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October 6, 2025

VIA: ELECTRONIC FILING

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

Re: Petition for approval of 2024 True-up, the Projected 2025 true-up and 2026 Revenue Requirements and Surcharges associated with Cast Iron / Bare Steel Replacement Rider, by Peoples Gas System, Inc.

FPSC Docket No. 20250106-GU

Dear Mr. Teitzman:

Attached for filing in the above-styled matter are Peoples Gas System, Inc. responses to Staff's First Data Request (Nos. 1-11), propounded by electronic mail on September 23, 2025.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'V. Ponder'.

Virginia Ponder

VLP/dh
Attachment
cc: All parties of record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Peoples Gas System, Inc. responses to Staff's First Data Request (Nos. 1-11), have been furnished by electronic mail on this 6th day of October, 2025 to the following:

Zachary Bloom
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
zbloom@psc.state.fl.us
discovery-gcl@psc.state.fl.us

A handwritten signature in blue ink, appearing to read "V. Ponder", is written above a horizontal line.

ATTORNEY

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250106-GU
STAFF'S FIRST DATA REQUEST
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1. Please identify all remaining activities under the utility's current CI/BSR. As part of this response, please identify the current status and the estimated completion date for each remaining activity.

ANSWER:

Please find the table below, which lists all known cast iron and bare steel ("CI/BS") and problematic plastic pipe ("PPP") replacement activities or projects remaining. Projects with the status "in permitting" have been in the permitting process for an extensive period due to long agency review times or required revisions to construction plans, such as for restoration of a roadway. Some projects in the Dade-Broward Division cannot proceed due to a five-year construction moratorium imposed by the municipality preventing completion of any project before 2027, or, in some cases, easements have been suspended due to a municipality's plans for redevelopment of the area.

| Pipe Material | Division | Project/Activity | Current Status | Estimated Completion |
|----------------------|-----------------|--|--|-----------------------------|
| CI/BS | Dade-Broward | Area 4 - SW 5th St & SW 4th Ave | In construction; partially still in permitting | 2026 |
| CI/BS | Dade-Broward | Area 23 - NE 1st Ter, NE 25th ST, NE 2nd Ter | In permitting | 2026 |
| CI/BS | Dade-Broward | Area 27 - Seton Dr & NW 62nd Ave, Pompano [Margate] | Construction starts October 2025 | 2025 |
| CI/BS | Dade-Broward | Area 31 - NE 5th St & NE 6th St & NE 3rd Ave, Ft Laud | Confirming pipe material is bare steel | 2026 |
| CI/BS | Dade-Broward | Area 33 - 35' length at E Broward Blvd & NE 9th Ave, Ft Laud | In permitting | 2026 |
| CI/BS | Dade-Broward | Area 35 - Alamanda Ct & SE 26th Ave, Ft Laud | Construction starts October 2025 | 2025 |
| CI/BS | Dade-Broward | Area 37 - Miami Rd & SE 12th Ct, Ft Laud | Confirming pipe material is bare steel | 2026 |
| CI/BS | Dade-Broward | Area 52 - NW 13th St & N Miami Ave and NW 11th Ter & N Miami Ave | In permitting | 2026 |
| CI/BS | Dade-Broward | Area 69 - Barry St & Garden Ave, Miami Beach | Reissuing permit | 2026 |
| CI/BS | Dade-Broward | Area 72 - Liberty Ave & 23rd St, Miami Beach | Awaiting start of municipality's projects | 2026 |
| CI/BS | Dade-Broward | Area X4 - 7124 Bay Dr N/O 71 St, Miami Beach | In design | 2026 |

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| Pipe Material | Division | Project/Activity | Current Status | Estimated Completion |
|----------------------|-----------------|--|--|-----------------------------|
| CI/BS | Dade-Broward | Area X7 - NE 35th St, b/w NE 10 Terr & NE 15th Ave, Pompano | In design | 2026 |
| CI/BS | Dade-Broward | Area X8 - 501-999 SE 25th Ave, Ft Lauderdale | Confirming pipe material is bare steel | 2026 |
| CI/BS | Dade-Broward | Area X9 - NW 12 Ave & NW 24ths St, Miami | Confirming pipe material is bare steel | 2026 |
| CI/BS | Dade-Broward | Westfield Broward Mall, Plantation | Requesting easements | 2026 |
| CI/BS | Dade-Broward | Collie Manor area - 2433 NE 13th Ter, Pompano Beach | In design | 2026 |
| CI/BS | Dade-Broward | 505 NE 3 rd Ave, Ft. Lauderdale | Confirming pipe material is bare steel | 2026 |
| CI/BS | Dade-Broward | 801 NE 17 TH AVE, Ft. Laud | Confirming pipe material is bare steel | 2026 |
| CI/BS | Dade-Broward | Area 25 - Design Place, s/o NE 54th St & e/o NE 2nd Ave (125 BS services) | HUD; easements denied due to redevelopment plans | TBD |
| CI/BS | Dade-Broward | Area 46 - NE 2nd Ave & NE 71st St | Confirming pipe material is bare steel | 2026 |
| CI/BS | Dade-Broward | Area 47 - NE 1st PL & NE 66th St (has 8+ BS services) | Confirming pipe material is bare steel | 2026 |
| CI/BS | Dade-Broward | Area 62 - 2121 NW 18th TERRACE (has 3 BS services) | HUD; easements denied due to redevelopment plans | TBD |
| CI/BS | Dade-Broward | Area X6 - NW 26th St & NW 23rd Ct (has 13+ BS services) | HUD; easements denied due to redevelopment plans | TBD |
| CI/BS | Dade-Broward | Area 26 - NE 2nd Ave from NE 38 St. to NE 42 St. and NE 38th St./NE 39th St., west of NE 6th Ave | Under construction moratorium | 2027 |
| CI/BS | Dade-Broward | Area 65 - W 51st St & Lakeview Dr | Under construction moratorium | 2027 |
| CI/BS | Dade-Broward | Area 66 - N Bay Rd between W 52nd St & Alton Road (0.28) | Under construction moratorium | 2027 |
| CI/BS | Dade-Broward | Area 67 - N Michigan Ave (0.03) | Under construction moratorium | 2027 |
| CI/BS | Dade-Broward | Area 73 - 9th St b/w Lenox Ave & Michigan Ave | Under construction moratorium | 2027 |
| CI/BS | Dade-Broward | Area 74 - 10th St & Pennsylvania Ave | Under construction moratorium | 2027 |

