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DIVISION OF ECONOMICS
JAMES W. DEAN
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Public Service Commission

April 30, 2015

Beth Keating
Gunster Law firm
215 South Monroe St., Suite 601
Tallahassee, FL 32301

John Cogburn, Director, Regulatory
Reporting and Strategic Planning
AGL Resources, Inc.
10 Peachtree Place
Atlanta, GA 30309

Re: Docket No. 150116-GU – Petition for approval of safety, access, and facility enhancement program and associated cost recovery methodology, by Florida City Gas

Dear Ms. Keating and Mr. Cogburn,

By this letter, the Commission staff requests that Florida City Gas (FCG) provide responses to the following data requests:

1. In its petition, FCG states that the proposed program will “expedite” making necessary changes. How long would the relocations and replacements take if the project were not expedited?
2. Paragraph 13 (2) on page 8 of the petition discusses a total capital budget of no more than \$9,500,000 in the first full calendar year, however the program cost chart on page 5 of Exhibit A shows that level of expenditure is not expected until after the 2nd year. Please reconcile or explain the difference.
3. The \$74,112,387 shown in the second line of text on page 5 of Exhibit A does not seem to appear in any of the data in Exhibits A or B. Please explain what that dollar amount represents, and what is its basis.
4. In Exhibit A, the total footage data on page 4 (1,104,576 for 2” and 239,184 for 4”) does not appear close to the 10-year total footage shown on page 5. Please explain the difference.

5. Please refer to Exhibit C and explain and show the derivation of the percentage allocation to customer class factors. Also, the table has a note (1), which does not appear in the table.
6. How much footage does the company expect to install each year?
7. What procedures will be used to notify the public of the installations?

Please file the original and five copies of the requested information by Thursday, May 15, 2015, with Carlotta Stauffer, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6676 if you have any questions.

Sincerely,

/s/ Stephen E. Garl

Stephen E. Garl
Public Utilities Analyst

cc: Office of Commission Clerk