

STATE OF FLORIDA



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Public Service Commission

September 28, 2022

Beth Keating
Gunster, Yoakley, & Stewart, P.A.
215 South Monroe St. Suite 601
Tallahassee, FL 32301

STAFF'S FIRST DATA REQUEST

Christopher Wright
Senior Attorney Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408

Dear Ms. Keating and Mr. Wright:

Re: Docket No. 20220153-GU -- Petition for approval of safety, access, and facility enhancement program true-up and 2023 cost recovery factors, by Florida City Gas.

By this letter, Commission staff requests that Florida City Gas (FGC or utility) provide responses to the following questions by October 10, 2022.

1. Referring to paragraph 18 of the petition, please state what the 2023 SAFE factors would be prior to FCG moving the investment as of December 31, 2022, from the SAFE program to rate base.
2. Please confirm that the projected 2023 investment is \$11,758,527 and is for the two projects discussed on page 2 of Attachment B to the petition (SAFE 45 and SAFE 47 projects).
3. Please provide Attachment C to the petition, the SAFE Schedules 1 through 7, in Excel format with formulas intact.
4. If the Commission approves FGC's request in rate case docket No. 20220069-GU to expand and continue the SAFE program, please explain whether any additional investments would start to be included in the September 2023 petition for 2024 SAFE factors or after the current SAFE program expires in 2025.
5. Please state if any of the 2021 or 2022 true-up amounts have been folded into rate base in Docket No. 20220069-GU or whether the amounts are all included in the 2023 SAFE factors.

6. If FGC's request in rate case docket No. 20220069-GU to expand and continue the SAFE program is approved, please confirm that FCG would still be subject to the original order approving the SAFE program, Order No. PSC-15-0390-TRF-GU, requiring the true-up for any over- or under- recovery.

Please file all responses electronically by October 10, 2022, via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and electronic Filing Web Form. Please contact me at hforrest@psc.state.fl.us or at 850.413.6808 if you have any questions.

Sincerely,

/s/ Holly Forrest

Holly Forrest

Public Utility Analyst II