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Public Service Commission

August 18, 2025

STAFF'S FIRST DATA REQUEST *via email*

Beth Keating
Gunster, Yoakley & Stewart, P.A.
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Tallahassee, FL 32301
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Matt Everngam
Assistant Vice President Regulatory Affairs
208 Wildlight Ave.
Yulee, FL 32097
MEverngam@chpk.com

RE: Docket No. 20250099-GU – Joint petition for approval of transportation service agreements between Peninsula Pipeline Company, Inc. and Florida City Gas.

Dear Ms. Keating and Mr. Everngam:

By this letter, the Commission staff requests that Florida City Gas (FCG) and Peninsula Pipeline Company, Inc. (Pipeline), jointly, provide responses to the following data requests:

1. Are the petitioners requesting Commission-approval of the confidential Interconnection Agreements (ICA)?
2. The following question refers to the confidential monthly reservation charges contained in the previously approved Transportation Service Agreements (TSA) and in the proposed TSA. Please confirm that they have not changed (staff no longer has the confidential TSA from Docket 20240039-GU).
3. The petition on the first page indicates that the three Renewable Natural Gas (RNG) producers, because of confidentiality provisions, are referred to as RNG 1, RNG 2, and RNG 3. However, in Docket 20240039-GU and the instant docket, approximate descriptions of the RNG producers are provided (e.g., landfill in Cocoa, landfill in Vero Beach, landfill in Medley). Please state what exactly is considered confidential in regards to the RNG producers.

4. Page 2 of the petition states FCG determined it to be more efficient for Peninsula to undertake the ICAs. Please describe the benefits to the general body of ratepayers of subcontracting to Peninsula. Also, in your response, explain why the overall scope of Peninsula's project did not include the ICAs in the original agreements proposed in Docket No. 20240039-GU.
5. Are the RNG producers aware that the work is being subcontracted?
6. Do the ICAs allow subcontracting of the work to Peninsula? If so, cite the specific paragraph in the agreement that allows for work to be subcontracted.
7. For each RNG project, please provide a discussion on whether the project to interconnect with the alternative gas supply has been completed; if not, state work done to date broken into pipeline facilities and interconnect, and estimated completion date, and whether FCG has been purchasing natural gas from the RNGs. If not, state the estimated date to start purchasing natural gas.
8. Why are the length and type of pipe in Attachment B to the petition considered confidential? Please explain.
9. Is the confidential section of pipe described in Attachment B related to the miles of pipe described in paragraph 14 on page 7 of the petition? Please explain.
10. Provide a breakdown of the capital costs of the interconnect projects associated with each RNG as proposed in the petition. Please provide a discussion on whether cost to construct an interconnection with a landfill are comparable to similar projects completed in Florida by Peninsula, FCG, or Chesapeake.
11. Provide a breakdown of the costs included (labor, material, O&M expenses, return, taxes, etc.) for each of the alternative natural gas interconnect monthly reservation charges included in Attachment A to the petition. In your response, please demonstrate why the monthly reservation charge is broken into 5-year terms over the 25-year term.
12. Provide a breakdown of the costs included (labor, material, O&M expenses, return, taxes, etc.) for the monthly reservation charge included in Segment III of Attachment B to the petition.
13. Provide a breakdown of the costs included (labor, material, O&M expenses, return, taxes, etc.) for each of the alternative natural gas interconnect monthly reservation charges included in Attachment C to the petition. In your response, please demonstrate why the monthly reservation charge is broken into 5-year terms over the 20-year term.

14. Are there any changes to the maps that were previously provided in Docket No. 20240039-GU? If so, please provide updated maps to reflect any additional construction proposed in the petition.
15. Please provide further discussion of paragraph 25 on page 11 of the petition. Specifically address how the payments from RNG to FCG and subsequent payments to Peninsula are organized (i.e., the direction of payments and type of payments between the parties, including RNG).

Please file all responses electronically no later than September 2, 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 discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413- 6846 if you have any questions.

Sincerely,

/s/ Daniel Dose
Daniel Dose
Senior Attorney

DD/ds

cc: Office of Commission Clerk