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April 28, 2025

VIA E-PORTAL

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

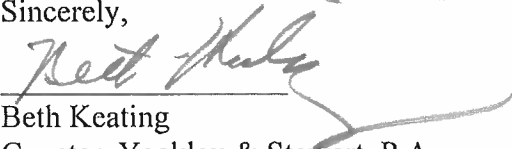
Re: Docket No. 20250042-GU - Petition for approval of amendment to transportation service agreement between Peninsula Pipeline Company, Inc. and Florida City Gas.

Dear Mr. Teitzman:

Attached for filing, please find Peninsula Pipeline's Responses to Staff's First Set of Data Requests. Attachment A to these requests is provided in redacted form only, and will be provided with a Request for Confidential Classification under separate cover.

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
(850) 521-1706

MEK

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Docket No. 20250042-GU - Petition for approval of amendment to transportation service agreement between Peninsula Pipeline Company, Inc. and Florida City Gas.

Peninsula Pipeline's Responses to Staff's First Set of Data Requests

1. Please provide a breakdown of the incremental costs required to relocate the pipeline, as required by the Florida Department of Transportation (FDOT).

Company Response:

The cost breakdown is the following:

Item	Cost
AFUDC Debt	\$ 136,603
Contractors	\$ 940,714
Direct Labor	\$ 66,000
Engineering and Permitting	\$ 167,000
Inspections	\$ 366,000
Legal	\$ 5,015
Materials, Supplies, and Contingency	\$ 1,295,000
Overhead	\$ 76,994
Tax	\$ 40,674
Total	\$ 3,094,000

2. Please provide documentation to demonstrate how Peninsula determined the incremental increase to the monthly reservation charge for the impacted pipeline segment.

Company Response

Please see Attachment A for the inputs used to calculate the incremental reservation charge. The calculation itself is not a simple mathematical calculation, but is instead the product of a proprietary model.

3. Please provide the current Total Monthly Reservation Charge for Segment I, as shown in Exhibits A and C to the existing transportation agreement.

Company Response

The current monthly reservation charge for Segment "I" in the existing transportation agreement is reflected in Confidential Attachment A.

4. Paragraph 12 of the petition states that, in February 2024, Peninsula and FCG entered into a transportation agreement to build several pipelines and to consolidate certain pre-existing agreements between the utilities. Please clarify whether the pipeline segment mandated by FDOT to be relocated was constructed subject to the February 2024 transportation agreement or from a pre-existing agreement.

Company Response

The pipeline segment “I” subject to mandated relocation is part of the pre-existing agreement between Peninsula Pipeline and Florida City Gas dated August 2012.

5. Please provide the pipeline segment’s original in-service date.

Company Response

Segment “I” was placed in service in August 2013.

6. Please provide the expected completion date of the pipeline relocation.

Company Response

The expected completion date of the relocation is November 2025.

7. Please provide the date when Peninsula was initially notified that FDOT’s road enhancement project could impact existing natural gas facilities.

Company Response

FDOT notified PPC of the road enhancement project on May 23, 2024.

Attachment A

**PPC - Indian River Relocate
Monthly Reservation Charge**

1	Capital Costs	\$	3,094,000
2	Incremental O&M	\$	62,000
3	Book Depreciation	\$	68,756
4	Interest Expense and ROE	\$	228,278
5	Tax Expense	\$	58,000
6	Total Annual Reservation Charge	\$	417,034
7	Incremental Monthly Reservation Charge (Line 6/12)	\$	
8	Prior Monthly Reservation Charge	\$	
9	Total New Reservation Charge	\$	

CERTIFICATE OF SERVICE

I HEREBY ATTEST that a true and correct copy of the foregoing has been served upon the following by Electronic Mail (redacted only) this 28th day of April, 2025:

Daniel Dose, Esquire
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
ddose@psc.state.fl.us

By: 
Beth Keating, Esq.
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*Attorneys for Peninsula Pipeline
Company, Inc.*