

Eric Fryson

From: Andy Shoaf [andy@stjoegas.com]
Sent: Monday, March 12, 2012 2:38 PM
To: Filings@psc.state.fl.us
Subject: Docket No. 110303-OT
Attachments: Docket No 110303-OT Legislatlve Review 0302 2012 e filing.pdf

a. Andy Shoaf

301 Long Ave - POB 549

Port St Joe, FL 850-229-8216

andy@stjoegas.com

- b. Docket No. 110303-OT Industry survey for legislative review of agency rules in effect on or before November 16, 2010
- c. St Joe Natural Gas Company
- d. 7 Pages Total – 1 document
- e. Reponses to Survey questions

Andy Shoaf
St Joe Gas Company
850-229-8216 Ext: 208



3/12/2012

03/12/2012

DOCUMENT NUMBER DATE

01421 MAR 12 09

FPSC-COMMISSION CLERK

ST JOE NATURAL GAS COMPANY, INC.



POB 549 – 301 LONG AVENUE – PORT ST JOE, FLORIDA 32457
PHONE 850-229-8216 – FAX 850-229-8392

March 12, 2012

BY ELECTRONIC FILING

Bill McNulty
c/o Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 110303-OT

Dear Mr. McNulty,

Attached is St Joe Natural Gas Company, Inc.'s Response(s) to your Industry survey for legislative review in the above referenced docket.

Thank you.

s/ Andy Shoaf
Vice- President
St Joe Natural Gas Company
301 Long Ave - POB 549
Port St Joe, FL 32457
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Enclosures

03/12/12 10:00 AM

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FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

In Re: Industry Survey for legislative review)
of agency rules in effect on or before)
November 16, 2010)
_____)

Docket No. 110303-OT
Filed: March 14, 2012

ST JOE NATURAL GAS COMPANY'S ANSWERS TO
FLORIDA PUBLIC SERVICE COMMISSION
STAFF'S SURVEY QUESTIONS

St Joe Natural Gas Company ("SJNG") answers to Florida Public Service Commission
Staff's Survey questions are set forth below:

Rule 25-7.0131, F.A.C. – Survey Questions

1. What are the Company's estimated transactional costs resulting from the Company's compliance with Rule 25-7.0131, F.A.C., for the five year period beginning July 1, 2011? Please identify regulatory assessment fees separately from all other transactional costs required to comply with the rule.

RESPONSE: Immaterial

2. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by s. 288.703) located in the Company's service territory, resulting from the implementation of Rule 25-7.0131, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: Costs to small business and ultimately to the public is the actual regulatory assessment tax amount.

3. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in s. 120.52) located in the Company's service territory, resulting from the implementation of Rule 25-7.0131, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: Costs to small counties, small cities and ultimately to the public is the actual regulatory assessment tax amount.

4. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the implementation of Rule 25-7.0131, F.A.C., for the five year period beginning July 1, 2011?

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RESPONSE: See response to questions 2 and 3 above.

5. What does the Company believe is the expected impact of Rule 25-7.0131, F.A.C., on economic growth, private sector job creation or employment, and private sector investment in the Company's service territory for the five year period beginning July 1, 2011?

RESPONSE: Any and all tax has a negative impact on economic growth.

6. What does the Company believe is the expected impact of Rule 25-7.0131, F.A.C., on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period beginning July 1, 2011?

RESPONSE: No impact as long as everybody pays the tax.

7. What does the Company believe are the benefits of Rule 25-7.0131, F.A

RESPONSE: None

Rule 25-22.032, F.A.C. – Survey Questions

1. What are the Company's estimated transactional costs resulting from the Company's compliance with Rule 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: \$135.00 per compliant

- a. For the five year period beginning July 1, 2011, which requirements of Rule 25-22.032, F.A.C., if any, would be performed by the Company assuming the rule were not in effect? Please explain.

RESPONSE: Company's complaint experience has been customer's misunderstanding of FPSC approved rates and charges. The rule results in the company mailing the customer and FPSC a complete written explanation.

- b. For each of the requirements identified in 1a., what are the estimated transactional costs associated with such requirements for the five year period beginning July 1, 2011?