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| Pipe Material | Division | Project/Activity | Current Status | Estimated Completion |
|----------------------|-----------------|--|---|-----------------------------|
| PPP | Dade-Broward | Baypoint PPP (includes Area 26 - NE 2nd Ave from NE 38 St. to NE 42 St. and NE 38th St./NE 39th St., west of NE 6th Ave) | In design; Permitting in October | 2026 |
| PPP | Dade-Broward | Westfield Broward Mall, Plantation | Easements needed | 2026 |
| PPP | Dade-Broward | Dade-Broward Remaining (approximately 18.65 miles) | In design/permitting | 2028 |
| PPP | Tampa | Area 32- Redwood Blvd (between Elm Way & Sheldon Rd) | Legal delays | TBD |
| PPP | Tampa | Grosse Pointe Blvd PPP | Easements needed | 2026 |
| PPP | Tampa | Tampa Remaining (approximately 2.45 miles) | In design/permitting | 2028 |
| CI/BS | St. Pete | 58th Ave N & 30th St N, St Pete | Confirming pipe material is bare steel | 2026 |
| PPP | St. Pete | 317 Park St | In permitting | 2026 |
| PPP | St. Pete | Area 52- 13th Ave NE & Beach Dr NE | Issued for construction | 2025 |
| PPP | St. Pete | Area 115- 34th St N & 50th Ave N | Easements needed | 2026 |
| PPP | St. Pete | Area 127- Bay Pines Lakes Blvd & Pine Lakes Trl | Issued for construction | 2025 |
| PPP | St. Pete | Area 41- Downtown St Pete | Construction starting October | 2025 |
| PPP | St. Pete | 113th St North, from 54th Ave N to 60th Ave | In construction | 2025 |
| PPP | St. Pete | Remaining St Pete to design | In design/permitting | 2026 |
| PPP | St. Pete | St. Pete Remaining (approximately 59.58 miles) | In design/permitting | 2028 |
| CI/BS | Orlando | Kaley St - S Division Ave to S Fern Creek Ave | Under construction; Awaiting permit for railroad crossing | 2025 |
| CI/BS | Orlando | N Paramore Ave (and south) & W Robinson St | Under construction | 2025 |
| CI/BS | Orlando | Lake Ave and Orlando Ave S crossing | In redesign | 2026 |
| CI/BS | Orlando | Showalter Aviation St - cut/cap | Confirming amount of bare steel | 2026 |
| PPP | Orlando | Alhambra Ave & Dahlia PPP | In construction | 2025 |
| PPP | Orlando | Violet Dell near Carriage Hill Cir, Casselberry | Issued for construction | 2025 |
| PPP | Orlando | Lochmond Dr & Waverly Dr, Casselberry | Issued for construction | 2025 |
| PPP | Orlando | Remaining Orlando PPP (approximately 45.76 miles) | In design/permitting | 2028 |
| PPP | Eustis | Jackson & Orange | In construction | 2025 |

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| Pipe Material | Division | Project/Activity | Current Status | Estimated Completion |
|----------------------|-----------------|--|-------------------------------|-----------------------------|
| PPP | Eustis | Eustis remaining (approximately 3.1 miles) | In design/permitting | 2028 |
| PPP | Jacksonville | Downtown - North Core | In design | 2026 |
| PPP | Jacksonville | Downtown - Brooklyn n/o I95 | In design | 2026 |
| PPP | Jacksonville | Springfield | In design | 2026 |
| PPP | Jacksonville | Jacksonville Remaining (approximately 67.29 miles) | In design/permitting | 2028 |
| PPP | Lakeland | E Rose St & Ingraham Ave | In construction | 2025 |
| PPP | Lakeland | Area 15- Dogwood Dr & Red Bud Ln | Easements needed | 2026 |
| PPP | Lakeland | Lakeland Remaining (approximately 2.43 miles) | In design/permitting | 2028 |
| PPP | Daytona | Downtown Daytona South Section (2025) | In construction | 2025 |
| PPP | Daytona | North Woods Village HUD | In construction | 2025 |
| PPP | Daytona | Daytona Plaza Nova Rd | Issued for construction | 2025 |
| PPP | Daytona | Kennedy Rd & 6th St | Issued for construction | 2025 |
| PPP | Daytona | Daytona Remaining (approximately 12.57 miles) | In design/permitting | 2026 |
| PPP | Jupiter | Jupiter Remaining (approximately 11.58 miles) | In construction | 2026 |
| PPP | Panama City | Derby Woods | Construction starting October | 2025 |
| PPP | Panama City | Boat Race Estates | In design | 2026 |
| PPP | Panama City | South Calloway | In permitting | 2026 |
| PPP | Panama City | Panama City Remaining (approximately 25.61 miles) | In design/permitting | 2028 |
| PPP | Ocala | SE 14th St & SE 25th Ave | Issued for construction | 2025 |
| PPP | Ocala | Pavilion Oaks Ocala HUD: NW 23rd Pl & NW 1st Ave | In design | 2026 |
| PPP | Ocala | SW 13th St: Between SW 37th Ave & SW 27th Ave | In permitting | 2026 |
| PPP | Ocala | NW 21st St & NW 24th Rd | Issued for construction | 2025 |
| PPP | Ocala | NE 14th St | In permitting | 2026 |
| PPP | Ocala | NW 6th Ter & NW 6th St | In design | 2026 |
| PPP | Ocala | SE 10th Ln & SE 10th St | In permitting | 2026 |
| PPP | Ocala | Ocala Remaining (approximately 5.54 miles) | In design/permitting | 2028 |

