Company's last rate case including the loss Arizona Chemical revenues allocated to remaining customer classes.

		Total	RS1	RS2	RS3	GS1	GS2	GS/FTS4
Rever	nues	\$285,011	\$53,099	\$72,547	\$97,279	\$22,083	\$23,306	\$16,697
1	Gas Sales	\$1,228,052	\$228,792	\$312,590	\$419,153	\$95,151	\$100,420	\$71,945
	Other Operating Revenues	\$103,746	\$37,702	\$32,631	\$31,376	\$2,037	\$0	\$0
	Total	\$1,616,809	\$319,593	\$417,769	\$547,808	\$119,271	\$123,726	\$88,642
Exper	nses							
	PGA	\$0	\$0			\$0	\$0	\$0
	O&M Exp	\$898,432	\$194,663	\$260,823	\$312,197	\$31,837	\$65,975	\$32,937
	Depr Exp	\$246,210	\$45,097	\$36,537	\$54,729	\$62,519	\$28,823	\$18,505
	Amort Exp	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Taxes O/T Income - Fixed	\$52,719	\$9,762	\$12,534	\$16,332	\$3,863	\$5,100	\$5,128
2.	Taxes O/T Income - Revenue	\$8,085	\$1,506	\$2,058	\$2,759	\$626	\$662	\$474
	Total Exp Excl Income Tax	\$1,205,446	\$251,028	\$311,952	\$386,017	\$98,845	\$100,560	\$57,044
	Pre Tax NOI	\$411,363	\$68,565	\$105,817	\$161,791	\$20,426	\$23,166	\$31,598
3	Income Taxes	\$246,821	\$46,006	\$62,228	\$85,816	\$16,098	\$15,423	\$21,250
	NOI	\$164,542	\$22,559	\$43,589	\$75,975	\$4,328	\$7,743	\$10,348
4	Rate Base	\$3,024,657	\$554,918	\$717,693	\$939,445	\$221,993	\$292,679	\$297,929
	Rate of Return	5.44%	4.07%	6.07%	8.09%	1.95%	2.65%	3.47%
	Rate Base	\$3,024,657	\$554,918	\$717,693	\$939,445	\$221,993	\$292,679	\$297,929
	Less AC Retirement	(\$7,849)	(\$1,462)	(\$1,998)	(\$2,679)	(\$608)	(\$642)	(\$460)
5	Rate Base w/o AC	\$3,016,808	\$553,456	\$715,695	\$936,766	\$221,385	\$292,037	\$297,469
	Rate of Return	5.45%	4.08%	6.09%	8.11%	1.95%	2.65%	3.48%

Rate of return by Customer Reflects All Data Used in the Company's Last Rate Case Except for the Reduction of Arizona Chemical Revenues Allocated to remaining Customer Classes

1	Gas Sales - Arizona Chemical	\$285,011	Substracted from Gas Sales
2	Taxes O/T Income - Revenue	\$1,523	Regulatory Assessment Fee Arizona Chemical
3	Income Tax Allocated to Arizona Chemical	\$36,038	
4	Rate Base Before Retirement of Arizona Chemical Plant Items		
5	Rate Base After Retirement of Arizona Chemical Plant Items	\$7,848	

ST JOE NATURAL GAS COMPANY Allocation Method Revenue - Expenses - Income Tax - Rate Base

2008 Revenue Approach	TOTAL	RS-1	RS-2	RS-3	G\$-1	GS-2	FTS-4	FTS-5
Approved Revenue	\$1,513,062	\$228,791	\$312,591	\$419,153	\$95,151	\$100,420	\$71,945	\$285,011
Less Arizona	(\$285,011)							
Reveune w/o Arizona	\$1,228,051	\$228,791	\$312,591	\$419,153	\$95,151	\$100,420	\$71,945	
Percent Class Revenue/Total Rev	100.00%	18.63%	25.45%	34.13%	7.75%	8.18%	5.86%	
Arizona Revenue To Recover	\$285,011	\$53,099	\$72,547	\$97,279	\$22,083	\$23,306	\$16,697	
Revenue	\$1,513,062	\$281,890	\$385,138	\$516,432	\$117,234	\$123,726	\$88,642	
	\$285,011	\$53,099	\$72,547	\$97,279	\$22,083	\$23,306	\$16,697	
2008 Therm Sales	1,488,982	89,736	239,198	432,770	97,612	221,568	408,098	
		\$0.59173	\$0.30329	\$0.22478	\$0.22624	\$0.10518	\$0.04091	
Current Rates		\$0.70441	\$0.56729	\$0.50381	\$0.43981	\$0.31801	\$0.11749	
Proposed Rates		\$1.29614	\$0.87058	\$0.72859	\$0.66605	\$0.42319	\$0.15840	
2008 TOTAL APPROVED EXP	TOTAL	RS-1	RS-2	RS-3	GS-1	G\$-2	FTS-4	FTS-5
O&M Exp	\$898,431	\$157,850	\$210,527	\$244,755	\$16,527	\$49,817	\$21,361	\$197,594
Depr Exp	\$246,211	\$39,987	\$29,555	\$45,367	\$60,393	\$26,580	\$16,89 8	\$27,429
Amort Exp	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Taxes O/T Income - fixed	\$52,720	\$4,280	\$5,044	\$6,288	\$1,583	\$2,694	\$3, 4 04	\$29,427
Taxes O/T Income - Revenue	\$8,084	\$1,222	\$1,670	\$2,239	\$508	\$537	\$384	\$1,52
Total Exp Excl Income Tax	\$1,205,446	\$203,339	\$246,796	\$298,649	\$79,011	\$79,629	\$42,048	\$255,974
2008 APPROVED ARIZONA ONLY EXP	TOTAL	18.63%	25.45%	34.13%	7.75%	8.18%	5.86%	
O&M Exp	\$197,594	\$36,813	\$50,296	\$67,442	\$15,310	\$16,158	\$11,576	
Depr Exp	\$27,429	\$5,110	\$6,982	\$9,362	\$2,125	\$2,243	\$1,607	
Amort Exp	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Taxes O/T Income - Fixed	\$29,427	\$5,482	\$7,490	\$10,044	\$2,280	\$2,406	\$1,724	
Taxes O/T Income - Revenue	\$1,523	\$284	\$388	\$520	\$118	\$125	\$89	
Total Exp Excl Income Tax	\$255,973	\$47,689	\$65,156	\$87,368	\$19,833	\$20,931	\$14,996	
2008 ARIZONA REV ALLOCATED TO REMA	INING CLASSES							
D&M Exp	\$898,431	\$194,663	\$260,823	\$312,197	\$31,837	\$65,975	\$32,937	
De p r Exp	\$246,210	\$45,097	\$36,537	\$54,729	\$62,519	\$28,823	\$18,505	
Amort Exp	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Taxes O/T Income - Fixed	\$52,720	\$9,762	\$12,534	\$16,332	\$3,863	\$5,100	\$5,128	
Faxes O/T Income - Revenue	\$8,084	\$1,506	\$2,058	\$2,759	\$626	\$662	\$474	
Fotal Exp Excl Income Tax	\$1,205,445	\$251,028	\$311,952	\$386,017	\$98,845	\$100,560	\$57,044	
ncome Tax	TOTAL	18.63%	25.45%	34.13%	7.75%	8.18%	5.86%	
2008 Arizona Income Tax	\$36,038	\$6,714	\$9,173	\$12,300	\$2,792	\$2,947	\$2,111	
2008 Company Income Tax	\$246,822	\$39,292	\$53,055	\$73,516	\$13,306	\$12,476	\$19,139	
ncome Tax	\$246,822	\$46,006	\$62,228	\$85,816	\$16,098	\$15,423	\$21,250	
Rate Base	TOTAL	18.63%	25.45%	34,13%	7.75%	8.18%	5.86%	
			\$282,531	\$355,936	\$89,532	\$152,883	\$197,773	
	S1.709.587	3230.415	3404.33	3133.550				
1008 Company Rate Base 1008 Arizona Rate Base	\$1,709,587 \$1,709,587	\$236,415 \$318,503						
008 Company Rate Base		\$318,503 (\$1,462)	\$435,162 (\$1,998)	\$583,509	\$132,461 (\$608)	\$139,796 (\$642)	\$100,156	

