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Public Service Commission

October 15, 2019

Beth Keating
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STAFF'S TWELFTH DATA REQUEST
via e-mail

RE: Docket No. 20190083-GU – Application for rate increase in Highlands, Hardee, and Desoto Counties, by Sebring Gas System, Inc.

Dear Ms. Keating:

By this letter, the Commission staff requests that Sebring Gas System, Inc. (Sebring or Utility) provide responses to the following data requests:

Please Refer to page 17, lines 17-21 of the Direct Testimony of Jerry Melendy, Jr. for the following questions:

1. Please complete the table below for Sebring's calculation of the CPI for the year 2018.

Month	CPI
January	
February	
March	
April	
May	
June	
July	
August	
September	
October	
November	
December	

2. On MFR Schedule C-37, CPI is used to derive the Inflation Multiplier. What additional purposes did Sebring have for this Multiplier other than the calculation of the Inflation X Growth Multiplier in its current filing?
3. On MFR Schedule C-37, please validate the percent increase in Average CPI for the year 2003. If there is an error in the value, a correction could lead to the increase in the Inflation X Growth Multiplier.

Please refer to Sebring's witness Russell Melendy's Direct Testimony (Testimony) and MFR Schedules G-2 and E-2 for questions 4 – 6 below:

4. With respect to the forecast for customer growth in the Cities of Wauchula and Arcadia discussed in the Testimony, pages 2 - 3, please provide responses to the questions below:
 - a. Please explain in detail on what bases the customer additions associated with the Cities of Wauchula and Arcadia are projected.
 - b. Has Sebring received any written, verbal, or other form of commitment/intention/interest for subscribing gas service from these potential customers? If so, please provide details.
 - c. Was Sebring's forecast of the new customer additions associated with the Cities of Wauchula and Arcadia solely derived from management's judgement? If the answer is affirmative, please explain. If not, please explain other sources that were used for this forecast.
 - d. Please specify the number of the customer additions associated with each of the Cities of Wauchula and Arcadia, for 2019 and 2020, respectively.
 - e. Referring to MFR Schedules G-2, pages 6 – 9, and E-2, page 1 of 1, please identify the Bills and therms (or, Customer Charge and Transportation Charge as presented in E-2) that are related to the customer additions associated with the Cities of Wauchula and Arcadia for each Rate Classification in each Schedule.
 - f. Please identify the "potential commercial and industrial customers" discussed on page 3, lines 1 – 2, of the Testimony.
5. With respect to the potential customer additions associated with the 50 low-income housing units in and around the City of Sebring discussed in the Testimony, page 3, lines 10 – 13, please provide responses to the following questions:
 - a. Please explain in detail on what bases such customer additions are projected.

Ms. Beth Keating

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- b. Has Sebring received any written, verbal, or other form of commitment/intention/interest for subscribing gas service from these potential customers?
 - c. Was Sebring's forecast of the potential customer additions associated with the 50 low-income housing units solely derived from management's judgement? If so, please explain. If not, please explain other sources that were used for this forecast.
 - d. Please specify the number of customer additions associated with the 50 low-income housing units, for 2019 and 2020, respectively.
 - e. Referring to MFR Schedule G-2, pages 6 – 9, and E-2, page 1 of 1, please identify the Bills and terms (or, Customer Charge and Transportation Charge as presented in E-2) that are related to the customer additions associated with the 50 low-income housing units for each Rate Classification in each Schedule.
6. Referring to the Testimony, page 5, lines 17 – 19, please explain how Sebring used historical data as a basis for its projections of "normal" customer growth. Please provide workpapers, in MS Excel format, to support your response.

Please file all responses electronically no later than November 4, 2019, through 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

Senior Attorney

MAD/cf

cc: Office of Commission Clerk
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