2. Please provide the total CI/BSR investment to date (2012-2025).

ANSWER:

The company's investment in replacement of pipeline included in the Rider CI/BSR from 2012 through August 2025 is \$333,854,281. This investment is comprised of \$209,637,200 of CI/BS and \$124,217,081 of PPP and excludes the first million of investment annually per Order No. PSC-12-0476-TRF-GU.

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3. Please discuss the progress of CI/BSR replacement projects and Problematic Plastic Pipe (PPP) replacement projects in 2024, 2025, and those planned for 2026.

ANSWER:

2024

In 2024, Peoples continued to focus on CI/BS replacement projects in the Dade-Broward and Orlando Divisions. Multiple CI/BS projects in Dade-Broward incurred continued delays due to construction moratoriums and lengthy permitting processes.

In 2024, Peoples continued to focus on PPP replacement projects in the Tampa, St. Petersburg, Eustis, Jacksonville, Daytona, Avon Park, and Ocala Divisions. Many of these projects were completed in 2024, with some projects delayed or continuing into 2025.

Please find the CI/BS and PPP projects for 2024 with their status as of year-end listed in the table below.

| Pipe Material | Division | Project Name | Status |
|----------------------|-----------------|--|--------------------------------|
| CI/BS | Dade-Broward | Area 20 - N/O NE 79th St. and NE Miami Ct, Miami | Completed |
| CI/BS | Dade-Broward | Area 26 - NE 2nd Ave from NE 38 St. to NE 42 St. and NE 38th St./NE 39th St., west of NE 6th Ave | Construction moratorium |
| CI/BS | Dade-Broward | Area 27 - NW 62nd Ave & NW 58th Ter & Seton Dr | In permitting |
| CI/BS | Dade-Broward | Area 33 - E Broward Blvd between se 9th & se 10th Ave | In permitting |
| CI/BS | Dade-Broward | Area 42 - Cleveland St between N Federal Hwy & N 17th Ave | Permitting; Partially complete |
| CI/BS | Dade-Broward | Area 53 - between NW 12th St & NW 11 St | To retire |
| CI/BS | Dade-Broward | Area 61 - Alley between S Miami Ave, SE 15th St & Brickell Ave | Completed |
| CI/BS | Dade-Broward | Area 68 - Post Ave & W 47th St | Completed |
| CI/BS | Dade-Broward | Area 69 - Barry St & Garden Ave, Miami Beach | In permitting |
| CI/BS | Dade-Broward | Area 70 - W 40 TH St and Sheridan, Miami Beach | Completed |

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| Pipe Material | Division | Project Name | Status |
|----------------------|-----------------|--|-------------------------------------|
| CI/BS | Dade-Broward | Area 71 - W 26th St & Flamingo PL, Miami Beach | Completed |
| CI/BS | Dade-Broward | Area 4 - SW 5th Ave. SW 6 St. to SW 7 St. and SW 5th St., e/o SW 4th Ave., | Completed |
| CI/BS | Dade-Broward | N. MIAMI AVE & NE 24TH ST, MIAMI | Completed |
| CI/BS | Dade-Broward | Bay Point PPP | Initial planning |
| CI/BS | Dade-Broward | Area 23 - NE 1st Ter, NE 25th ST, NE 2nd Ter | In permitting |
| CI/BS | Dade-Broward | N Miami Ave & NE 20th Street, Miami - Leak | Completed |
| CI/BS | Dade-Broward | CIBS-SW 8 St., w/o SW 16 Ave. | Initial planning |
| PPP | Tampa | Interbay Blvd, MacDill Ave to Interbay Ave | In construction |
| PPP | Tampa | Bayshore Blvd, from Bay Ave to Old Bayshore Way | On hold until 2025 |
| PPP | Tampa | Area 32- Redwood Blvd (between Elm Way & Palm Way) | On hold until 2025 |
| PPP | Tampa | W Euclid from S Grady to S Church | In construction |
| PPP | St. Pete | Park Blvd | Partial completion |
| CI/BS | Orlando | Kaley St - S Division Ave to S Fern Creek Ave (remaining BS) | In permitting; partial construction |
| CI/BS | Orlando | Central Ave - US 17-92 & Lake Ave | Partial completion |
| CI/BS | Orlando | Orange Ave - Pineloch Ave to Jennie Jewel Dr | Completed |
| CI/BS | Orlando | N Parramore BS & Bentley | In redesign |
| CI/BS | Orlando | W Central Blvd (w of S Tampa Ave) | Easement received |
| CI/BS | Orlando | Grand St (Avondale Ave & S Parramore | Completed |
| CI/BS | Orlando | Orlando Ave (US 17-92) & Elvin Ave (BS) | Completed |
| CI/BS | Orlando | Area 16- W Oak Ridge Rd & Lake Ellenor Dr | Completed |
| CI/BS | Orlando | Michigan to S OBT | Completed |
| PPP | Eustis | Southern Palms | Completed |
| PPP | Eustis | Pine St & Orange Ave | Completed |
| PPP | Eustis | Crestview Dr Replacement | Completed |
| PPP | Eustis | Overlook Dr Replacement | Completed |
| PPP | Eustis | Mission Inn - HH | Completed |
| PPP | Eustis | El Red Replacement | In design |
| PPP | Eustis | Clifford St replacement | Completed |
| PPP | Eustis | Prescott St | On hold until 2025 |
| PPP | Eustis | Hackett St & Jackson Ave Preliminary Eng | On hold until 2025 |
| PPP | Jacksonville | Downtown - Cathedral Phase | In construction |

