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STATE OF FLORIDA



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Public Service Commission

November 7, 2025

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

STAFF'S FIRST DATA REQUEST VIA ELECTRONIC MAIL

Re: Docket No. 20250121-GU – Joint petition for approval of actual, estimated, and projected relocation costs and approval to establish a recovery surcharge, by Florida City Gas and Florida Public Utilities Company.

Dear Ms. Keating:

By this letter, the Commission staff requests that Florida City Gas (FCG) and Florida Public Utilities Company (FPUC) provide responses to the attached data request. Please file all responses no later than **Friday, November 21, 2025**, via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20250121-GU) and also please email the filed response to discovery-gcl@psc.state.fl.us. We appreciate your cooperation in filing your responses correctly and in a timely manner. If you have any questions, please contact Eric Wooten by phone at (850) 413-6546 or by email at ewooten@psc.state.fl.us.

Sincerely,

A handwritten signature in blue ink that reads "Cayce Hinton".

Cayce Hinton
Director

Attachment

cc: Office of Commission Clerk (Docket No. 20250121-GU)
cc: Office of Industry Development & Market Analysis (Bates, Nave, Long, Pendris, Wooten)
cc: Division of Accounting and Finance (Gatlin, Holloway, Norris, Vogel)
cc: Division of Economics (Draper, Hampson, Ward)
cc: Division of Engineering (Ellis, Sanchez)
cc: Office of General Counsel (Marquez, Shaw)

20250121 Staff's First Data Request

1. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG and SM-1 FPU. For each relocation project listed, please provide the following:
 - a. A brief description of the activities associated with the project, and identify when each activity was completed, or for projects under construction or in the design phase, the estimated time of completion.
 - b. A breakdown of what is included in the cost estimate for each project, and explain how the cost estimate was developed for each.
2. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG and SM-1 FPU. For each relocation project identified below, verify the correct project ID number.
 - a. 0361-RELO-405606 SEBASTIAN
 - b. SR 434 and Winding Hollow Trl (Steel GM Rel with PE GM)
 - c. SR806 (Atlantic AVE) Homewood Blvd and SR 704 Okeechobee Blvd /Haverhill RD (GM Reloc)
 - d. Fort Fraser Trail over SR 60 (Install 4" PE)
3. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG, page 1, and SM-2 CG, pages 1 through 4. Clarify whether the state road referred to in the project name should be SR932 or SR392 for FDOT Financial Project ID 445993-1-52-01.
4. Refer to witness McCloskey's pre-filed Exhibits SM-1 CG, page 1, and SM-2 CG, page 36. Please provide additional documentation associated with the project identified as BCA417007 Nicklaus Dr. Culvert to demonstrate the requesting authority from the City of Melbourne.
5. Please refer to witness McCloskey's pre-filed Exhibit SM-2 CG, pages 15 through 25. The documentation provided appears to be a duplication of the documents associated with the project identified as Okeechobee Rd Relocation FDOT. If so, provide additional documentation associated with the project identified as 0361-DOT-OSLO RD RELO to demonstrate the need for the project by the requesting authority pursuant to Rule 25-7.150(2), Florida Administrative Code (F.A.C.).
6. Please refer to witness McCloskey's pre-filed Exhibit SM-2 FPU, page 1. Provide the attachment, 65% Construction Plan and Conflict Matrix, referenced in the provided memorandum.
7. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, page 7. Verify the correct project name and the location of where the associated activities were performed.
8. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 31 through 33. Clarify if the project is in Volusia County, as stated in Exhibit SM-2 FPU, page 31, or in Seminole County, as stated in Exhibit SM-1 FPU. As part of

this response, state what activities associated with this project have been or are being performed in Debary.

9. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 34 through 36. Verify the names of the streets where the conflict is located.
10. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 38 through 40. Provide additional documentation to demonstrate the need for the project by the requesting authority pursuant to Rule 25-7.150(2), F.A.C.
11. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 45 through 47. Verify the city location of the project.
12. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 48 through 50. Clarify the connection between the streets named in the project name.
13. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 51 through 56. Verify the project location and the name of the requesting authority.
14. Please calculate the FCG and FPUC Natural Gas Facilities Relocation Cost Recovery Clause (NGFRCRC) surcharges, as shown on Schedules D-1 of Diana Williams' pre-filed composite Exhibit DW-1, for each rate class based on a March 1 through December 31, 2026 billing period.
15. Please provide original tariff sheet No. 7.413 (FPUC) and original tariff sheet No. 83 (FCG) to show the recalculated surcharges based on the 10-month recovery period contemplated by Question 14.
16. Please refer to Schedules A-1 in pre-filed Exhibits SM-1 CG and SM-1 FPU, for both FCG and FPUC, have any of the relocation projects been previously included in base rates or recovered through any other type of rider, surcharge, or regulatory asset amortization?

If yes, please provide the prior proceeding or mechanism through which the recovery occurred and explain how that portion of the cost was disallowed in the NGFRCRC surcharge in this proceeding or deducted from the previously recorded account.
17. Does either FCG or FPUC intend to transfer any of the relocation projects into plant-in-service in a future rate base proceeding?

If yes, please provide information on FCG's and/or FPUC's policies and internal controls to prevent double recovery of these costs.
18. Refer to Schedules B-1 in witness Williams' pre-filed Exhibits DW-1 CG and DW-1 FPU. Please provide the calculation used to determine the 2024 revenue expansion factor of 1.353 for FCG and 1.350 for FPUC.

19. Please reference Schedules C-1 through C-3 in both of witness Williams' pre-filed Exhibits DW-1 CG and DW-1 FPU, specifically the line items of "General Public Notice Expense & Customer Notice Expense." Provide information on what the expense includes.
20. Please provide information on how the ad valorem tax was calculated in determining the revenue requirement for both FCG and FPUC.