



Writer's E-Mail Address: bkeating@gunster.com

October 27, 2020

**VIA E-PORTAL**

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

**Re: Docket 20200193-PU -- Proposed amendment of Rules 25-6.043, 25-7.039, 25-22.0406, 25-22.0407, 25-30.436, and 25-30.437, and repeal of Rules 25-30.438, 25-30.4385, 25-30.440, and 25-30.443, F.A.C., concerning notice, public information, and minimum filing requirements for electric, gas, water, and wastewater applications for rate increase.**

Dear Mr. Teitzman:

Enclosed for electronic filing, please find Sebring Gas System, Inc.'s response to Staff's October 20, 2020 SERC data request.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions or concerns.

Sincerely,

s/Beth Keating  
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

MEK

Docket 20200193-PU -- Proposed amendment of Rules 25-6.043, 25-7.039, 25-22.0406, 25-22.0407, 25-30.436, and 25-30.437, and repeal of Rules 25-30.438, 25-30.4385, 25-30.440, and 25-30.443, F.A.C., concerning notice, public information, and minimum filing requirements for electric, gas, water, and wastewater applications for rate increase.

Sebring Gas System's Response to Staff's SERC Data Request

- 1) What are the estimated incremental cost impacts to implement, and comply with, the proposed modifications to Rule 25-7.039, F.A.C. Please explain.

**Sebring:** At present, the Company anticipates no incremental cost impacts associated with the proposed changes to the rule. It is possible these changes will result in regulatory cost savings.

- 2) What are the estimated incremental cost impacts to implement, and comply with, the proposed modifications to Rule 25-22.0406, F.A.C. Please explain.

**Sebring:** The Company anticipates no incremental cost increases associated with the proposed rule changes. Instead, it is likely there will be some cost savings associated with the changes, namely the savings associated with the elimination of the requirement to place hard copies of the MFRs in numerous locations. These savings could be as much as \$500 per rate case for Sebring.