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| Pipe Material | Division | Project Name | Status |
|----------------------|-----------------|---|--------------------|
| PPP | Jacksonville | Downtown - Central Core | In construction |
| PPP | Jacksonville | Downtown - Lavilla | In construction |
| PPP | Jacksonville | Springfield West | Completed |
| PPP | Lakeland | S Florida Ave & Terrace Way Mobile Park (55 services) | Completed |
| PPP | Lakeland | E Rose St & Ingraham Ave (2025 construction) | In design |
| PPP | Lakeland | Area 15- Dogwood Dr & Red Bud Ln | On hold until 2025 |
| PPP | Lakeland | Miramar & Kenwith | In construction |
| PPP | Daytona | Downtown Daytona North Section | Completed |
| PPP | Daytona | Downtown Daytona South Section (2025) | In design |
| PPP | Daytona | Georgetown PPP - phase 2 | Completed |
| PPP | Daytona | North Woods Village HUD | On hold until 2025 |
| PPP | Daytona | Daytona Plaza Nova Rd | On hold until 2025 |
| PPP | Daytona | Kennedy & 6th | Easement requested |
| PPP | Avon Park | Frost Proof (scattered) | Completed |
| PPP | Ocala | Fox Meadow NE 39th between NE 14th St & NE 21st St | Completed |
| PPP | Ocala | SE 19th Replacement | Completed |
| PPP | Ocala | SE 14th St & SE 25th Ave | On hold until 2025 |

2025

In 2025, Peoples continues to focus on CI/BS replacement projects in the Dade-Broward, Orlando and St. Petersburg Divisions. The company continued to see delays of CI/BS projects in Dade-Broward due to construction moratoriums, lengthy permitting processes, and denial of easement requests due to the municipality's plans to redevelop the relevant areas. St. Petersburg and Orlando each have a project that the company is in the process of confirming that the pipe material is bare steel. Orlando also has two projects in construction and one in redesign.

In 2025, Peoples continues to focus on PPP replacement projects in the Dade-Broward, Tampa, St. Petersburg, Orlando, Eustis, Jacksonville, Lakeland, Daytona, Jupiter, Panama City, and Ocala Divisions. Thirteen projects have been completed across these divisions and multiple projects are in or starting construction. Several projects are awaiting easements to be granted and one project is experiencing a delay due to legal challenges.

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Please find CI/BS PPP projects for 2025 with their status as of September 2025 listed in the table below.

| Pipe Material | Division | Project Name | Status |
|----------------------|-----------------|---|--|
| CI/BS | Dade-Broward | Area 4 - SW 5th St & SW 4th Ave | In construction; partially still in permitting |
| CI/BS | Dade-Broward | Area 23 - NE 1st Ter, NE 25th ST, NE 2nd Ter | In permitting |
| CI/BS | Dade-Broward | Area 27 - Seton Dr & NW 62nd Ave, Pompano [Margate] | Construction starts October 2025 |
| CI/BS | Dade-Broward | Area 31 - NE 5th St & NE 6th St & NE 3rd Ave, Ft Laud | Confirming pipe material is bare steel |
| CI/BS | Dade-Broward | Area 33 - 35' length at E Broward Blvd & NE 9th Ave, Ft Laud | In permitting |
| CI/BS | Dade-Broward | Area 35 - Alamanda Ct & SE 26th Ave, Ft Laud | Construction starts October 2025 |
| CI/BS | Dade-Broward | Area 37 - Miami Rd & SE 12th Ct, Ft Laud | Confirming pipe material is bare steel |
| CI/BS | Dade-Broward | Area 52 - NW 13th St & N Miami Ave and NW 11th Ter & N Miami Ave | In permitting |
| CI/BS | Dade-Broward | Area 69 - Barry St & Garden Ave, Miami Beach | Reissuing permit |
| CI/BS | Dade-Broward | Area 72 - Liberty Ave & 23rd St, Miami Beach | Awaiting start of municipality's projects |
| CI/BS | Dade-Broward | Area X4 - 7124 Bay Dr N/O 71 St, Miami Beach | In design |
| CI/BS | Dade-Broward | Area X7 - NE 35th St, b/w NE 10 Terr & NE 15th Ave, Pompano | In design |
| CI/BS | Dade-Broward | Area X8 - 501-999 SE 25th Ave, Ft Lauderdale | Confirming pipe material is bare steel |
| CI/BS | Dade-Broward | Area X9 - NW 12 Ave & NW 24ths St, Miami | Confirming pipe material is bare steel |
| CI/BS | Dade-Broward | Westfield Broward Mall, Plantation | Requesting easements |
| CI/BS | Dade-Broward | Collie Manor area - 2433 NE 13th Ter, Pompano Beach | In design |
| CI/BS | Dade-Broward | 505 NE 3 rd Ave, Ft. Lauderdale | Confirming pipe material is bare steel |
| CI/BS | Dade-Broward | 801 NE 17 TH AVE, Ft. Laud | Confirming pipe material is bare steel |
| CI/BS | Dade-Broward | Area 25 - Design Place, s/o NE 54th St & e/o NE 2nd Ave (125 BS services) | HUD; easements denied; potential for redevelopment |
| CI/BS | Dade-Broward | Area 46 - NE 2nd Ave & NE 71st St | Confirming pipe material is bare steel |
| CI/BS | Dade-Broward | Area 47 - NE 1st PL & NE 66th St (has 8+ BS services) | Confirming pipe material is bare steel |