RESPONSE: see response to No. 1 above

- c. What are your actual transactional costs resulting from your Company's compliance with Rule 25-22.032, F.A.C., for the period July 1, 2011 to December 31, 2011?

RESPONSE: \$0.00, no complaints

2. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: \$135.00 per compliant

3. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company's service territory, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: \$135.00 per compliant

4. What is the Company's estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the implementation of 25-22.032, F.A.C., for the five year period beginning July 1, 2011?

RESPONSE: \$135.00 per compliant

5. What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on economic growth, private sector job creation or employment, and private sector investment for the five year period beginning July 1, 2011 in the Company's service territory?

RESPONSE: None

6. What does the Company believe is the expected impact of Rule 25-22.032, F.A.C., on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period beginning July 1, 2011?

RESPONSE: None

7. What does the Company believe are the benefits of Rule 25-22.032, F.A.C.?

RESPONSE: Empowers a customer while adding to cost of service

8. Assuming Rule 25-22.032, F.A.C., is unchanged over the next five years, do you expect your Company's costs to comply with the rule going forward, to increase, decrease, or remain the same. Please explain your response.

RESPONSE: Increase as operating costs increase

9. Does your Company currently have procedures/personnel in place to address complaints received directly from your consumers?

RESPONSE: Yes

10. If Rule 25-22.032, F.A.C., were repealed would your Company continue to accept and address consumer complaints? Please explain your response.

RESPONSE: Yes, company complies with its gas tariff approved by the FPSC

11. Do you believe the costs, if any, incurred by your Company to comply with the records retention, reporting, and auditing requirements of Rule 25-22.032(10), F.A.C., for the five year period beginning July 1, 2011, if any, have an adverse impact on your Company? If so, please provide any and all data which supports your response.

RESPONSE: Yes, adverse impact in that there are some costs to address complaints.

12. Of the transactional costs estimated to be associated with compliance with 25-22.032, F.A.C., what percentage is spent on the following items:

a. Staffing

RESPONSE: 15%

b. Document storage and retention

RESPONSE: 5%

c. Postage and shipping

RESPONSE: 6%

d. Communications (dedicated phone lines, emails or faxes)

RESPONSE: 59%

e. Other

RESPONSE: 0%

13. How many staff members at your Company are currently responsible for handling consumer complaints associated with 25-22.032, F.A.C.?

RESPONSE: 1

a. Are they full time employees?

RESPONSE: Yes

b. Do these employees have responsibilities apart from handling complaints?

RESPONSE: Yes

14. Section 3 of Rule 25-22.032, F.A.C., states that a customer's service shall not be discontinued during the complaint resolution process. Have there been instances within 2010 through 2011, when your Company was uncompensated for service provided as a result of a billing dispute?

RESPONSE: Yes

a. In the majority of these cases, is the Company able to recoup these costs after the complaint is resolved?

RESPONSE: Yes

15. Does your Company subscribe to the Florida Public Service Commission's telephone "transfer-connect" or email transfer system?

RESPONSE: No

a. What are the annual costs associated with subscription to these systems, including costs due to additional requirements for staffing, operating hours and document retention?

RESPONSE: NA

16. Approximately what percentage of complaints are resolved prior to reaching the Informal Conference stage described in section 8 of Rule 25-22.032, F.A.C.?

RESPONSE: 100%

- a. How many times has your Company had a consumer complaint that has escalated all the way to the informal conference stage in the previous two years?

RESPONSE: Never

- b. How many times within 2010 through 2011, has your Company had a complaint process that was escalated beyond the informal conference stage?

RESPONSE: Never

17. Approximately what percentage of complaints from your customers filed with the Florida Public Service Commission are successfully resolved within 30 days?

RESPONSE: 100%

18. How has Rule 25-22.032, F.A.C., affected the way your Company processes complaints?

RESPONSE: Delayed collection

- a. Has the rule had a positive, negative, or neutral impact on your Company?

RESPONSE: Negative

- b. How has the rule affected the Company's cost of handling complaints?

RESPONSE: Increased the cost

s/ Andy Shoaf
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