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July 25, 2023

VIA ELECTRONIC FILING

Mr. Adam J. Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 20230023-GU; Petition for Rate Increase by Peoples Gas System, Inc.

Docket No. 20220219-GU; Peoples Gas System's Petition for Rate Approval of 2022 Depreciation Study

Docket No. 20220212-GU; Peoples Gas System's Petition for Approval of Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others

Dear Mr. Teitzman:

Please find attached for filing on behalf of Peoples Gas System, Inc. in the abovementioned docket:

- 1. Substituted Pages 36 and 37 of Donna L. Bluestone's Direct Testimony
- 2. Substitution of Document No. 7 of Donna L. Bluestone's Exhibit DLB-1

The revisions on pages 36 and 37, and to Document No. 7 conform to the company's revised response to Staff's Third Set of Interrogatories, Number 39 and its supplemental response to Staff's Third Request for Production, Number 11 filed on July 25, 2023.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

VLP/ne Attachment

cc: All parties of record (w/att.)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 25th day of July 2023 to the following:

Major Thompson Ryan Sandy **Austin Watrous** Daniel Dose Chasity Vaughan Danyel Sims Office of General Counsel Florida Public Service Commission Room 390L – Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 rsandy@psc.state.fl.us mthompso@psc.state.fl.us awatrous@psc.state.fl.us ddose@psc.state.fl.us dsims@psc.state.fl.us cvaughan@psc.state.fl.us

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ATTORNEY

Q. Do the actuarial assumptions and methods provide a reasonable basis for determining the level of pension costs to be included in the company's operating cost?

A. Yes, the actuarial assumptions used for the pension valuation are reasonable both individually and in the aggregate. The actuarial assumptions and methods are reasonable and consistent with Financial Accounting Standards Board standards and industry practice and provide a reasonable basis for determining the level of pension cost included in Peoples cost of service studies. The company's pension costs are reflected in FERC Account 926 on MFR Schedule G-2, page 18.

Q. How does the company's pension plan and retirement savings plan compare to industry standards?

A. The BENVAL study, Document No. 7 of my exhibit, shows Peoples' retirement savings plans and pension plans are at or above the median plan compared to the company's peer group, which includes a total of 25 utilities. This competitive position is driven by providing all three elements of retirement savings - Defined Contribution, Defined Benefit, and Stock Purchase plans.

Together the company's total employer contribution of about 11 percent is similar to the peer group median and the general market median of about 7 percent. Peoples believes these contribution levels are reasonable to maintain its status as a competitive employer and support long-term development of team members.

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2024 PROJECTED TEST YEAR PAYROLL COSTS

Q. Has Peoples' added team members since 2020?

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Yes. Peoples has added 85 team members since December 2020, Α. with 84 team members joining the company in 2022. The majority of the additional headcount went to support the company's system and customer growth, with 23 new team members Engineering, Construction joining the and Technology ("Engineering") team and 32 joining Gas Operations, Sustainability and External Affairs ("Operations") team.

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Q. How did the company project its human resource needs in 2023 and 2024?

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A. Peoples determined the need for additional human resources by evaluating factors including customer growth, expansion

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Executive Summary

Benefit	Peer* Position	Market* Position
Retirement	Rank = 13 th Index = 102	Rank = 75 th Index = 181
Medical	Rank = 14 th Index = 100	Rank = 185 th Index = 106
	\blacksquare	1
Dental	Rank = 7 th Index = 116	Rank = 72 nd Index = 137
		•
Paid Leave	Rank = 18 th Index = 96	Rank = 309 th Index = 97
	=	=
Life Insurance	Rank = 14 th Index = 79	Rank = 260 th Index = 100
	•	
Short-Term Disability	Rank = 3 rd Index = 113	Rank = 63 rd Index = 121
	1	1
Long-Term Disability	Rank = 2 nd Index = 141	Rank = 34 th Index = 141
		
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Your benefits are:

Above market

Aligned with market

Varied from market

*25 utility companies are in the custom peer group; 545 are in the general (for profit) peer group.

SUBSTITUED:

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