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| Pipe Material | Division | Project Name | Status |
|----------------------|-----------------|--|---|
| CI/BS | Dade-Broward | Area 62 - 2121 NW 18th TERRACE (has 3 BS services) | HUD; easements denied; potential for redevelopment |
| CI/BS | Dade-Broward | Area X6 - NW 26th St & NW 23rd Ct (has 13+ BS services) | HUD; easements denied; potential for redevelopment |
| CI/BS | Dade-Broward | Area 26 - NE 2nd Ave from NE 38 St. to NE 42 St. and NE 38th St./NE 39th St., west of NE 6th Ave | Under construction moratorium |
| CI/BS | Dade-Broward | Area 65 - W 51st St & Lakeview Dr | Under construction moratorium |
| CI/BS | Dade-Broward | Area 66 - N Bay Rd between W 52nd St & Alton Road (0.28) | Under construction moratorium |
| CI/BS | Dade-Broward | Area 67 - N Michigan Ave (0.03) | Under construction moratorium |
| CI/BS | Dade-Broward | Area 73 - 9th St b/w Lenox Ave & Michigan Ave | Under construction moratorium |
| CI/BS | Dade-Broward | Area 74 - 10th St & Pennsylvania Ave | Under construction moratorium |
| PPP | Dade-Broward | Baypoint PPP (includes Area 26 - NE 2nd Ave from NE 38 St. to NE 42 St. and NE 38th St./NE 39th St., west of NE 6th Ave) | In design; Permitting in October |
| PPP | Dade-Broward | Westfield Broward Mall, Plantation | Easements needed |
| PPP | Tampa | Interbay | Completed |
| PPP | Tampa | Area 32- Redwood Blvd (between Elm Way & Sheldon Rd) | Legal delays |
| PPP | Tampa | Grosse Pointe Blvd PPP | Easements needed |
| PPP | Tampa | W Euclid from S Grady to S Church | Completed |
| CI/BS | St. Pete | 58th Ave N & 30th St N, St Pete | Confirming pipe material is bare steel |
| PPP | St. Pete | Park Blvd | Completed |
| PPP | St. Pete | 317 Park St | In permitting |
| PPP | St. Pete | 113th St North, from Walker Ave to 54TH Ave N | Completed |
| PPP | St. Pete | Area 52- 13th Ave NE & Beach Dr NE | Issued for construction |
| PPP | St. Pete | Area 115- 34th St N & 50th Ave N | Easements needed |
| PPP | St. Pete | Area 127- Bay Pines Lakes Blvd & Pine Lakes Trl | Issued for construction |
| PPP | St. Pete | Area 41- Downtown St Pete | Construction starting October |
| PPP | St. Pete | 113th St North, from 54th Ave N to 60th Ave | In construction |
| PPP | St. Pete | Remaining St Pete to design | In design/permitting |
| CI/BS | Orlando | Kaley St - S Division Ave to S Fern Creek Ave | Under construction; Awaiting permit for railroad crossing |
| CI/BS | Orlando | N Paramore Ave (and south) & W Robinson St | Under construction |

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| Pipe Material | Division | Project Name | Status |
|----------------------|-----------------|---|---------------------------------|
| CI/BS | Orlando | Lake Ave and Orlando Ave S crossing | In redesign |
| CI/BS | Orlando | Showalter Aviation St - cut/cap; look for more BS | Confirming amount of bare steel |
| PPP | Orlando | Alhambra Ave & Dahlia PPP | In construction |
| PPP | Orlando | Violet Dell near Carriage Hill Cir, Casselberry | Issued for construction |
| PPP | Orlando | Lochmond Dr & Waverly Dr, Casselberry | Issued for construction |
| PPP | Orlando | Remaining Orlando PPP | In design/permitting |
| PPP | Eustis | Prescott St | Completed |
| PPP | Eustis | Hackett St & Jackson Ave | Completed |
| PPP | Eustis | Jackson & Orange | In construction |
| PPP | Eustis | Titcomb & Idlewild BS replace | Completed |
| PPP | Eustis | Eustis remaining | In design/permitting |
| PPP | Jacksonville | Downtown - Cathedral Phase | Completed |
| PPP | Jacksonville | Downtown - Central Core | Completed |
| PPP | Jacksonville | Downtown - Lavilla | Completed |
| PPP | Jacksonville | Downtown - North Core | In design |
| PPP | Jacksonville | Downtown - Brooklyn n/o I95 | In design |
| PPP | Jacksonville | Springfield | In design |
| PPP | Jacksonville | Remaining Jacksonville PPP | In design/permitting |
| PPP | Lakeland | Miramar & Kenwith | Completed |
| PPP | Lakeland | S Florida Ave & Terrace Way Mobile Park - Phase 2 | Completed |
| PPP | Lakeland | E Rose St & Ingraham Ave | In construction |
| PPP | Lakeland | Area 15- Dogwood Dr & Red Bud Ln | Easements needed |
| PPP | Lakeland | Remaining Lakeland PPP | In design/permitting |
| PPP | Daytona | Downtown Daytona South Section (2025) | In construction |
| PPP | Daytona | North Woods Village HUD | In construction |
| PPP | Daytona | Daytona Plaza Nova Rd | Issued for construction |
| PPP | Daytona | Kennedy Rd & 6th St | Issued for construction |
| PPP | Daytona | Commercial Dr | Completed |
| PPP | Daytona | Daytona remaining | In design/permitting |
| PPP | Jupiter | Jupiter Remaining | In construction |
| PPP | Panama City | Derby Woods | Construction starting October |
| PPP | Panama City | Boat Race Estates | In design |
| PPP | Panama City | South Calloway | In permitting |
| PPP | Panama City | Remaining PC to design | In design/permitting |
| PPP | Ocala | SE 14th St & SE 25th Ave | Issued for construction |

