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Commissioners: Mike La Rosa, Chairman Art Graham Gary F. Clark Andrew Giles Fay Gabriella Passidomo

STATE OF FLORIDA

OFFICE OF THE GENERAL COUNSEL KEITH C. HETRICK GENERAL COUNSEL (850) 413-6199

Public Service Commission

October 18, 2024

Beth Keating, Esq. Gunster Law Firm 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 bkeating@gunster.com

STAFF'S ELEVENTH DATA REQUEST *via email*

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

Dear Ms. Keating:

By this letter, the Commission staff requests that St. Joe Natural Gas Company, Inc. (SJNG) provide responses to the following data requests:

Please refer to SJNG's response to staff's sixth data request filed on October 3, 2024.

1. SJNG included an invoice dated June 9, 2023, for the past purchase of two toroidal tanks.

Please explain how these tanks are used and why they are needed.

- 2. Please state whether or not a "conversion kit" is required for each toroidal tank.
- 3. Exhibits A1 and A2, show a quote provided to SJNG for the purchase of a tractor and other equipment from Crystal Tractor & Equipment that reflected a "trade value" of \$20,000. Please state what equipment was traded-in, including the original purchase price of that equipment.

4. It appears, from the invoices provided, that the new proposed standard cab F150 will have multiple new toolboxes installed. Please confirm if the number and documented cost of each toolbox that will be installed in this vehicle reflected below is correct. If not, please explain.

Standard Cab

| Toolbox - | Drawer Unit | \$1,428.77 |
|-----------|--------------|------------|
| Toolbox | 2 @ \$412.95 | \$825.90 |
| Toolbox | | \$545.95 |

- 5. SJNG states the Fl50 trucks varied by \$30,000 because one is a standard single cab service truck and the other is a Manager's truck with a crew cab 4x4. Please elaborate on the need and purpose of a "Manager's Truck" and how often it is used.
- 6. SJNG provided a single Devtech quote for the Check Meter Station. Did SJNG obtain quotes from other vendors? If not, please explain why not.
- 7. For each pro forma project in which SJNG submitted an invoice from a previous purchase, please explain why multiple current bids were not obtained and submitted.

Staff's Eleventh Data Request October 18, 2024 Page 3

Please file all responses electronically no later than Wednesday, October 23, 2024, through the Commission's website at <u>www.floridapsc.com</u>, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to <u>discovery-gcl@psc.state.fl.us</u>.*

Please feel free to call me at (850) 413-6846 if you have any questions.

Sincerely,

/s/ Daniel Dose Daniel Dose Senior Attorney

DD/ds

cc: Office of Commission Clerk