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November 20, 2025

VIA E-PORTAL

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

Re: Docket No. 20250121-GU – Joint petition for approval of actual, estimated, and projected relocation costs and approval to establish a recovery surcharge, by Florida City Gas and Florida Public Utilities Company.

Dear Mr. Teitzman:

Attached for filing, please find the Responses of Florida City Gas and Florida Public Utilities Company to Staff's First Set of Data Requests. (Attachments not included with filing; provided to staff via email).

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301

(Enclosure)

Re: Docket No. 20250121-GU – Joint petition for approval of actual, estimated, and projected relocation costs and approval to establish a recovery surcharge, by Florida City Gas and Florida Public Utilities Company.

Responses of Florida City Gas and Florida Public Utilities Company to Staff's First Data Request

1. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG and SM-1 FPU. For each relocation project listed, please provide the following:
 - a. A brief description of the activities associated with the project, and identify when each activity was completed, or for projects under construction or in the design phase, the estimated time of completion.
 - b. A breakdown of what is included in the 1 estimate for each project, and explain how the cost estimate was developed for each.

Company Response:

- 1a. Please refer to the attached file DR 1.1a. This file contains SM-1 CG and SM-1 FPU, with additional columns highlighted in yellow to provide the description and, completion date.
- 1b. Relocation projects start when the agency with authority over the roadway or their engineering contractor reaches out to the company advising us of their upcoming project. The company will then review the set of plans provided and markup the agency's plans with the location of our existing facilities. The company might request that the agency complete any verification digs at locations where a conflict is uncertain. The company will then work with the agency to determine if any adjustments to their design are possible to mitigate the need for a relocation. The avoidance of a relocation is the company's priority. The company will then complete any required documentation from the agency that denotes the scope of the conflict which can include a conflict matrix, drawings / markups, or written notification. The size of the relocation is based upon the conflict identified and constructability of the design to eliminate it. The estimate is based upon the design developed as well as utilizing a mixture of existing contractual pricing and historical data the company has experienced on previous projects. Additional details on the estimate methodology can be found in the excel file provided in response to 1a. under the column heading "Breakdown of what is included in cost estimate".

2. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG and SM-1 FPU. For each relocation project identified below, verify the correct project ID number.
 - a. 0361-RELO-405606 SEBASTIAN
 - b. SR 434 and Winding Hollow Trl (Steel GM Rel with PE GM)
 - c. SR806 (Atlantic AVE) Homewood Blvd and SR 704 Okeechobee Blvd /Haverhill RD (GM Reloc)
 - d. Fort Fraser Trail over SR 60 (Install 4" PE)

Company Response:

- 2a. The correct number is 405606-7-52-01
- 2b. The correct number is 432642-1-58-01
- 2c. The correct number is 449283-1-52-01
- 2d. The correct number is 440272-1-52-01

3. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG, page 1, and SM-2 CG, pages 1 through 4. Clarify whether the state road referred to in the project name should be SR932 or SR392 for FDOT Financial Project ID 445993-1-52-01.

Company Response:

The correct number is State Road 932.

4. Refer to witness McCloskey's pre-filed Exhibits SM-1 CG, page 1, and SM-2 CG, page 36. Please provide additional documentation associated with the project identified as BCA417007 Nicklaus Dr. Culvert to demonstrate the requesting authority from the City of Melbourne.

Company Response:

Nicklaus Dr is owned and maintained by the City of Melbourne located in Melbourne FL. The City's project entailed replacing a box culvert that our facilities had a direct conflict with. The City and their contractor, Don Luchetti Construction, Inc., reached out to Florida City Gas during their construction advising that our facilities were in direct conflict with

their culvert and they were unable to continue until the line was removed. In order to minimize impact to the City's project, Florida City Gas elected to abandon the pipeline in conflict and not replace it due to the large excavation taking place as part of their project. Florida City Gas's system was a two way feed thus the elimination of this crossing did not critically affect the system's reliability. Please refer to the attached file DR 1.4 Email from City of Melbourne.

5. Please refer to witness McCloskey's pre-filed Exhibit SM-2 CG, pages 15 through 25. The documentation provided appears to be a duplication of the documents associated with the project identified as Okeechobee Rd Relocation FDOT. If so, provide additional documentation associated with the project identified as 0361-DOT-OSLO RD RELO to demonstrate the need for the project by the requesting authority pursuant to Rule 25- 7.150(2), Florida Administrative Code (F.A.C.).

Company Response:

Please refer to the attached file "DR 1.5 361 DOT OSLO ROAD" which has the correct request.

6. Please refer to witness McCloskey's pre-filed Exhibit SM-2 FPU, page 1. Provide the attachment, 65% Construction Plan and Conflict Matrix, referenced in the provided memorandum.