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| Pipe Material | Division | Project Name | Status |
|----------------------|-----------------|--|-------------------------|
| PPP | Ocala | Pavilion Oaks Ocala HUD: NW 23rd Pl & NW 1st Ave | In design |
| PPP | Ocala | SW 13th St: Between SW 37th Ave & SW 27th Ave | In permitting |
| PPP | Ocala | NW 21st St & NW 24th Rd | Issued for construction |
| PPP | Ocala | NE 14th St | In permitting |
| PPP | Ocala | NW 6th Ter & NW 6th St | In design |
| PPP | Ocala | SE 10th Ln & SE 10th St | In permitting |

2026

In 2026, for CI/BS projects, Peoples will continue working through permitting challenges and complete any remaining verification necessary to submit projects for design and permitting in Miami and Orlando.

Peoples will continue the design and permitting of PPP projects in St. Petersburg, Orlando, Panama City, Eustis, Daytona, Ocala, and Tampa, releasing to construction as plans and permits become available. Additionally, the company will begin design work for replacement of pipe in the Downtown Miami area.

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4. Please provide the Excel spreadsheets for petition exhibits A, B, C, and D with formulas unlocked.

ANSWER:

Please find attached the Excel file entitled "DR No. 4 – 2026 Projection Filing Exhibits," which contains tabs for each of the petition exhibits.

5. Referring to paragraph 18 of the petition, please explain the factors that led to the \$331,724 under-recovery (including interest) in 2024.

ANSWER:

The under-recovery of \$337,724 is primarily a result of the Long-Term Debt Cost Rate True-Up Mechanism ("LTDR True-up Mechanism"). The creation and purpose of the LTDR True-up Mechanism are discussed in paragraphs 11 to 13 of our petition. As explained in paragraph 12 of the petition, and as set out in Order No. PSC-2023-0388-fof-GU (the 2023 Rate Case Order"), incremental revenue requirement resulting from the company's long-term debt issuance, above \$500,000, for the period between the implementation of the base rate increase and implementation of the LTDR True-Up Mechanism, would be recovered through the Rider CI/BSR for 2025.

The company's Rider CI/BSR 2024 annual filing made with the Commission on August 30, 2024, demonstrated that the amount associated with the LTDR True-Up Mechanism for the first six months of 2024 to be recovered through the 2025 Rider CI/BSR filing was \$476,034. This under-recovery was partially offset by a roll-forward over-recovery of \$144,210. The beginning balance reflects the difference between actual replacement costs for CI/BS and PPP under Rider CI/BSR in 2023 and the projected amounts included in the 2023 rate case to be rolled into rate base.

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6. Please update the tables contained in Peoples' response to Staff's First Data Request No. 8 (Document No. 09444-2024) in Docket No. 20240133-GU.

ANSWER:

Actual and projected miles replaced and costs:

| Year | CI/BS Miles Replaced | PPP Miles Replaced | CI/BS Investment ^a | PPP Investment ^b | CI/BS Revenue Requirement | PPP Revenue Requirement |
|-------|----------------------------|--------------------------|----------------------------------|--------------------------------|---------------------------------|-------------------------------|
| 2017 | 51 | - | \$17,588,366 | \$2,915,802 | \$6,868,302 | \$74,021 |
| 2018 | 62 | 56 | \$27,035,678 | \$15,890,424 | \$8,510,823 | \$848,201 |
| 2019 | 52 | 42 | \$35,821,371 | \$17,425,589 | \$11,075,229 | \$2,706,161 |
| 2020 | 55 | 43 | \$32,317,184 | \$11,115,571 | \$14,817,804 | \$4,358,010 |
| 2021 | 14 | 38 | \$23,726,642 | \$19,812,603 | \$1,347,321 | \$(160,452) |
| 2022 | 10.4 | 29 | \$13,079,280 | \$15,486,397 | \$3,154,597 | \$1,921,940 |
| 2023 | 2.3 | 44 | \$5,815,954 | \$18,210,943 | \$3,927,032 | \$3,604,313 |
| 2024 | 2.4 | 10 | \$5,798,611 | \$15,279,982 | \$224,372 ^e | \$382,518 ^e |
| 2025* | 4.7 | 51 | \$3,001,439 | \$28,644,082 | \$719,587 | \$2,363,618 |
| 2026* | 2.4 | 87 | \$4,175,820 | \$57,967,838 | \$194,023 ^f | \$2,751,803 ^f |
| 2027* | 1.5 ^c | 96 | \$2,919,534 | \$72,206,101 | \$625,475 | \$10,269,846 |
| 2028* | 1.3 | 54 | \$2,868,930 ^d | \$43,044,041 ^d | \$967,738 | \$17,510,136 |

* Projected

^a CI/BS Investment includes removal of initial \$1M through 2025.

^b PPP Investment includes removal of initial \$1M each year starting in 2026.

