

STATE OF FLORIDA



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Public Service Commission

May 10, 2017

STAFF'S SECOND DATA REQUEST *via email*

Floyd R. Self, Esquire
Colin Roopnarine, Esquire
Berger Singerman LLP
313 North Monroe Street, Suite 301
Tallahassee, FL 32301
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Carolyn Bermudez, Vice President of Operations & General Manager
Florida City Gas
4045 NW 97th Avenue
Doral, FL 33178-2300
cbermude@southernco.com

Re: Docket No. 160175-GU - Petition for review and determination on the project construction and gas transportation agreement between NUI Utilities, Inc. d/b/a City Gas Company of Florida and Florida Crystals Corporation, and approval of an interim service arrangement.

Dear Mr. Self and Ms. Bermudez:

Commission staff respectfully requests the following information from Florida City Gas (FCG or Company). Where reference is made to confidential exhibits, the indicated cell numbers correspond to the cell numbers on the hard copies of the exhibits and not the cell numbers in the native Excel spreadsheets.

1. Please refer to page 1 of Confidential Exhibits C-2B and C-2C. Please discuss in detail and provide supporting documentation to explain the differences between the values in Cells D16 and D20 in Exhibit C-2B, and Cells D16 and D19 in Exhibit C-2C. For spreadsheets provided, please ensure that all cell formulas are intact and unlocked.

2. For the following question, please refer to: (a) Confidential Exhibit C-3B (2017), page 2 of 5, Cell B17; (b) previously filed Confidential Exhibit No. 3, page 2 of 7, Cell B17; and (c) previously filed Confidential Exhibit No. 3A (2017), page 2 of 9, Cell B19.

Please explain in detail why FCG believes that the methodology used to determine the value presented in Exhibit C-3B is preferable to the prior methodologies used in the development of previously filed Exhibit Nos. 3 and 3A.

3. Please refer to Confidential Exhibit D, pages 1, 4, 11, and 12. Please explain why the entries on pages 1 and 4 for the most recent calendar month presented duplicate the prior month's entries and do not use the actual values indicated on the source document included at pages 11 and 12. Please make any necessary adjustments to Exhibit D.
4. Please refer to Confidential Exhibit D, pages 1, 3, 9, and 10. Please note the minor discrepancy between the entries on page 1, Cells B25 and F24; page 3, Cells O2, O8, O10, O14, O20, and O22, as compared to the actual billing units indicated on the source document included at pages 9 and 10. Please adjust Exhibit D accordingly to be correct going forward.
5. Please refer to page 1 of Confidential Exhibit C-2C. Given that the values in Cells C13 through C16 are less than the values in Cells C19 through C33, please explain why FCG believes there is a reasonable likelihood that the values in Cells C19 through C33 will be equaled or exceeded during the remaining term of the proposed Amended and Restated Gas Transportation Agreement (GTA).
6. Please refer to the redacted portion of Confidential Exhibit A, page 10 of 21, paragraph 9.D.(2). Please discuss whether FCG and Florida Crystals Corporation (Crystals) have developed a written procedure to enable the parties to agree on the elements to be included in the stated methodology that will be used to calculate potential adjustments to future volumetric rates. If so, please provide a copy of the written procedure. If not, please discuss the process of how FCG and Crystals will work together to reach agreement on prospective volumetric rate adjustments.
7. Please refer to page 9 of the instant petition requesting approval of the proposed Amended and Restated GTA, and to the unredacted portion of page 10, paragraph 9.D.(1) of Confidential Exhibit A attached thereto, both of which refer to the provision of additional gas transportation services on an interruptible basis. Please describe the types of circumstances under which FCG anticipates that the Company potentially might have to interrupt a portion of its service to Crystals during the remaining term of the proposed Amended and Restated GTA.

Please file all responses electronically no later than Wednesday, May 24, 2017, via the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6076 if you have any questions.

Sincerely,

/s/ Margo A. DuVal

Margo A. DuVal
Attorney

MAD

cc: Office of Commission Clerk (Docket No. 160175-GU)
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