ST JOE NATURAL GAS COMPANY

Monthly Bill Comparison Present and Proposed Rates

SCHEDULE 5

PAGE 1 OF 6

		0-149
	Rate Schedule	Residential (RS1)
	Present Rates	Proposed Rates
Customer Charge	\$13	\$13
Energy Charge	\$0.70441	\$1,29614
Gas Cost	\$0.55000	\$0.55000
Therm Usage Increment	8	8

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
0	\$13	\$13	\$13	\$13	0.00%	0.00%
8	\$18.64	\$23.04	\$23.37	\$27.77	25.40%	20.55%
16	\$24.27	\$33.07	\$33.74	\$42.54	39.01%	28.63%
24	\$29.91	\$43.11	\$44.11	\$57.31	47.49%	32.95%
32	\$35.54	\$53.14	\$54.48	\$72.08	53.28%	35.63%
40	\$41.18	\$63.18	\$64.85	\$86.85	57.48%	37.46%
48	\$46.81	\$73.21	\$75.21	\$101,61	60.67%	38.80%
56	\$52.45	\$83.25	\$85.58	\$116.38	63.18%	39.81%
64	\$58.08	\$93.28	\$95.95	\$131.15	65.20%	40.60%
72	\$63.72	\$103.32	\$106.32	\$145.92	66.86%	41.24%
80	\$69.3 5	\$113.35	\$116.69	\$160.69	68.26%	41.76%
88	\$74.99	\$123.39	\$127.06	\$175.46	69.44%	42.20%
96	\$80.62	\$133.42	\$137,43	\$190.23	70.46%	42,58%
104	\$86.26	\$143.46	\$147.80	\$205.00	71.34%	42.90%
112	\$91.89	\$153.49	\$158.17	\$219.77	72.12%	43.18%
120	\$97.53	\$163.53	\$168.54	\$234.54	72.81%	43.42%
128	\$103.16	\$173.56	\$178.91	\$249.31	73.42%	43.64%
136	\$108.80	\$183.60	\$189.27	\$264.07	73.97%	43.83%
144	\$114.44	\$193.64	\$199.64	\$278.84	74.46%	44.00%
150	\$118.66	\$201.16	\$207.42	\$289.92	74.80%	44.12%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 2 OF 6

		150-299
	Rate Schedule	Residential (RS2)
	Present Rates	Proposed Rates
Customer Charge	\$16	\$16
Energy Charge	\$0.56729	\$0.87058
Gas Cost	\$0.55000	\$0.55000
Therm Usage Increment	18	18

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
18	\$26.21	\$36.11	\$31.67	\$41.57	20.83%	15. 12 %
36	\$36.42	\$56.22	\$47.34	\$67.14	29.98%	19.42%
54	\$46.63	\$76.33	\$63.01	\$92.71	35.12%	21.46%
72	\$56.84	\$96.44	\$78.68	\$118.28	38.42%	22.64%
90	\$67.06	\$116.56	\$94.35	\$143.85	40.71%	23.42%
108	\$77.27	\$136.67	\$110.02	\$169.42	42.39%	23.97%
126	\$87.48	\$156.78	\$125.69	\$194.99	43.68%	24.38%
144	\$97.69	\$176.89	\$141.36	\$220.56	44.71%	24.69%
162	\$107.90	\$197.00	\$157.03	\$246.13	45.54%	24.94%
180	\$118,11	\$217.11	\$172.70	\$271.70	46,22%	25.14%
198	\$128.32	\$237.22	\$188.38	\$297.28	46.80%	25.31%
216	\$138.53	\$257.33	\$204.05	\$322.85	47.29%	25.46%
234	\$148.75	\$277.45	\$219.72	\$348.42	47.71%	25.58%
252	\$158.96	\$297.56	\$235.39	\$373.99	48.08%	25.69%
270	\$169.17	\$317.67	\$251.06	\$399.56	48.41%	25.78%
288	\$179.38	\$337.78	\$266.73	\$425.13	48.69%	25.86%
306	\$189.59	\$357.89	\$282.40	\$450.70	48.95%	25.93%
324	\$199.80	\$378.00	\$298.07	\$476.27	49.18%	26.00%
342	\$210.01	\$398.11	\$313.74	\$501.84	49.39%	26.05%
299	\$185.62	\$350.07	\$276.30	\$440.75	48.86%	25.90%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 3 OF 6

		GT 300
	Rate Schedule	Residential (RS3)
	Present Rates	Proposed Rates
Customer Charge	\$20	\$20
Energy Charge	\$0.50381	\$0.72859
Gas Cost	\$0.55000	\$0.55000
Therm Usage Increment	31	31

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
31	\$35.62	\$52.67	\$42.5 9	\$5 9 .64	19.56%	13.23%
62	\$51.24	\$85.34	\$65.17	\$99.27	27.20%	16.33%
93	\$66.85	\$118.00	\$87.76	\$138.91	31.27%	17.72%
124	\$82.47	\$150.67	\$110.35	\$178.55	33.80%	18.50%
155	\$98.09	\$183.34	\$132.93	\$218.18	35.52%	19.00%
186	\$113.71	\$216.01	\$155.52	\$257.82	36.77%	19.36%
217	\$129.33	\$248.68	\$178.10	\$297.45	3 7 .72%	19.61%
248	\$144.94	\$281.34	\$200.69	\$337.09	38.46%	19.81%
279	\$160.56	\$314.01	\$223.28	\$3 7 6.73	39.06%	19.97%
310	\$176.18	\$346.68	\$245.86	\$416.36	39,55%	20,10%
341	\$191.80	\$379.35	\$268.45	\$456.00	39.96%	20.21%
372	\$207.42	\$412.02	\$291.04	\$495.64	40.31%	20.29%
403	\$223.04	\$444.69	\$313.62	\$535.27	40.62%	20.37%
434	\$238.65	\$477.35	\$336.21	\$574.91	40.88%	20.44%
465	\$254.27	\$510.02	\$358.79	\$614.54	41.11%	20.49%
496	\$269.89	\$542.69	\$381.38	\$654.18	41.31%	20.54%
527	\$285.51	\$575.36	\$403.97	\$693.82	41.49%	20.59%
558	\$301.13	\$608.03	\$426.55	\$733.45	41.65%	20.63%
589	\$316.74	\$640.69	\$449.14	\$773.09	41.80%	20.66%
600	\$322.29	\$652.29	\$457.15	\$787.15	41.85%	20.68%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 4 OF 6

