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Jacksonville, Florida 32202-3139

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COMMISSION  
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May 31, 2016

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

**RE: Docket No. 160120-GU, JEA Petition for Leave to Intervene**

Dear Ms. Stauffer:

Attached is JEA's Petition for Leave to Intervene in the above captioned docket. If there are any questions, please feel free to call me.

Respectfully submitted,

A handwritten signature in blue ink that reads 'Berdell Knowles'.

Berdell Knowles  
Government Relations Specialist  
JEA  
21 West Church Street  
Jacksonville, FL 32202  
(904) 665-4524  
[Knowb@jea.com](mailto:Knowb@jea.com)

ELECTRIC

WATER

SEWER

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**IN RE: Petition for approval of tariff modifications to Rider NCTS, the Firm Delivery and Operational Balancing Agreement, and negative imbalance cash-out prices, by Peoples Gas System.**

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**Docket No. 160120-GU  
Filed: May 31, 2016**

**PETITION OF JEA  
FOR LEAVE TO INTERVENE**

Pursuant to Chapter 120, Florida Statutes and Rules 25-22.0376 and 28-106.205, Florida Administrative Code, JEA hereby files this Petition for Leave to Intervene in the above captioned docket and in support thereof states as follows:

1. JEA is a public agency existing under the laws of the State of Florida. JEA is authorized by the laws of the State of Florida to, and does, provide retail natural gas service to industrial and commercial end users within the greater, Jacksonville, Florida area.

2. JEA is a recognized third party supplier ("Pool Manager") on the Peoples Gas System ("PGS"), serving a number of consumers in the greater Jacksonville, Florida area that elected to take service under the PGS Natural Choice Transportation Service ("NCTS") tariff.

3. The modifications to the NCTS tariff that PGS has proposed will greatly impact the costs incurred for JEA to provide service to its natural gas customers in the greater Jacksonville, Florida area,

*to wit:*

a) change "...the rate, or reservation charge, at which releases of upstream capacity to Pool Managers under Rider NCTS will be made"

b) modify the "cash-out" price for negative monthly imbalance amounts.

3. JEA's substantial interests are subject to determination in and will be affected by the Commission's decision in this docket. JEA's rights and interests cannot be adequately represented by any other party in this docket. JEA's participation in this matter will not unduly delay these proceedings or prejudice any other party. Accordingly, JEA is entitled to intervene in this docket.

4. JEA respectfully requests that it be granted leave to intervene and participate fully as a party in this proceeding in order to protect its interests.

5. JEA requests that the following persons be included on the Service List in this docket and that all communications regarding this docket be directed to them:

Jody Brooks, Esq  
Chief, Government Operations  
City of Jacksonville  
117 West Duval Street, Suite 480  
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Lori Phelan  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been provided by U.S. Mail and/or electronic mail, this 31st day of May, 2016 to the following:

Ansley Watson, Jr.  
Andrew M. Brown  
Macfarlane Ferguson & McMullen  
P.O. Box 1531  
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Paula K. Brown  
Regulatory Affairs  
Peoples Gas System  
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Berdell Knowles, JEA