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STATE OF FLORIDA



DIVISION OF ECONOMICS
ELISABETH J. DRAPER
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(850) 413-6410

Public Service Commission

June 18, 2025

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

STAFF'S THIRD DATA REQUEST
via email

RE: Docket 20250035-GU - Petition for approval of 2025 depreciation study and for approval to amortize reserve imbalance, by Florida City Gas.

Dear Ms. Keating:

By this letter, the Commission staff requests that Florida City Gas (FCG) provide responses to the following data requests:

1. Please refer to Schedule B (marked as Exhibit PSL-2 in workbook) of FCG's 2025 Depreciation Study, specifically Account 3762: Mains-Steel. The following parameters for the account are proposed by FCG:
 - Average Service Life = 65 years
 - Average Age = 21.5 years
 - Curve Shape = R4
 - Average Remaining Life = 48 years

FCG provided the R4/65 life table as an attachment to its response to Staff's First Data Request, Question No. 3. At an average account age of 21.5 years, the R4/65 life table estimates an average remaining life of 43.69 years, yet FCG proposes an average remaining life of 48 years in the instant study. Please explain.

2. Please refer to Schedule B (marked as Exhibit PSL-2 in workbook) of FCG's 2025 Depreciation Study, specifically Account 3922: Transportation – Light –Med. Trucks, SUVs & Vans. The following parameters for the account are proposed by FCG:
 - Average Service Life = 12 years
 - Average Age = 4.7 years

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- Curve Shape = S2

Please provide the life tables that show the estimated average remaining life, based on the above parameters, and explain how FCG calculated a remaining life of 5.4 years for this account.

Please file all responses electronically no later than Wednesday, June 25th, 2025, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discoverygcl@psc.state.fl.us.*

Please feel free to call me at (850) 413-6648 if you have any questions.

Sincerely,

/s/ Andrew Kunkler
Andrew Kunkler
Public Utility Analyst
Florida Public Service Commission
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cc: Office of Commission Clerk