		0 - 2,000		
	Rate Schedule	Commercial (GS1)		
	Present Rates	Proposed Rates		
Customer Charge	\$20	\$20		
Energy Charge	\$0.43981	\$0.66605		
Gas Cost	\$0.55000	\$0.55000		
Therm Usage Increment	34	34		

Therm Usage	Present Mthly Bill W/O Fuel	Present Mthly Bill With Fuel	Proposed Mthly Bill W/O Fuel	Proposed Mthly Bill With Fuel	% Incresae W/O Fuel	% Increase With Fuel
34	\$34.95	\$53.65	\$42.65	\$61.35	22.01%	14.34%
68	\$49.91	\$87.31	\$65.29	\$102.69	30.83%	17.62%
102	\$64.86	\$120.96	\$87.94	\$144.04	35.58%	19.08%
	•	•	•	•		
136	\$79.81	\$154.61	\$110.58	\$185.38	38.55%	19.90%
170	\$94.77	\$188.27	\$133.23	\$226.73	40.58%	20.43%
204	\$109.72	\$221.92	\$155.87	\$268.07	42.06%	20.80%
238	\$124.67	\$255.57	\$178.52	\$309.42	43.19%	21.07%
27 2	\$139.63	\$289.23	\$201.16	\$350.76	44.07%	21.28%
306	\$154.58	\$322.88	\$223.81	\$392.11	44.78%	21.44%
340	\$169.54	\$356.54	\$246.46	\$433.46	45.37%	21.57%
374	\$184.49	\$390.19	\$269.10	\$474.80	45.86%	21.68%
408	\$199.44	\$423.84	\$291.75	\$516.15	46.28%	21.78%
442	\$214.40	\$457.50	\$314.39	\$557.49	46.64%	21.86%
476	\$229.35	\$491.15	\$337.04	\$598.84	46.95%	21.93%
510	\$244.30	\$524.80	\$359.68	\$640.18	47.23%	21.99%
544	\$259.26	\$558.46	\$382.33	\$681.53	47.47%	22.04%
5 78	\$274.21	\$592.11	\$ 40 4. 9 7	\$722.87	47.69%	22.08%
612	\$289.16	\$625.76	\$427.62	\$764.22	47.88%	22.13%
646	\$304.12	\$659.42	\$450.27	\$805.57	48.06%	22.16%
680	\$319.07	\$693.07	\$472.91	\$846.91	48.22%	22.20%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 5 OF 6

		2,000 - 87,500		
	Rate Schedule	Commercial (GS2)		
	Present Rates	Proposed Rates		
Customer Charge	\$70	\$70		
Energy Charge	\$0.31801	\$0.42319		
Gas Cost	\$0.55000	\$0.55000		
Therm Usage Increment	481	481		

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
481	\$222.96	\$487.51	\$273.56	\$538.11	22.69%	10.38%
962	\$375.93	\$905.03	\$477.11	\$1,006.21	26.92%	11.18%
1,443	\$528.89	\$1,322.54	\$680.67	\$1,474.32	28.70%	11.48%
1,924	\$681.85	\$1,740.05	\$884.22	\$1,942.42	29,68%	11.63%
2,405	\$834.81	\$2,157.56	\$1,087.78	\$2,410.53	30.30%	11.72%
2,886	\$987.78	\$2,575.08	\$1,291.33	\$2,878.63	30.73%	11.79%
3,367	\$1,140.74	\$2,992.59	\$1,494.89	\$3,346.74	31.05%	11.83%
3,848	\$1,293.70	\$3,410.10	\$1,698.44	\$3,814.84	31.29%	11.87%
4,329	\$1,446.67	\$3,827.62	\$1,902.00	\$4,282.95	31.47%	11.90%
4,810	\$1,599.63	\$4,245.13	\$2,105.56	\$4,751.06	31.63%	11.92%
5,291	\$1,752.59	\$4,662.64	\$2,309.11	\$5,219.16	31.75%	11.94%
5,772	\$1,905.55	\$5,080.15	\$2,512.67	\$5,687.27	31.86%	11.95%
6,253	\$2,058.52	\$5,497.67	\$2,716.22	\$6,155.37	31.95%	11.96%
6,734	\$2,211.48	\$5,915.18	\$2,919.78	\$6,623.48	32.03%	11.97%
7,215	\$2,364.44	\$6,332.69	\$3,123.33	\$7,091.58	32.10%	11.98%
7,696	\$2,517.40	\$6,750.20	\$3,326.89	\$7,559.69	32.16%	11.99%
8,177	\$2,670.37	\$7,167.72	\$3,530.44	\$8,027.79	32,21%	12.00%
8,658	\$2,823.33	\$7,585.23	\$3,734.00	\$8,495.90	32.26%	12.01%
9,139	\$2,976.29	\$8,002.74	\$3,937.55	\$8,964.00	32.30%	12.01%
9,620	\$3,129.26	\$8,420.26	\$4,141.11	\$9,432,11	32.34%	12.02%

ST JOE NATURAL GAS COMPANY SCH Monthly Bill Comparison Present and Proposed Rates

SCHEDULE 5

PAGE 6 OF 6

	Rate Schedule	87,500 - 1,000,000 GS/FTS4		
	Present Rates	Proposed Rates		
Customer Charge	\$2,000	\$2,000		
Energy Charge	\$0.11749	\$0.15840		
Gas Cost	\$0.55000	\$0.55000		
Therm Usage Increment	31,000	31,000		

