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DIVISION OF ECONOMICS
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Public Service Commission

December 12, 2023

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

STAFF'S SECOND DATA REQUEST
Via E-Mail

Re: Docket No. 20230110-GU - Petition for approval of tariff modifications to implement transportation balancing charge rider, by Florida City Gas.

Dear Ms. Keating:

By this letter, the Commission staff respectfully requests Florida City Gas (FCG) to provide responses to the following questions, regarding the petition for approval of tariff modifications to implement a Transportation Balancing Charge (TBC) rider.

1. Please refer to the petition, Appendix 5, entitled "Proposed Transportation Balancing Charge Rates".
 - a. Appendix 5 shows a breakdown of various measurements allocated by customer rate class. Please state whether FCG records a similar breakdown of imbalance allocated by customer class. If so, please include figures for the amount of imbalance that each customer class is responsible for in the years of 2021 and 2022. If not, please state what measures FCG would need to take in order to record imbalance for each customer class.
 - b. Contract Demand Service (KDS) show a projected increase of 11.44 percent to KDS customers' billing following the implementation of the proposed TBC, which is a significantly higher increase than any other customer class. In FCG's response to staff's first data request, Request No. 16(d), FCG states that KDS customers have different gas delivery service requirements. Please state whether KDS's percentage of increase is impacted by any other factors other than the proposed transportation balancing charge, including those pertinent to confidential KDS negotiated rates.
 - c. Per Appendix 5, FCG's calculated TBC charge of \$0.00780 has been applied uniformly to all rate classes. Please explain FCG's reason for using the same rate for all rate classes.
2. Please refer to FCG's response to staff's first data request, Request No. 17 to address the following questions. Therein, FCG states, in part, "FCG will not forecast or estimate the revenues/credits from the Transportation Balancing Charge in its annual PGA filings, instead

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FCG proposes to only reflect the actual revenues received as a credit in its final actual PGA true-up filed annual with the Commission.”

- a. Discuss FCG’s reason(s) for proposing to reflect the actual total TBC revenues received only on Schedule A-7 in FCG’s PGA true-up filing as a credit, rather than proposing to reflect the forecasted TBC revenue as a credit on FCG’s Schedule E-1 in its PGA projection filing, and thereby allow the TBC entry on Schedule A-7 to function as a true-up of the TBC charge in that true-up schedule.
- b. Please explain the advantages and disadvantages of projecting TBC credits in Schedule E-1 of FCG’s PGA projection filings, to then be true-up in Schedule A-7 of FCG’s PGA true up filings.
- c. Please explain whether FCG believes that including in its PGA factor in Period Y an estimate of the TBC credit projected to be earned during Period Y allows a more accurate estimate of costs to be incurred during that period, rather than including an actual TBC credit from preceding period X.
- d. In part, FCG’s response indicated that the TBC would most likely be found as a subpart to Line 1 on Schedule A-7 of the company’s final PGA true-up filing, similar to the line entry for Off System Sales (OSS). Please clarify if a line entry for the TBC would also be included on Schedule A-2, consistent with the line entry for OSS? Please explain your response.

Please file all responses electronically no later than December 22, 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 kmcclell@psc.state.fl.us or at 850.413.6814 if you have any questions.

Thank you,

/s/Kate McClelland

Kate McClelland
Public Utility Analyst

cc: Bailey Lang (BLang@psc.state.fl.us)

Office of the Commission Clerk (Docket No. 20230110-GU)