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Public Service Commission

August 28, 2019

Andrew M. Brown
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Tampa, Florida 33601-1531
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STAFF'S FIRST DATA REQUEST
via e-mail

RE: Docket No. 20190109-GU – Petition for recovery of costs associated with Hurricane Michael and replenishment of storm reserve, by Peoples Gas System.

Dear Mr. Brown:

By this letter, the Commission staff requests that Peoples Gas System (PGS) provide responses to the following data requests:

1. Refer to page 3, lines 6-8. Please provide examples of “new improvements identified” that would be updated in Peoples’ Gas Delivery Emergency Preparedness Plan?
2. Please refer to page 4, lines 1-5.
 - a. How does Peoples determine who critical customers are?
 - b. Please describe Peoples’ predetermined prioritization process.
 - c. Please describe Peoples’ methodology to ensure safety and gas service is provided promptly.
3. Please refer to page 9, lines 14-24.
 - a. Did Peoples start incurring costs for securing additional contractors on October 8, 2018?
 - b. Why did Peoples not start the convoy of storm responders until October 10, 2018?
4. Refer to page 10, lines 1-17. Please clarify if the damage assessors were use to make emergency calls or were other contractors responsible for this task.

5. Please refer to page 11, lines 14-21. How did Peoples determine to demobilize its response team on November 1, 2018?
6. Please refer to page 13, lines 3-11. Did Peoples have a contract with Storm Services, LLC prior to Hurricane Michael making landfall?
 - a. If so, when was the contract initiated?
 - b. If not, what was Peoples plan for lodging?
7. Refer to page 14, lines 3-7. Please explain the "contractor networks" that Peoples relied on to access external resources.
8. Refer to page 15, lines 3-6. Please provide examples of lessons learned by Peoples from Hurricane Michael.
9. Refer to page 3, lines 3-5. Please provide a copy of Peoples' Gas Delivery Emergency Preparedness Plan.

Please file all responses electronically no later than September 27, 2019 on 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) 413-6584 if you have any questions.

Sincerely,

/s/ Walt Trierweiler

Walt Trierweiler
Senior Attorney

WLT/lms

cc: Office of Commission Clerk
Paula Brown- Regulatory Affairs
Mireille Fall-Fry- Office of Public Counsel