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STATE OF FLORIDA



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

Public Service Commission

November 7, 2025

Staff's First Data Request

Via E-mail

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Matt Everngam
Assistant Vice President Regulatory Affairs
208 Wildlight Ave.
Yulee, FL 32097
MEverngam@chpk.com

Re: Docket No. 20250132-GU - Petition for approval of second amendment to transportation service agreement between Peninsula Pipeline Company, Inc. and Florida Public Utilities Company, for the New Smyrna Beach project.

Dear Ms. Keating and Mr. Everngam:

By this letter, Commission staff respectfully requests that Peninsula Pipeline Company (Peninsula) provide responses to the following questions:

1. Please explain why the additional delivery point was not included in the currently approved amendment No. 1 to the transportation service agreement, previously provided in Docket No. 20230135-GU.
2. Please provide an updated map showing where the additional delivery point would be located.
3. Please provide a breakdown of the incremental capital costs required to construct the additional delivery point.
4. In paragraph 12 of the petition, it is stated that Peninsula has agreed to install the additional delivery point without additional charges. Please confirm that there is no change in the monthly reservation charge. If there is, please explain.
5. Please provide the expected completion date of the additional delivery point.

6. Please provide a description of the current progress of the New Smyrna Beach project, as approved in Docket No. 20230135-GU.
7. Please confirm the seventh delivery point described, as at or near the intersection of Pioneer Trail and Junonia Blvd in Attachment A of the petition, is the additional delivery point being referenced in the petition.
8. In paragraph 12 of the petition, it states, “an additional delivery point should have been included in the plans for the project.” Does that mean that the cost for this delivery point was included in the previously approved amendment No. 1, previously provided in Docket No. 20230135-GU?
 - a. If the answer to question No. 8 is no, please explain how Peninsula will recover the cost to construct the additional delivery point.
 - b. If the answer to question No. 8 is yes, please state if Florida Public Utilities Company has been paying Peninsula for a project that has not been constructed.

Please file all responses electronically no later than November 21, 2025, 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 discovery-gcl@psc.state.fl.us and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please contact me at cnguyen@psc.state.fl.us or at 850.413.6402 if you have any questions.

Thank you,

/s/ Chris Nguyen
Chris Nguyen
Public Utility Analyst I

cc: Office of Commission Clerk