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Public Service Commission

July 8, 2026

STAFF'S SECOND DATA REQUEST *via email*

J. Jeffry Wahlen
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Matthew J. Jones
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Charles Morgan
Supervisor, Conservation Programs
Peoples Gas System, Inc.
Post Office Box 2562
Tampa, Florida 33601-2562
pgsregulatory@tecoenergy.com

RE: Docket No. 20260088-GU – Petition for approval of firm service agreement with Peoples Gas System, Inc. in Lee and Collier Counties, by SeaCoast Gas Transmission, LLC.

Dear Mr. Wahlen, Ms. Ponder, Mr. Jones, and Mr. Morgan:

By this letter, the Commission staff requests that Peoples Gas System (PGS) and SeaCoast Gas Transmission, LLC. (SeaCoast) provide responses to the following data requests:

1. Refer to paragraph 7 of the Petition.
 - a. What specific pressure thresholds define the measurable pressure degradation currently experienced in the southern segments of the Lee and Collier County distribution systems during peak high-demand periods?
 - b. Define or describe the capacity constraints on the system.

- c. What is the current operating pressure at the existing Florida Gas Transmission (FGT) single gate station?
 - d. Provide the current and projected peak day demand models over the next 5 years that demonstrate why a capacity increase of nearly 50 percent is required for the current customer base.
2. Refer to paragraphs 8 and 9 of the Petition.
 - a. What are the technical specifications and design pressure ratings for each of the three proposed interconnections, including the FGT/SeaCoast interconnect south of the Caloosahatchee River and the two SeaCoast/People Gas System, Inc. (PGS) interconnects?
 - b. How will the system be monitored to prevent operational imbalances between the FGT interstate system and the SeaCoast/PGS intrastate systems?
3. Refer to paragraph 12 of the Petition. Identify each competitive option evaluated by PGS, including the name of the entity or pipeline provider that submitted the option, proposal, or bid.
 - a. For each option identified, state the specific proposed transportation rates, reservation charges, usage charges, and fuel retainage percentages offered to PGS.
 - b. State the explicit economic, geographic, or operational metrics used by PGS to determine that the SeaCoast Southwest (SW) Florida Project was more cost-effective or reliable than the alternative options evaluated.
 - c. Provide details of the routing evaluation utilized to choose the alignment from the Caloosahatchee River to Corkscrew Road and State Road 41. As part of your response, state whether it utilizes or parallels existing public rights-of-way or utility corridors.
 - d. Are there any known geographical engineering challenges regarding the crossing of the Caloosahatchee River or surrounding protected wetlands along the pipeline corridor?
 - e. What specific engineering alternative solutions were evaluated by PGS to resolve the pressure challenges before selecting the SW Florida Project?
 - f. Why was an expansion of the existing single gate station or looping existing lines deemed technically unfeasible compared to building the SW Florida Project?

- g. Please provide all documents, communications, spreadsheets, memos, and internal evaluations concerning the other competitive options referenced in paragraph 12 of the petition, including but not limited to:
 - i. Copies of all requests for proposals, bids, alternative rate sheets, tariffs, and contract offers received by PGS from third-party natural gas transmission companies or alternative service providers for the SW Florida region.
 - ii. All financial modeling, cost-benefit analyses, and price-comparison spreadsheets generated by or for PGS comparing third-party alternative rates against the proposed SeaCoast negotiated rate.

Please file all responses electronically no later than Tuesday, July 28, 2026, 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.*

Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless
Suzanne Brownless
Special Counsel

SBr/ds

cc: Office of Commission Clerk