



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE LEGAL OPERATIONS AGENCY

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Rate Increase by)
Florida City Gas)
_____)
Docket No. 20170179-GU
Filed: January 5, 2018

January 5, 2018

Florida Public Service Commission
2540 Shumard Oak Blvd. Room 110
Tallahassee, FL 32399

Sir/Ma'am:

Enclosed for filing on behalf of Federal Executive Agencies ("FEA") is a Petition for Intervention.

Thank you for your assistance. If you should have any question about this filing, please do not hesitate to contact me.

Sincerely,

Attorneys for Federal Executive Agencies

By: s/ Andrew J. Unsicker

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Enclosure:

cc: Petition to Intervene
Counsel for Parties of Record (w/enc)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

* * * * *

In Re: Petition for Rate Increase by) DOCKET NO. 20170179-GU
Florida City Gas) FILED: January 5, 2018
)

THE FEDERAL EXECUTIVE AGENCIES' PETITION TO INTERVENE

Pursuant to sections 120.569, 120.57, 366.04(1), and 366.06, Florida Statutes; and Rules 25-22.039, 28-106.201 and 28-106.205, Florida Administrative Code, the Federal Executive Agencies (FEA), through their undersigned counsel, hereby submit this Petition to Intervene in the aforementioned Docket. In support thereof, FEA states the following:

1. Names of affected agencies. The affected agencies include is the Florida Public Service Commission, 2540 Shumard Oak boulevard, Tallahassee, Florida 32399.
2. Name and address of Petitioner. Copies of all pleadings, notice and orders in this docket should be provided to the Petitioner:

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3. Notice of docket Petitioner received notice of this docket from a review of the Commissioner's website.

4. Statement of Substantial Interest. The FEA consist of certain agencies of the United States Government which have offices, facilities, and/or installations in the service area of Florida City Gas (FCG) and purchase utility service from FCG. The Department of Defense has been delegated authority by the General Services Administration to represent, through Department of the Air Force counsel, the consumer interest of the FEA in this proceeding under 40 U.S.C.A. 481(a)(4) and 486(d).

5. In this case, the Commission will consider FCG's request for authority to increase general rates. Utility costs represent one of the largest variable expenses of operating Federal offices, facilities, and installations on whose behalf intervention is sought herein, and all will be significantly affected by any action this Commission takes in this Docket. For these reasons, FEA has a substantial interest in the above-captioned Docket.

6. Disputed Issues of Material Fact.
- a. Is FCG's requested rate increase just and reasonable?
 - b. What is the appropriate return on equity for FCG?
 - c. What is the appropriate capital structure for FCG?
 - d. What is the appropriate test year for FCG for the purpose of setting rates?
 - e. What are the appropriate depreciation rates for FCG?

FEA reserves all rights to raise additional issues in accordance with the Commission's rules and the Order Establishing Procedure issued in this case.

7. Disputed Legal Issues. Disputed issues include, but are not limited to, the following:

- a. Has FCG established the need for rate relief?
- b. Has FCG established that its requested return on the equity is just and reasonable?

8. Statement of Ultimate Facts Alleged. Ultimate facts include, but are not limited to, the following:

- a. The rate increase that FCG has requested is unreasonable and should be denied.

9. Rules and statutes justifying relief. The rules and statutes that entitle FEA to intervene and participate in this case include, but are not limited to;

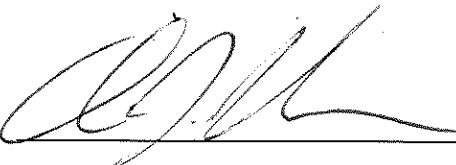
- a. Section 120.569, Florida Statutes;
- b. Section 120.57, Florida Statutes;
- c. Section 366.04(1), Florida Statutes;
- d. Section 366.06, Florida Statutes;
- e. Ruled 25-22.039, Florida Administrative Code;
- f. Rule 28-106.201, Florida Administrative Code;
- g. Rule 28-106.205, Florida Administrative Code;

10. Relief. FEA request that it be permitted to intervene as a full party in this docket.

WHEREFORE, FEA request the Commission enter an order allowing it to intervene and participate as a full party in this docket.

Attorneys for Federal Executive Agencies

By:



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CERTIFICATE OF SERVICE
Docket No. 20170179-GU

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Federal Executive Agencies' Motion to Intervene has been furnished by electronic mail (e-mail) and/or U.S. Mail this 5th day of January 2018 to the following:

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Paralegal for FEA