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January 5, 2026

**VIA E-PORTAL**

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

**Re: Docket No. 20250121-GU – Joint petition for approval of actual, estimated, and projected relocation costs and approval to establish a recovery surcharge, by Florida City Gas and Florida Public Utilities Company.**

Dear Mr. Teitzman:

Attached for filing, please find the Responses of Florida City Gas and Florida Public Utilities Company to Staff's Second Set of Data Requests. (Attachments not included with filing; provided to staff via email/OneDrive).

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

(Enclosure)

**FLORIDA PUBLIC UTILITIES COMPANY'S AND FLORIDA CITY GAS' S  
RESPONSES TO STAFF'S SECOND DATA REQUEST**

**Re: Docket No. 20250121-GU – Joint petition for approval of actual, estimated, and projected relocation costs and approval to establish a recovery surcharge, by Florida City Gas and Florida Public Utilities Company.**

1. Please refer to witness McCloskey's pre-filed Exhibit SM-1 CG, Schedule A-1, page 1, and FCG's and FPUC's response to staff's First Data Request, Question 5, page 3, with attached file "DR 1.5 361 OSLO ROAD." Please explain the discrepancy between Financial Project ID numbers, and if necessary, provide additional documentation associated with the project identified as 0361-DOT-OSLO RD RELO to support the eligibility for the project costs to be recovered through the NGFRCRC pursuant to Rule 25-7.150(2), Florida Administrative Code (F.A.C.).

**COMPANY RESPONSE: DR 1.5 was the incorrect attachment. This project came about via email from an ongoing FDOT project 431521-1-52-01. FCG previously completed the original scope identified from the review with FDOT. FDOT's contractor later came back with previously unidentified relocations that needed to be completed right away to minimize delays to their project. Please refer to the attached file DR 2.1.**

2. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG and SM-1 FPU. Do not address the following projects in your response to this question: (1) SR80 (Southern Blvd) @ SR 7 US 441 (Install 1.25 " PE Gas Service), (2) SR806 (Atlantic AVE) Homewood Blvd and SR 704 Okeechobee Blvd /Haverhill RD (GM Reloc), (3) BCA417007 Nicklaus Dr. Culvert, (4) Australian Ave (Steel GM Replaced with PE GM), (5) MR US 98 and Western Ave (4" PE installed), (6) 203 SW 14th Ave (Steel GM replaced with PE GM), (7) Pine Tree Lake Clarke Shore Bridge (PE GM Reloc), (8) Florida Mango Relocation 10th to Nemec (Steel GM relocation), or the (9) Earman Bridge over the C-17 Canal Bridge (PE GM Reloc). For each remaining relocation project, please provide the following:
  - a. Identify the mandate, statute, law, ordinance, or agreement between the utility and the authority that creates the requirement for the project as specified in 366.99(1)(d), Florida Statutes (F.S.). If more than one is applicable, identify each.
  - b. Provide the date and means by which the utility was notified by an authority, as defined by 337.401(1)(a), F.S., that relocation of the utility's facilities was required. As part of this response, provide a copy of the official notification the utility was provided. If this notification was verbal, such as a meeting or conference call, please provide follow-up documentation that formally memorialized the relocation need.

**COMPANY RESPONSE: Please refer to the columns highlighted in blue on the attached file DR 2.2.**

3. Please refer to witness McCloskey's pre-filed Exhibits SM-1 CG and SM-1 FPU. For each relocation project except for SR80 (Southern Blvd) @ SR 7 US 441 (Install 1.25 " PE Gas Service) and SR806 (Atlantic AVE) Homewood Blvd and SR 704 Okeechobee Blvd /Haverhill RD (GM Reloc), please provide the following:
  - a. Identify the start date of the project. If the project has not commenced, state so and provide an estimated commencement date (by day or month).
  - b. Identify the completion date of the project. If the project is not complete, state so and provide an estimated completion date (by day or month).
  - c. Provide the length(s), by size(s), for each material type of pipelines abandoned, as well as any other facilities, as part of the required relocations, if applicable.
  - d. Provide the length(s), by size(s), for each material type of pipelines installed, as well as any other facilities, as part of the required relocations, if applicable.
  - e. State if the utility also completed an associated Utility Work Estimate, as incorporated in Rule 14-46.001(2)(c), F.A.C., for the project. If so, please provide a copy of that document for each project

**COMPANY RESPONSE: Please refer to the columns highlighted in blue on the attached file DR 2.3. Please note that the estimates provided were initial estimates. The dollars included in the filing once the project was complete were the actual spent amounts. Therefore, there may be differences in the files provided in response to item e. and the amounts included in the filing.**

4. Regarding the 0361-RELO-405606 SEBASTIAN project, the Florida Department of Transportation (FDOT) utility work schedule references "County Road 510." Please explain why an FDOT work schedule was obtained for a county road. In your response, clarify which authority has jurisdiction over this road and which authority's need for natural gas facilities relocation precipitated the work.

