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October 26, 2018

**VIA E-PORTAL FILING**

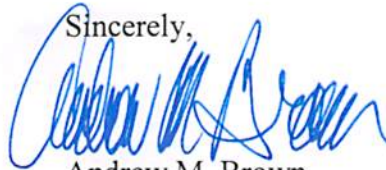
Ms. Carlotta S. Stauffer  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

**Re: 20180183 - In re: Petition for approval of tariff modifications for the protection of its employees, by Peoples Gas System.**

Dear Ms. Stauffer:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Notice of Service of Response to Staff's First Data Request (Nos. 1-6).

Your assistance in this matter is greatly appreciated.

Sincerely,  
  
Andrew M. Brown

AB/plb  
Attachments

cc: Office of Public Counsel  
Ms. Kandi M. Floyd  
Ansley Watson, Jr., Esq.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Peoples Gas System )  
for approval of tariff modification )  
 )  
\_\_\_\_\_ )

Docket No. 20180183-GU

Submitted for Filing:  
10/26/18

**NOTICE OF SERVICE OF RESPONSE TO STAFF'S FIRST DATA REQUEST (Nos. 1-6)**

Peoples Gas System, by and through its undersigned attorneys, files this its Notice of Service of Response to Staff's First Data Request (Nos. 1-6).

Dated this 26th day of October, 2018.



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Attorneys for Peoples Gas System

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of Response to Staff's First Data Request (Nos. 1-6) has been furnished by electronic mail this 26th day of October 2018, to Office of General Counsel, Suzanne Brownless, (email: [sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)), c/o Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850.



ANDREW M. BROWN

**PEOPLES GAS SYSTEM  
DOCKET NO. 20180183-GU  
STAFF'S FIRST DATA REQUEST  
REQUEST NO. 1  
PAGE 1 OF 2  
FILED: OCTOBER 26, 2018**

1. Please describe some of the incidents referred to in paragraph five of the petition. Have these incidents increased in recent years?
  - A. Since January 2017, TECO Energy's Corporate Security Department received and documented 8 threats made by Peoples Gas System ("Peoples" or "PGS") customers to Peoples employees. This number does not include the threats that were not reported to the TECO Corporate Security Department. Based on the number of threats documented by Corporate Security for Peoples, it is difficult to discern any particular trend in the number of incidents. Nevertheless, the Company remains concerned about any level of threats to employees and believes that the tariff authority being sought in its petition is justified.

See attached list of threat issues received and documented by TECO's Corporate Security Department.

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<u>Date</u>	<u>Type of Threat</u>
1/6/2017	Racial Slur to technician
10/11/2017	Threatened to punch the technician in the face.
12/13/2017	Threatened to use physical force to remove the PGS technician
12/20/2017	Threatened to shoot the 2 technicians
8/16/2018	Would release pitbull dogs on the technician
8/23/2018	Kill the PGS employee if he touched his meter
8/30/2018	To shoot the PGS or any TECO employee
10/18/2018	Meter worker was on site to interrupt service when he heard the customer inside home. The customer came outside with his dog and employee had to spray dog.

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REQUEST NO. 2  
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- 2.** Referring to the proposed language on Third Revised Sheet No. 5.101-2, please explain if the “reasonable opportunity” given to customers includes a set time period given for the customer to cease from further actions referred to.
  
- A.** In the rare instance where Peoples refuses or discontinues service to a customer because of a threatening situation, Peoples will reconnect service when the safety concern or issue has been resolved. The time period for connecting or re-connecting service to a customer in these situations will vary, depending on the customer’s willingness to ensure a safe environment for employees. However, once conditions are safe for company employees, Peoples will work swiftly during normal business hours to connect or re-connect service.

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STAFF'S FIRST DATA REQUEST  
REQUEST NO. 3  
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- 3.** Regarding the proposed tariff modification, please state whether customers will be given five days written notice of disconnection pursuant to Rule 25-6.105(5).
  - A.** Requirements pertaining to refusal or disconnection of service by natural gas utilities is Rule 25-7.089(2), F.A.C. In situations involving a threat condition, the company anticipates that disconnection will have already taken place, and the customer will have been noticed through normal business operations and notifications in accordance with FPSC rules and Peoples' tariff. Also, it is important to note that Rule 25-7.089(2), F.A.C., includes conditions that do not require 5-day notification.

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REQUEST NO. 4  
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- 4.** Please explain what communications with the customer will be attempted in order to address the unsafe conditions and advise of potential resulting action.
  - A.** In the instances where a customer's service has been disconnected and service is being refused because of a threat condition, the company will, as required by Rule 25-7.089(2), F.A.C., notify the customer as soon as practicable of the reason for refusal of service. Also, the company will communicate with the customer by phone, email, or written communication stating the reason why services remain off, and what is required to restore or reconnect service.

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REQUEST NO. 5  
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- 5.** Please describe the actions Peoples will take if a customer disputes the unsafe conditions and files a complaint with the Commission. Will Peoples disconnect service while the complaint is being handled at the Commission?
  - A.** The company will adhere to the requirement for protection from disconnection during the complaint process pursuant to Rule 25-22.032(3), F.A.C., which states that the company shall not discontinue service to a customer because of any unpaid disputed amount until the complaint is closed by Commission staff. However, if service has already been disconnected for cause, and any unsafe concerns or issues have not been resolved, the service will not be reconnected if the customer files a complaint disputing the unsafe conditions. To be required to send an employee to the customer's premises to re-connect service under the threatening condition would put Peoples' employees in harm's way, which is what this tariff change is attempting to avoid. Once the threatening condition is resolved to the company's satisfaction, the company will re-connect the customer.



**PEOPLES GAS SYSTEM  
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- 6.** If service to a customer is temporarily or permanently discontinued pursuant to the proposed tariff modifications, please explain which, if any, currently tariffed fees will be assessed to the customer.
- A.** All fees associated with the reconnection and disconnection of service will follow existing tariff service fees. Expected charges from this activity could include:
- Meter reconnection / service restoration charge: \$70.00 for initial unit or meter and \$15.00 for each additional meter for Residential customers; \$100.00 for initial unit or meter and \$20.00 for each additional unit or meter for Other customers.
  - Meter Turn On / Service Initiation Charge: \$50.00 for initial unit or meter and \$15.00 for each additional unit or meter for Residential customers; \$75.00 for initial unit or meter and \$30.00 for each additional unit or meter for Other customers.
  - Trip charge (applies when a trip is made to Customer's premises for the purpose of terminating Gas Service or providing final notice of termination for nonpayment of bills): \$20.00.