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
31,000	\$5,642.19	\$22,692.19	\$6,910.37	\$23,960.37	22.48%	5.59%
62,000	\$9,284.38	\$43,384.38	\$11,820.73	\$45,920.73	27.32%	5.85%
93,000	\$12,926.57	\$64,076.57	\$16,731.10	\$67,881.10	29.43%	5.94%
124,000	\$16,568.76	\$84,768.76	\$21,641.47	\$89,841.47	30.62%	5,98%
155,000	\$20,210.95	\$105,460.95	\$26,551.83	\$111,801.83	31.37%	6.01%
186,000	\$23,853.14	\$126,153.14	\$31,462.20	\$133,762.20	31.90%	6.03%
217,000	\$27,495.33	\$146,845.33	\$36,372.57	\$155,722.57	32.29%	6.05%
248,000	\$31,137.52	\$167,537.52	\$41,282.93	\$177,682.93	32.58%	6.06%
279,000	\$34,779.71	\$188,229.71	\$46,193.30	\$199,643.30	32.82%	6.06%
310,000	\$38,421.90	\$208,921.90	\$51,103.67	\$221,603.67	33.01%	6.07%
341,000	\$42,064.09	\$229,614.09	\$56,014.03	\$243,564.03	33.16%	6.08%
372,000	\$45,706.28	\$250,306.28	\$60,924.40	\$265,524.40	33.30%	6.08%
403,000	\$49,348.47	\$270,998.47	\$65,834.77	\$287,484.77	33.41%	6.08%
434,000	\$52,990.66	\$291,690.66	\$70,745.13	\$309,445.13	33.50%	6.09%
465,000	\$56,632.85	\$312,382.85	\$75,655.50	\$331,405.50	33.59%	6.09%
496,000	\$60,275.04	\$333,075.04	\$80,565.87	\$353,365.87	33.66%	6.09%
527,000	\$63,917.23	\$353,767.23	\$85,476.23	\$375,326.23	33.73%	6.09%
558,000	\$67,559.42	\$374,459.42	\$90,386.60	\$397,286.60	33.79%	6.10%
589,000	\$71,201.61	\$395,151.61	\$95,296.97	\$419,246.97	33.84%	6.10%
620,000	\$74,843.80	\$415,843.80	\$100,207.33	\$441,207.33	33.89%	6.10%

ST JOE NATURAL GAS COMPANY REVENUE DEFICIENCY CALCULATION

				CURRENT
	LAST RATE CASE	12/31/08		REQUEST W/O
	FOR 7/17/08	LESS ARIZONA	DIFFERENCE	RATE RELIEF
Rate Base Average	\$3,024,657	\$3,016,808	(\$7,849)	\$3,016,808
RATE OF RETURN	5.440%	5.454%	5.454%	5.454%
REQUIRED ROI	\$164,541	\$164,542	(\$428)	\$164,542
OPERATING REVENUES	\$1,616,809	\$1,331,798	(\$285,011)	\$1,331,798
OPERATING EXPENSES				
O&M EXPENSE	\$898,431	\$898,431	\$0	\$898,431
DEPRECIATION & AMORT	\$246,211	\$246,194	(\$17)	\$246,194
TAXES OTHER	\$60,804	\$59,281	(\$1,523)	\$59,281
INCOME TAXES	\$246,822	\$210,784	(\$36,038)	\$210,784
TOTAL OPERATING EXPENSE	\$1,452,268	\$1,414,690	(\$37,578)	\$1,414,690
ACHIEVED NO!	\$164,541	(\$82,893)	(\$247,433)	(\$82,893)
NOI DEFICIENCY	\$0	\$247,434	\$247,005	\$247,434

ST JOE NATURAL GAS COMPANY FINANCIAL COMPARISON AT 7/17/08 WITHOUT ARIZONA CHEMICAL

	DESCRIPTION	LAST RATE CASE FOR 7/17/08	LAST RATE CASE LESS ARIZONA	NOTE	REQUEST W/O RATE RELIEF
OPERAT	ING REVENUES				
	RES. / COMM.	\$1,331,798	\$1,331,798		\$1,331,798
	Arizona Chemical	\$285,011	\$0		\$0
	TOTALS	\$1,616,809	\$1,331,798		\$1,331,798
OPERAT	ING EXPENSES				
O&M EX	(PENSE				
	DISTRIBUTION	\$366,865	\$366,865		\$366,865
	CUSTOMER ACCOUNTS	\$151,616	\$151,616		\$151,616
	SALES EXPENSE	\$5,459	\$5,459		\$5,459
	A & G EXPENSE	\$374,491	\$374,491		\$374,491
	TOTALS	\$898,431	\$898,431		\$898,431
DEPRECI	IATION & AMORTIZATION				
	TOTALS	\$246,211	\$246,194 < 0	Note 1	\$246,194
TAXES O	THER THAN INCOME				
	TOTALS	\$60,804	\$59,281 < 1	Vote 2	\$59,281
TOTAL`O	PERATING EXPENSES	\$1,205,446	\$1,203,906		\$1,203,906
NET OPE	RATING INCOME BIT	\$411,363	\$127,891		\$127,891
INCOME	TAXES	\$246,822	\$210,784 < n	Note 3	\$210,784
NOI		\$164,541	(\$82,893)		(\$82,893)
1.	Arizona Acct No. 385 Accur Arizona Acct No. 385 Accur Less Arizona Retirement Ac	n Depr 2010		\$669 \$652 \$17	
2.	Less Arizona Chemical - Tax	kes Other Than Income - Revenu	ie	\$1,523	
3.	Less Arizona Chemical Inco	me Tax		\$36,038	

ST JOE NATURAL GAS COMPANY REVENUE LOSS FY ENDING 12/31/15

SCHEDULE 2
PAGE 2 OF 2

ARIZONA CHEMICAL

LAST RATE CASE CURRENT FORCAST TOTAL \$285,011 \$0 \$285,011

ST JOE NATURAL GAS COMPANY RETURN ON EQUITY COMPARISONS

SCHEDULE 3

PAGE 1 OF 1

	LAST RATE CASE	CURRENT 2008	CURRENT REQUEST	CURRENT REQUEST
	07/17/08	FORCAST	W/O RATE RELIEF	W/ RATE RELIEF
EQUITY	\$2,179,903	\$2,179,903	\$2,179,903	\$2,179,903
NOI	\$164,542	(\$82,893)	(\$82,893)	\$164,542
INTEREST EXP	\$11,834	\$11,834	\$11,834	\$11,834
RETURN ON EQUITY	7.01%	-4.35%	-4.35%	7.01%

ST JOE NATURAL GAS COMPANY CALCULATION OF PROPOSED RATES 2008 Rate Case Data

SCHEDULE 4

PAGE 1 OF 3

	Total	RS1	RS2	RS3	GS1	GS2	GS/FTS4
PROPOSED TOTAL TARGET REVENUES	\$1,616,809	\$319,593	\$417,769	\$547,808	\$119,271	\$123,726	\$88,642
LESS OTHER OPERATING REVENUES	\$103,746	\$37,702	\$32,631	\$31,376	\$2,037	\$0	\$0
LESS: CUSTOMER CHARGE REVENUES							
PROPOSED CUSTOMER CHARGES		\$13	\$16	\$20	\$20	\$70	\$2,000
TIMES NUMBER OF BILLS	36,900	12,737	11,056	10,056	2,611	428	12
EQUALS CUSTOMER CHARGE REVENUE	\$649,777	\$165,58 1	\$176,896	\$201,120	\$52,220	\$29,960	\$24,000
LESS PER THERM TARGET REVENUES							
EQUALS PER THERM TARGET REVENUES	\$863,286	\$116,310	\$208,242	\$315,312	\$65,014	\$93,766	\$64,642
DIVIDED BY NUMBER OF THERMS	1,488,982	89,736	239,198	432,770	97,612	221,568	408,098
EQUALS PER THERM RATES		\$1.29614	\$0.87058	\$0.7285 9	\$0.66605	\$0.42319	\$0.15840
PER THERM RATE ROUNDED		\$1.29614	\$0.87058	\$0.72859	\$0.66605	\$0.42319	\$0.15840

Per-Therm Revenue (Rnded)

Calculation of Proposed Rates reflects all data as used in Company's last rate case including the loss Arizona Chemical revenues allocated to remaining customer classes.

