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Public Service Commission

March 18, 2025

Virginia Ponder
Ausley McMullen
123 S Calhoun Street
Tallahassee, FL 32301-1517
vponder@ausley.com

STAFF'S FIRST DATA REQUEST VIA E-MAIL

Re: Docket No. 20250026-GU - Petition for approval to modify swing service charge, individual transportation service rider, and off-system service rate schedule, by Peoples Gas System, Inc.

Dear Ms. Ponder:

By this letter, the Commission staff respectfully requests Peoples Gas System, Inc. (PGS or utility) to provide responses to the following questions, regarding the petition for approval of swing service charge, individual transportation service rider, and off-system service rate schedule.

1. On page 16 of the petition, the utility discusses proposed modifications to Rider ITS.
 - a. Please state how many customers would move from Rider ITS to Rider NCTS.
 - b. Please provide projected bill impacts for the affected Rider ITS customers. Are their gas costs expected to increase, decrease, or remain the same under Rider NCTS (compared to Rider ITS), with the understanding that the gas is provided by unregulated third party marketers.
 - c. Please explain whether the company has considered establishing all qualifying new customers under NCTS, and grandfathering existing ITS customers under their existing agreements rather than moving the existing customers to NCTS.
2. On page 17 of the petition, the utility discusses proposed changes to the Off-System Service (OSS) rate schedule. Please respond to the questions below:

- a. The utility cites conformity with other gas utilities' sharing mechanisms as the reason for the proposed change. Please explain whether there are any other reasons for the proposed change.
 - b. Please discuss the impact(s) the proposed change would have on the utility's earnings.
 - c. Please explain how the proposed change will impact the general body of rate payers and how the general body of ratepayers would benefit from a reduction in net revenues received as a credit through the PGA.
 - d. The table on page 25 of the petition shows the cost of OSS. Please describe the type of costs that are included in the amounts shown and how those costs are being recovered. Are they born 100 percent by the general body of ratepayers?
 - e. Please provide copies of all relevant information (e.g., testimony, discovery responses) from the 2002 rate case (Docket No. 020384-GU) that led to revising the sharing from 50/50 to 25/75.
 - f. Please see the chart indicated on page 11, paragraph 25, and provide the same breakdown for years 2015-2020.
 - g. 2022 is indicated to have significantly higher OSS sales and costs than the other years indicated. Please explain why.
 - h. Are third party marketers serving Rider ITS customers purchasing their own capacity or purchasing capacity released to them by Peoples? Please discuss.
3. Please provide a hypothetical calculation of the current and proposed Weighted Average Cost of Capacity (WACC). Please demonstrate how the WACC changes would affect a customer's bill, including an estimate for an average usage bill calculation.
 4. Please explain "No Notice Transportation Service" and provide the relevant pages from the recent FERC rate case that address the updated rates.
 5. Referring to paragraph 38 of the petition, please discuss how injection and withdrawal costs are determined. Are they market-based, FERC determined, etc.?

Please file all responses electronically no later than April 1, 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 and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please contact me at kmcclell@psc.state.fl.us or at (850) 413-6814 if you have any questions.

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Sincerely,

/s/Kate McClelland

Kate McClelland

Public Utility Analyst II

cc: Office of the Commission Clerk (Docket No. 20250026-GU)