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September 23, 2025

**BY E-PORTAL**

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

**Docket No. 20250099-GU – Joint petition for approval of transportation service agreements between Peninsula Pipeline Company, Inc. and Florida City Gas.**

Dear Mr. Teitzman:

Attached for filing, please find Peninsula Pipeline Company's and Florida City Gas's Joint Responses to Staff's 2<sup>nd</sup> Set of Data Requests. Portions of Attachment A to these responses are redacted. A Request for Confidential Classification for Attachment A will be submitted under separate cover.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,



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**Docket No. 20250099-GU** – Joint petition for approval of transportation service agreements between Peninsula Pipeline Company, Inc. and Florida City Gas.

**Florida City Gas's and Peninsula Pipeline's Joint Responses  
to Staff's Second Set of Data Requests**

- 1) Please provide a more detailed explanation of the payment arrangement and flow of revenues between one RNG producer, FCG, and Peninsula .**

**Company Response:**

Please see the attached confidential chart (Attachment A) explaining the payment arrangement between the parties.

- 2) Please explain in more detail the capital costs of each interconnect project associated with each RNG. Are these costs comparable to similar projects?**

**Company Response:**

The capital costs of these projects include a majority of items that are standard with most of the Company's similar interconnect projects. This includes the M&R site with regulators, automated valving, remote monitoring communication and control configurations, and meters. It also includes flanges, strainers, and interconnected piping.

The costs of these projects are comparable to those of a standard interconnect. Two components that are RNG specific are the gas chromatograph and quality analyzers. These two RNG specific components average approximately \$550K per project, a small portion of the overall cost. The ICA includes recovery of these costs from the RNG producers.

- 3) Please explain what is included in the costs for the monthly reservation charges for each alternative natural gas interconnect. Refer to response 11 of data request.**

**Company Response:**

The monthly reservation charges in the ICAs were negotiated between FCG and the RNG producers prior to Chesapeake's acquisition of FCG. Despite not being involved in the specific details of those negotiations, the reservation charges do apparently include:

- Cost of operations, maintenance, and testing of the facilities
- Return on and recovery of asset cost
- Depreciation of the assets

- Costs associated with shared services (ie, accounting, legal, tax departments.)
- Estimated property tax

**4) Confirm that on attachment B (Indian River) to the petition the amounts listed by year are the monthly reservation charge.**

**Company Response:**

Yes, the amounts listed are the monthly reservation charge.

**5) Confirm that the monthly reservation charge related to transportation for attachments A (Brevard) and C (Miami-Dade) are the same as what was approved in the previous FTSA.**

**Company Response:**

Regarding Brevard (A), the charge related to the transportation is the same as approved in the previous FTSA.

For Miami-Dade (C), it is also the same.

**6) Confirm that when you are talking about Hialeah you are referring to the Medley interconnect.**

**Company Response:**

Yes, when talking about Hialeah the Company is referring to the Medley interconnect.

**7) Referring to response number 4 to staff's first data request, is it true that before FCG was acquired by Chesapeake, Peninsula still would've completed the interconnection part.**

**Company Response:**

Chesapeake cannot speak to what the previous management's decision would have been with regard to utilizing an intra-state transmission company to complete the interconnect work on these RNG projects. At the time of the Chesapeake's acquisition of FCG there were no agreements yet in place between PPC and FCG regarding the RNG projects.

**8) Monthly reservation charges for interconnect match between FTSA's and ICAs?  
Verified for Brevard but no other projects.**

**Company Response:**

- The monthly reservation charges for the interconnects do match between the FTSA's and the ICAs.
  - Indian River – See Exhibit E (For specific amount, see Attachment A)
  - Miami-Dade – Years 1-5 (See also Attachment A.

**9) What is the current status of the construction of each of the projects and how much was done by Peninsula vs. FCG?**

**Company Response:**

Many of the Company's projects are designed, engineered and constructed by a shared services team who are not specifically designated as either Peninsula or FCG employees. However, these teams focus on areas of expertise that are specific to transmission (PPC) or distribution (FCG) functions. The costs associated with these employees, their work, and the construction of the projects is ultimately assigned to the business unit they are supporting and the unit that ends up owning and operating the project.

These shared service teams have members with skillsets geared toward different areas of expertise, such as distribution vs transmission systems. As such, when a project comes in specific people are assigned based on their individual areas of expertise. Due to the nature of these specific projects, shared services employees with expertise more geared toward the transmission side (PPC) of the business have been primarily used, which wouldn't have traditionally used for FCG or other LDC projects. FCG's historical expertise has been in distribution and to continue co-mingling the activities of our transmission focused team with the historically distribution focused FCG team is not as efficient for this project's design, construction, and O&M activities.

Brevard – The pipeline facilities for this project have been completed and are in-service and the interconnect facilities are anticipated to be completed in October 2025. Natural gas anticipated to be purchased after interconnect facilities are in service.

Indian-River – Interconnect is constructed and pipeline facilities to Vero Beach south are in service, with pipeline segment to Vero North estimated to be complete in mid-2026. Natural gas is currently being purchased.

Miami-Dade – Pipeline facilities are partially completed with the pipeline and tie-in to Hialeah completed and in-service. Interconnect completion and natural gas purchases anticipated in early 2026.

# ATTACHMENT A

1.

Current			
	FCG-PPC FTSA Monthly Revenue	FCG-RNG Producer ICA Monthly Revenue	Total
Brevard			
Indian River			
Miami Dade			

Amended				
	FCG-PPC FTSA Monthly Revenue	FCG-RNG Producer ICA Monthly Revenue	FCG-RNG Producer ICA Revenue Credit to PGA/Swing	Total
Brevard				
Indian River				
Miami Dade				

8. Indian River -

Miami-Dade - annual shown in contract as but monthly is