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Public Service Commission

July 9, 2013

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COMMISSION
CLERK

Floyd Self, Esquire
Gonzalez Saggio & Harlan LLP
3411 Capital Medical Blvd.
Tallahassee, FL 32308

STAFF'S THIRD DATA REQUEST

RE: Docket No. 130089-GU – Joint petition for approval of natural gas transportation service agreement between Florida City Gas and Miami-Dade County, through Miami-Dade Water and Sewer Department.

Dear Mr. Self,

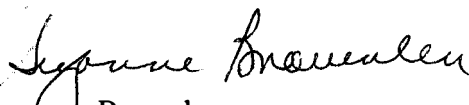
By this letter, the Commission staff requests that Florida City Gas provide responses to the following data requests.

1. Please refer to FCG's response to Staff's DR 2-8B.
 - a. Please clarify whether FCG has identified all leak repairs from 2003 through 2012 for the pipelines serving the Alexander Orr and Hialeah plants.
 - b. What was the nature of the equipment failure associated with the Alexander Orr leak completed on September 29, 2011, and what was the expense to repair the equipment failure?
 - c. Are repair expenses similar to those incurred to repair the Alexander Orr leak completed on September 29, 2011 incorporated into the O&M expenses identified in Confidential Exhibit D to the Joint Petition?
2. Please refer to FCG's response to Staff's DR 2-8C.
 - a. What is the cost of meter changes required due to periodic testing for the Alexander Orr and Hialeah plants from 2003 through 2012?
 - b. What was the cost of the 2010 to 2012 four inch main relocation for the main referenced in the response serving the Hialeah Plant?
 - c. Approximately what portion of the capacity of the 4 inch main along West 4th Avenue serving the Hialeah Plant is used to serve the Hialeah plant?
 - d. What was the date and approximate cost of the valve box changed on a valve along the four inch main serving the Hialeah Plant on NW 62nd Street, just west of NW 38th Avenue?

- e. Approximately what portion of the capacity of the 4 inch main on NW 62nd Street serving the Hialeah Plant is used to serve the Hialeah plant?
 - f. Does FCG's incremental cost analysis presented in Confidential Exhibit D to the Joint Petition incorporate the expenses associated with the capital costs similar to those identified in FCG's response to Staff's DR 3-2a,b, and d if such costs were to be incurred during the 2014-2023 period? If so, please explain. If not, why not?
3. Please refer to FCG's response to Staff's DR 2-8D. Is FCG aware of any future municipal right of way improvements that may require adjustments to the pipeline facilities serving Alexander Orr or Hialeah plants through 2023?
 4. Please refer to FCG's response to Staff's DR 2-9(A). Considering the FCG's CRA tariff, which describes "base revenue" as the revenue which the Company would have derived based on gas sold, why should the CRA be calculated based on the "take or pay" gas volume rather than the actual gas volume for the year, in instances where the volumes sold are below the take or pay threshold and the "out" provision is not applicable?
 5. Please refer to the Joint Petition, Exhibit A, Page 9 of 15, Article IX.
 - a. Is MDWASD authorized per the Joint Petition to use its landfill gas to operate its lime kilns at Alexander Orr and Hialeah from 2014-2023?
 - b. If so, what impact does FCG believe such alternative fuel availability will have on its quantity of natural gas transportation to MDWASD during the contract term?

Please file the original and five copies of the requested information by Wednesday, July 24, 2013 with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,


Suzanne Brownless
Senior Attorney

SBr/nah

cc: Office of Commission Clerk ✓