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June 27, 2024

VIA: ELECTRONIC FILING

Mr. Adam J. Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket 20240094-GU; Joint petition by Peoples Gas System, Inc. and Florida Public Utilities Company for approval of special contract.

Dear Mr. Teitzman:

Please find attached for filing in the above-styled matter Peoples Gas System, Inc.'s Response to Staff's First Data Request (Nos. 1-3), served on June 13, 2024.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'V. Ponder'.

Virginia Ponder

VLP/ne  
Attachment

cc: Patrick Kelly  
All parties of record

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing response, filed on behalf of People Gas System, Inc., has been furnished by electronic mail on this 27<sup>th</sup> day of June, 2024 to the following:

Suzanne Brownless  
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Florida Public Service Commission  
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ATTORNEY

**PEOPLES GAS SYSTEM, INC.  
DOCKET NO. 20240094-GU  
STAFF'S FIRST DATA REQUEST  
REQUEST NO. 1  
BATES PAGE(S): 1  
FILED: JUNE 27, 2024**

- 1.** Please explain why PGS is now planning to supply uninterruptible gas service to Florida Public Utilities Company (FPUC) as set forth in the proposed 2024 Gas Transportation Agreement (Special Contract).
  - A.** FPUC first approached PGS in June 2022 regarding the ability to obtain uninterruptible service due to volatile natural gas pricing in the Transco Zone 5 market, caused largely by natural gas shortages in Europe. Priority of service was a prime concern for FPUC. PGS agreed to the provision of pipeline-to-pipeline uninterruptible gas service subject to a fixed monthly reservation fee. FPUC and PGS filed a joint petition for approval of a special contract – the 2022 Gas Transportation Agreement – which was approved by the Florida Public Service Commission in Order No. PSC-2022-0374-PAA-GU. Earlier this year, FPUC approached PGS about entering into a similar agreement for a shorter term at a different rate. PGS has the availability and opportunity to provide firm capacity and transportation services to FPUC.

**PEOPLES GAS SYSTEM, INC.  
DOCKET NO. 20240094-GU  
STAFF'S FIRST DATA REQUEST  
REQUEST NO. 2  
BATES PAGE(S): 2  
FILED: JUNE 27, 2024**

- 2.** Please explain why the term of the Special Contract is 7 months.
  - A.** The term reflects FPUC's desired timeframe and the ability of PGS to meet the commitment.

**PEOPLES GAS SYSTEM, INC.  
DOCKET NO. 20240094-GU  
STAFF'S FIRST DATA REQUEST  
REQUEST NO. 3  
BATES PAGE(S): 3  
FILED: JUNE 27, 2024**

- 3.** Please discuss the benefits to PGS's general body of ratepayers flowing directly from the Special Contract.
  
- A.** The Special Contract is in the best interest of and will provide benefits to PGS' general body of ratepayers. The monthly service charge will generate revenues for PGS, resulting in savings for PGS' general body of ratepayers.