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STATE OF FLORIDA

DIVISION OF ECONOMICS JUDY HARLOW DIRECTOR (850) 413-6410

Public Service Commission

May 3, 2023

Beth Keating, Esquire Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite601 Tallahassee, FL 32301 bkeating@gunster.com

STAFF'S SECOND DATA REQUEST <u>VIA EMAIL</u>

Jason Bennett Florida Public Utilities Company 208 Wildlight Avenue Yulee, FL 32097 jbennett@chpk.com

Re: Docket No. 20230029-GU: Petition for approval of Gas Utility Access and Replacement Directive (GUARD), by Florida Public Utilities Company

Dear Ms. Keating and Mr. Bennett:

By this letter, Commission staff respectfully requests that Florida Public Utilities Company respond to the following questions.

1. Please provide a copy of Florida Public Utilities Company's (FPUC) three most recent

Distribution Integrity Management Programs (DIMP).

2. Has FPUC identified any other states that have approved a program similar to GUARD?

If yes, please provide any relevant information.

- 3. Please refer to FPUC's response to Staff's First Data Request, No. 15.
 - a. Explain the basis for the statement regarding "increased risk of disruption due to third party damage." Has FPUC seen an increase in third party damage in recent years?

- b. Explain the benefits to the general body of ratepayers of paying through a surcharge to improve the reliability for a specific community on an island or peninsula.
- 4. Please refer to Florida Public Utilities Company's response to Staff's First Data Request, No. 11(a). Is it possible for FPUC to quantify the estimated savings associated with implementing the GUARD program now as opposed to later? If so, please provide the estimated savings. If not, please explain.
- 5. Please refer to FPUC's response to Staff's First Data Request, No. 18(a). Please identify the communities that are at higher risk for reliability issues than others, and identify the factors that led to this determination for each.
- 6. Please refer to FPUC's response to Staff's First Data Request, No. 18(a). The utility states that many customers in these areas, including residential and commercial, use natural gas to fuel generators to be used in case of emergencies. Please state the total number of residential and commercial customers who currently take service under the standby generator tariff and approximately what percent of those customers live in communities that FPUC has identified as potentially vulnerable in response to Staff's First Data Request No. 15.
- 7. Please refer to FPUC's response to Staff's First Data Request, No. 18(b). Please explain how FPUC typically addresses reliability projects. As part of this response, please explain if the same can be done for the reliability projects proposed under the GUARD program.
 - a. If the reliability portion of the GUARD program is not approved, please explain how FPUC would be impacted and indicate how reliability issues in the proposed communities would be addressed in the future.

- 8. Please refer to Exhibit DR 4. For the projects that are not identified by location (i.e., "Access Rear Easement Project 4," "Span Pipe Project 4," "Obsolete Facility Project 1," etc.), does this mean that FPUC has not yet identified the locations for these projects? If so, please identify when FPUC will know the locations for these projects. If not, please explain.
- 9. Referring to the response in Staff's First Data Request, No. 24, is it correct that the tariff sheets included with the February 21, 2023 petition have been provided for informational purposes only and the September 2023 petition will include the tariffs that would be effective January 2024 (assuming Commission approval of the proposed GUARD program)?
- Referring to the response in Staff's First Data Request, No. 27, page 21 of 21, the calculations show a projected average monthly cost of \$35,284 for the GS-8 rate class in 2032. For the GS-7 rate class, the projected average monthly cost is \$9,611. Does FPUC believe those are reasonable customer impacts?

Please file all responses electronically no later than May 17, 2023 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 edraper@psc.state.fl.us or at 850.413.6706 if you have any questions.

Thank you.

/s/Elisabeth Draper Elisabeth Draper Chief

cc: Office of Commission Clerk