Company Response:

Please refer to the attached file "DR 1.6 Australian Ave-65_Signal Plans.pdf".

7. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, page 7. Verify the correct project name and the location of where the associated activities were performed.

Company Response:

The correct name is Thompson Nursery Road Segment 1. The County Project Number is 5400203. The location is on Cameron Road, Eagle Lake, FL 33839, just east of US-17 North.

8. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 31 through 33. Clarify if the project is in Volusia County, as stated in Exhibit SM-2 FPU, page 31, or in Seminole County, as stated in Exhibit SM-1 FPU. As part of this response, state what activities associated with this project have been or are being performed in Debary.

Company Response:

The correct county is Seminole County. This project is not in Debary. It is in Sanford. Please refer to the attached file DR 1.8 FDOT project description.

9. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 34 through 36. Verify the names of the streets where the conflict is located.

Company Response:

The gas main relocation was done on the south side of E. St. Road 434.

10. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 38 through 40. Provide additional documentation to demonstrate the need for the project by the requesting authority pursuant to Rule 25-7.150(2), F.A.C.

Company Response:

Please refer to the attached files:

DR 1.10 Letter PBC.pdf

DR 1.10 Palm Beach County email.docx

DR 1.10 Florida Mango Rd. Utility Conflict Matrix.pdf

11. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 45 through 47. Verify the city location of the project.

Company Response:

The location of this project is in West Palm Beach. However, since filing the relocation petition, FPUC was able to successfully negotiate an adjustment to the FDOT design, which resulted in eliminating the need for the relocation. The Company included estimated costs of \$10,000 related to this project and will be accounted for in the true-up calculation.

12. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 48 through 50. Clarify the connection between the streets named in the project name.

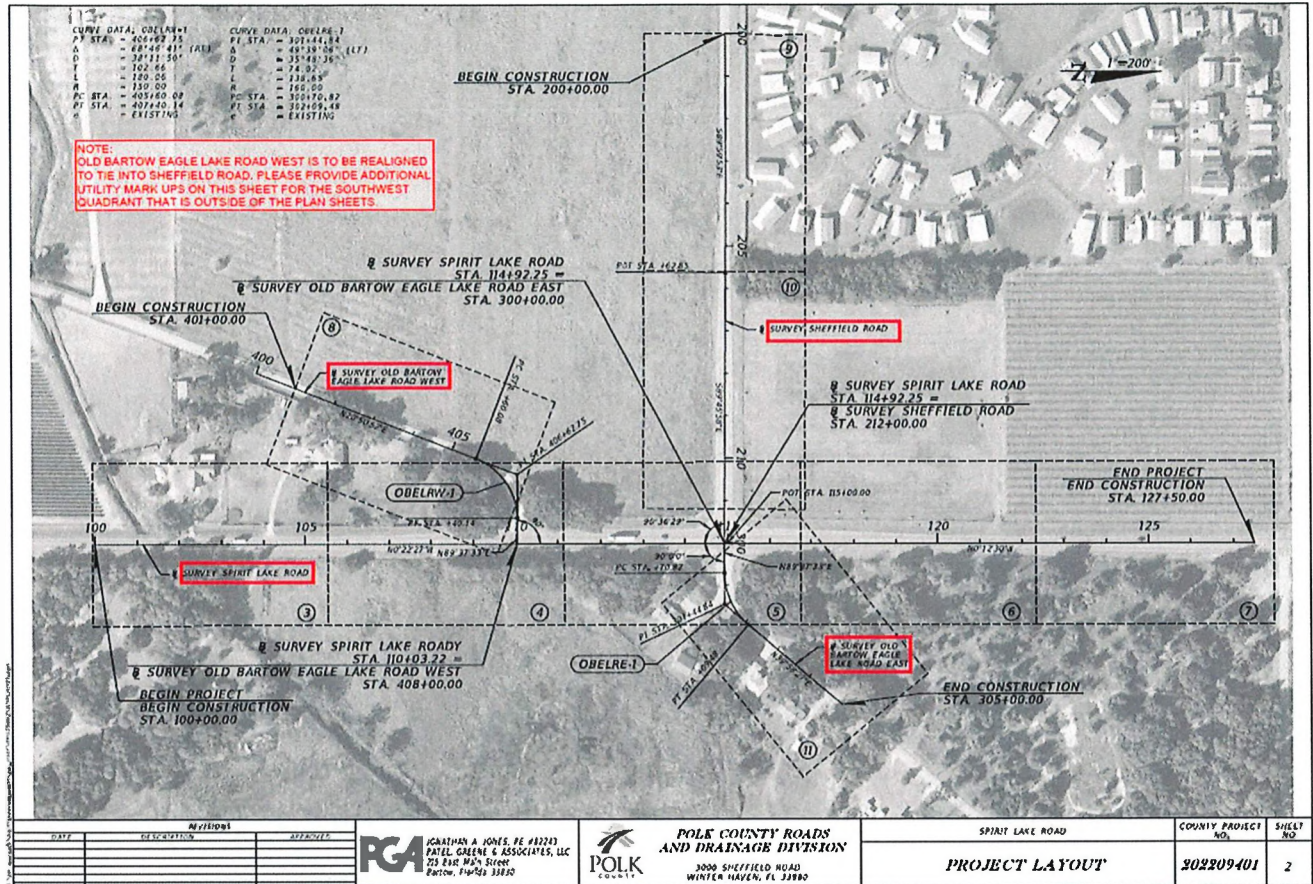
Company Response:

