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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

June 13, 2024

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

**STAFF'S FIRST DATA REQUEST  
VIA EMAIL**

**Re: Docket No. 20240094-GU -- Joint petition by Peoples Gas System and Florida Public Utilities Company for approval of special contract.**

Dear Ms. Keating:

By this letter, Commission staff request that Florida Public Utilities Company (FPUC) provide responses to the following data requests:

1. Please provide Exhibit B to the petition.
2. Please provide Document No. 06294-2022 from Docket No. 20220159-GU.
3. Please explain why FPUC needs uninterruptible gas service from People's Gas System (PGS) as set forth in the proposed 2024 Gas Transportation Agreement (Special Contract).
4. Please explain why the term of the Special Contract is 7 months.
5. Please explain FPUC's plans to maintain its natural gas supply when the term of the Special Contract expires, including whether FPUC will negotiate a new contract with PGS or will seek alternative transportation options.
6. Please explain how FPUC plans to recover payments made to PGS pursuant to the Special Contract.
7. Please discuss the benefits to FPUC's general body of ratepayers flowing directly from the Special Contract.
8. Please discuss all relevant facts considered by PGS and FPUC when negotiating the amount of the monthly charge to FPUC for reservation of firm capacity and transportation service on the PGS distribution system as set forth in Section 5.1 of the Special Contract, and then explain how FPUC and PGS used those facts to calculate the monthly charge.

Beth Keating, Esq.

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Please file all responses electronically no later than June 27, 2024 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. In addition, please email the file response to [discoverygcl@psc.state.fl.us](mailto:discoverygcl@psc.state.fl.us) and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please contact me at [pkelley@psc.state.fl.us](mailto:pkelley@psc.state.fl.us) or at 850.413.6495 if you have any question.

Thank you,

*/S/Patrick Kelley*

Patrick Kelley

Public Utility Analyst II

cc: Office of Commission Clerk (Docket No. 20240094-GU)