^c 5-year construction moratoriums in effect in the City of Miami preventing completion before 2027.

^d 2028 investment includes rollover costs to occur in 2029.

^e Revenue requirement based on current year investment only as investment for prior years rolled into rate base pursuant to the 2023 Rate Case.

^f Revenue requirement based on current year investment only as investment for prior years rolled into rate base pursuant to the 2025 Rate Case.

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Actual cast iron and bare steel miles of main and number of services replaced and remaining:

| Year | Main Replacements | | | | | Service Line Replacements | |
|-------|----------------------------|-----------------------------|---|--|--------------------------------------|-----------------------------------|------------------------------------|
| | Replaced Cast Iron (miles) | Replaced Bare Steel (miles) | Remaining Cast Iron at Year End (miles) | Remaining Bare Steel at Year End (miles) | Total Miles Remaining of CI/BS Mains | Bare Steel Service Lines Replaced | Remaining Bare Steel Service Lines |
| 2012 | - | - | 100 | 354 | 454 | - | 14,978 |
| 2013 | 13 | 38 | 87 | 316 | 403 | 907 | 14,071 |
| 2014 | 2 | 15 | 85 | 298 | 383 | 7,964 | 6,107 |
| 2015 | 26 | 60 | 59 | 238 | 297 | 1,019 | 5,088 |
| 2016 | 15 | 35 | 44 | 203 | 247 | 1,050 | 6,963 |
| 2017 | 15 | 36 | 29 | 178 | 207 | 1,135 | 4,279 |
| 2018 | 10 | 52 | 18 | 126 | 144 | 1,970 | 2,309 |
| 2019 | 8 | 44 | 10 | 83 ^a | 93 | 649 | 1,660 |
| 2020 | 4 | 51 | 6 | 35 ^a | 41 | 423 | 1,237 |
| 2021 | 3.5 | 10.5 | 2 | 24 | 26 | 191 | 998 |
| 2022 | 1.3 | 9.1 | 0.9 | 14.6 ^a | 15.5 | 74 | 941 |
| 2023 | 0.3 | 2.0 | 0.6 | 12.4 ^a | 12.4 | 40 | 931 |
| 2024 | 0.1 | 2.3 | 0.3 | 5.6 | 5.9 | 79 | 686 |
| 2025* | < 0 | 4.7 | < 0 | 2.4 | 2.4 | ^b | ^b |

* Projected

^a Additional miles of pipe added after reclassification of pipe type.

^b To be determined.

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Actual problematic plastic pipes miles of main and number of services replaced and remaining:

| Year | Replaced PPP (Miles) | Total Remaining PPP Mains (Miles) | Replaced PPP Service Lines | Remaining PPP Service Lines |
|-------------|-------------------------------------|--|---|--|
| 2016 | - | 551 | - | 28,237 |
| 2017 | - | 509 | 1,396 | 26,841 |
| 2018 | 56 | 461 | 3,941 | 24,741 |
| 2019 | 42 | 418 | 2,349 | 20,420 |
| 2020 | 43 | 370 | 1,702 | 18,718 |
| 2021 | 38 | 337 | 882 | 17,683 |
| 2022 | 29 | 306 | 837 | 17,229 |
| 2023 | 44 | 281 ^a | 883 | 16,346 ^a |
| 2024 | 10 | 296 ^a | 637 | 15,499 ^b |
| 2025* | 51 | 236 | b | b |
| 2026* | 87 | 150 | b | b |
| 2027* | 96 | 54 | b | b |
| 2028* | 54 | - | b | b |

* Projected

^a Additional service lines reclassified during the year.

^b This will be determined during the replacement year.

7. Please provide a discussion on how Peoples prioritizes its replacement projects and ensures that they are completed in a cost effective manner. GU.

ANSWER:

Peoples historically prioritized removal/replacement by considering the risk per foot and the likelihood of asset failure. The replacement of cast iron and bare steel is prioritized over Problematic Plastic Piping ("PPP"). Peoples is actively working to accelerate the removal of all remaining PPP, with project prioritization based on construction readiness. Projects that require extended lead times for acquiring easements, environmental permits, or other difficult to obtain permits are identified as projects to be construction ready for late 2026 through 2027.

To ensure cost-effective completion of projects, Peoples utilizes "bid compliant" suppliers for design, permitting, and construction, who were competitively selected through a Request for Proposal process. The materials purchased for these projects are standard agreement items and with predetermined pricing. Additionally, the company continues to incorporate lessons learned from previous projects to identify and address unexpected costs. An example of unexpected costs is inaccurate cut and cap locations for the existing system or tie-in locations for the new system into the existing system. Peoples is now performing additional surveys at the proposed tie-in and cut and cap locations during the design phase of the project to avoid costly delays in the construction phase.

8. If the CI/BSR relies on the DIMP plan, please provide any relevant pages from the DIMP plan that support the replacement projects planned for 2026.

ANSWER:

The Distribution Integrity Management Program (“DIMP”) supports Rider CI/BSR replacement projects. The table below shows the confidential sections from the 2025 PGS DIMP that supports the replacement projects planned for 2026. The designated confidential pages from the DIMP are attached and a Request for Confidential Classification will be filed contemporaneously with this response.

| Page No. | Section No. | Section Title |
|-----------------|--------------------|--|
| 18 | 7.4.4 | Legacy Pipe Materials |
| 21 – 22 | 8.1 | Risk Assessment Process |
| 22 | 8.4 | Legacy Pipe Replacement Risk Assessment |
| 23 | 9.3 | Legacy Pipe Replacement Program |
| 57 – 58 | 16.9 | Legacy Pipe Replacement Risk Ranking Methodology |

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BATES STAMPED PAGES NOS. 21-26 ARE REDACTED FOR CONFIDENTIALITY

9. Please provide a discussion on whether the utility uses in-house or contract labor to complete the replacement projects and what criteria that decision is based on.

