

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida City
Gas.

DOCKET NO. 20170179-GU

DATED: FEBRUARY 12, 2018

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO

FLORIDA CITY GAS (NOS. 16-24)

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon FLORIDA CITY GAS (FCG).

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, no later than thirty days after service of this request for the purpose of inspection and copying.

DEFINITIONS

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

DOCUMENTS REQUESTED

Please refer to the Company's response to Staff Interrogatory 5.b. for the following requests.

16. Please refer to witness Nikolich's Direct Testimony, Page 10 and Exhibit DJN-2 and DJN-3. Show FCG's actual/forecasted monthly number of customers billed by geographical divisions and class from March 2001 through the test year. Provide total monthly number of customers billed by class (i.e. sum of all geographical divisions) for the same time period, consistent with the data provided in Exhibit DJN-2 and DJN-3.
17. Refer to Exhibit DJN-2 and DJN-3. For residential consumption, provide the actual consumption in therms by geographical divisions and residential class from April 1998 through the most recent available month. Provide total monthly consumption in therms by class (i.e. sum of all geographic divisions) for the same time period, consistent with the data provided in Exhibits DJN-2 and DJN-3.
18. Refer to Exhibit DJN-2 and DJN-3. For commercial consumption, provide the actual consumption in therms by geographical division and commercial classes from October 2008 through the most recent available month. Provide total monthly consumption in therms by class (i.e. sum of all geographic divisions) for the same time period, consistent with the data provided in Exhibits DJN-2 and DJN-3.
19. Flotation Costs. Please provide any documents responsive to Staff's 13th Set of Interrogatories, No. 165. (Did Dr. Vander Weide perform any analyses or conduct any studies to determine the actual flotation costs incurred by the gas utilities in his proxy group?)
20. Return on Equity. Please provide any documents responsive to Staff's 13th Set of Interrogatories, No. 166. (Did Dr. Vander Weide perform any analyses or conduct any studies to compare the business risk of Florida City Gas, or its parent company, Southern Company Gas, to the business risk of each gas utility used in the proxy group?)
21. Capital Structure. Please refer to FCG's response to OPC's Eighth Interrogatories, Number 175, Summary of Changes Related to Tax Changes, Tickmark C/. Regarding the proposed change in capital structure to maintain Southern Company Gas' credit metrics. Please provide the following.
 - a. All reports from credit rating agencies that reported Southern Company Gas needs to increase its equity to maintain its credit metrics.
 - b. Please provide copies of all documents FCG relied upon to calculate the credit metrics for Southern Company Gas.

22. Capital Structure. Please refer to FCG's response to OPC's Eighth Interrogatories, Number 175, Summary of Changes Related to Tax Changes, Tickmark C/. Regarding the proposed change in capital structure to maintain Southern Company Gas' credit metrics. Please provide the following.
- a. Please provide, in Excel Format with formulas intact, all calculations used to determine FCG's cash contributions to Southern Company Gas.
 - b. Please provide, in Excel Format with formulas intact, all calculations used to determine Southern Company Gas' credit metrics.
 - c. Please provide a schedule delineating the proposed changes to consolidated capital structure of Southern Company Gas as a result of the Tax Reform Act.

PODs for CFG Witness Nikolich

23. Referring to Cost of Service Schedule H-2, page 5 of 6, please provide support to show how the weighting for customer costs was developed.
24. Referring to Cost of Service Schedule H-1, page 5 of 6, please show the steps used to calculate the RS-1 customer unit cost (\$15.03).

/s/ Walt Trierweiler

WALT TRIERWEILER
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA CITY GAS (NOS. 16-24) has been served by electronic mail to Beth Keating, Esquire, Gunster Law Firm, 215 South Monroe Street, Ste. 601, Tallahassee, Florida 32301, bkeating@gunster.com, and that a true copy has been furnished to the following by electronic mail this 12th day of February, 2018:

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