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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

July 20, 2022

Beth Keating, Esq.  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301  
bkeating@gunster.com

## **STAFF'S FIRST DATA REQUEST VIA E-MAIL**

Matt Everngam  
Director-Regulatory Affairs  
500 Energy lane  
Dover, DE 19901  
MEverngam@chpk.com

**Re: Docket No: 20220123-GU: Petition for approval of transportation service agreement to reflect expansion of St. Cloud by Florida Public utilities Company and Peninsula Pipeline Company, Inc.**

Dear Ms. Keating and Mr. Everngam:

By this letter, Commission staff requests that Florida Public Utilities Company (FPUC) and Peninsula Pipeline Company, Inc. (Peninsula or PPC) provide responses to the following data requests:

- 1) Please provide estimated costs and start and completion dates for the expansion projects shown in the table below:

| Description  | Location  | Cost \$ | Start & Completion |
|--|---|---------|--------------------|
| Construction of 23,232 ft. of 4-inch steel pipeline by PPC | From FGT interconnect going south along Missouri Avenue, west along Fertic Road, then south following Canoe Creek Road to Nolte Road and to the east along Nolte Road to the district regulator station |         |                    |
| New district regulator station by PPC                      | At or near intersection of Nolte Road and Hickory Tree Road   |         |                    |

| Description  | Location   | Cost \$ | Start & Completion |
|--|--|---------|--------------------|
| Construction of 1,320 ft. of 6-inch plastic pipeline by FPUC | From above regulator station along Hickory Tree Road |         |                    |

- 2) Please provide an updated project map (electronic) to replace the provided project map in Attachment B in the petition, that clearly indicates the city gate locations, regulator locations, proposed pipelines indicating beginning and ending locations and PPC and FPUC segments, and Twin Lakes community discussed in the petition.
- 3) What is the expected build out date of the Twin Lakes community?
- 4) Please provide a description of the approvals required by Peninsula from any other state or local agencies to complete the projects outlined in the petition.
- 5) Please provide a description of the approvals required by FPUC from any other state or local agencies to complete the projects outlined in the petition.
- 6) Please describe the manner in which Peninsula will recover its associated costs for installing the pipeline and district regulator.
- 7) Please describe the manner in which FPUC will recover its associated costs for the proposed expansion project.
- 8) Are the costs associated with this project, being recovered in the pending FPUC Docket No. 20220067-GU? Please discuss.
- 9) Please identify and explain the types of costs that the monthly reservation charge as shown on Exhibit A to the Agreement is designed to recover.
- 10) Did FPUC issue a Request for Proposals (RFP) to obtain construction cost estimates for the pipeline and regulator station from other entities? If so, please identify all respondents to the RFP and provide an explanation regarding why their proposals were rejected. If not, please state why FPUC did not solicit competitive bids.
- 11) Please discuss how many residential, commercial, and industrial customers are expected to take service from the proposed Saint Cloud expansion project.
- 12) Paragraph 10 of the petition states that “other commercial customers are also expected to be picked up along the path of the PPC portion ...” (in Osceola County). Please provide a general description of type of expected commercial customers and an estimated number of commercial customers.
- 13) Referring to Attachment A – Transportation Agreement, it appears that subsections 3.3 and 3.4 are identical. If a new 3.4 subsection is needed, please provide it as an addendum to the Transportation Agreement.

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14) Please describe the nature of service and the customer base already being served by FPUC and Peninsula in the St. Cloud area and Osceola County.

15) Which pipelines does FPUC currently use to transport gas to Osceola County?

16) Referring to paragraph 4.1 of the Agreement, please state the expected in-service date that begins the initial period of 20 years.

Please file all responses electronically no later than Wednesday, August 5, 2022, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at [sguffey@psc.state.fl.us](mailto:sguffey@psc.state.fl.us) if you have any questions.

Sincerely,

*/s/ Sevini Guffey*

Public Utility Analyst III

cc: Office of the Commission Clerk  
Tripp Coston, Economic Supervisor