

# DICKSTEINSHAPIRO<sub>LLP</sub>

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## By Electronic Filing

April 16, 2008

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Re: Supplement to Application, Exhibits D and Z  
Floridian Natural Gas Storage Company, LLC  
FERC Docket No. CP08-13-000

Dear Ms. Bose:

In connection with the Application of Floridian Natural Gas Storage Company, LLC ("FGS") for a certificate of public convenience and necessity to construct, own and operate a new natural gas storage facility filed on October 31, 2007 (the "Application") in the above-referenced docket, FGS hereby supplements the Application with the following information.

First, with respect to Exhibit D, FGS advises that, as of April 8, 2008, the 98% interest in FGS held by Warburg Pincus Private Equity IX, L.P. has been transferred to, and assumed by, Targa Resources, Inc. ("Targa"), a Delaware corporation. Accordingly, FGS submits for filing the attached Revised Exhibit D.

Second, FGS supplements Exhibit Z with the following additional letters of support for the FGS Project which are attached hereto as Supplement to Exhibit Z:

9. Agency for Workforce Innovation  
March 18, 2007
10. Office of Public Counsel, State of Florida  
March 21, 2008
11. Florida Industrial Power Users Group  
April 5, 2008

**DICKSTEINSHAPIRO**LLP

Ms. Kimberly D. Bose  
April 16, 2008  
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FGS's Response contains only Public material and FGS is making this filing electronically. Electronic copies of this filing are being sent by email to all parties to this proceeding, as well as to the persons identified below.

If you have any questions about any of these submissions, please do not hesitate to contact me at (202) 420-2745 or Beth Webb at (202) 420-4782.

Sincerely,



Joan M. Darby

Enclosures

cc: All Parties  
Sheila Hernandez, FERC  
Charles Brown, FERC  
Barbara Mohrman, ERM  
Tim Gray, Florida Department of Environmental Protection  
John Wrublik, US Fish and Wildlife Service  
Ted Walden, US Environmental Protection Agency, Region 4  
Eric Reusch, U.S. Army Corps of Engineers  
Tom Colios, South Florida Water Management District  
Joseph Walsh, Florida Fish and Wildlife Conservation Commission

*Revised Exhibit D*  
*April 16, 2008*  
Floridian Natural Gas Storage Company, LLC  
Docket No. CP08 - 13 - 000

## **REVISED EXHIBIT D**

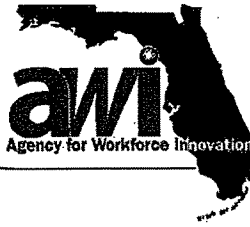
Neither Floridian Natural Gas Storage Company, LLC or any of its Managers, directly or indirectly, owns, controls or holds with power to vote, ten percent or more of the outstanding voting securities of any other person or organized group of persons engaged in production, transportation, distribution or sale of natural gas, or of any person or group of persons engaged in the construction or financing of such enterprises or operations.

Targa Resources, Inc., a Delaware corporation, owns 98% of FGS. The remaining 2% of FGS is held by individual private investors.

*Supplement to Exhibit Z*  
*April 16, 2008*  
Floridian Natural Gas Storage Company, LLC  
Docket No. CP08 - 13 - 000

**SUPPLEMENT TO**  
**EXHIBIT Z**  
**ADDITIONAL LETTERS OF SUPPORT**

9. Agency for Workforce Innovation  
March 18, 2007
10. Office of Public Counsel, State of Florida  
March 21, 2008
11. Florida Industrial Power Users Group  
April 5, 2008



Charlie Crist  
Governor  
Monesia T. Brown  
Director

March 18, 2008

Mr. J. Bradley Williams  
Mr. David Sharp  
Floridian Natural Gas Storage Company  
1000 Louisiana Street  
Suite 4361  
Houston, Texas 77002


Dear Sirs:

I am excited to hear about the progress that Floridian Natural Gas Storage Company is making in Martin County to bring the first natural gas storage facility to the State of Florida. From our perspective at the Agency for Workforce Innovation, this is a great example of how private dollars can be used to create short- and long-term jobs for Florida's residents. This type of private investment and job creation is particularly important in an area like Indiantown where the project's economic study (developed by Florida Atlantic University) found per capita income to be approximately half that of Martin County and three-fourths that of Florida. The financial benefits to Indiantown and Martin County will be a long-term significant addition to the economy.

