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Attorneys and Counselors at Law  
123 South Calhoun Street  
P.O. Box 391 32302  
Tallahassee, FL 32301

P: (850) 224-9115  
F: (850) 222-7560

[ausley.com](http://ausley.com)

October 9, 2024

VIA: ELECTRONIC FILING

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

Re: Docket 20240133; Petition for approval of 2023 true-up, projected 2024 true-up, and 2025 revenue requirements and surcharges associated with cast iron/bare steel pipe replacement rider, by Peoples Gas System, Inc.

Dear Mr. Teitzman:

Attached for filing in the above-styled matter is Peoples Gas System, Inc.'s substantive responses to Staff's First Data Request (Nos. 1-8), specifically numbers 3(a), 4 and 8, pursuant to an extension of time granted by staff on October 2, 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: Oakley Ward, [oward@psc.state.fl.us](mailto:oward@psc.state.fl.us)  
Ryan Sandy, [rsandy@psc.state.fl.us](mailto:rsandy@psc.state.fl.us)

**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 9th day of October, 2024 to the following:

Ryan Sandy  
Office of General Counsel  
Florida Public Service Commission  
Room 390L – Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[rsandy@psc.state.fl.us](mailto:rsandy@psc.state.fl.us)  
[discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us)



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ATTORNEY

**PEOPLES GAS SYSTEM, INC.  
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3. Please refer to paragraph 7, pages 3-4, for the following questions.
- a. Please identify all remaining activities under the utility's current CI/BSR. As part of this response, please identify the current status and the estimated completion date for each remaining activity.

- A. a. Please see Peoples' response to Staff's First Data Request No. 4 for a list of specific projects for 2024 and 2025. The company does not have specific projects set beyond 2025 but has the miles of pipe by type identified in our Geographic Information System ("GIS"). The tables below show the number of miles remaining by pipe type and service area. Beyond 2025, this is the most specific data the company can provide.

<b>Cast Iron / Bare Steel</b>	<b>Mileage Left (9/2024)</b>
01 - MIAMI	5.78
02 - TAMPA	0.01
03 - ST. PETERSBURG	0.47
04 - ORLANDO	3.88
05 - EUSTIS	0.38
06 - JACKSONVILLE	0.08
<b>Total</b>	<b>10.60</b>

<b>Problematic Plastic Pipe</b>	<b>Mileage Left (9/2024)</b>
01 - MIAMI	21.06
02 - TAMPA	6.60
03 - ST. PETERSBURG	65.90
04 - ORLANDO	35.77
05 - EUSTIS	5.53
06 - JACKSONVILLE	97.28
08 - LAKELAND	14.27
09 - DAYTONA	15.35
10 - HIGHLANDS	1.40
11 - SARASOTA	0.37
13 - JUPITER	9.29
14 - PANAMA CITY	29.61
15 - OCALA	8.36
<b>Total</b>	<b>310.79</b>

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4. Please discuss the progress of CI/BSR replacement projects and Problematic Plastic Pipe (PPP) replacement projects in 2023, 2024, and those planned for 2025.

**A. Cast Iron/Bare Steel Pipe Replacement Rider Projects and Problematic Plastic Pipe Replacement Projects in 2023**

In 2023, Peoples Gas continued to focus on CI/BS replacement projects in Miami, Orlando, and Jacksonville to meet the program's approved 10-year period. The COVID-19 Pandemic environment greatly contributed to replacement efforts going beyond the 10-year period. Factors included construction contractor labor shortages, consulting firm (e.g., engineering) availability, supply chain challenges, and extensive permitting challenges.

In 2023, Peoples Gas continued replacement of PPP in Tampa, St Petersburg, Jacksonville, Orlando, Eustis, Lakeland, Daytona, Jupiter, Ocala, and Avon Park.

**Projects Projected to be Completed in 2023:**

No.	Service Area	Pipe Type	Project Name
1	Miami	CI/BS	NE 1st Ter, NE 25th ST, NE 2nd Ter
2	Miami	CI/BS	Various projects <0.5 miles in length
3	Tampa	PPP	Interbay Blvd, MacDill Ave to Interbay Ave
4	Tampa	PPP	Bayshore Blvd, from Bay Ave to Old Bayshore Way
5	Tampa	PPP	Various projects <0.5 miles in length
6	St Petersburg	PPP	Park Blvd
7	St Petersburg	PPP	54th Ave N & US-19
8	St Petersburg	PPP	Various projects <0.5 miles in length
9	Orlando	CI/BS	S Paramore Ave
10	Orlando	PPP	Ivanhoe Estates
11	Orlando	PPP	w/o Semoran Blvd & n/o Kewannee Park
12	Orlando	PPP	Winsor Manor Neighborhood
13	Orlando	PPP	Sierra Ln & Lake Howell Ln
14	Orlando	PPP	Various projects <0.5 miles in length
15	Eustis	PPP	Country Club Estates
16	Eustis	PPP	Tavares
17	Eustis	PPP	Various projects <0.5 miles in length
18	Jacksonville	CI/BS & PPP	Springfield - West
19	Jacksonville	PPP	Avondale
20	Jacksonville	PPP	Downtown Phases
21	Lakeland	PPP	S Florida Ave & Terrace Way Mobile Park
22	Daytona	PPP	Downtown

