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July 26, 2019

**Via email:** [RDziehc@psc.state.fl.us](mailto:RDziehc@psc.state.fl.us)  
Rachel A. Dziechciarz, Senior Attorney  
-Regulatory Analysis Section  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Mirabito Gas v. Peoples Gas System  
Docket No.: 20190000-OT

Dear Rachel:

Peoples Gas System has the following responses to your request for information.

1. A description of the corporate entity structure of Peoples Gas System, including its relationship to TECO Partners, LLC, TECO Consulting, and any other affiliated legal entities involved with initiating and/or marketing natural gas service.

**RESPONSE:**

Peoples Gas System is a division of Tampa Electric Company, a Florida corporation ("PGS"). TECO Partners, Inc., also a Florida corporation, is a wholly-owned non-utility subsidiary of Tampa Electric Company. TECO Partners provides sales and marketing services to PGS and energy consulting services to third parties. There is no corporate entity named TECO Consulting.

2. A description of the contractual relationship between Peoples Gas System and TECO Partners, including how Peoples monitors TECO Partners' compliance with the contract and its policies and procedures.

**RESPONSE:**

The contractual relationship is contained in the contract which is attached. With regard to the NCTS program, generally, customers are connected with an employee of TECO Partners ("TPI") who advises the prospective customer of the pool manager choices which are available on [www.peoplesgas.com](http://www.peoplesgas.com). The customer is also provided pricing information for the four (4) pool managers which are represented by TPI. Once a customer decides to proceed with the NCTS program, TPI provides documentation for review by the customer including a Natural Choice Transportation Service Letter of Authorization (Peoples' Fourth Revised Tariff Sheet No. 8-118) and a brochure explaining the program (copies of which are attached) which informs the prospective customer of the program highlights and provides the website information where customers can obtain a full list of the qualified pool managers. Once all questions about the program are explained, and the customer selects the type of service it desires, the customer then signs the brochure and letter of authorization which is an acknowledgment that they have been informed of the existence of the full list of pool managers.

The letters of authorization, in which the customer "affirms that it has been informed of the list of approved pool managers for the supply of gas for transportation under Rider NCTS, available on the PGS website ([www.peoplesgas.com](http://www.peoplesgas.com))" are sent to PGS which reviews them and verifies that the customers have signed the authorization and have indicated that they were told about the existence of other pool managers whose information can be found on the PGS website. In addition, PGS management is in frequent communication with TPI's management concerning program implementation and whenever PGS becomes aware of issues concerning the administration of the program, those issues are immediately brought to the attention of TPI. Because of the length of time that the arrangement with TPI has been in place, PGS has a high level of confidence that TPI's employees understand what information they are to convey to potential customers.

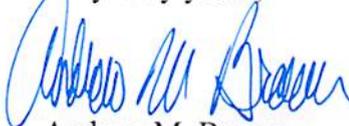
3. A copy of the contract between Peoples Gas System and TECO Partners, LLC.

**RESPONSE:**

Attached is a copy of the contract between PGS and TPI with the payment amounts from PGS to TPI redacted. PGS will be seeking confidential treatment of the contractual payments it makes to TPI under the contract.

Let me know if you have any further questions or comments.

Very truly yours,



Andrew M. Brown

AB/plb

Attachments

cc: Robert Scheffel Wright, Esq. (via email: [schef@gbwlegal.com](mailto:schef@gbwlegal.com))  
Keith Hetrick, General Counsel (via email: [khetrick@psc.state.fl.us](mailto:khetrick@psc.state.fl.us))

## It's your **NaturalChoice**

**Commodity Transportation Services from Peoples Gas allows you to control your energy costs while receiving the same reliable delivery service.**



You've already made a wise energy choice by using natural gas. With Peoples Gas' NaturalChoice program, you may further control your natural gas commodity costs.

- Any commercial customer at any consumption level may select a third-party natural gas supplier.
- Residential customers using 2,000 therms or more annually may select a third-party supplier to meet their natural gas needs.
- The third-party supplier, known as a Pool Manager, assumes the responsibility for supplying the natural gas used by a Peoples Gas transportation customer.
- Peoples Gas receives the gas delivered by the Pool Manager and redelivers the gas to the customer's site or facility.
- Peoples Gas will continue to manage your service, read the meters, and respond to emergencies.

NaturalChoice is completely voluntary. If you do not wish to participate, Peoples Gas will continue to be the supplier of your natural gas.

