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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

October 10, 2016

Robert Scheffel Wright, Esquire
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1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com

STAFF'S FIRST DATA REQUEST
via email

Gus Cepero, Vice President
Florida Crystals Corporation
One North Clematis Street, Suite 200
West Palm Beach, FL 33401
Gus.Cepero@floridacrystals.com

Re: Docket No. 160175-GU: Petition for review and determination on the project construction and gas transportation agreement between NIU Utilities, Inc. d/b/a City Gas Company of Florida and Florida Crystals Corporation, and approval of an interim service arrangement.

Dear Mr. Wright and Mr. Cepero:

By this letter and pursuant to subsection 366.04(3), Florida Statutes, Commission staff respectfully requests the following information from Florida Crystals Corporation (Crystals).

1. Please refer to Crystals' September 19 Response in Opposition to Motion for Approval of a Temporary Service Arrangement. In footnote 1 on page 3, Crystals asserts that the Extended Term begins prior to January 1, 2017. Please provide the date on which Crystals believes the Extended Term begins and support for the assertion that the Extended Term begins earlier than January 1, 2017.
2. Please provide an estimate of the number of therms Crystals believes it will consume during 2017. To the extent that such information is readily available, please discuss whether Crystals has reason to believe that its gas usage will change significantly over the next 15 years.
3. Please refer to the second page of Exhibit A to Crystals' August 29 motion to dismiss. Also, please refer to the attached file which contains the FCG tariff sheets for the KTS rate schedule in effect as of the date of execution of the GTA, i.e., "City Gas Company of

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Florida, FPSC Natural Gas Tariff, Volume No. 6, Original Sheet Nos. 76-78, effective February 15, 2001.” Please confirm that the language under the subject heading “Confidentiality” in Crystals’ Exhibit A differs from the language under the subject heading “Confidentiality” as stated in the tariff. (Original Sheet No. 77)

4. Please refer to footnote 1 and the paragraph with which footnote 1 is associated on page 10 of Crystals’ motion to dismiss. Also, please refer to the attached file which contains the FCG tariff sheets for the KDS rate schedule currently in effect, i.e., “Florida City Gas, FPSC Natural Gas Tariff, Volume No. 8, Original Sheet Nos. 49-51, effective December 7, 2004.” Please confirm that the language included in the paragraph associated with footnote 1 is not included in the tariff. (Original Sheet No. 50)

Please file all responses electronically no later than Friday, October 21, 2016 via the Commission’s website at www.floridapsc.com by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please feel free to call Don Rome at (850) 413-6495 or Sevini Guffey at (850) 413-6204 if you have any questions.

Thank you,

/s/Don Rome, Public Utility Analyst
drome@psc.state.fl.us

/s/Sevini Guffey, Public Utility Analyst
sguffey@psc.state.fl.us

cc: Office of the Commission Clerk