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Public Service Commission

July 18, 2024

Beth Keating, Esq. Gunster, Yoakley, & Stewart, P.A. 2015 South Monroe St., Suite 601 Tallahassee, FL 32301 STAFF'S SECOND DATA REQUEST VIA EMAIL

Miguel Bustos Florida City Gas 208 Wildlight Ave Yulee, FL 32097

Re: Docket No. 20240071-GU: Petition for Approval of Safety, Access, and Facility Enhancement Program (SAFE) Modifications, by Florida City Gas.

Dear Ms. Keating and Mr. Bustos:

By this letter, Commission staff requests that Florida City Gas (FCG or utility) provide responses regarding the petition for approval of modifications to the SAFE program.

- 1. Please refer to the utility's response to Staff's First Data Request, No. 1. As the contractor's risk assessment report is now complete, please provide a construction timeline detailing the anticipated activities throughout the term of the proposed expansion to the SAFE program. As part of this response, please explain how FCG prioritized the projects.
- 2. Please confirm if there are any additional projects related to the problematic pipe and facilities consisting of obsolete span, and exposed pipe not in the program modifications the utility intends on locating or including for recovery in a future petition to modify the SAFE program.
- 3. Are the new rates in the same timeline as the original continuation of the program?
 - a. Does FCG expect to full recover SAFE investments, including the proposed program expansion, by 2035 as approved in Order No. PSC-2023-0345-TRF-GU? Please explain.
- 4. Please refer to the utility's response to Staff's First Data Request, No. 2. As the contractor's risk assessment report is now complete, please indicate if the utility's most recent Distribution Integrity Management Program risk assessment model is now

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available. If so, please provide a copy. If not, please explain why and indicate when FCG expects this assessment to be complete.

- 5. Please refer to the utility's response to Staff's First Data Request, No. 5(a), Attachment B for the following questions.
 - a. Please explain how these project cost estimates were determined.
 - b. Please indicate if these estimates are still accurate now that the contractor's risk assessment report is complete. If not, please provide a revised document with the updated project cost estimates, and provide an explanation of how these costs were determined.
- 6. Please refer to the contractor's risk assessment report for the following questions.
 - a. Of the 82 total span pipe segments in FCG's service territory, please identify the total number of span pipes the utility intends to replace, and identify the total number of span pipes that are considered moderate to high-risk. If these values are different, please explain why.
 - b. Please provide a table identifying the estimated annual project costs by each proposed project category included in the contractor's risk assessment report for each year of the program term.

Please file all responses electronically no later than August 1, 2024 via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. In addition, please email the file response to discoverygel@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 or at 850.413.6495 if you have any questions.

Thank you,

/S/Patrick Kelley
Patrick Kelley
Public Utility Analyst II

cc: Office of Commission Clerk (Docket No. 20240071-GU)