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# Public Service Commission

May 5, 2025

Virginia Ponder  
Ausley McMullen  
123 S. Calhoun Street  
Tallahassee, FL 32301-1517  
vponder@ausley.com

## STAFF'S SECOND DATA REQUEST *via email*

**Re: Docket No. 20250026-GU - Petition for approval to modify swing service charge, individual transportation service rider, and off-system service rate schedule, by Peoples Gas System, Inc.**

Dear Ms. Ponder:

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

1. Please explain in detail why PGS did not propose to alter the OSS sharing mechanism in its current rate case docket (20250029-GU) as the Commission's decision on the sharing could impacts the revenue requirement set in the rate case.
2. Please provide the same information as provided in the table in paragraph 25 of the petition for years 2025 (include actuals and projection until December 2025) and projected numbers for 2026.
3. Witness Nichols in the rate case testimony in Exhibit AN-1 shows budgeted 2026 off system sales margin as \$2.6 million. Please confirm that the \$5.2 million referred to in response to staff's first data request no. 2a (in this docket) is twice that amount if the sharing gets revised from a 25/75 to a 50/50 basis.
4. PGS has proposed removing the 90 per cent cap in its 2025 rate case on tariff sheet 7.202 (20250029-GU). Please explain whether this proposed tariff revision is factored into the calculation of the \$5.2 million.
5. In response to staff's first data request No. 2, PGS provide the rebuttal testimony of Witness Grimard on behalf of Peoples which stated that "...off-system sales are sporadic, opportunistic transactions that are highly dependent on natural gas supply and market conditions...." Please explain whether the utility still considers its OSS revenue to be unpredictable and volatile.

6. Witness Buzard in his testimony filed in the rate case docket No. 20250029-GU, on page 29, testifies that OSS revenues budgeted for 2026 reflect less favorable market conditions. Please explain if actual OSS revenues are materially different (higher or lower) than budgeted, how that would impact PGS's general body of ratepayers and PGS's earnings. In your response, also provide an explanation for the "less favorable market conditions."
7. Please explain whether in the annual PGA docket, PGS currently credits 75 percent of actual annual OSS revenues for the year (not a budgeted amount that could vary from actual OSS revenues).
8. Referring to paragraph 44 of the petition, please provide an estimate of the additional revenues to be credited to the 2026 PGA as a result of the proposed modifications.
9. Referring to paragraph 43 of the petition which states that Rider ITS customers can elect to receive the company's pipeline capacity or the capacity of a third-party. Please provide a general discussion as to why an ITS customer would elect company's pipeline capacity versus the capacity of a third-party. Also discuss the process by which the third-party marketers acquire capacity.

Please file all responses electronically no later than Thursday, May 15, 2025, through the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to [discovery-gel@psc.state.fl.us](mailto:discovery-gel@psc.state.fl.us).*

Please feel free to call me at (850) 413-6856 if you have any questions.

Sincerely,

/s/ Ryan Sandy  
Ryan Sandy  
Senior Attorney

RPS/ds

cc: Office of Commission Clerk