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23	Avon Park	PPP	Frostproof
24	Jupiter	PPP	Elm Ave & Banyan
25	Jupiter	PPP	Various projects <0.5 miles in length
26	Ocala	PPP	Ft King District
27	Ocala	PPP	Fox Meadow

**Cast Iron/Bare Steel Pipe Replacement Rider Projects and Problematic Plastic Pipe Replacement Projects in 2024**

In 2024, Peoples Gas continues to focus on CI/BS replacement projects in Miami and Orlando and nominal amounts in Tampa and Jacksonville to meet the program's approved 10-year period. However, Peoples Gas will have approximately 8.11 miles of CI/BS replacement remaining as we enter 2025, which includes an additional 0.38 identified in Eustis during 2024. The COVID-19 Pandemic environment and continual increases in resource, construction and restoration costs have greatly contributed to replacement efforts going beyond the 10-year period. Additionally, in the City of Miami, construction moratoriums currently in place will delay work in replacing 0.46 miles of pipe in this area until 2027.

In 2024, Peoples Gas continued replacement of PPP in Jacksonville, Eustis, Daytona, Ocala, Tampa, Lakeland, St Petersburg and Avon Park.

**Projects Completed or to be Completed in 2024:**

No.	Service Area	Pipe Type	Project Name
1	Miami	CI/BS	Area 20 - N/O NE 79th St. and NE Miami Ct, Miami
2	Miami	CI/BS	Area 61 - Alley between S Miami Ave, SE 15th St & Brickell Ave
3	Miami	CI/BS	Area 68 - Post Ave & W 47th St
4	Miami	CI/BS	Area 70 - W 40 <sup>TH</sup> St and Sheridan, Miami Beach
5	Miami	CI/BS	Area 71 - W 26th St & Flamingo PL, Miami Beach
6	Miami	CI/BS	Area 4 - SW 5th Ave. SW 6 St. to SW 7 St. and SW 5th St., e/o SW 4th Ave.,
7	Miami	CI/BS	N. MIAMI AVE & NE 24TH ST, MIAMI
8	Miami	CI/BS	N Miami Ave & NE 20th Street, Miami
9	Tampa	PPP	Interbay Blvd, MacDill Ave to Interbay Ave
10	Tampa	PPP	W Euclid from S Grady to S Church
11	St Pete	PPP	Park Blvd
12	Orlando	CI/BS	Kaley St - S Division Ave to S Fern Creek Ave
13	Orlando	CI/BS	Central Ave - US 17-92 & Lake Ave
14	Orlando	CI/BS	Orange Ave - Pineloch Ave to Jennie Jewel Dr
15	Orlando	CI/BS	W Central Blvd (w of S Tampa Ave)

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16	Orlando	CI/BS	Grand St (Avondale Ave & S Parramore
17	Orlando	CI/BS	Woods St
18	Orlando	CI/BS	Orlando Ave (US 17-92) & Elvin Ave (BS)
19	Orlando	CI/BS	Area 16- W Oak Ridge Rd & Lake Ellenor Dr
20	Orlando	CI/BS	Michigan to S OBT
21	Eustis	PPP	Southern Palms
22	Eustis	PPP	Pine St & Orange Ave
23	Eustis	PPP	Crestview Dr Replacement
24	Eustis	PPP	Overlook Dr Replacement
25	Eustis	PPP	Mission Inn - HH
26	Eustis	PPP	Clifford St replacement
27	Eustis	PPP	Prescott St
28	Jacksonville	PPP	Springfield West
29	Lakeland	PPP	S Florida Ave & Terrace Way Mobile Park (55 services)
30	Lakeland	PPP	Miramar & Kenwith
31	Daytona	PPP	Downtown Daytona North Section
32	Daytona	PPP	Georgetown PPP - phase 2
33	Daytona	PPP	Daytona Plaza Nova Rd
34	Avon Park	PPP	Frost Proof (scattered)
35	Ocala	PPP	Fox Meadow NE 39th between NE 14th St & NE 21st St
36	Ocala	PPP	SE 19th Replacement
37	Ocala	PPP	SE 14th St & SE 25th Ave
38	Ocala	CI/BS	SW 13th St and S Pine Ave

**Cast Iron/Bare Steel Pipe Replacement Rider Projects and Problematic Plastic Pipe Replacement Projects in 2025**

In 2025, Peoples Gas will continue to focus on CI/BS replacement projects in Miami and Orlando. Although contingent on work completed in the remainder of 2024, Peoples Gas estimates the remaining replacement mileage for these areas at the beginning of 2025 to be as follows:

- Miami: 0.2 miles CI / 3.72 miles BS (Note: 0.46 miles of bare steel replacement is delayed due to a construction moratorium until 2027)
- Orlando: 3.52 miles BS

In 2025, Peoples Gas will continue replacement of PPP in Jacksonville, Orlando, Eustis, Lakeland, Daytona, Ocala, Miami, Tampa, St Petersburg, Panama City and Jupiter.

