



March 31, 2026

**VIA ELECTRONIC FILING**

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

Re: Docket No. 20260011-GU, Natural Gas Facilities Relocation Cost Recovery Clause.

Dear Mr. Teitzman:

Attached for filing in the above docket is Peoples Gas System's Petition for actual Natural Gas Facilities Cost Recovery.

The testimony of Peoples Gas System's supporting witnesses, Matthew E. Elliot and Kristopher J. Kelley, are being filed contemporaneously under separate, individual cover letters.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'V. Ponder'.

Virginia L. Ponder

VLP/dk  
Attachment

cc: All parties of record (w/attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Facilities Relocation ) DOCKET NO. 20260011-GU  
Cost Recovery Clause )  
\_\_\_\_\_) FILED: March 31, 2026

**PETITION OF PEOPLES GAS SYSTEM, INC.**

Peoples Gas System, Inc. ("Peoples" or the "company"), pursuant to Section 366.99, Florida Statutes and Rules 25-7.150 and 28-106.201, Florida Administrative Code, hereby petitions for the Florida Public Service Commission ("Commission") for a determination that its actual natural gas facilities relocation costs for the period July 1, 2024, through December 31, 2025 (the "True-Up Period"), were prudently incurred and are eligible for recovery through the Natural Gas Facilities Relocation Cost Recovery Clause ("NGFRCRC"), and states:

**Introduction**

1. Peoples is a natural gas local distribution company providing sales and transportation delivery of natural gas throughout most of the State of Florida and is a natural gas public utility subject to the Commission's statutory jurisdiction to establish rates and charges under Section 366.06, Florida Statutes.

**Applicable Law**

2. In 2024, the Florida Legislature created Section 366.99, Florida Statutes, entitled "Natural gas facilities relocation costs." Section 366.99(3) directs the Commission to "conduct an annual proceeding to determine each utility's prudently incurred natural gas facilities relocation costs and to allow each utility to recover such costs through a

charge separate and apart from base rates, to be referred to as the natural gas facilities relocation cost recovery clause.”

3. The Commissions review is limited "to determining the prudence of the utility's actual incurred natural gas facilities relocation costs and the reasonableness of the utility's projected natural gas facilities relocation costs for the following calendar year, and providing for a true-up of the costs with the projections on which past factors were set.”<sup>1</sup>

4. The term “natural gas facilities relocation costs” is defined as:

the costs to relocate or reconstruct facilities as required by a mandate, a statute, a law, an ordinance, or an agreement between the utility and an authority, including, but not limited to, costs associated with reviewing plans provided by an authority. The term does not include any costs recovered through the public utility's base rates.<sup>2</sup>

Additionally, only costs incurred on or after July 1, 2024, may be included.<sup>3</sup>

5. Section 366.99(1)(a) defines the term “authority” to have the same meaning as the Florida Department of Transportation and local governmental entities “that have jurisdiction and control of public roads or publicly owned rail corridors...” (citing §337.401(1)(a), Florida Statutes).

6. Any costs approved for recovery through the natural gas facilities relocation cost recovery clause “must be allocated to customer classes pursuant to the rate design most recently approved by the commission.”<sup>4</sup>

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<sup>1</sup> Section 366.99(3), Florida Statutes

<sup>2</sup> Section 366.99(1)(d), Florida Statutes.

<sup>3</sup> See Order No. PSC-2026-0052-TRF-GU, issued on February 23, 2026, Docket NO. 20250121-GU (Joint Petition For Approval To Establish Recovery Surcharge).

<sup>4</sup> Section 366.99(4), Florida Statutes.

7. Rule 25-7.150 (the "Rule") implements Section 366.99 and specifies the process and requirements for a utility to file its petition for recovery of natural gas facilities relocation costs through the NGFRCRC.

**Statement of Ultimate Facts Alleged and Providing the Basis for Relief**

8. During the period July 1, 2024, through December 31, 2025, Peoples incurred actual facilities relocation costs of \$33,840,873 associated with the company's 47 proposed projects included in this filing.

9. Peoples seeks a Commission determination that its actual natural gas facilities relocation costs associated with the 47 proposed projects for the period July 1, 2024, through December 31, 2025, were prudently incurred and eligible for recovery through the NGFRCRC.

10. In accordance with Subsection (1) the Rule, this Petition is supported by the testimony of company witnesses Kristopher J. Kelley and Matthew E. Elliott.

11. The direct testimony of Kristopher J. Kelley identifies each of the company's 47 proposed projects and provides the information required by Subsection (2) of the Rule for each of those proposed projects, including the notification by the authority requiring the relocation, a description of the scope of work for each project, and the actual or estimated costs associated with each project.

12. The direct testimony of Matthew E. Elliott presents the company's calculation of Peoples total actual NGFRCRC costs for the True-Up period and the NGFRCRC revenue requirement associated with those costs. As described in witness Elliott's testimony, Peoples' actual incurred natural gas facilities relocation costs are \$33,840,873.

**Other**

13. The Petitioner's name and address are:

Peoples Gas System, Inc.  
P.O. Box 2562  
Tampa, Florida 33601-256

14. Any pleading, motion, notice, order, or other document required to be served upon any party to this proceeding shall be served upon the following individuals:

J Jeffrey Wahlen  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
Virginia Ponder  
[vponder@ausley.com](mailto:vponder@ausley.com)  
Matthew J. Jones  
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Director, Regulatory Affairs  
Peoples Gas System, Inc.  
Post Office Box 2562  
Tampa, Florida 33601-2562

15. The Commission has jurisdiction to entertain this Petition pursuant to Sections 366.04(1), 366.05(1) and 366.06, Florida Statutes.

16. Peoples states that it is not aware of any disputed issues of material fact at this time but acknowledges the possibility that other parties could assert disputed issues of material fact during this proceeding.

**WHEREFORE**, Peoples Gas respectfully requests that the Commission find that the company's actual natural gas facilities relocation costs were prudently incurred and that these costs are eligible for recovery through the NGFRCRC.

DATED this 31<sup>st</sup> day of March, 2026.

Respectfully submitted,



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*Attorneys for Peoples Gas System, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Petition, the Direct Testimony of Kristopher J. Kelley and Exhibit (KJK-1) and the Direct Testimony of Matthew E. Elliott, and Exhibit (MEE-1) filed on behalf of Peoples Gas System, Inc., have been furnished electronic mail on this 31<sup>st</sup> day of March 2026, to the following:

Carlos Marquez  
Shaw Stiller  
Office of General Counsel  
Florida Public Service Commission  
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ATTORNEY