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STATE OF FLORIDA



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

Public Service Commission

September 12, 2023

Virginia Ponder
vponder@ausley.com
Ausley McMullen
123 S. Calhoun St.
Tallahassee, FL 32301-1517

STAFF'S FIRST DATA REQUEST
Via E-mail

Re: Docket No. 20230098-GU: Petition of Peoples Gas System, Inc. for approval of 2022 true-up, the projected 2023 true-up and 2024 revenue requirements and surcharges associated with cast iron/bare steel replacement rider.

Dear Ms. Ponder:

By this letter Commission staff respectfully requests that Peoples Gas System, Inc. (Peoples) provide responses to the following data requests:

1. Please provide the Excel spreadsheets for petition Exhibits A, B, and C with formulas unlocked.
2. Referring to paragraph 12 of the petition, please explain the factors that led to the \$787,888 under-recovery (including interest) in 2022.
3. Please discuss the progress of Cast Iron/Bare Steel Pipe Replacement Rider (CI/BS) projects and Problematic Plastic Pipe (PPP) replacement projects in 2022, 2023, and those planned for 2024.
4. Please update the tables below, contained in Peoples' response to Staff's First Data Request No. 4, in Docket No. 20220152-GU.

	CI/BS Miles Replaced	PPP Miles Replaced	CI/BS Investment≠	PPP Investment	CI/BS Revenue Requirement	PPP Revenue Requirement
2017	51	-	\$17,588,366	\$2,915,802	\$6,868,302	\$74,021
2018	62	56	\$27,035,678	\$15,890,424	\$8,510,823	\$848,201
2019	52	42	\$35,821,371	\$17,425,589	\$11,075,229	\$2,706,161
2020	55	43	\$32,317,184	\$11,115,571	\$14,817,804	\$4,358,010
2021	14	38	\$23,726,642	\$19,812,603	\$1,347,321	\$(160,452)
2022*	22.6	42	\$12,726,454	\$13,257,487	\$3,198,966	\$1,893,717
2023*	3	56	\$4,733,434	\$20,084,370	\$4,427,140	\$3,606,787
2024*	-	53		\$21,113,609	\$4,719,944	\$5,790,505
2025*	-	50	-	\$20,422,085	\$4,665,567	\$7,934,661
2026*	-	48	-	\$20,065,464	\$4,604,292	\$9,995,517
2027*	0.4!	45	**	\$19,320,794	\$4,542,798	\$11,974,082
2028*	-	43	-	\$20,464,387†	\$4,481,301	\$13,934,519

*Projected

†2028 PPP investment includes rollover costs to occur in 2029.

≠CI/BS Investment includes removal of initial \$1M.

!5-year construction moratoriums in effect in the City of Miami preventing completion before 2027.

**Costs for remaining CI/BS miles in 2027 expected to be less than \$1M and thus excluded from the investment amount.

Year	Main Replacements					Service Replacements	
	Replaced Cast Iron (miles)	Replaced Bare Steel (miles)	Remaining Cast Iron at Year End (miles)	Remaining Bare Steel at Year End (miles)	Total Miles Remaining of CI/BS Mains	Replaced Number of Bare Steel Services	Total Number of Remaining Bare Steel Services
2012	-	-	100	354	454	-	14,978
2013	13	38	87	316	403	907	14,071
2014	2	15	85	298	383	7,964	6,107
2015	26	60	59	238	297	1,019	5,088
2016	15	35	44	203	247	1,050	6,963
2017	15	36	29	178	207	1,135	4,279
2018	10	52	18	126	144	1,970	2,309
2019	8	44	10	83!	93	649	1,660
2020	4	51	6	35!	41	423	1,237
2021	3.5	10.5	2	24	26	191	998
2022*	1.8	20.8	0.2†	3.2†!	3.4	500	≠

*Projected

†For an explanation regarding remaining CI/BS after 2022 see response to question number 3.

≠This will be determined during the replacement year.

!Additional miles of pipe added after reclassification of pipe type.

Miles	Replaced PPP (miles)	Total Remaining PPP Mains (miles)	Replaced Number of PPP Services	Total Number of Remaining PPP Services
2016	-	551	-	28,237
2017	-	509	1,396	26,841
2018	56	461	3,941	24,741
2019	42	418	2,349	20,420
2020	43	370	1,702	18,718
2021	38	337	882	17,683
2022*	42	295	†	†
2023*	56	239	†	†
2024*	53	186	†	†
2025*	50	136	†	†
2026*	48	88	†	†
2027*	45	43	†	†
2028*	43	-	†	†

*Projected

†This will be determined during the replacement year.

Please file all responses electronically no later than September 19, 2023 via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. Please call me at 850.413.6554 if you have any questions.

Thank you,

/s/Oakley Ward
Public Utility Analyst II
oward@psc.state.fl.us

CC: Office of Commission Clerk
Jeff Wahlen, Ausley McMullen
Malcolm N. Means, Ausley McMullen
Paula K. Brown, Peoples Gas System, Inc.
Karen L. Bramley, Peoples Gas System, Inc.
Matthew E. Elliott, Peoples Gas System, Inc.