Learn more at [peoplesgas.com/business/services](http://peoplesgas.com/business/services). Select *Transportation Services* then *NaturalChoice* for a complete list of qualified Pool Managers.

Or call a customer care representative toll free at **877-832-6747**.

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Customer affirms that he/she has been informed of the list of approved Pool Managers for the supply of natural gas transportation under rider NCTS, available on [peoplesgas.com](http://peoplesgas.com).

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**Business Name**

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**Customer Signature**

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**Date**

**NATURAL CHOICE TRANSPORTATION SERVICE LETTER OF  
AUTHORIZATION**

PGS Rev 03/15

**NATURAL CHOICE TRANSPORTATION SERVICE  
Letter of Authorization**

Peoples Gas System ("PGS")  
P.O. Box 2562  
Tampa, Florida 33601-2562

**TO WHOM IT MAY CONCERN:**

This letter constitutes a formal request by the undersigned ("Customer") for gas transportation service pursuant to PGS's Rider NCTS and other applicable provisions of PGS's applicable Natural Gas Tariff, as the same may be amended from time to time, for the following PGS customer account number(s):

ACCOUNT NUMBER(S):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CUSTOMER CONTACT:

Company: \_\_\_\_\_  
Contact Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip Code: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
E-mail Address: \_\_\_\_\_

As signified by initials in the box, Customer hereby authorizes PGS to release to the "Pool Manager" named below, the twelve-month historic gas usage for the accounts listed above. Customer understands that said Pool Manager will be assessed a fee of \$20 per account, payable upon receipt of request, for the authorized information.

Customer has entered, or intends to enter, into one or more agreement(s) with Pool Manager providing for Pool Manager's delivery of the gas purchased by Customer from or through Pool Manager to PGS pursuant to the Firm Delivery and Operational Balancing Agreement between PGS and Pool Manager (the "Firm Delivery Agreement").

Provided the Firm Delivery Agreement is in effect at the time gas is tendered to PGS by or on behalf of Pool Manager for Customer's account(s) listed above, PGS will transport gas delivered for such account(s) pursuant to Rider NCTS and the applicable provisions of PGS's tariff on file with the Florida Public Service Commission ("FPSC"), as the same may be amended from time to time.

Subject to the terms of Rider NCTS and the Firm Delivery Agreement, such service shall continue until Customer, Pool Manager, or PGS gives written notice to the others of the termination of such service in accordance with Rider NCTS. If the Firm Delivery Agreement is terminated for any reason as it applies to any Gas to be delivered for Customer's account(s) for transportation by PGS, PGS shall have the right to immediately terminate transportation service to the above account(s) under Rider NCTS.

Customer understands that it may terminate participation in Rider NCTS with thirty (30) days notice and return to sales service from the Company. However, the Customer must then remain on sales service for the following twelve-month period. In the event the Pool Manager terminates its agreement with the Customer without the Customer's consent, the Customer may return to Rider NCTS, but not to the same Pool Manager within the twelve-month period.

Customer agrees to pay PGS in accordance with the applicable rate schedule for the transportation of gas for Customer's account(s), including charges that may be applicable under Rider NCTS that are not applicable under sales service. Customer understands that it is responsible for the payment of all bills rendered to Customer by Pool Manager, and that each Pool Manager's bill for gas purchased by Customer will be rendered separately from PGS's bill for transportation service. It is the Customer's obligation to make payments to the Company (or to an Authorized Payment Agent of the Company) of all bills rendered. Payment by a Customer to a third party (including a Third Party Gas Supplier) which has not been designated by Company as an Authorized Payment Agent will not satisfy the Customer's obligation to make payment of Company's bill for Gas Service.

Customer affirms that it has been informed of the list of approved pool managers for the supply of gas for transportation under Rider NCTS, available on the PGS website ([www.peoplesgas.com](http://www.peoplesgas.com)).

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

The undersigned Pool Manager agrees that it will keep confidential, and not use or disclose to any person not named herein, information released pursuant to the above authorization, or information received from the above Customer, except to the extent necessary to deliver gas to PGS for transportation to the above Customer account(s), or as may be required by law (in which case Pool Manager will provide notice to PGS prior to making such disclosure).

Pool Manager: \_\_\_\_\_

By: \_\_\_\_\_

Title: \_\_\_\_\_

Customer history requested by Pool Manager. If requested, payment must be received to deem complete.