ANSWER:

Peoples primarily uses contract labor for its replacement projects related to Rider CI/BSR. For the design and permitting phases, the company typically engages contract engineering firms due to the significant workload and to ensure design is overseen by a Professional Engineer. Peoples exclusively utilizes contract labor for construction, as in-house internal construction team members are primarily focused on pipeline compliance work and leak response.

10. If the utility uses contract labor, please discuss controls to ensure the payments for contract labor are reasonable.

ANSWER:

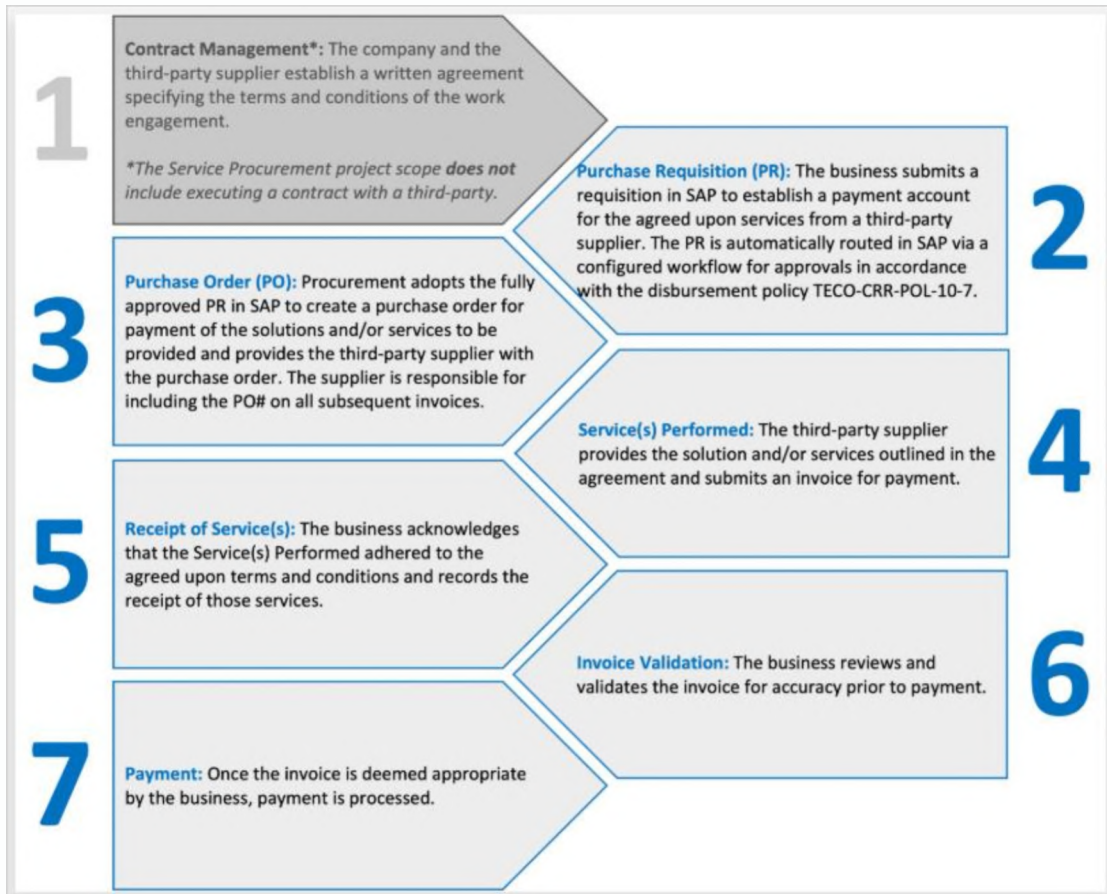
Peoples utilizes "bid compliant" suppliers through a Master Service Agreement for designing, permitting, and construction services. These suppliers were competitively selected through a Request for Proposal ("RFP") process. Potential vendors must meet several qualifications relevant to the type of work performed. Categories of these qualifications include safety performance, financial reviews, qualifications, necessary certifications, etc.

The company's bid process includes the following guidelines:

1. Up to \$50,000 - Discretionary Bid - Bid at the discretion of the purchasing buyer.
2. Between \$50,000 and up to \$200,000 - Informal Bid - Minimum of two (2) written bids required (excluding OEMs or Preferred Source Memo).
3. Anything \$200,000 and over - Formal Bid - Minimum of three (3) written bids must be submitted in the form of RFP or RFQ (excluding OEMs or Preferred Source Memo).

For large replacement projects anticipated to exceed \$1.5 million, Peoples may initiate a new RFP.

The company's Service Procurement Process is detailed in the diagram below.



- 11.** Please provide a discussion on how Peoples purchases the replacement materials and ensures that they are purchased in a cost effective manner.

ANSWER:

Peoples purchases materials for replacement projects utilizing the process, including controls, outlined in the company's response to Data Request No. 10. This process is overseen by the company's supply chain management team, which focuses on strategic sourcing, contracting, inventory management, and supply chain governance. The team's goal is to ensure materials and supplies are contracted to provide the best value for Peoples' customers. Peoples competitively bids the management of its consolidated material inventory and supply through a centralized material management firm. This approach enables the company to secure the necessary construction materials at pre-established competitive prices. The supply chain management team also uses competitive sourcing and competitive bidding to procure materials and supplies that are not typically maintained in inventory.