

Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

October 15, 2024

BY E-FILING

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

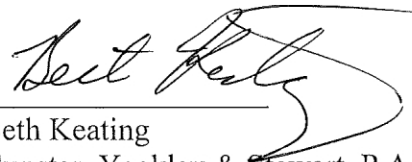
Re: **Docket No. 20240046-GU - Petition for rate increase by St. Joe Natural Gas Company, Inc.**

Dear Mr. Teitzman:

Attached, for electronic filing in the referenced docket on behalf of St. Joe Natural Gas, please find the Company's Responses to Staff's 7th Set of Data Requests.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706



Serving Florida's Panhandle Since 1963

P. O. Box 549 / 301 Long Ave, Port St. Joe, FL 32457
tel 850.229.8216 / fax 850.229.8392

www.stjoegas.com

October 16, 2024

Office of the Commission Clerk

Attn: Saad Farooqi

Re: Docket No. 20240046-GU – Petition for Rate Increase
SJNG's Response to Staff's Seventh Data Request

1. Please provide the Company's actual monthly number of customers (by customer class) for 2024 year-to-date.

Response: see attachment

2. Please refer to SJNG's response to Staff's 3rd Data Request, Q#7. In its response, SJNG stated that after examining previous therm sales and number of customers, it determined that 14% growth for therm sales and 5% growth for customers were appropriate for the 2024 test year. Please refer to the table and explain how SJNG calculated the aforementioned 14% growth for therm sales and the 5% growth for customers.

Response: There was not a calculation, it was a determination only.

3. Please refer to SJNG's response to Staff's 3rd Data Request, Q#8, specifically Attachment #8, "Therm Sales & Customer Data". Please explain the addition of the "GS-4 SHH" customer class, which does not appear in the G-Schedules of SJNG's MFRs, and how this customer class relates to the Gs-4 customer class.

Response: It is just GS-4, I added SHH because Sacred Heart Hospital is the only customer in this class at this time.

4. Please refer to SJNG's response to Staff's 3rd Data Request, Q#9. In explaining its projected 31.7% reduction in therm sales for the GS-4 rate class for the 2024 test year compared to the 2023 historical year, the Company stated that it did not project Gas South for GS-4 therms, only transport therms (FTS-4).

- a. Please explain in detail the business relationship that exists between Gas South and SJNG, and the specific regulated services provided from and to each entity.

Response: Gas South is the gas marketer for our only transport End-Use customer, GCI. SJNG invoices Gas South monthly for gas transported over SJNG distribution system to GCI which includes scheduled transport gas and on occasion without notice, system gas when GCI uses more gas than Gas South schedules.

- b. Please explain why the Company did not project "Gas South" for the GS-4 therm sales.

Response: Gas South's objective is to meet GCI's gas requirement with FTS-4 transport gas. On occasion without notice, GCI uses more gas than Gas South delivers which results in SJNG selling GS-4 (system gas).

- c. Please explain the Company's reasoning for its 31.7% reduction in 2024 test year therm sales for the GS-4 customer class.

Response: same answer as b. Typically, 3rd party marketers schedule appropriate amount of gas for its customer to avoid the LDC's higher system gas rate. There have been times in past where very little system gas was required.

- d. Please explain the relationship, if any, between the GS-4 rate class and FTS-4 rate class which includes the sole customer, GCI or Gas South, according to witness Stuart Shoaf's direct testimony, pg. 12.

Response: same answer as a and b

5. Please refer to SJNG's response to Staff's 3rd Data Request, Q#6,7 and 10. In the Company's response to Q#6, SJNG stated that Company employees examined previous therm sales and data to determine a forecast for residential customers. Please identify:

- a. The proposed residential and non-residential projects that were taken into account when estimating the Company's 2024 test year customers and therm sales,

Response: No projects were taken into account

- b. The quantitative impact such projects had on SJNG 2024 test year projections of therm sales number of customers by class.

Response: See response (a) above.

- c. The source of the public knowledge of such projects.

Response: No projects, the source would be historical and projected number of permits pulled for new construction in our service area.

NUMBER OF CUSTOMER DATA
 St Joe Natural Gas Company, Inc.
 Peak + Average
 2024

	Jan	Feb	C-1 had 2 billings Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
RS-1	1,203	1,218	1,451	1,233	1,238	1,248	1,247	1,248	1,251	605	0	0	11,942
RS-2	1,189	1,192	1,373	1,194	1,203	1,209	1,215	1,219	1,224	546	0	0	11,564
RS-3	684	687	804	689	687	684	689	685	684	323	0	0	6,616
GS-1	159	159	168	161	163	164	164	165	164	111	(1)	(1)	1,576
GS-2	33	33	37	33	33	33	33	33	34	20	0	0	322
GS-4 SHH	1	1	1	1	1	1	1	1	1	0	0	0	9
FTS-4	1	1	1	1	1	1	1	1	1	1	1	1	12
GS-4	0	0	0	0	0	0	0	0	0	0	0	0	0
	2	2	2	2	2	2	2	2	2	1	1	1	21
TOTAL	3,270	3,291	3,835	3,312	3,326	3,340	3,350	3,352	3,359	1,606	0	0	32,041
GS-1 COMPANY	1	1	1	1	1	1	1	1	1	1	1	1	12
Gro Total	3,271	3,292	3,836	3,313	3,327	3,341	3,351	3,353	3,360	1,607	1	1	32,053