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KEITH C. HETRICK GENERAL COUNSEL (850) 413-6199

Public Service Commission

January 21, 2020

Andrew M. Brown Macfarlane Ferguson & McMullen Post Office Box 1531 Tampa, Florida 33601-1531 <u>AB@macfar.com</u> **STAFF'S SECOND DATA REQUEST** *via e-mail*

RE: Docket No. 20190109-GU – Petition for recovery of costs associated with Hurricane Michael and replenishment of storm reserve, by Peoples Gas System.

Dear Mr. Brown:

By this letter, the Commission staff requests that Peoples Gas System (PGS) provide responses to the following data requests:

- 1. Please refer to PGS's response to OPC's first set of interrogatories, question 7. What were the duties performed by RAW Construction crews?
- 2. Please refer to PGS's response to OPC's first request for production of documents, number 4.
 - a. What does the Column Class represent on the RAW daily time sheets? What are the class types?
 - b. A number of timesheets do not list the supervisor or job number. How did PGS determine the assigned work was completed?
 - c. A high percentage of the invoices lack work location information. How was this recorded and reconciled for completion?
- 3. Please refer to the Staff Audit Report, Document No. 10809-2019, page 6, Finding 1. Please provide a breakdown of the equipment charges on all thirteen RSR Industrial Coatings, Inc. invoices as was provided for Invoice #6363 during the audit.

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Please file all responses electronically no later than February 21, 2020 on the Commission's website at <u>www.floridapsc.com</u>, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6584 if you have any questions.

Sincerely,

/s/ Walt Trierweiler

Walt Trierweiler Senior Attorney

WLT/lms

cc: Office of Commission Clerk Paula Brown- Regulatory Affairs Mireille Fall-Fry- Office of Public Counsel