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December 19, 2019

BY E-PORTAL

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

Re: Docket No. 20190201-GU: Petition for authority for approval of revised transportation nomination tariffs, by Florida Public Utilities Company and Florida Public Utilities Company-Fort Meade.

Dear Mr. Teitzman:

Attached, please find the Florida Public Utilities Company's Responses to Staff's First Data Request in the above-referenced docket.

As always, thank you for your assistance. Please do not hesitate to contact me if you have any questions whatsoever.

Sincerely,

Beth Keating
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MEK

Enclosure

Cc:// Bianca Llerisson, Office of the General Counsel (email)
Sevini Guffey, Division of Economics (email)

Response to Staff's First Data Request

Re: Docket No. 20190201-GU: Petition for authority for approval of revised transportation nomination tariffs, by Florida Public Utilities Company and Florida Public Utilities Company-Fort Meade.

1. Please state the number of current customer pools, per pool manager, for FPUC and FPUC-Fort Meade.

Company Response:

There are currently twelve (common) Pool Managers for the Company's Ft. Meade and FPUC divisions. These customer pools can include customers from the Company's FPUC and Ft. Meade divisions.

2. Please state if the pool managers have been informed of the proposal in the instant petition to allow the pool managers one mid-month nomination change, no later than the 15th of each month. If so, what is their perception and level of acceptance of this allowance?

Company Response:

The proposed changes were discussed with the Pool Managers during a meeting on June 27, 2019. During this meeting, the Company committed to providing the mid-month nomination deadline no later than the 15th of each month. The Pool Managers are receptive of the mid-month nomination change opportunity.

3. Have the pool managers been informed of the proposed Pool Manager Nomination method shown in FPUC's revised tariff Sheet No. 33.1 and FPUC- Fort Meade's revised tariff Sheet No. 52.1? If so, what is the pool manager perception and acceptance level of this proposed nomination method?

Company Response:

The proposed changes were discussed with the Pool Managers during a meeting on June 27, 2019. There were no objections or concerns identified concerning the new information requirements. The additional information requested by the Company is routinely required by upstream pipelines and other LDCs operating in Florida.

4. In Docket No. 20190036-GU, the FPUC and FPUC-Fort Meade provided responses to staff's first data request questions 1, 2, and 3 that are summarized below. Please

update the data shown through December 2019.

	FPUC As of 1/31/2019	FPUC- Fort Meade As of 1/31/2019
Number of Transportation Customers	2,369	7
Number of Sales Customers	58,733	584
Number of Pool Managers	13	

Company Response:

	FPUC As of 12/1/2019	FPUC- Fort Meade As of 12/1/2019
Number of Transportation Customers	2,436	9
Number of Sales Customers	60,958	579
Number of Pool Managers	12	

5. In response to question 7 in staff's first data request in Docket No. 20190036-GU, the petitioners stated that the Company communicated with affected pool managers and were supportive of the proposal in that docket. In the instant petition, paragraph 10 states that "subsequent to the proceedings in Docket No. 20190036-GU, the Pool Managers of FPUC and FPUC-Fort Meade's systems expressed concerns over the changes due to penalties..." Please discuss the reasons and difference in level of acceptance by pool managers since the issuance of the Commission Order No. PSC-2019-00153-TRF-GU in April 2019.

Company Response:

Subsequent to the filing of the tariff changes proposed by the Company in Docket No. 20190036-GU some of the affected Pool Managers expressed concern that the penalties associated with the Pool Manager's Daily Delivery Requirement could be detrimental because the Pool Manager does not have an opportunity during the month to address their respective pool imbalances i.e., to nominate incremental gas deliveries or to cut excess gas deliveries to the Company in order to balance their customer pools. To date,

the Pool Managers' concerns have remained consistent with those expressed by the same Pool Managers subsequent to the filing in Docket No. 20190036-GU.

6. Please discuss the effect of the instant proposal, if any, on cash-out rates and index that were approved in Docket No. 20190036-GU?

Company Response:

The proposed changes will not affect cash-out rates and index that were approved in Docket No. 20190036-GU.

7. It appears that Pool Manager Warranty paragraph on FPUC Second Revised Sheet No. 33.1 has been moved to Second Revised Sheet No. 33.2. The moved paragraph does not include the words "...or good right to deliver the Gas". Please state if this is intentional or is a scrivener's error.

Company Response:

The Pool Manager Warranty paragraph that was moved to Second Revised Sheet No. 33.2 *intentionally* eliminates the words "...or good right to deliver the Gas".

8. The revisions to FPUC tariff Sheet No. 33.2 and FPUC-Fort Meade tariff Sheet No. 52.1 include five additional requirements of information from each nomination. Is this information currently required outside the tariff? If not, how will FPUC and FPUC-Fort Meade implement these requirements?

Company Response:

The additional information included for each nomination is not currently required outside of the Company's tariffs. The additional information requested by the Company is information that is consistently required by upstream pipelines and by other LDCs operating in Florida. Once approved by the Commission, the Company will send notice to all participating Pool Managers concerning the requisite changes and making the new requirements effective as of the first day of the month following Commission approval.

9. Please discuss if the proposal in the instant petition would have an effect on the recently approved 2020 PGA factor or if there would be effects on the PGA after 2020.

Company Response:

The instant petition will have no effect on the recently approved 2020 PGA factor and there will be no effects on the PGA after 2020.