**COMPANY RESPONSE: This project was undertaken by FDOT. The FDOT often partners with the local counties who have jurisdiction over the roadway to oversee large scale roadway projects. Below are some links outlining the project from the FDOT website:**

- i. [FDOT Treasure County Construction - County Road \(CR\) 510/85th Street Widening Project](#)
- ii. [County Road 510 Design Projects](#)
- iii. [CR 510 Reconstruction Project Flyer.pdf](#)



**CR 510/85<sup>TH</sup> STREET WIDENING PROJECT**  
The Florida Department of Transportation (FDOT) invites the community to a Virtual Public Meeting and In-Person Construction Open House regarding the CR 510/85<sup>th</sup> Street Widening Project in Indian River County. The project limits are on CR 510/85<sup>th</sup> Street from CR 512/Sebastian Boulevard to 87<sup>th</sup> Street. Indian River County, as project sponsor, requested that the FDOT design and construct this project through Resolution No. 2020-025. FDOT is pleased to assist with completing these improvements aimed to enhance the safety, resiliency, and longevity of the infrastructure for our communities. Please see below for detailed meeting information.

Construction Cost: \$24.89 Million      Construction Start: September 2025      Estimated Completion: Fall 2028

5. Regarding all four phases of the MR CR491 projects, the FDOT work schedules reference "CR 491." Please explain why an FDOT work schedule was obtained for a county road. In your response, clarify which authority has jurisdiction over this road and which authority's need for natural gas facilities relocation precipitated the work.

**COMPANY RESPONSE:** Some counties or municipalities request that these relocations be tracked on the FDOT established UWS due to it being an industry standard. This UWS does show that a Citrus County employee approved and requested the relocations.

#### Welcome to Citrus County

#### APPROVAL BY Citrus County Tech Svcs

This utility work schedule is complete and acceptable to <b>Citrus County</b>	
<b>County</b>	<b>Rep.</b> <b>Walt Eastmond</b>
Name <b>Walt Eastmond</b>	
Title <b>Tech Svcs Div Dir</b>	

Date Jan 22, 2024

6. Please provide fully executed copies (i.e., with all party signatures) of any utility work schedules from FDOT or Polk County, if not already previously given.

**COMPANY RESPONSE:** All utility work schedules from FDOT or Polk County have been provided in the original petition or the answer to question 2 above except Oslo Road, Earman Bridge, and MR US 98 and Western. There is no UWS for Oslo Rd. since it occurred during active construction and everything was stopped while it was completed. The UWS for the Earman Bridge can be found in DR 2.6 Earman Bridge which is attached. And, the UWS for MR US 98 and Western can be found in DR 2.6 MR 98 and Western which is also attached.

7. Please provide, for each of the last five years and projected 2026, the amounts that FCG and FPUC budgeted and included in base rates for the relocation of facilities, including the associated revenue requirement.

**COMPANY RESPONSE:** To be provided January 23.

8. Please identify and categorize any relocation expenditures for the past five years that were incurred by FCG or FPUC due to one of the following: (1) relocations required by other entities; (2) relocations due to problematic pipes or infrastructure; or (3) relocations related to easements or right-of-way issues.

**COMPANY RESPONSE: To be provided January 23.**

9. Please refer to Witness McCloskey's direst testimony, page 5, line 18 and the joint response to staff's first data request, no. 2a for the following questions.
  - a. Please explain why FDOT project 405606-7-52-01 has been included for recovery in Docket No. 20250042-GU for Peninsula Pipeline Company and in the instant petition for FCG.
  - b. Please explain how the utilities would avoid the double recovery of projects associated with affiliate transactions, such as firm transportation service agreements with Peninsula.
  - c. Please clarify if any other relocation projects listed in Witness McCloskey's Exhibits SM-1 CG and SM-1 FPU are associated with a previously-approved transportation service agreements with Peninsula. If so, please provide the docket numbers.

**COMPANY RESPONSE:**

- a. **Both Peninsula Pipeline Company (“PPC”) and FCG facilities required relocation as part of the FDOT project 405606-7-52-01. These projects were treated separately within their own company work order numbers.**
- b. **Double recovery is avoided by having separate work orders for the work related to each business unit.**
- c. **There were no other projects that related to multiple business units.**