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Public Service Commission

March 20, 2020

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STAFF'S FIRST DATA REQUEST
via e-mail

Jon C. Moyle, Esquire
Moyle Law Firm
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

Re: Docket No. 20200085-GU: Joint Petition for approval of territorial agreement in Sumter County by Peoples Gas System, the City of Leesburg, and South Sumter Gas Company.

Dear Mr. Brown and Mr. Moyle:

By this letter, Commission staff request that Peoples Gas System (PGS) and City of Leesburg (Leesburg) provide responses to the following data requests.

All Parties: (Joint response requested)

1. The title of the docket indicates that the joint petition for the approval of the territorial agreement is between Peoples Gas System (PGS), City of Leesburg (Leesburg), and South Sumter Gas Company (SSGC). However, the Territorial Agreement and signature page of the Agreement do not include SSGC. Please confirm whether SSGC is part of the proposed Territorial Agreement.
2. Paragraph 12 of the petition states that the parties have entered into a Settlement Agreement which delineates rights and responsibilities of the parties in Sumter County. Please provide a copy of the referenced Settlement Agreement for informational purposes.
3. Paragraph 16 of the petition states that without the Commission's approval of the Territorial Agreement in Exhibit A, that the parties would likely be involved in litigation

in the future. Please elaborate on paragraph 16 of the petition without disclosing privileged or confidential matters.

4. Paragraph 7 of the Territorial Agreement refers to a map (included with Agreement) depicting areas where Leesburg would provide natural gas in future Villages developments within Sumter County. Please provide a large scale map clearly labeled, indicating the description of the areas to be served by Leesburg and PGS. Additionally, please verify if the above discussed map is the same as the map referenced as Exhibit A in Section 2.1 on page 3 of the Territorial Agreement.
5. Referring to Section 2.3 of the Territorial Agreement, please review, and correct if needed, the first sentence which concludes as follows: “. . . . territory reserved under this Territorial Petition Peoples.”
6. Paragraph 7 of the petition refers to Docket No. 20180185-GU regarding natural gas service to the Suwannee American Cement. Section 2.1 of the Territorial Agreement lists Suwannee American Cement as being served by PGS. Please confirm that the issues disputed by Leesburg in the above referenced docket will be resolved and whether Leesburg will withdraw its counter-petition to resolve a territorial dispute if the Commission approves the proposed Agreement.
7. Please state the process and timeline for notifying customers to be transferred from Leesburg to PGS. Please explain the type and methods of customer communication implemented and provide a copy of customer notification(s) indicating and explaining the differences in rates.
8. Paragraph 10 of the petition states that the parties wish to provide an orderly transfer of infrastructure. Rule 25-7.041(2)a, F.A.C., requires the Commission to consider the reasonableness of the purchase price of any facilities being transferred. Please explain if Leesburg will sell its infrastructure in the Bigham developments to PGS. If yes, state and show the derivation of the purchase price. If not, please explain.

PGS:

9. Will PGS require all Leesburg customers being transferred to pay a deposit as new customers of PGS or can PGS, pursuant to Tariff Sheet No. 5.301, perform a credit verification? Please explain.
10. Please explain how PGS will calculate any required deposits, including assumptions for expected usage and monthly bills for the transferred customers.
11. Does PGS anticipate any disruption of service to the transferred customers due to any potential new deposit requirements? Please explain.

Leesburg:

12. Leesburg customers will be transferred to PGS. Please provide the number of customers, by class, being transferred.

13. Please confirm that pursuant to Section 2.3 of the Territorial Agreement, Leesburg will transfer customers to PGS from the developments of Bigham North, Bigham East, and Bigham West, the territory awarded to PGS in the Recommended Order by the Administrative Law Judge and adopted by the Commission and additional customers from Bailey West and the fire station adjacent west to Bailey West.
14. Please state out of the 3,625 customers being transferred, how many are located in Bigham North, Bigham East, and Bigham West and how many in the Bailey West area.
15. Please explain the process for transferring Leesburg customers to PGS, including the length of time to transfer 3,625 customers.
16. Please provide information with respect to any feedback by the Leesburg customers to be transferred to PGS. Please indicate the number in favor and those opposed to the transfer.
17. How many of the 3,625 Leesburg customers to be transferred to PGS currently have a deposit on file?
18. Will Leesburg refund all transferred customers any deposits prior to transitioning the accounts to PGS? Please explain and state when the refund of any deposits will occur.

Please file all responses electronically no later than April 3, 2020, via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at wtrierwe@psc.state.fl.us or at 850.413.6204 if you have any questions.

Sincerely,

/s/ Walt Trierweiler

Walt Trierweiler
Senior Attorney

WLT/lms

cc: Office of Commission Clerk
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