We understand that your project will also need a skilled workforce of approximately 350 workers, including approximately 150 certified welders during the three-year construction phase. In that regard, I commend you again for the commitment to work with Indian River College to forge a private-public partnership to create a welding training initiative. I also encourage you to coordinate with the Treasure Coast Regional Workforce Board that serves Martin County. The Regional Workforce Board can assist you in the recruitment of applicants for training slots and for the jobs created by this project. Private investment like the Floridian project that creates jobs and adds over \$2.5 million per year in taxes is the type of growth we are promising.

We support and applaud your efforts. Please let us know how we can assist in ensuring the completion of the project on behalf of the people of the State of Florida

Sincerely,



Monesia T. Brown  
Director

MTB/kww

Agency for Workforce Innovation  
The Caldwell Building, Suite 100•107 East Madison Street•Tallahassee, Florida•32399-4120  
Telephone (850) 245-7105•Fax (850) 921-3223•TTY/TDD 1-800-955-8771-Voice 1-800-955-8770  
[www.floridajobs.org](http://www.floridajobs.org)

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All voice telephone numbers on this document may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.

**KEN BRUNTT**  
*President of the Senate*



**J. R. Kelly**  
Public Counsel

**STATE OF FLORIDA**  
**OFFICE OF PUBLIC COUNSEL**

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March 21, 2008

**MARCO RUBIO**  
*Speaker of the House of Representatives*



**Mr. Brad Williams**  
**Mr. David Sharp**  
Floridian Natural Gas Storage Company  
1000 Louisiana Street  
Suite 4361  
Houston, Texas 77002

Dear Mr. Williams and Mr. Sharp:

Thank you for sharing information concerning Floridian Natural Gas Storage Company's efforts to bring the first market area natural gas storage facility to Florida, and Mr. Craig Fugate's letter of February 27, 2008.

As you are aware, the Office of Public Counsel (OPC) is charged with representing Florida consumers in utility related matters before the appropriate regulatory agencies. Along with the traditional focus on economic regulatory considerations, OPC must also give due consideration to reliability of Florida's electric utilities and to the inevitable economic health strong reliability brings to our state.

The issue of in-state storage of natural gas is certainly an important factor to be considered in examining the reliability of our gas consuming electric utilities. I believe it is incumbent upon the regulatory process to carefully evaluate its costs and benefits. And I concur with Mr. Fugate that natural gas storage can be an effective tool in mitigating the risks of supply interruption, especially during a natural disaster.

If you should have any questions for my office, please let me know. Also, I would appreciate you keeping me apprised of the progress of your facilities.

Sincerely,

A handwritten signature in black ink, appearing to read "J.R. Kelly".

**J.R. Kelly**  
Public Counsel

JRK/jk

**MCWHIRTER & DAVIDSON, P.A.**  
**A T T O R N E Y S A T L A W**  
400 NORTH TAMPA STREET, SUITE 2450  
TAMPA, FLORIDA 33602-5126

April 5, 2008

Mr. Bradley Williams  
Floridian Natural Gas Storage, LLC  
1000 Louisiana  
Suite 4361  
Houston, TX 77002

Dear Mr. Williams:

I represent an independent group of large companies that pay about \$400 million a year for electricity. The group known as Florida Industrial Power Users Group [FIPUG] is deeply concerned about soaring fuel costs included in their electric bills. In response to your request I asked a representative number of the group whether they would endorse your company's proposed above ground storage facility as a prudent expenditure for Florida regulated utilities. They said that if the storage facility is reasonably priced and the costs are fairly allocated to customers it sounds like a very good idea for at least three reasons.

1. **It will provide greater reliability for emergency fuel supply.** ... [details omitted]
2. **Gas storage is a hedging program that will provide savings.** ... [details omitted]
3. **The storage facility is available to several electric utilities and local gas distribution companies.** ... [details omitted]

Today's energy market requires energy providers and regulators to be proactive and diligent in maintaining system reliability and affordable prices on behalf of Florida's consumers. While companies have appropriately taken advantage of storage outside of Florida, we also need in-state storage to prevent an unforeseen circumstance where the supply from outside Florida is restricted. The Floridian Natural Gas Storage Project proposed in South Florida will provide a strategic reserve of natural gas for power generators to use during emergencies and that will help avoid price spikes during peak days. As long as the storage price is reasonable and fairly allocated to the customers that benefit from the service FIPUG supports the efforts of your company to provide innovative new tools to Florida users to help manage the changing energy marketplace.

Sincerely yours,  
*John W. McWhirter, Jr.*  
John W. McWhirter, Jr.