

COMMISSIONERS:
MIKE LA ROSA, CHAIRMAN
ART GRAHAM
GARY F. CLARK
ANDREW GILES FAY
GABRIELLA PASSIDOMO SMITH

STATE OF FLORIDA



ADRIA E. HARPER
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

September 22, 2025

STAFF'S FIRST DATA REQUEST *via email*

Jeff Wahlen, Esq.
Ausley McMullen
123 S. Calhoun St.
Tallahassee, Florida 32301-1517
jwahlen@ausley.com

RE: Docket No. 20250106-GU – Petition for approval of 2024 true-up, projected 2025 true-up; and 2026 revenue requirements and surcharges associated with cast iron/bare steel pipe replacement rider, by Peoples Gas System.

Dear Mr. Wahlen:

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

1. Please identify all remaining activities under the utility's current CI/BSR. As part of this response, please identify the current status and the estimated completion date for each remaining activity.
2. Please provide the total CI/BSR investment to date (2012-2025).
3. Please discuss the progress of CI/BSR replacement projects and Problematic Plastic Pipe (PPP) replacement projects in 2024, 2025, and those planned for 2026.
4. Please provide the Excel spreadsheets for petition exhibits A, B, C, and D with formulas unlocked.
5. Referring to paragraph 18 of the petition, please explain the factors that led to the \$331,724 under-recovery (including interest) in 2024.
6. Please update the tables contained in Peoples' response to Staff's First Data Request No. 8 (Document No. 09444-2024) in Docket No. 20240133-GU.
7. Please provide a discussion on how Peoples prioritizes its replacement projects and ensures that they are completed in a cost effective manner.

8. If the CI/BSR relies on the DIMP plan, please provide any relevant pages from the DIMP plan that support the replacement projects planned for 2026.
9. Please provide a discussion on whether the utility uses in-house or contract labor to complete the replacement projects and what criteria that decision is based on.
10. If the utility uses contract labor, please discuss controls to ensure the payments for contract labor are reasonable.
11. Please provide a discussion on how Peoples purchases the replacement materials and ensures that they are purchased in a cost effective manner.

Please file all responses electronically no later than Monday, October 6, 2024, 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 discoverygcl@psc.state.fl.us.*

Please feel free to call me at (850) 413- 6524 if you have any questions.

Sincerely,

/s/ Zachary Bloom
Zachary Bloom
Attorney

ZB/ds

cc: Office of Commission Clerk