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12 APR 27 AM 10:30

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Public Service Commission

April 27, 2012

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, FL 32301

STAFF'S FIRST DATA REQUEST

Re: Docket No. 120126-GU - Petition for approval of a residential standby generator rate schedule, by Florida City Gas.

Dear Ms. Keating:

By this letter, the Commission staff requests that Florida City Gas (FCG or utility) provide responses to the following data requests.

1. Please explain why FCG used the GS-100, as opposed to the GS-1, rate schedule to base the proposed RSG customer charge on.
2. Please explain why FCG used the GS-220 rate, as opposed to another GS rate schedule, to base the proposed CSG customer charge on.
3. How many current residential generator-only customers does FCG serve and what is the average therm consumption of those customers?
4. How many current commercial generator-only customers does FCG serve and what is the average therm consumption of those customers?
5. Does FCG charge new generator-only customers a CIAC to connect the customer to FCG's distribution system?
6. Please provide a table showing the calculation for the CSG customer charge similar to the table provided in paragraph 14.
7. The annual base rate revenue of \$288 for GS-220 customers stated in paragraph 13 appears low. Is that a correct number? (642 annual therms for GS-220 customers equates to 53.5 monthly therms, resulting in a monthly \$37.5 monthly bill or \$450 annual revenues)

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8. Please clarify FCG's proposed treatment with respect to current generator-only customers. Paragraph 18 says during the annual review of customer usage, certain existing customers may be transferred to the proposed rates.
 - a. How would FCG determine which existing customers were generator-only customers and thus subject to transfer to the proposed rates?
 - b. Under what circumstances could a generator-only customer remain on an otherwise applicable rate?
 - c. Please explain why it would not be considered discriminatory that some existing generator-only customers could be transferred to the new rates, while others could remain on their current rate.
 - d. What would be the impact on the bills for the customers that may be transferred?

Please file the original and five copies of the requested information by Friday, May 11, 2012, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6187 if you have any questions.

Sincerely,



Martha C. Brown
Senior Attorney
Office of the General Counsel

MCB/sh

cc: Office of Commission Clerk
Division of Economic Regulation (Kummer)