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April 16, 2018

E-Portal

Ms. Carlotta Stauffer, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20180043-GU – Petition for approval of Area Extension Plan Rate Extension Agreement with United States Sugar Corporation, by Florida City Gas.

Dear Ms. Stauffer:

Attached for filing, please find Florida City Gas's Responses to Staff's Third Data requests in the referenced docket.

Thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,



Beth Keating
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Docket No. 20180043-GU – Petition for approval of Area Extension Plan Rate Extension Agreement with United States Sugar Corporation, by Florida City Gas.

Responses to Staff's Third Set of Data Requests

1. The petition on page 6, paragraph 15, states that the reset surcharge will be extended through November 2027 for all customers on the Glades AEP project. The proposed agreement on page 2 item 3.0 (Release of Non-Affiliates) states that the surcharge will be eliminated for all customers at the end of the 12 year Amortization Period. However, the 12 year Amortization Period is defined as the period from November 2012 to November 2024 on the first page of the Agreement. Please clarify the language of item 3.0 (Release of Non-Affiliates) in the Agreement and how it relates to paragraph 15 on page 6 of the petition.

FCG RESPONSE: The language in the Agreement in paragraph 3.0 regarding Release of Non-Affiliates is correct that customers not affiliated with U.S. Sugar will be released from the AEP surcharge in 2024. The statement at paragraph 15 is in error, and should have instead stated “all U.S. Sugar-affiliated customers.”

2. If U.S. Sugar has not paid back the 87.13% of the Contribution by November 2027, will they continue to be assessed an AEP surcharge? Please explain which provision of the proposed Agreement addresses this scenario.

FCG RESPONSE: The AEP surcharge set forth in the agreement is calculated conservatively such that U.S. Sugar's 87.13% contribution should be fully recovered by the end of the term of the Agreement, as reflected on Exhibit A to the Agreement. In the unlikely event that a balance remains for U.S. Sugar at November 30, 2027, Section 5.1 contemplates that the remaining balance would be paid.

3. Please state how many U.S. Sugar subsidiaries and affiliates are currently being served by the Glades AEP Project.

FCG RESPONSE: There are 2 entities associated with U.S. Sugar on the Glades AEP project.