FDOT project 449283-1-52-01 takes place at two separate locations. One of which is at SR 806 at Homewood Blvd. and the other location being SR 704 at Haverhill Road. FPUC impacted facilities are at the intersection of SR 704 and Haverhill Road. However, since filing the relocation petition, FPUC was able to successfully negotiate an adjustment to the FDOT design which resulted in eliminating the need for the relocation. The Company included estimated costs of \$20,000 related to this project and will be accounted for in the true-up calculation.

13. Please refer to witness McCloskey's pre-filed Exhibits SM-1 FPU, page 1, and SM-2 FPU, pages 51 through 56. Verify the project location and the name of the requesting authority.

Company Response:

As shown in the title on page 51 of SM-2 FPU, Polk County is the requesting authority whose project limits can be seen in the image below. FPUC's impacted facilities are at the intersection of Old Bartow Eagle Lake Rd. East, Sheffield Rd, and Spirit Lake Road.



14. Please calculate the FCG and FPUC Natural Gas Facilities Relocation Cost Recovery Clause (NGFRCRC) surcharges, as shown on Schedules D-1 of Diana Williams' pre- filed composite Exhibit DW-1, for each rate class based on a March 1 through December 31, 2026 billing period.

Company Response:

Please refer to the attached files DR 1.14 Schedule D FCG based on March-Dec therms.xlsx and DR 1.14 Schedule D FPUC based on March-Dec therms.xlsx for the rate calculations.

15. Please provide original tariff sheet No. 7.413 (FPUC) and original tariff sheet No. 83 (FCG) to show the recalculated surcharges based on the 10-month recovery period contemplated by Question 14.

Company Response:

Please refer to the attached files:

DR 1.15 FPUC Tariff Redline.docx

DR 1.15 FPUC Tariff Clean.docx

DR 1.15 FCG Tariff Redline.docx

DR 1.15 FCG Tariff Clean.docx

16. Please refer to Schedules A-1 in pre-filed Exhibits SM-1 CG and SM-1 FPU, for both FCG and FPUC, have any of the relocation projects been previously included in base rates or recovered through any other type of rider, surcharge, or regulatory asset amortization?

If yes, please provide the prior proceeding or mechanism through which the recovery occurred and explain how that portion of the cost was disallowed in the NGFRCRC surcharge in this proceeding or deducted from the previously recorded account.

Company Response:

No, none of these projects were included in base rates since all occurred after the projected test years in our last rate cases. In addition, none were included in the GUARD or SAFE programs.

17. Does either FCG or FPUC intend to transfer any of the relocation projects into plant-in-service in a future rate base proceeding?

If yes, please provide information on FCG's and/or FPUC's policies and internal controls to prevent double recovery of these costs.

Company Response:

If the costs were to be transferred into base rates, the relocation clause investment would be

reset to zero as done for the GRIP program in the last 2023 projected year rate case and for SAFE in the last 2023 projected year rate case.

18. Refer to Schedules B-1 in witness Williams' pre-filed Exhibits DW-1 CG and DW-1 FPU. Please provide the calculation used to determine the 2024 revenue expansion factor of 1.353 for FCG and 1.350 for FPUC.

Company Response:

Please refer to the attached files DR 1.18 Expansion Factor FCG.xlsx and DR 1.18 Expansion Factor FPUC.xlsx.

19. Please reference Schedules C-1 through C-3 in both of witness Williams' pre-filed Exhibits DW-1 CG and DW-1 FPU, specifically the line items of "General Public Notice Expense & Customer Notice Expense." Provide information on what the expense includes.

Company Response:

General Public Notice Expense & Customer Notice Expense are expenses related to notifying customers about the new relocation surcharge. The Company will provide notice of the surcharge through a message on the customer's bill. It would also include notices to any customers that were affected by the work being done.

20. Please provide information on how the ad valorem tax was calculated in determining the revenue requirement for both FCG and FPUC.

Company Response:

Consistent with other clauses, the tax was calculated using 2% of the prior year's ending net book value of the qualified investment.