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STATE OF FLORIDA



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Public Service Commission

April 16, 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
bkeating@gunster.com

RE: Docket No. 20250059-GU – Petition requesting approval of an updated AFUDC rate of 7.72%, effective January 1, 2025, by Florida City Gas.

Dear Ms. Keating:

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

1. Please provide a schedule showing how Florida City Gas (FCG) calculated the long-term debt cost rate of 6.67 percent. The schedule should provide the same information as provided in a Minimum Filing Requirements (MFR) Schedule D-4a.
2. Rule 25-7.0141(3)(b), F.A.C., Allowance for Funds Used During Construction (AFUDC), requires that the cost of long-term debt will be based on end-of-period cost. FCG has not provided a schedule for the end-of-period capital structure. Please provide a 2024 year-end capital structure schedule for FCG.
3. FCG's sister companies, Florida Public Utilities Company (FPUC) gas division and electric division, included a 2024 year-end long term debt cost rate of 3.78 percent for Chesapeake Utilities in each of their December 2024 surveillance reports. Please provide an explanation and reconciliation of why the reported long-term debt cost rate for FPUC's gas and electric division is 3.78 percent as compared 6.67 percent for FCG.

4. In FPUC's electric rate case (Docket No. 20240099-EI), the 13-month average long-term debt cost rate for the year ended December 31, 2024, was 5.04 percent, based on Chesapeake Utilities Corporation's debt issuances as provided in MFR Schedule D-4a. Please explain why FCG's long-term debt cost rate is 6.67 percent as compared to CUC's long-term debt cost rate of 5.04 percent.
5. Rule 25-7.041(7), F.A.C., requires that each utility charging AFUDC must include in its December Rate of Return surveillance report to the Commission Schedules A and B identified in subsection (5) of this rule, as well as disclosure of the AFUDC rate it is currently charging. FCG did not include neither of these schedules in its December 2023 nor December 2024 surveillance reports. Please file revised surveillance reports for both December 2023 and 2024 that include the required information.
6. Please file a revised AFUDC Schedule A including the end-of-period cost for long-term debt pursuant to Rule 25-7.041(3)(b), F.A.C.

Please file all responses electronically no later than Tuesday, April 22, 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) 413-6524 if you have any questions.

Sincerely,

/s/ Zachary Bloom
Zachary Bloom
Attorney

ZB/ds

cc: Office of Commission Clerk