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October 3, 2025

BY E-PORTAL

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

Docket No. 20250111 – Petition for approval of safety, access, and facility enhancement program true-up and 2026 cost recovery factors, by Florida City Gas.

Dear Mr. Teitzman:

Enclosed for filing, please find Florida City Gas's Responses to Staff's First Set of Data Requests in the referenced docket.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,



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(850) 521-1706

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FLORIDA CITY GAS’S RESPONSES TO STAFF’S FIRST DATA REQUESTS

1. Please provide an explanation on how FCG prioritizes its replacement projects and ensures that they are completed in a cost effective manner.

Company Response

FCG prioritizes its replacement projects based on a risk assessment, labeled as high, medium and low risk. This program prioritizes all high-risk areas and consults with a team of subject matter experts to determine which of the high-risk projects will be completed first. To complete all projects in a cost-effective manner we have a competitively bidding process and work is awarded based on lowest bid, capacity to complete the work and historical performance.

2. If FCG relies on the DIMP plan, please provide any relevant pages from the DIMP plan that support the replacement projects planned for 2026.

Company Response

FCG's Distribution Integrity Management Plan complies with Section 192.1007 of the Title 49 of the Code of Federal Regulations. The DIMP plan establishes priority criteria based on risk areas reviewed annually that combines FCG Subject Matter Expert's knowledge and feedback, and the risk assessment noted in response to Question 1. Please see attached the pages from the DIMP plan which addresses the Risk Evaluation.

3. Please explain whether the FCG uses in-house or contracted labor to complete the replacement projects and what criteria that decision is based on.
 - a. If contracted labor is used, please discuss controls to ensure the payments for contract labor are reasonable.

Company Response

FCG utilizes contracted labor to complete the replacement projects due to limited internal resources. The labor contracts for the replacement work are competitively bid and are awarded based on lowest bid, capacity to complete the work and historical performance. Invoices are reviewed by the project management staff for accuracy.

4. Please provide an explanation to how FCG purchases the replacement materials and ensures that they are purchased in a cost effective manner.

Company Response

For each project a bill of material is created and before the project starts the construction team orders the materials. FCG utilizes the vendor that provides fair pricing and material

availability.

5. Please confirm that the total projected 2026 investment shown on Attachment C, Schedule 4 is \$29,200,577 and is for the 14 projects discussed on pages 3, 4, 5, and 6 of Attachment B to the petition (Miami SAFE 56, Miami SAFE 58, Miami SAFE 61, Brevard SAFE 9, Miami SAFE 65, Miami Orange 6, Miami Orange 2, Brevard Orange 4, Miami Span 1, Miami Span 2, Miami Span 3, PSL Span 4, Eau Gallie Gate Station Renewal project, and Ryder 106 Station Renewal project).

Company Response

Correct. As shown on Schedule 4 of Attachment C to FCG's Petition, the total investment projected for 2026 is \$29,200,577 for the projects discussed on pages 3-6 of Attachment B. However, FCG acknowledges that projects scheduled to be completed in 2025 may have some potential carry-over to 2026 for reasons that are out of FCG's control; this will be reflected in the final true-up that is filed for the calendar year of 2025.