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## STATE OF FLORIDA

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## **Public Service Commission**

April 27, 2023

Beth Keating, Esq. Gunster, Yoakley, & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 bkeating@gunster.com STAFF'S FIRST DATA REQUEST Via E-mail

Jason Bennett AVP – Regulatory Affairs/Business jbennett@chpk.com

Re: Docket No. 20230050-GU: Petition for Approval of Amendment to Firm Transportation Service Agreement with the Florida Public Utilities Company, by Peninsula Pipeline Company, Inc.

Dear Ms. Keating and Mr. Bennett:

By this letter, Commission staff requests that Florida Public Utilities Company (FPUC) and Peninsula Pipeline Company, Inc. (Peninsula) provide responses to the following data requests:

- 1. Please explain why the proposed Amendment is not dated (first page) and not signed by Peninsula and FPUC (last page)? Please provide a completed Amendment.
- 2. Has Pensacola Energy been informed of the construction costs and accepted its responsibility to pay FPUC for the additional point of delivery?
- 3. What is the estimated start and completion date of the construction of the facilities as described in paragraph 11 of the petition.
- 4. Please confirm that the reservation charge shown on page 4 of the proposed amendment includes the amount approved in the 2018 original agreement and the additional costs Peninsula will incur for the construction and maintenance of the facilities requested by Pensacola Energy.

PSC Website: http://www.floridapsc.com

Internet E-mail: contact@psc.state.fl.us

Beth Keating, Esq. Page 2 April 27, 2023

- 5. Please explain how FPUC will ensure that part of its payments to Peninsula (approved in the 2018 agreement) will continue to be recovered through the PGA and Swing Service mechanism, while the additional payments (subject of the proposed Amendment) will be recovered only from Pensacola Energy.
- 6. The petition states that Peninsula will construct a 510 feet pipeline; the project map in Attachment B to the petition shows a 450 feet proposed pipeline. Please explain.

Please file all responses electronically no later than May 11, 2023, via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. Please call me at 850.413.6706 if you have any questions.

Thank you,

/s/Elisabeth Draper
Elisabeth Draper
Chief
Division of Economics