

COMMISSIONERS:  
ART GRAHAM, CHAIRMAN  
LISA POLAK EDGAR  
RONALD A. BRISÉ  
JULIE I. BROWN  
JIMMY PATRONIS

STATE OF FLORIDA



DIVISION OF ECONOMICS  
GREG SHAFER  
DIRECTOR  
(850) 413-6410

# Public Service Commission

November 24, 2015

## STAFF'S FIRST DATA REQUEST

Ansley Watson, Jr.  
Macfarlane Ferguson & McMullen  
P. O. Box 1531  
Tampa, FL 33601-1531  
aw@macfar.com

**Re: Docket No. 150218-GU - Petition for approval to discontinue charging multiple purchased gas adjustment (PGA) factors by Peoples Gas System.**

Dear Mr. Watson:

By this letter, Commission staff requests the following information from Peoples Gas System.

1. Please explain why the Residential PGA is higher than the Commercial PGA as shown in Exhibit A to the petition.
2. Please explain the variation in the Residential PGA (highest PGA in June, July, August and in December, lowest PGA January through May) as shown in Exhibit A to the petition.
3. Please provide a comparison of PGA factors for 2015 similar to the 2014 table provided.
4. Paragraph 9 of the petition states that as of December 2014 there were 22,123 NCTS customers. Please state how many commercial customers take sales service.
5. Please state the most recent annual therms consumed by the commercial sales customers and the commercial NCTS customers.
6. Referring to paragraph 9 of the petition, please explain why the 1999 approved methodology resulted in the residential customers bearing more of the costs included in the PGA charge.
7. Please refer to the direct testimony filed by Ms. Floyd on August 21, 2015, in Docket No. 150003-GU, Exhibit KMF-2, seasonal peak allocation factors. The residential class' contribution to the company's peak month is higher than the commercial class' contribution (67.31% vs 32.69% in the winter, 60.49% vs 39.51% in the summer).

Ansley Watson, Jr.  
Page 2  
November 24, 2015

Explain why it is appropriate to discontinue recognizing the residential class' higher sales during winter and summer peak months to assign fixed interstate pipeline costs.

Please file all responses electronically no later than Tuesday, December 8, 2015 via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6204 if you have any questions.

Thank you.

/s/ Sevini Guffey  
Public Utility Analyst I  
[sguffey@psc.state.fl.us](mailto:sguffey@psc.state.fl.us)

cc: Office of Commission Clerk  
Office of the Public Counsel