PAGE 2 OF 3

		Total	RS1	RS2	RS3	G\$1	GS2	GS/FTS4
Rever	nues	\$285,011	\$53,099	\$72,547	\$97,279	\$22,083	\$23,306	\$16,697
1	Gas Sales	\$1,228,052	\$228,792	\$312,590	\$419,153	\$95,151	\$100,420	\$71,945
	Other Operating Revenues	\$103,746	\$37,702	\$32,631	\$31,376	\$2,037	\$0	\$0
	Total	\$1,616,809	\$319,593	\$417,769	\$547,808	\$119,271	\$123,726	\$88,642
Expen	ses							
	PGA	\$0	\$0			\$0	\$0	\$0
	O&M Exp	\$898,432	\$194,663	\$260,823	\$312,197	\$31,837	\$65,975	\$32,937
	Depr Exp	\$246,210	\$45,097	\$36,537	\$54,729	\$62,519	\$28,823	\$18,505
	Amort Exp	\$0	\$0	\$0	\$0	\$0	\$0	\$0
	Taxes O/T Income - Fixed	\$52,719	\$9,762	\$12,534	\$16,332	\$3,863	\$5,100	\$5,128
2	Taxes O/T Income - Revenue	\$8,085	\$1,506	\$2,058	\$2,759	\$626	\$662	\$474
	Total Exp Excl Income Tax	\$1,205,446	\$251,028	\$311,952	\$386,017	\$98,845	\$100,560	\$57,044
	Pre Tax NOI	\$411,363	\$68,565	\$105,817	\$161,791	\$20,426	\$23,166	\$31,598
3	Income Taxes	\$246,821	\$46,006	\$62,228	\$85,816	\$16,098	\$15,423	\$21,250
	NOI	\$164,542	\$22,559	\$43,589	\$75,975	\$4,328	\$7,743	\$10,348
4	Rate Base	\$3,024,657	\$554,918	\$717,693	\$939,445	\$221,993	\$292,679	\$297,929
	Rate of Return	5.44%	4.07%	6.07%	8.09%	1.95%	2.65%	3.47%
	Rate Base	\$3,024,657	\$554,918	\$717,693	\$939,445	\$221,993	\$292,679	\$297,929
	Less AC Retirement	(\$7,849)	(\$1,462)	(\$1,998)	(\$2,679)	(\$608)	(\$642)	(\$460)
5	Rate Base w/o AC	\$3,016,808	\$553,456	\$715,695	\$936,766	\$221,385	\$292,037	\$297,469
	Rate of Return	5.45%	4.08%	6.09%	8.11%	1.95%	2.65%	3.48%

Rate of return by Customer Reflects All Data Used in the Company's Last Rate Case Except for the Reduction of Arizona Chemical Revenues Allocated to remaining Customer Classes

1 Gas Sales - Arizona Chemical \$285,011 Substracted from Gas Sales
2 Taxes O/T Income - Revenue \$1,523 Regulatory Assessment Fee Arizona Chemical
3 Income Tax Allocated to Arizona Chemical \$36,038
4 Rate Base Before Retirement of Arizona Chemical Plant Items
5 Rate Base After Retirement of Arizona Chemical Plant Items \$7,848

ST JOE NATURAL GAS COMPANY Allocation Method Revenue - Expenses - Income Tax - Rate Base

