OFFICE OF THE GENERAL COUNSEL S. CURTIS KISER GENERAL COUNSEL (850) 413-6199

Hublic Service Commission

March 19, 2013

STAFF'S THIRD DATA REQUEST

Beth Keating Gunster Law Firm 215 South Monroe Street, Suite 601 Tallahassee, Florida 32301-1804

Re: Docket Number 120313-GU - Petition for approval of transportation service agreement with Florida Public Utilities Company, by Peninsula Pipeline Company, Inc.

Dear Ms. Beth Keating:

COMMISSIONERS:

**ART GRAHAM** 

LISA POLAK EDGAR

EDUARDO E. BALBIS JULIE I. BROWN

RONALD A. BRISÉ, CHAIRMAN

By this letter, the Commission staff requests that Florida Public Utilities Company (FPUC or utility) provide responses to the following data requests.

- 1. Please provide any FERC filing, or any other documents, that support the assertion that FGT has been attempting to sell its small diameter laterals.
- 2. (a) Please provide FPUC's benefit cost analysis of PPC owning and operating the Riviera Lateral versus FPUC owning and operating the lateral.
  - (b) Please provide any documents or work papers that support your response to 2(a).
- 3. (a)Please provide FPUC's benefit cost analysis of purchasing service from PPC versus the costs FPUC would incur to construct a new lateral or upgrade its existing systems.
  - (b) Please provide any documents or work papers that support your response to 3(a).
- 4. Does FPUC's transportation service agreement with FGT change with PPC providing transportation service over the Riviera Lateral? If so, how. If not, why not.
- 5. (a) Please explain how pressure on the Riviera Lateral will be increased and what the benefits are of increasing the pressure on the lateral.

FPSC-COMMISSION CLERK

(b) Please discuss the benefits to FPUC of PPC owning and maintaining the Riviera Lateral versus FGT owning and maintaining the lateral.

Please file the original and five copies of the requested information by Tuesday, March 26, 2013, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6226 if you have any questions.

Keino Young Senior Attorney

KY/ace

cc: Office of Commission Clerk