

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Peoples
Gas System, Inc.

DOCKET NO.: 20250029-GU

FILED: April 22, 2025

**CITIZENS' UNOPPOSED MOTION FOR MODIFICATION OF
TESTIMONY DATES IN THE ORDER ESTABLISHING PROCEDURE**

The Citizens of Florida ("Citizens"), through the Office of Public Counsel ("OPC"), request the Commission to grant, as unopposed by Peoples Gas System ("PGS" or "Company") and Florida Industrial Power Users Group ("FIPUG"), a modification to Order No. PSC-2025-0123-PCO-GU, issued April 14, 2025 ("OEP"). In support, the Citizens state as follows:

1. Order No. PSC-2025-0123-PCO-GU, was issued April 14, 2025. The OEP contained numerous milestone dates, including dates for the filing of Intervenor and staff testimony and Company rebuttal testimony. The dates are as follows:

Intervenor testimony	June 17, 2025
Staff testimony	July 1, 2025
Company rebuttal testimony	July 15, 2025

2. These dates are similarly spaced from corresponding ones relative to the filing of the Company petition in its last rate case that was decided in Docket No. 20230023-GU. In that case, the time from petition filing to the scheduled start of the hearing was 147 days.¹ There, the petition was filed on April 4, 2023, and Intervenor testimony was established for June 22, 2023, or 79 days from the initial filing. In this case, the currently established time between the petition filing and the start of the hearing is 161² days, and Intervenor testimony is currently due within 78 days of the filing. Notably, in Docket No. 20250011-EI (Florida Power & Light ("FPL" rate case)) the corresponding time between petition filing and hearing is 164 days and the spacing for Intervenor testimony is 101 days.³

¹ Order No. PSC-2023-0128-GU, issued April 12, 2023, in Docket No. 20230029-GU.

² The OPC understands that the Commission intends to begin the PGS hearing on September 8th and will amend the schedule soon accordingly.

³ Order No. PSC-2025-0075-EI, issued March 14, 2025, in Docket No. 20250011-EI.

3. The Citizens believe that the dates for testimony understandably may have been drawn from the most recent PGS rate case and used without reference to the fact that there are 14 days more allotted between petition filing and the start of the hearing. Accordingly, the OPC requests that an additional 13 days be added to the Intervenor and Company testimony deadlines. This would mean that the revised dates would be as follows:

Intervenor testimony	June 30, 2025
Staff testimony	TBD
Company rebuttal testimony	July 28, 2025

4. The Citizens have not suggested a date for staff testimony. That would be up to the staff to recommend (as they know best their needs) as long as the Company was not given less time than currently provided to respond to any staff testimony. This modest modification would still provide the OPC with slightly less time than could otherwise be afforded by the lengthened schedule as it compares to the most recent PGS case and would also be less time (91 days versus 101 days) provided for in the FPL rate case for preparation of Intervenor testimony. Regardless, the OPC believes an additional 13 days is a reasonable compromise and accommodation.
5. The OPC reached out to the Company to determine if the proposed adjustment met its needs. The Company has advised it is amenable to the change. The Citizens have also conferred with intervenor FIPUG, which has indicated its support for the motion. Accordingly, this motion is unopposed and does not affect the other dates on the schedule and, in fact, will even provide 21 days after rebuttal testimony is filed to conduct discovery as opposed to the current FPL rate case schedule that allows for 14 days.
6. To the extent additional time is seen as needed between the proposed rebuttal date and the discovery cut-off, the OPC would propose that the discovery deadline could be moved to August 22, yielding 24 days for discovery and allowing for two sets of full 10-day discovery cycles. The parties are also in concurrence with this modification if deemed necessary.

Wherefore, the OPC asks that the Commission enter an order making the modifications to the testimony dates and the discovery cut-off date, as set out above, on an expedited basis since

there is no opposition and no need to provide a response time and since an early modification would allow depositions to be timely and efficiently scheduled.

Respectfully submitted,

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CERTIFICATE OF SERVICE
DOCKET NO. 20250029-GU

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 22nd day of April, 2025, to the following:

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