PAGE 3 OF 3

TOTAL	RS-1	RS-2	RS-3	GS-1	GS-2	FTS-4	FTS-5
\$1,513,062	\$228,791	\$312,591	\$419,153	\$95,151	\$100,420	\$71,945	\$285,011
(\$285,011)							
\$1,228,051	\$228,791	\$312,591	\$419,153	\$95,151	\$100,420	\$71,945	
100.00%	18.63%	25.45%	34.13%	7.75%	8.18%	5.86%	
\$285,011	\$53,099	\$72,547	\$97,279	\$22,083	\$23,306	\$16,697	
\$1,513,062	\$281,890	\$385,138	\$516,432	\$117,234	\$123,726	\$88,642	
\$285,011	\$53,099	\$72,547	\$97,279	\$22,083	\$23,306	\$16,697	
1,488,982	89,736	239,198	432,770	97,612	221,568	408,098	
-	\$0.59173	\$0.30329	\$0.22478	\$0.22624	\$0.10518	\$0.04091	
	\$0.70441	\$0.56729	\$0.50381	\$0.43981	\$0.31801	\$0.11749	
-	\$1.29614	\$0.87058	\$0.72859	\$0.66605	\$0.42319	\$0.15840	
TOTAL	RS-1	RS-2	RS-3	GS-1	G\$-2	FTS-4	FTS-5
\$898,431	\$157,850	\$210,527	\$244,755	\$16,527	\$49,817	\$21,361	\$197,594
\$246,211	\$39,987	\$29,555	\$45,367	\$60,393	\$26,580	\$16,898	\$27,429
\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
\$52,720	\$4,280	\$5,044	\$6,288	\$1,583	\$2,694	\$3,404	\$29,427
\$8,084	\$1,222	\$1,670	\$2,239	\$508	\$537	\$384	\$1,523
\$1,205,446	\$203,339	\$246,796	\$298,649	\$79,011	\$79,629	\$42,048	\$255,974
TOTAL	18.63%	25.45%	34.13%	7,75%	8.18%	5.86%	
\$197,594	\$36,813	\$50,296	\$67,442	\$15,310	\$16,158	\$11,576	
\$27,429	\$5,110	\$6,982	\$9,362	\$2,125	\$2,243	\$1,607	
\$0	\$0	\$0	\$0	\$0	\$0	\$0	
\$29,427	\$5,482	\$7,490	\$10,044	\$2,280	\$2,406	\$1,724	
\$1,523	\$284	\$388	\$520	\$118	\$125	\$89	
\$255,973	\$47,689	\$65,156	\$87,368	\$19,833	\$20,931	\$14,996	
INING CLASSES							
\$898,431	\$194,663	\$260,823	\$312,197	\$31.837	\$65. 9 75	\$32,937	
\$246,210	\$45.097	\$36.537			\$28.823	\$18,505	
\$0	\$0	\$0	\$0		\$0	\$0	
\$52,720	\$9,762	\$12,534	\$16,332		\$5,100	\$5,128	
			,		•	\$474	
\$8,084	\$1.506	\$2.058	\$2.759	\$626	\$662	34/4	
\$8,084 \$1,205,445	\$1,506 \$251,028	\$2,058 \$311,952	\$2,759 \$386,017	\$98,845	\$100,560	\$57,044	
		\$311,952	\$386,017	\$98,845			
\$1,205,445	\$251,028 18.63%	\$311,952 25.45%	\$386,017 3 4.13%	\$98,845 7.75%	\$100,560 8.18%	\$57,044	
\$1,205,445 TOTAL \$36,038	\$251,028 18.63% \$6,714	\$311,952 25.45% \$9,173	\$386,017 34.13% \$12,300	\$98,845 7.75% \$2,792	\$100,560 8.18% \$2,947	\$57,044 5.86% \$2,111	
\$1,205,445 TOTAL	\$251,028 18.63%	\$311,952 25.45%	\$386,017 3 4.13%	\$98,845 7.75%	\$100,560 8.18%	\$57,044 5.86%	
\$1,205,445 TOTAL \$35,038 \$245,822 \$246,822	\$251,028 18.63% \$6,714 \$39,292 \$46,006	\$311,952 25.45% \$9,173 \$53,055 \$62,228	\$386,017 34.13% \$12,300 \$73,516 \$85,816	\$98,845 7.75% \$2,792 \$13,306 \$16,098	\$100,560 8.18% \$2,947 \$12,476 \$15,423	\$57,044 5.86% \$2,111 \$19,139 \$21,250	
\$1,205,445 TOTAL \$36,038 \$246,822 \$246,822 TOTAL	\$251,028 18.63% \$6,714 \$39,292 \$46,006	\$311,952 25.45% \$9,173 \$53,055 \$62,228 25.45%	\$386,017 34.13% \$12,300 \$73,516 \$85,816 34.13%	\$98,845 7.75% \$2,792 \$13,306 \$16,098	\$100,560 8.18% \$2,947 \$12,476 \$15,423 8.18%	\$57,044 5.86% \$2,111 \$19,139 \$21,250 5.86%	
\$1,205,445 TOTAL \$36,038 \$246,822 \$246,822 TOTAL \$1,709,587	\$251,028 18.63% \$6,714 \$39,292 \$46,006 18.63% \$236,415	\$311,952 25.45% \$9,173 \$53,055 \$62,228 25.45% \$282,531	\$386,017 34.13% \$12,300 \$73,516 \$85,816 34.13% \$355,936	\$98,845 7.75% \$2,792 \$13,306 \$16,098 7.75% \$89,532	\$100,560 8.18% \$2,947 \$12,476 \$15,423 8.18% \$152,883	\$57,044 5.86% \$2,111 \$19,139 \$21,250 5.86% \$197,773	
\$1,205,445 TOTAL \$36,038 \$246,822 \$246,822 TOTAL	\$251,028 18.63% \$6,714 \$39,292 \$46,006	\$311,952 25.45% \$9,173 \$53,055 \$62,228 25.45%	\$386,017 34.13% \$12,300 \$73,516 \$85,816 34.13%	\$98,845 7.75% \$2,792 \$13,306 \$16,098 7.75% \$89,532	\$100,560 8.18% \$2,947 \$12,476 \$15,423 8.18%	\$57,044 5.86% \$2,111 \$19,139 \$21,250 5.86%	
	\$1,513,062 (\$285,011) \$1,228,051 100.00% \$285,011 \$1,513,062 \$285,011 1,488,982 	\$1,513,062	\$1,513,062 \$228,791 \$312,591 \$1,228,051 \$228,791 \$312,591 100.00% 18.63% 25.45% \$285,011 \$53,099 \$72,547 \$1,513,062 \$281,890 \$385,138 \$285,011 \$53,099 \$72,547 1,488,982 89,736 239,198 \$0,59173 \$0,30329 \$0,70441 \$0,56729 \$1,29614 \$0.87058 TOTAL RS-1 RS-2 \$898,431 \$157,850 \$210,527 \$246,211 \$39,987 \$29,555 \$0 \$0 \$0 \$52,720 \$4,280 \$5,044 \$8,084 \$1,222 \$1,670 \$1,205,446 \$203,339 \$246,796 TOTAL 18.63% 25,45% \$197,594 \$36,813 \$50,296 \$27,429 \$5,110 \$6,982 \$0 \$0 \$0 \$29,427 \$5,482 \$7,490 \$1,523 \$284 \$388 \$255,973 \$47,689 \$65,156 INING CLASSES \$898,431 \$194,663 \$260,823 \$246,210 \$45,097 \$36,537 \$0 \$0 \$0 \$0 \$0 \$36,233	\$1,513,062	\$1,513,062	\$1,513,062	\$1,513,062 \$228,791 \$312,591 \$419,153 \$95,151 \$100,420 \$71,945 \$285,011 \$1,228,051 \$228,791 \$312,591 \$419,153 \$95,151 \$100,420 \$71,945 \$100,00% \$18.63% \$25,45% \$34.13% \$7.75% \$8.18% \$5.86% \$285,011 \$53,099 \$72,547 \$97,279 \$22,083 \$23,306 \$16,697 \$1,513,062 \$281,890 \$385,138 \$516,432 \$117,234 \$123,726 \$88,642 \$285,011 \$53,099 \$72,547 \$97,279 \$22,083 \$23,306 \$16,697 \$1,513,062 \$281,890 \$385,138 \$516,432 \$117,234 \$123,726 \$88,642 \$1,488,982 \$89,736 \$239,198 \$432,770 \$97,612 \$221,568 \$408,098 \$0.59173 \$0.30329 \$0.22478 \$0.22624 \$0.10518 \$0.04091 \$0.59173 \$0.30329 \$0.22478 \$0.22624 \$0.10518 \$0.04091 \$0.59144 \$0.56729 \$0.50381 \$0.43981 \$0.31801 \$0.11749 \$1.29614 \$0.87058 \$0.72859 \$0.66605 \$0.42319 \$0.115840 \$0.10518 \$0.20471 \$0.20411 \$0.20512 \$244,755 \$16,527 \$49,817 \$21,361 \$246,211 \$39,987 \$29,555 \$45,367 \$60,393 \$26,580 \$16,898 \$0.552,720 \$4,280 \$5,044 \$6,288 \$1,583 \$2,694 \$3,404 \$8,084 \$1,222 \$1,670 \$2,239 \$508 \$537 \$384 \$1,205,446 \$203,339 \$246,796 \$298,649 \$79,011 \$79,629 \$42,048 \$1.205,446 \$203,339 \$246,796 \$298,649 \$79,011 \$79,629 \$42,048 \$1.57,549 \$36,813 \$50,296 \$67,442 \$15,310 \$16,158 \$11,576 \$27,429 \$5,110 \$6,982 \$9,362 \$2,125 \$2,243 \$1,607 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50 \$0.50

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 1 OF 6

		0-149
	Rate Schedule	Residential (RS1)
	Present Rates	Proposed Rates
Customer Charge	\$13	\$13
Energy Charge	\$0.70441	\$1.29614
Gas Cost	\$0.55000	\$0.55000
Therm Usage Increment	8	8

