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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

November 17, 2023

STAFF'S FIRST DATA REQUEST Via E-Mail

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Re: Docket No. 20230125-GU – Joint Petition of Florida Public Utilities Company and Peoples Gas System, Inc. Requesting Approval of Amendment to Territorial Agreement.

Dear Counsels:

By this letter, the Commission staff respectfully requests Florida Public Utilities Company (FPUC) and Peoples Gas System, Inc. (Peoples Gas) provide responses to the following questions, regarding the above-referenced joint petition.

1. Please refer to the petition, page 3, paragraph 5 to address the following questions.
 - a. How many acres are encompassed in “Service Area B?”
 - b. Please describe the new commercial development.
 - c. Describe the nearest FPUC’s operating gas facilities in terms of pipeline size and proximity to “Service Area B.”
 - d. Describe the facilities that would need to be constructed from the nearest FPUC’s operating gas facilities in order to serve the new commercial development. Include in your response approximate distance (linear feet and/or miles) between FPUC’s nearest operating gas facilities and the specific location of the new commercial development.

- e. State the estimated costs if FPUC were to construct the facilities necessary to serve the new commercial development in “Service Area B.”
 - f. Provide a demonstrative exhibit or diagram similar to Amendment Exhibit A that shows the nearest FPUC’s operating gas facilities to “Service Area B,” and the placement of facilities that would need to be constructed in order to serve the new commercial development.
 - g. Describe the nearest Peoples Gas’s operating gas facilities in terms of pipeline size and proximity to “Service Area B.”
 - h. Describe the facilities that would need to be constructed from the nearest Peoples Gas’s operating gas facilities in order to serve the new commercial development. Include in your response approximate distance (linear feet and/or miles) between Peoples Gas’s nearest operating gas facilities and the specific location of the new commercial development.
 - i. State the estimated costs if Peoples Gas were to construct the facilities necessary to serve the new commercial development.
 - j. Provide a demonstrative exhibit or diagram similar to Amendment Exhibit A that shows the nearest Peoples Gas operating gas facilities to “Service Area B,” and the placement of facilities that would need to be constructed in order to serve the new commercial development.
2. Are there natural gas facilities in “Service Area B” that are being transferred between the joint petitioners? If applicable, please state the purchase price for the transfer of such facilities.
 3. Please state if FPUC will receive, or has received, compensation from Peoples Gas in exchange for the right to serve customers in “Service Area B.” Please discuss your response.
 4. In the petition, page 3, paragraph 5 states, in part, that FPUC was unable to extend service into “Service Area B” in an economical manner. Please provide a discussion to the following questions.
 - a. Identify what economic considerations were evaluated by FPUC to reach this conclusion. Explain in your response how the territorial agreement with Peoples Gas overcomes this conclusion (i.e., how or why Peoples Gas is able to extend service into “Service Area B” in an economical manner, whereas FPUC is not able to).
 - b. Absent the territorial agreement with Peoples Gas, would extending service into “Service Area B” impair FPUC’s ability to offer reliable natural gas service to current or future customers? Is the territorial agreement with Peoples Gas a remedy for that? Please explain.

- c. Absent the territorial agreement with Peoples Gas, would extending service into “Service Area B” result in FPUC having or potentially having an uneconomic duplication of services? Is the territorial agreement with Peoples Gas a remedy for that? Please explain.
 - d. Please identify any other relevant factors that are unique to the instant Petition, to “Service Area B,” or to these joint petitioners that Staff should consider in evaluating this case.
5. Please state the estimated number of new customers and the associated volumes of gas the new customers could be requesting in the new commercial development, or surrounding areas within “Service Area B” in the next 5 to 10 years.
6. Please refer to the Petition’s Attachment A for the following questions:
 - a. On the Amendment Exhibit A, the legal description of the “Service Area B” appears in a very small font as a document that was inserted onto the map of the area. Please provide a stand-alone document of the legal description in an easily-readable font size (such as 12-point font size).
 - b. On Amendment No. 1 to the Territorial Agreement, the “...entered into this day” is not populated. Please explain if this was an oversight, and specify the date when Amendment No. 1 was entered into. If the intended date should match the date shown by signatories, please submit to the Commission an updated exhibit with the date populated.
7. Please refer to the Master Territorial Agreement, dated July 6, 2007, which was filed in Docket No. 070399-GU (Document No. 05681-2007). An illustration within that document is titled “Service Territory in Pasco County.” This illustration shows Pasco County boundaries, Peoples Gas facilities, and gas areas for Clearwater, Peoples Gas, and Chesapeake (now FPUC). Please clarify whether the Peoples Gas Service area encompasses the whole Pasco County except the areas shown for Clearwater and Chesapeake (the legend for Peoples Gas area does not appear on the map itself) or just the sections within the map that state “PGS Service Area.”

Please file all responses electronically no later than December 13, 2023 via the Commission’s website at www.floridapsc.com by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please contact me at akaymak@psc.state.fl.us or at (850) 413-6638 if you have any questions.

Thank you,

/s/Alara Kaymak

Alara Kaymak
Public Utility Analyst

Beth Keating, Esquire
Jeffrey Wahlen, Esquire
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cc: Michael Barrett, Economist Supervisor
Office of the Commission Clerk