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# Public Service Commission

April 14, 2025

## STAFF'S FIRST DATA REQUEST

*via email*

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RE: Docket No. 20250042-GU – Petition for approval of amendment to transportation service agreement between Peninsula Pipeline Company, Inc. and Florida City Gas.

Dear Ms. Keating and Mr. Bustos:

By this letter, the Commission staff requests that Peninsula Pipeline Company, Inc. (Peninsula) and Florida City Gas (FCG) provide responses to the following data requests regarding the petition for approval of an amendment to transportation service agreement in Indian River, Florida.:

1. Please provide a breakdown of the incremental costs required to relocate the pipeline, as required by the Florida Department of Transportation (FDOT).
2. Please provide documentation to demonstrate how Peninsula determined the incremental increase to the monthly reservation charge for the impacted pipeline segment.

3. Please provide the current Total Monthly Reservation Charge for Segment I, as shown in Exhibits A and C to the existing transportation agreement.
4. Paragraph 12 of the petition states that, in February 2024, Peninsula and FCG entered into a transportation agreement to build several pipelines and to consolidate certain pre-existing agreements between the utilities. Please clarify whether the pipeline segment mandated by FDOT to be relocated was constructed subject to the February 2024 transportation agreement or from a pre-existing agreement.
5. Please provide the pipeline segment's original in-service date.
6. Please provide the expected completion date of the pipeline relocation.
7. Please provide the date when Peninsula was initially notified that FDOT's road enhancement project could impact existing natural gas facilities.

Please file all responses electronically no later than Monday, April 28, 2024, through the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us).*

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