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
. 0	\$13	\$13	\$13	\$13	0.00%	0.00%
8	\$18.64	\$23.04	\$23.37	\$27.77	25.40%	20.55%
16	\$24.27	\$33.07	\$33.74	\$42.54	39.01%	28.63%
24	\$29.91	\$43.11	\$44.11	\$57.31	47.49%	32.95%
32	\$35.54	\$53.14	\$54.48	\$72.08	53.28%	35.63%
40	\$41.18	\$63.18	\$64.85	\$86.85	57.48%	37.46%
48	\$46.81	\$73.21	\$75.21	\$101.61	60.67%	38.80%
56	\$52.45	\$83.25	\$85.58	\$116.38	63.18%	39.81%
64	\$58.08	\$93.28	\$95.95	\$131.15	65.20%	40.60%
72	\$63.72	\$103.32	\$106.32	\$145.92	66.86%	41.24%
80	\$69.35	\$113.35	\$116.69	\$160.69	68.26%	41.76%
88	\$74.99	\$123.39	\$127.06	\$175.46	69.44%	42.20%
96	\$80.62	\$133.42	\$137,43	\$190.23	70.46%	42.58%
104	\$86.26	\$143.46	\$147.80	\$205.00	71.34%	42.90%
112	\$91.89	\$153.49	\$158.17	\$219.77	72.12%	43.18%
120	\$97.53	\$163.53	\$168.54	\$234.54	72.81%	43.42%
128	\$103.16	\$173.56	\$178.91	\$249.31	73.42%	43.64%
136	\$108.80	\$183.60	\$189.27	\$264.07	73.97%	43.83%
144	\$114.44	\$193.64	\$199.64	\$278.84	74.46%	44.00%
150	\$118.66	\$201.16	\$207.42	\$289.92	74.80%	44.12%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 2 OF 6

		150-299
	Rate Schedule	Residential (RS2)
	Present Rates	Proposed Rates
Customer Charge	\$16	\$16
Energy Charge	\$0.56729	\$0.87058
Gas Cost	\$0.55000	\$0.55000
Therm Usage Increment	18	18

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
18	\$26.21	\$36.11	\$31.67	\$41.57	20.83%	15.12%
36	\$36.42	\$56.22	\$47.34	\$67.14	29.98%	19.42%
54	\$46.63	\$76.33	\$63.01	\$92.71	35.12%	21.46%
72	\$56.84	\$96.44	\$78.68	\$118.28	38.42%	22.64%
90	\$67.06	\$116.56	\$94.35	\$143.85	40.71%	23.42%
108	\$77.27	\$136.67	\$110.02	\$169.42	42.39%	23.97%
126	\$87.48	\$156.78	\$125.69	\$194.99	43.68%	24.38%
144	\$97.69	\$176.89	\$141.36	\$220.56	44.71%	24.69%
162	\$107.90	\$197.00	\$157.03	\$246.13	45.54%	24.94%
180	\$118,11	\$217.11	\$172.70	\$271.70	46.22%	25.14%
198	\$128.32	\$237.22	\$188.38	\$297.28	46.80%	25.31%
216	\$138.53	\$257.33	\$204.05	\$322.85	47.29%	25.46%
234	\$148.75	\$277.45	\$219.72	\$348.42	47.71%	25.58%
252	\$158.96	\$297.56	\$235.39	\$373.99	48.08%	25.69%
270	\$169.17	\$317.67	\$251.06	\$399.56	48.41%	25.78%
288	\$179.38	\$337.78	\$266.73	\$425.13	48.69%	25.86%
306	\$189.59	\$357.89	\$282.40	\$450.70	48.95%	25.93%
324	\$199.80	\$378.00	\$298.07	\$476.27	49.18%	26.00%
342	\$210.01	\$398.11	\$313.74	\$501.84	49.39%	26.05%
299	\$185.62	\$350.07	\$276.30	\$440.75	48.86%	25.90%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 3 OF 6

	Rate Schedule	GT 300 Residential (RS3)
	Present Rates	Proposed Rates
Customer Charge	\$20	\$20
Energy Charge	\$0.50381	\$0.72859
Gas Cost	\$0.55000	\$0.55000
Therm Usage Increment	31	31

Therm Usage	Present Mthly Bill W/O Fuel	Present Mthly Bill With Fuel	Proposed Mthly Bill W/O Fuel	Proposed Mthly Bill With Fuel	% Incresae W/O Fuel	% Increase With Fuel
31	\$35.62	\$52.67	\$42.59	\$59.64	19.56%	13.23%
62	\$51.24	\$85.34	\$65.17	\$99.27	27.20%	16.33%
93	\$66.85	\$118.00	\$87.76	\$138.91	31.27%	17.72%
124	\$82.47	\$150.67	\$110.35	\$178.55	33.80%	18.50%
15 5	\$98.09	\$183.34	\$132.93	\$218.18	35,52%	19.00%
186	\$113.71	\$216.01	\$155.52	\$257.82	36.77%	19.36%
217	\$129.33	\$248.68	\$178.10	\$297.45	37.72%	19.61%
248	\$144.94	\$281,34	\$200.69	\$337.09	38.46%	19.81%
279	\$160.56	\$314.01	\$223.28	\$376.73	39.06%	19.97%
310	\$176.18	\$346.68	\$245.86	\$416.36	39.55%	20.10%
341	\$191.80	\$379.35	\$268.45	\$456.00	39.96%	20.21%
372	\$207.42	\$412.02	\$291.04	\$495.64	40.31%	20.29%
403	\$223.04	\$444.69	\$313.62	\$535.27	40.62%	20.37%
434	\$238.65	\$477.35	\$336.21	\$574.91	40.88%	20.44%
465	\$254.27	\$510.02	\$358.79	\$614.54	41.11%	20.49%
496	\$269.89	\$542.69	\$381.38	\$654.18	41.31%	20.54%
527	\$285.51	\$575.36	\$403.97	\$693.82	41.49%	20.59%
558	\$301.13	\$608.03	\$426.55	\$733.45	41.65%	20.63%
589	\$316.74	\$640.69	\$449.14	\$773.09	41.80%	20.66%
600	\$322.29	\$652.29	\$457.15	\$787.15	41.85%	20.68%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 4 OF 6

		0 - 2,000
	Rate Schedule	Commercial (GS1)
	Present Rates	Proposed Rates
Customer Charge	\$20	\$20
Energy Charge	\$0.43981	\$0.66605
Gas Cost	\$0.55000	\$0.55000
Therm Usage Increment	34	34

