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IN REPLY REFER TO:

Ansley Watson, Jr.
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April 21, 2015

VIA E-PORTAL

Carlotta S. Stauffer, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**Re: Docket No. 150093-GU – Joint petition for approval of territorial agreement
in Hardee County, by Peoples Gas System and Sebring Gas System, Inc.**

Dear Ms. Stauffer:

Enclosed for filing with the Commission on behalf of Peoples Gas System and Sebring Gas System, Inc., please find responses to the Commission Staff's First Data Request in the above docket.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a
Enclosures

cc: Norman H. Horton, Jr., Esquire
John Villafrate, Esquire
Ms. Kandi M. Floyd

**PEOPLES GAS SYSTEM
DOCKET NO: 150093-GU
STAFF'S 1ST DATA REQUEST
REQUEST NO. 1
PAGE: 1 OF 1
FILED: APRIL 22, 2015**

1. Which company served the City of Wachula in the past, and is there some background information we should know about the change?
 - A. Natural gas service was not available to the City of Wauchula in the past and therefore no company served it. By Ordinance No. 2014-10, the City of Wauchula granted a non-exclusive franchise to Sebring Gas to provide natural gas within the City; however, service has not yet commenced.

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- 2.** Why is the premise at 205 Hanchey Rd. excluded from the Sebring service area, and service to be provided by PGS? If PGS serves this location in the middle of Sebring's service area, how will uneconomic duplication of facilities be avoided?
 - A.** Prior to the negotiation of the Territorial Agreement with Sebring Gas, Hardee County expressed interest in a Compressed Natural Gas ("CNG") station at this location and natural gas service from Peoples Gas System ("PGS"). Further, PGS and Hardee County had committed to the construction of the station and PGS's providing gas service to the station. The carve out of this customer from the Territorial Agreement is necessary to keep the agreements made between PGS and the customer (Hardee County) intact since construction of the CNG station has been completed.

If necessary for Sebring to serve customers in this area, and to avoid duplication of service facilities, PGS and Sebring may establish a second interconnect on the PGS main line in this area. From that interconnect, Sebring could proceed to design and build-out their distribution facilities.

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- 3.** In regard to Section 3 of the Agreement, if Sebring determines serving a location would violate good engineering practices or incur economic constraints, how could PGS serve that location?
 - A.** If serving a particular location would violate good engineering practices then it is possible neither party would serve the location. If Sebring incurs economic constraints and the service location is economically feasible for PGS to serve then both parties will approach the Commission for approval of a modification to this Territorial Agreement.

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4. Do we understand correctly that the Agreement does not require any transfer of customers or facilities?

A. Yes.

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- 5.** Please provide a legible map clearly identifying the proposed service areas of both parties. (The map provided with the petition is too faint to be readable.)
 - A.** See attached.

Exhibit A

