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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

March 19, 2024

Beth Keating, Esq.  
Gunster, Yoakley & Stewart, P.A.  
2015 South Monroe St., Suite 601  
Tallahassee, FL 32301

## **STAFF'S FIRST DATA REQUEST VIA EMAIL**

Matt Everngam  
Director-Regulatory Affairs  
208 Wildlight Ave  
Yulee, FL 32097

### **Re: Docket No. 20240038-GU: Petition for Approval of Amendment to Transportation Agreement with Florida Public Utilities Company by Peninsula Pipeline Company, Inc.**

Dear Ms. Keating and Mr. Everngam:

By this letter, Commission staff requests that Florida Public Utilities Company (FPUC) and Peninsula Pipeline Company, Inc. (Peninsula), jointly the parties, provide responses regarding the petition for approval of transportation service agreement for the St. Cloud project.

1. What is the cost to construct/install 6-inch coated steel pipeline (including any necessary appurtenances) from the new interconnect with Florida Gas Transmission (FGT) to the Green Island Ranch development?
2. What is the cost to construct/install the 6-inch coated steel pipeline (including any necessary appurtenances) from the new interconnect with FGT to the Center Lake Ranch development?
3. Please include a general description of the types of costs that will be incurred (e.g., materials, labor, permitting, secure right-of-way, etc.).
4. Please confirm that the pipeline material will not consist of "bare steel" construction.
5. Please provide the percent breakdown between materials and labor for the total cost of the project.
6. How many miles of pipeline will be constructed for the Northern and Southern section of the project?

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7. Please explain how FPUC plans to recover the costs of constructing the proposed St. Cloud projects?
8. Please provide a brief description of the approval required by PPC or FPUC from any other state or local agencies to complete the proposed project.
9. Did FPUC issue a formal request for proposals or initiate discussions with other parties to obtain construction cost estimates for the proposed pipeline? If so, please identify all respondents and provide an explanation regarding why their proposals were rejected. If not, please justify why FPUC did not solicit competitive bids from other parties.
10. Please discuss approximately how many commercial and industrial customers are expected to take service from this expansion project.
11. Approximately when would FPUC expect to request Peninsula to begin any construction of Phase II of the project, as described in paragraph 14 of the petition? Please explain.
12. Please confirm that the proposed amendment is subject to the initial term of 20 years from the original execution date of the agreement approved by the Commission in Order No. PSC-2022-0351-PAA-GU.
13. In Order No. PSC-2022-0351-PAA-GU, the Commission approved the Maximum Daily Transportation Quantity per Dekatherm for unauthorized usage at 2.0 times the rate. Please explain why the parties have agreed to the new rate for unauthorized usage identified in Exhibit B to the agreement.

Please file all responses electronically no later than April 2, 2024 via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at [pkelley@psc.state.fl.us](mailto:pkelley@psc.state.fl.us) or at 850.413.6495 if you have any questions

Thank you,

*/S/Patrick Kelley*

Patrick Kelley

Public Utility Analyst I

cc: Office of Commission Clerk (Docket No. 20240038-GU)