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
34	\$34.9 5	\$53.65	\$42.65	\$61.35	22.01%	14.34%
68	\$49.91	\$87.31	\$65.29	\$102.69	30.83%	17.62%
102	\$64.86	\$120.96	\$87.94	\$144.04	35.58%	19.08%
136	\$79.81	\$154.61	\$110.58	\$185.38	38.55%	19.90%
170	\$94.77	\$188.27	\$133.23	\$226.73	40.58%	20,43%
204	\$109.72	\$221.92	\$155.8 7	\$268.07	42.06%	20.80%
238	\$124.67	\$255.57	\$178.52	\$309.42	43.19%	21.07%
272	\$139.63	\$289.23	\$201.16	\$350.76	44.07%	21.28%
306	\$154.58	\$322.88	\$223.81	\$392.11	44.78%	21.44%
340	\$169.54	\$ 3 56.54	\$246.46	\$433.46	45.37%	21.57%
374	\$184.49	\$390.19	\$269.10	\$474.80	45.86%	21.68%
408	\$199.44	\$423.84	\$291.75	\$516.15	46.28%	21.78%
442	\$214.40	\$457.50	\$314.39	\$557.49	46.64%	21.86%
476	\$229.35	\$491.15	\$ 3 37.04	\$598.84	46.95%	21.93%
510	\$244.30	\$524.80	\$359.68	\$640.18	47.23%	21.99%
544	\$259.26	\$558.46	\$382.33	\$681.53	47.47%	22.04%
578	\$274.21	\$592.11	\$404.97	\$722.87	47.69%	22.08%
612	\$289.16	\$625.76	\$427.62	\$764.22	47.88%	22.13%
646	\$304.12	\$659.42	\$450.27	\$805.57	48.06%	22.16%
680	\$319.07	\$693.07	\$472.91	\$846.91	48.22%	22.20%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

PAGE 5 OF 6

		2,000 - 87,500
	Rate Schedule	Commercial (GS2)
	Present Rates	Proposed Rates
Customer Charge	\$70	\$70
Energy Charge	\$0.31801	\$0.42319
Gas Cost	\$0.55000	\$0.55000
Therm Usage Increment	481	481

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
481	\$222.96	\$487.51	\$273.56	\$538.11	22.69%	10.38%
962	\$375.93	\$905.03	\$477.11	\$1,006.21	26.92%	11.18%
1,443	\$528.89	\$1,322.54	\$680.67	\$1,474.32	28.70%	11.48%
1,924	\$681.85	\$1,740.05	\$884.22	\$ 1 ,942.42	29.68%	11.63%
2,405	\$834.81	\$2,157.56	\$1,087. 7 8	\$2,410.53	30.30%	11.72%
2,886	\$987.78	\$2, 5 75.08	\$1,29 1 .33	\$2,878.63	30.73%	11,79%
3,367	\$1,140.74	\$2,992.59	\$1,494.89	\$3,346.74	31.05%	11.83%
3,848	\$1,293.70	\$3,410.10	\$1,698.44	\$3,814.84	31.29%	11.87%
4,329	\$1,446.67	\$3,827.62	\$1,902.00	\$4,282.95	31.47%	11.90%
4,810	\$1,599.63	\$4,245.13	\$2,105.56	\$4,751.06	31.63%	11.92%
5,291	\$1,752.59	\$4,662.64	\$2,309.11	\$5,219.16	31.75%	11.94%
5,772	\$1,905.55	\$5,080.15	\$2,512.67	\$5,687.27	31.86%	11.95%
6,253	\$2,058.52	\$5,497.67	\$2,716.22	\$6,155.37	31.95%	11.96%
6,734	\$2,211.48	\$5,915.18	\$2,919.78	\$6,623,48	32.03%	11.97%
7,215	\$2,364.44	\$6,332.69	\$3,123.33	\$7,091.58	32.10%	11.98%
7,696	\$2,517.40	\$6,750.20	\$3,326.89	\$7,559.69	32.16%	11.99%
8,177	\$2,670.37	\$7,167.72	\$3,530.44	\$8,027.79	32.21%	12.00%
8,658	\$2,823.33	\$7,585.23	\$3,734.00	\$8,495.90	32.26%	12.01%
9,139	\$2,976.29	\$8,002.74	\$3,937.55	\$8,964.00	32.30%	12.01%
9,620	\$3,129.26	\$8,420.26	\$4,141.11	\$9,432.11	32.34%	12.02%

ST JOE NATURAL GAS COMPANY Monthly Bill Comparison Present and Proposed Rates

SCHEDULE 5

PAGE 6 OF 6

	Rate Schedule	87,500 - 1,000,000 GS/FTS4	
	Present Rates	Proposed Rates	
Customer Charge	\$2,000	\$2,000	
Energy Charge	\$0.11749	\$0.15840	
Gas Cost	\$0.55000	\$0.55000	
Therm Usage Increment	31,000	31,000	

Therm	Present Mthly	Present Mthly	Proposed Mthly	Proposed Mthly	% Incresae	% Increase
Usage	Bill W/O Fuel	Bill With Fuel	Bill W/O Fuel	Bill With Fuel	W/O Fuel	With Fuel
31,000	\$5,642.19	\$22,692.19	\$6,910.37	\$23,960.37	22,48%	5.59%
62,000	\$9,284.38	\$43,384.38	\$11,820.73	\$45,920.73	27.32%	5.85%
93,000	\$12,926.57	\$64,076.57	\$16,731.10	\$67,881.10	29.43%	5.94%
124,000	\$16,568.76	\$84,768.76	\$21,641.47	\$89,841.47	30.62%	5.98%
155,000	\$20,210.95	\$105,460.95	\$26,551.83	\$111,801.83	31.37%	6.01%
186,000	\$23,853.14	\$126,153.14	\$31,462.20	\$133,762.20	31.90%	6.03%
217,000	\$27,495.33	\$146,845.33	\$36,372.57	\$155,722.57	32.29%	6.05%
248,000	\$31,137.52	\$167,537.52	\$41,282.93	\$177,682.93	32.58%	6.06%
279,000	\$34,779.71	\$188,229.71	\$46,193.30	\$199,643.30	32.82%	6.06%
310,000	\$38,421.90	\$208,921.90	\$51,103.67	\$221,603.67	33.01%	6.07%
341,000	\$42,064.09	\$229,614.09	\$56,014.03	\$243,564.03	33.16%	6.08%
372,000	\$45,706.28	\$250,306.28	\$60,924.40	\$265,524.40	33.30%	6.08%
403,000	\$49,348.47	\$270,998.47	\$65,834.77	\$287,484.77	33.41%	6.08%
434,000	\$52,990.66	\$291,690.66	\$70,745.13	\$309,445.13	33.50%	6.09%
465,000	\$56,632.85	\$312,382.85	\$75,655.50	\$331,405.50	33.59%	6.09%
496,000	\$60,275.04	\$333,075.04	\$80,565.87	\$353,365.87	33.66%	6.09%
527,000	\$63,917.23	\$353,767.23	\$85,476.23	\$375,326.23	33.73%	6.09%
558,000	\$67,559.42	\$374,459.42	\$90,386.60	\$397,286.60	33.79%	6.10%
589,000	\$71,201.61	\$395,151.61	\$95,296.97	\$419,246.97	33.84%	6.10%
620,000	\$74,843.80	\$415,843.80	\$100,207.33	\$441,207.33	33.89%	6.10%