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**Projects Projected to be Completed in 2025:**

No.	Service Area	Pipe Type	Project Name
1	Miami	CI/BS	Area 4 - SW 5th Ave. SW 6 St. to SW 7 St. and SW 5th St., e/o SW 4th Ave
2	Miami	CI/BS	Area 23 - NE 1st Ter, NE 25th ST, NE 2nd Ter
3	Miami	CI/BS	Area 27 - NW 62nd Ave & NW 58th Ter & Seton Dr
4	Miami	CI/BS	Area 33 - E Broward Blvd between se 9th & se 10th ave
5	Miami	CI/BS	Area 42 - Cleveland St between N Federal Hwy & N 17th Ave
6	Miami	CI/BS	Area 53 - between NW 12th St & NW 11 St
7	Miami	CI/BS	Area 68 - Post Ave & W 47th St
8	Miami	CI/BS	Area 69 - Barry St & Garden Ave, Miami Beach
9	Miami	CI/BS	Area 70 - W 40 <sup>TH</sup> St and Sheridan, Miami Beach
10	Miami	PPP	Design Place, s/o NE 54th St & e/o NE 2nd Ave
11	Miami	CI/BS	NE 35th St, b/w NE 10 Terr & NE 15th Ave, Pompano
12	Miami	PPP	Bay Point PPP
13	Miami	PPP	NW 119th Ave & NW 121st Ave
14	Miami	PPP	NE 37th Ave & Point PI
15	Miami	PPP	Jacob Ln & W Country Club Dr
16	Tampa	PPP	Bayshore Blvd, from Bay Ave to Old Bayshore Way
17	Tampa	PPP	Area 32- Redwood Blvd (between Elm Way & Sheldon Rd)
18	Tampa	PPP	W Euclid from S Grady to S Church
19	Tampa	PPP	Tampa downtown
20	St Pete	PPP	54th Ave N & US-19 N, Saint Petersburg
21	St Pete	PPP	317 Park St
22	St Pete	PPP	Country Club Rd N between 80th St N & Follow Thru Rd N
23	St Pete	PPP	Robinson Dr N & Par Ave N
24	St Pete	PPP	113th St North, from Walker St to 54TH Ave N
25	St Pete	PPP	Area 52- 13th Ave NE & Beach Dr NE
26	St Pete	PPP	Area 115- 34th St N & 50th Ave N
27	St Pete	PPP	Area 127- Bay Pines Lakes Blvd & Pine Lakes Trl
28	St Pete	PPP	Area 188- 104th Ave N & S Lake Dr
29	St Pete	PPP	Area 41- 4th St N & Central Ave
30	St Pete	PPP	Area 172- Porpoise Park Dr & Seminole Blvd
31	Orlando	CI/BS	Kaley St - Remainder
32	Orlando	CI/BS	N Parramore Ave (and south) & W Robinson St
33	Orlando	CI/BS	W Central Blvd (w of S Tampa Ave)
34	Orlando	CI/BS	W Church St, e/o Rio Grande Ave S
35	Orlando	CI/BS	Oregon St & Canton St (e/o N Hampton Ave) & Elvin
36	Eustis	PPP	El Red Replacement

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37	Jacksonville	PPP	Downtown - Cathedral Phase
38	Jacksonville	PPP	Downtown - Central Core
39	Jacksonville	PPP	Downtown - Lavilla
40	Jacksonville	PPP	Downtown - North Core
41	Lakeland	PPP	S Florida Ave & Terrace Way Mobile Park
42	Lakeland	PPP	E Rose St & Ingraham Ave
43	Lakeland	PPP	Area 15- Dogwood Dr & Red Bud Ln
44	Daytona	PPP	Downtown Daytona South Section
45	Daytona	PPP	North Woods Village HUD
46	Daytona	PPP	Daytona Plaza Nova Rd
47	Jupiter	PPP	Jupiter Remaining
48	Panama City	PPP	Area 45- E 4th St & Harlem Ave
49	Panama City	PPP	Area 70- Drummond Ave & W 25th Ct
50	Panama City	PPP	Area 69- Breezy Ln & Windy Ln
51	Panama City	PPP	Area 12- Lake Dr & S Comet Ave
52	Ocala	PPP	Fox Meadow NE 39th between NE 14th St & NE 21st St
53	Ocala	PPP	SE 14th St & SE 25th Ave
54	Ocala	PPP	SW 13th St and S Pine Ave



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8. Please update the tables contained in Peoples' response to Staff's First Data Request No. 4, in Docket No. 20230098-GU.

