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STATE OF FLORIDA



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Public Service Commission

May 21, 2025

STAFF'S FIRST DATA REQUEST

via email

Beth Keating, Esq.
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
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Miguel Bustos
Manager Regulatory Affairs
208 Wildlight Ave
Yulee, FL 32097
mbustos@chpk.com

RE: Docket No. 20250058-GU – Petition for approval of natural gas transportation service agreement between Florida City Gas and Miami-Dade County, through the Miami-Dade Water and Sewer Department.

Dear Ms. Keating and Mr. Bustos:

By this letter, Commission staff requests that Florida City Gas (FCG) provide responses to the following data requests:

1. Please provide a copy of Miami-Dade County's documentation of its alternative energy source or an economic natural gas bypass alternative.
2. Please provide cost support data to demonstrate that service under the proposed contract will not impose additional costs on FCG's other rate classes, including, at a minimum, that the rate shall not be set lower than the incremental cost of service plus some additional amount as a reasonable return on investment.
3. Please confirm the start date of the term for the proposed agreement.

4. Please provide an un-redacted version of Confidential Exhibits A and D to the joint petition in Docket No. 20130089-GU (Document No. 02129-2013).
5. Please provide documentation to demonstrate that the new negotiated rates proposed in the agreement reflect an adjustment in inflationary factors.
6. Article VII, subsection 3 of the 2014 TSA contains a provision allowing for the rate of natural gas transported to Miami-Dade County's plants by FCG to be increased each year by the annual United States Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U), beginning in 2018. Please explain if FCG increased the rate for natural gas transportation by the CPI-U during the term of the 2014 TSA. If so, which years?
7. Please provide the natural gas transportation rates for service for the period January 1, 2018 through December 31, 2023 as a result of any Annual Price Increase, as stated in Article VII, subsection 3 of the 2014 TSA.
8. Did Article VII, subsection 3 of the 2014 TSA provide FCG with a sufficient mechanism to reflect changing inflationary factors? Please explain.
9. Attachment B to the proposed 2025 TSA states that rates shall be increased by a minimum of 0.75 percent or by the result of the increase, if any, to the CPI-U, whichever is greater. Please explain how FCG determined the annual increase of a minimum of 0.75 percent.

10. Please refer to Tariff Sheet No. 59, Special Condition No. 3 of Load Enhancement Service, which states, "If an agreement is not reached by the end of the term, the agreement will convert to the applicable General Services tariff (based on volume) until a new contract has been approved by the FPSC and executed by the parties." Paragraph 6 of the petition states that since the expiration of the 2014 TSA on December 31, 2023, FCG has continued to serve Miami-Dade on a month-to-month basis under the old contract while the parties negotiated a new contract. Please explain whether Miami-Dade is being served under the applicable General Services tariff or under the previous transportation service agreement.

11. Have the parties considered a provision to the Effective Date and Term of the proposed transportation service agreement allowing for the agreement to continue on a month-to-month basis until a new contract has been negotiated? Please explain.

Please file all responses electronically no later than Monday, June 2, 2025, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413- 6856 if you have any questions.

Sincerely,

/s/Ryan Sandy
Ryan Sandy
Senior Attorney

RS/ds

cc: Office of Commission Clerk