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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# 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 VIA EMAIL**

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?



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)?
10. 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](http://www.floridapsc.com) by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please contact me at [edraper@psc.state.fl.us](mailto: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