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December 2, 2025

BY E-PORTAL

Mr. Adam Teitzman, Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Docket No. 20250132 -GU -Petition for approval of second amendment to transportation service agreement between Peninsula Pipeline Company, Inc. and Florida Public Utilities Company, for the New Smyrna Beach project

Dear Mr. Teitzman:

Attached for electronic filing in the above-referenced docket, please find Peninsula Pipeline Company's Responses to Staff's First Set of Data Requests.

As always, 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

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

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ENCL

CC:// (certificate of service)

Question PSC 1: Please explain why the additional delivery point was not included in the currently approved amendment No. 1 to the transportation service agreement, previously provided in Docket No. 20230135-GU.

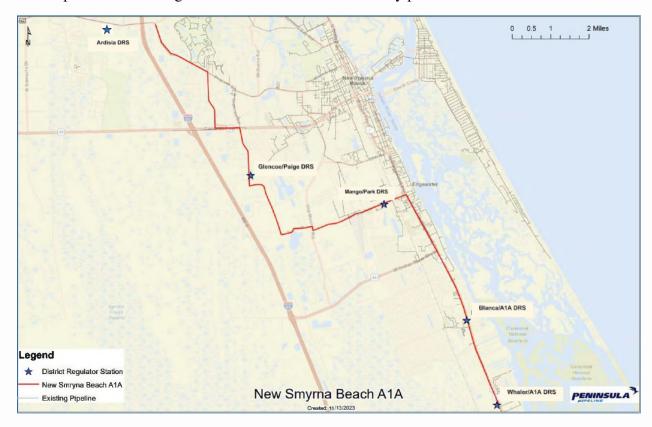
Response:

Due to additional growth in the New Smyrna Beach area, an additional delivery point was necessary to enhance reliability and to meet Florida Public Utilities Company ("FPUC") supply capacity design-day demand.

Question PSC 2: Please provide an updated map showing where the additional delivery point would be located.

Response:

See map below indicating location of the additional delivery point.



Question PSC 3: Please provide a breakdown of the incremental capital costs required to construct the additional delivery point.

Response:

Peninsula is able to construct the additional delivery point within the anticipated capital cost for the original project. The estimated cost for the additional facilities is \$50,000.

Question PSC 4: In paragraph 12 of the petition, it is stated that Peninsula has agreed to install the additional delivery point without additional charges. Please confirm that there is no change in the monthly reservation charge. If there is, please explain.

Response:

There is no change to the monthly reservation charge.

Question PSC 5: Please provide the expected completion date of the additional delivery point.

Response:

Anticipated completion date of additional delivery point - 3/31/2026.

Question PSC 6: Please provide a description of the current progress of the New Smyrna Beach project, as approved in Docket No. 20230135-GU.

Response:

Construction is anticipated to complete in 2026. Peninsula is currently providing temporary service to meet FPUC's requirements.

Question PSC 7: Please confirm the seventh delivery point described, as at or near the intersection of Pioneer Trail and Junonia Blvd in Attachment A of the petition, is the additional delivery point being referenced in the petition.

Response:

The delivery point as described, at or near the intersection of Pioneer Trail and Junonia Blvd, is the additional delivery point referenced in the Petition.

Question PSC 8: In paragraph 12 of the petition, it states, "an additional delivery point should have been included in the plans for the project." Does that mean that the cost for this delivery point was included in the previously approved amendment No. 1, previously provided in Docket No. 20230135-GU?

- a. If the answer to question No. 8 is no, please explain how Peninsula will recover the cost to construct the additional delivery point.
- b. If the answer to question No. 8 is yes, please state if Florida Public Utilities Company has been paying Peninsula for a project that has not been constructed.

Response:

No, the cost for this delivery point was not included in the previously approved amendment No. 1. As noted in response to Question No. 4, Peninsula is not changing the monthly reservation charge.