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STATE OF FLORIDA



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Public Service Commission

December 19, 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 **Monday, January 5, 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 if you have any questions.

Sincerely,

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

Cayce Hinton
Director

Attachment

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 Second Data Request

1. Please refer to witness McCloskey's pre-filed Exhibit SM-1 CG, Schedule A-1, page 1, and FCG's and FPUC's response to staff's First Data Request, Question 5, page 3, with attached file "DR 1.5 361 OSLO ROAD." Please explain the discrepancy between Financial Project ID numbers, and if necessary, provide additional documentation associated with the project identified as 0361-DOT-OSLO RD RELO to support the eligibility for the project costs to be recovered through the NGFRCRC pursuant to Rule 25-7.150(2), Florida Administrative Code (F.A.C.).
2. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG and SM-1 FPU. Do not address the following projects in your response to this question: (1) SR80 (Southern Blvd) @ SR 7 US 441 (Install 1.25 " PE Gas Service), (2) SR806 (Atlantic AVE) Homewood Blvd and SR 704 Okeechobee Blvd /Haverhill RD (GM Reloc), (3) BCA417007 Nicklaus Dr. Culvert, (4) Australian Ave (Steel GM Replaced with PE GM), (5) MR US 98 and Western Ave (4" PE installed), (6) 203 SW 14th Ave (Steel GM replaced with PE GM), (7) Pine Tree Lake Clarke Shore Bridge (PE GM Reloc), (8) Florida Mango Relocation 10th to Nemec (Steel GM relocation), or the (9) Earman Bridge over the C-17 Canal Bridge (PE GM Reloc). For each remaining relocation project, please provide the following:
 - a. Identify the mandate, statute, law, ordinance, or agreement between the utility and the authority that creates the requirement for the project as specified in 366.99(1)(d), Florida Statutes (F.S.). If more than one is applicable, identify each.
 - b. Provide the date and means by which the utility was notified by an authority, as defined by 337.401(1)(a), F.S., that relocation of the utility's facilities was required. As part of this response, provide a copy of the official notification the utility was provided. If this notification was verbal, such as a meeting or conference call, please provide follow-up documentation that formally memorialized the relocation need.
3. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG and SM-1 FPU. For each relocation project except for SR80 (Southern Blvd) @ SR 7 US 441 (Install 1.25 " PE Gas Service) and SR806 (Atlantic AVE) Homewood Blvd and SR 704 Okeechobee Blvd /Haverhill RD (GM Reloc), please provide the following:
 - a. Identify the start date of the project. If the project has not commenced, state so and provide an estimated commencement date (by day or month).
 - b. Identify the completion date of the project. If the project is not complete, state so and provide an estimated completion date (by day or month).
 - c. Provide the length(s), by size(s), for each material type of pipelines abandoned, as well as any other facilities, as part of the required relocations, if applicable.
 - d. Provide the length(s), by size(s), for each material type of pipelines installed, as well as any other facilities, as part of the required relocations, if applicable.

- e. State if the utility also completed an associated Utility Work Estimate, as incorporated in Rule 14-46.001(2)(c), F.A.C., for the project. If so, please provide a copy of that document for each project
4. Regarding the 0361-RELO-405606 SEBASTIAN project, the Florida Department of Transportation (FDOT) utility work schedule references “County Road 510.” Please explain why an FDOT work schedule was obtained for a county road. In your response, clarify which authority has jurisdiction over this road and which authority’s need for natural gas facilities relocation precipitated the work.
5. Regarding all four phases of the MR CR491 projects, the FDOT work schedules reference “CR 491.” Please explain why an FDOT work schedule was obtained for a county road. In your response, clarify which authority has jurisdiction over this road and which authority’s need for natural gas facilities relocation precipitated the work.
6. Please provide fully executed copies (i.e., with all party signatures) of any utility work schedules from FDOT or Polk County, if not already previously given.
7. Please provide, for each of the last five years and projected 2026, the amounts that FCG and FPUC budgeted and included in base rates for the relocation of facilities, including the associated revenue requirement.
8. Please identify and categorize any relocation expenditures for the past five years that were incurred by FCG or FPUC due to one of the following: (1) relocations required by other entities; (2) relocations due to problematic pipes or infrastructure; or (3) relocations related to easements or right-of-way issues.
9. Please refer to Witness McCloskey’s direst testimony, page 5, line 18 and the joint response to staff’s first data request, no. 2a for the following questions.
 - a. Please explain why FDOT project 405606-7-52-01 has been included for recovery in Docket No. 20250042-GU for Peninsula Pipeline Company and in the instant petition for FCG.
 - b. Please explain how the utilities would avoid the double recovery of projects associated with affiliate transactions, such as firm transportation service agreements with Peninsula.
 - c. Please clarify if any other relocation projects listed in Witness McCloskey’s Exhibits SM-1 CG and SM-1 FPU are associated with a previously-approved transportation service agreements with Peninsula. If so, please provide the docket numbers.