A.

**Actual and projected miles replaced and costs:**

Year	CI/BS Miles Replaced	PPP Miles Replaced	CI/BS Investment <sup>a</sup>	PPP Investment <sup>b</sup>	CI/BS Revenue Requirement	PPP Revenue Requirement
2017	51	-	\$17,588,366	\$308,227	\$6,868,302	\$74,021
2018	62	56	\$27,035,678	\$18,113,104	\$8,510,823	\$848,201
2019	52	42	\$35,821,371	\$15,349,847	\$11,075,229	\$2,706,161
2020	55	43	\$32,317,184	\$9,209,668	\$14,817,804	\$4,358,010
2021	14	38	\$23,726,642	\$21,051,938	\$1,347,321	\$(160,452)
2022	10.4	29	\$13,079,280	\$6,109,870	\$3,154,597	\$1,921,940
2023	2.3	44	\$5,815,954	\$26,827,191	\$3,927,032	\$3,604,313
2024*	5	31	\$4,698,860	\$14,646,431	\$217,946 <sup>c</sup>	\$366,776 <sup>c</sup>
2025*	5	65	\$2,906,616	\$29,213,728	\$760,428	\$2,721,026
2026*	2	75	\$1,104,945	\$32,951,727	\$1,043,083	\$6,227,488
2027*	1 <sup>c</sup>	90	\$874,752	\$35,028,300	\$1,151,720	\$10,103,281
2028*	1	54	\$1,081,100 <sup>d</sup>	\$20,139,383 <sup>d</sup>	\$1,246,217	\$13,341,632

\*Projected

<sup>a</sup>CI/BS Investment includes removal of initial \$1M through 2025.

<sup>b</sup>PPP Investment includes removal of initial \$1M each year starting in 2026.

<sup>c</sup>5-year construction moratoriums in effect in the City of Miami preventing completion before 2027.

<sup>d</sup>2028 investment includes rollover costs to occur in 2029

<sup>e</sup>Revenue requirement based on current year investment only as investment for prior years rolled into rate base pursuant to the 2023 Rate Case.

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**Actual cast iron and bare steel miles of main and number of services replaced and remaining:**

Year	Main Replacements					Service Line Replacements	
	Replaced Cast Iron (miles)	Replaced Bare Steel (miles)	Remaining Cast Iron at Year End (miles)	Remaining Bare Steel at Year End (miles)	Total Miles Remaining of CI/BS Mains	Number of Bare Steel Service Lines Replaced	Number of Remaining Bare Steel Service Lines
2012	-	-	100	354	454	-	14,978
2013	13	38	87	316	403	907	14,071
2014	2	15	85	298	383	7,964	6,107
2015	26	60	59	238	297	1,019	5,088
2016	15	35	44	203	247	1,050	6,963
2017	15	36	29	178	207	1,135	4,279
2018	10	52	18	126	144	1,970	2,309
2019	8	44	10	83 <sup>a</sup>	93	649	1,660
2020	4	51	6	35 <sup>a</sup>	41	423	1,237
2021	3.5	10.5	2	24	26	191	998
2022	1.3	9.1	0.9	14.6 <sup>a</sup>	15.5	74	941
2023	0.3	2.0	0.6	12.4 <sup>a</sup>	12.4	40	931
2024*	<0	5	0.5	8.6 <sup>a</sup>	8.11	63	799

\*Projected

<sup>a</sup>Additional miles of pipe added after reclassification of pipe type.

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**Actual problematic plastic pipes miles of main and number of services replaced and remaining:**

Year	Replaced PPP (Miles)	Total Remaining PPP Mains (Miles)	Replaced Number of PPP Service Lines	Total Number of Remaining PPP Service Lines
2016	-	551	-	28,237
2017	-	509	1,396	26,841
2018	56	461	3,941	24,741
2019	42	418	2,349	20,420
2020	43	370	1,702	18,718
2021	38	337	882	17,683
2022	29	306	837	17,229
2023	44	281 <sup>a</sup>	883	16,346 <sup>a</sup>
2024*	31	284 <sup>a</sup>	500	<sup>b</sup>
2025*	65	219	<sup>b</sup>	<sup>b</sup>
2026*	75	144	<sup>b</sup>	<sup>b</sup>
2027*	90	54	<sup>b</sup>	<sup>b</sup>
2028*	54	-	<sup>b</sup>	<sup>b</sup>

\*Projected

<sup>a</sup>Additional service lines reclassified during the year.

<sup>b</sup>This will be determined during the replacement year.