

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Rate Increase by Peoples Gas System, Inc.

DOCKET NO. 20230023-GU

Peoples Gas System’s Petition for Rate Approval of 2022 Depreciation Study

DOCKET NO. 20220219-GU

Peoples Gas System’s Petition for Approval of Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others

DOCKET NO. 20220212-GU

DATED: July 20, 2023

OFFICE OF PUBLIC COUNSEL’S RESPONSE TO STAFF’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 6)

The Citizens of the State of Florida, by and through the Office of Public Counsel, (“Citizens” or “OPC”), by the requirements set forth in Commission Nos. PSC-2023-0128-PCO-GU, Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, submit the following response to the First Request for Production of Documents (Nos. 1-6) propounded by Staff on June 30, 2023.

Document Requests

- 1) Please refer to the June 22, 2023, testimony of OPC witness Lane Kollen, page 51. Please provide the calculation, in MS Excel format with formulas intact, for the amount of the reduction to depreciation expense referenced on Line 17, to support OPC’s response to Staff’s First Set of Interrogatories, No. 1.

OPC RESPONSE:

Please see OPC’s response to PGS’ First Request for Production of Documents, No. 1(b) and OPC’s response to Staff’s First Set of Interrogatories, No. 1.

- 2) Please refer to the June 22, 2023, direct testimony of OPC Lane Kollen, page 53. Please provide the calculations, in MS Excel format with formulas intact, for the amount of the reduction to depreciation expense referenced on Line 10, and the amount of the reduction to depreciation expense referenced on Line 15, to support OPC's response to Staff's First Set of Interrogatories, No. 2.

OPC RESPONSE:

Please see OPC's response to PGS' First Request for Production of Documents, No. 1(b) and OPC's response to Staff's First Set of Interrogatories, No. 2.

- 3) Please refer to the June 22, 2023, direct testimony of OPC Lane Kollen, page 4. Please provide the calculation, in MS Excel format with formulas intact, for the amount of “Operating Income Adjustment” to “Reduce Depreciation Expense to Reflect Reduction in Projected Capital Expenditures” reflected in the table at the top of page 4, to support OPC’s response to Staff’s First Set of Interrogatories, No. 3.

OPC RESPONSE:

Please see OPC’s response to PGS’ First Request for Production of Documents, No. 1(b) and OPC’s response to Staff’s First Set of Interrogatories, No. 3.

4) Please refer to June 22, 2023, direct testimony of OPC witness David J. Garrett, Exhibit DJG-22. Please provide the calculations, in MS Excel format with formulas intact, of the theoretical reserve amount for each account and the total, presented in column [3] “Theoretical Reserve” of this exhibit to support OPC’s response to Staff’s First Set of Interrogatories, No. 4.

OPC RESPONSE:

The calculations for the theoretical reserve amounts shown in Column [3] of Exhibit DJG-22 are presented in Exhibit DJG-32 for each account. The total / composite theoretical reserve calculations for each account are based on the calculated reserves for each vintage year, which are determined by the selected Iowa curve and net salvage rate for each account. The detailed calculations are explained in the response to Interrogatory No. 4. Exhibit DJG-32 represents the native format for this information.

5) Please refer to June 22, 2023, direct testimony of OPC witness David J. Garrett, Exhibit DJG-23. Please provide the calculations, in MS Excel format with formulas intact, of the theoretical reserve amount for each account and the total, presented in column [3] “Theoretical Reserve” of this exhibit to support OPC’s response to Staff’s First Set of Interrogatories, No. 5.

OPC RESPONSE:

The calculations for the theoretical reserve amounts shown in Column [3] of Exhibit DJG-23 are presented in Exhibit DJG-36 for each account. The total / composite theoretical reserve calculations for each account are based on the calculated reserves for each vintage year, which are determined by the selected Iowa curve and net salvage rate for each account. The detailed calculations are explained in the response to Interrogatory No. 4 above. Exhibit DJG-36 represents the native format for this information.

- 6) Referring to June 22, 2023, direct testimony of OPC witness David J. Garrett, Exhibits DJG-18 through DJG-28, please provide these files, in MS Excel format with formulas intact.

OPC RESPONSE:

Please see OPC's response to PGS' First Request for Production of Documents, No. 1(b).

Respectfully submitted,

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CERTIFICATE OF SERVICE
DOCKET NO. 20230023-GU

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 20th day of July 2023, to the following:

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