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STATE OF FLORIDA

DIVISION OF ECONOMICS JUDY HARLOW DIRECTOR (850) 413-6410

Public Service Commission

May 5, 2023

Beth Keating, Esquire Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite601 Tallahassee, FL 32301 bkeating@gunster.com

STAFF'S FIRST DATA REQUEST VIA EMAIL

Jason Bennett Florida Public Utilities Company 208 Wildlight Avenue Yulee, FL 32097 jbennett@chpk.com

Re: Docket No. 20230063-GU: Petition for approval of Transportation Service Agreement for the City of Newberry with the Florida Public Utilities Company by Peninsula Pipeline Company, Inc.

Dear Ms. Keating and Mr. Bennett:

By this letter, Commission staff respectfully requests that Peninsula and Florida Public Utilities Company (FPUC) respond to the following questions.

- 1. Please provide estimated costs and descriptions of the various components of the proposed construction project.
- 2. Please explain when construction is expected to start and the excepted completion date.
- 3. The following questions refer to paragraph 13 of the petition and the statement regarding the interest in the City of Newberry for "replacing their current fuel source with less expensive natural gas."
 - a. Please state what the current fuel source is for customers in the City of Newberry.
 - b. Who is the provider of the current fuel source?

- c. Does the current fuel source have any existing infrastructure FPUC would use for the provision of the planned natural gas service? If yes, please explain how the transfer of any infrastructure to FPUC would be handled, including its costs.
- 4. Does FPUC have a franchise agreement with the City of Newberry to provide natural gas service? Please explain.
- 5. Has FPUC had discussions with others parties or issued a Request for Proposals to obtain construction cost estimates for the project to provide natural gas service to the City of Newberry? Please explain.
- 6. How will FPUC recover its payments to Peninsula pursuant to the projected transportation agreement?
- 7. The following questions refer to footnote 8 on page 6 of the petition.
 - a. Peninsula's tariff sheet No. 3 refers to Peninsula as a natural gas transmission company. Footnote 8 indicates that the proposed pipeline will not meet the definition of a transmission pipeline. Please explain whether Peninsula pursuant to its tariff can engage in the construction of pipelines that do not meet the definition of a transmission pipeline.
 - b. Please explain how the hoop stress of the proposed pipeline has been determined and why Peninsula is not constructing a transmission pipeline to serve the City of Newberry.

Please file all responses electronically no later than May 19, 2023 via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at edraper@psc.state.fl.us or at 850.413.6706 if you have any questions.

Thank you.

/s/Elisabeth Draper Elisabeth Draper Chief

cc: Office of Commission Clerk