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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

November 25, 2015

## STAFF'S FIRST DATA REQUEST

Beth Keating  
Gunster Law Firm  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301

Shannon O. Pierce, Vice President, State & Federal Regulatory Affairs  
AGL Resources Inc.  
10 Peachtree Place  
Atlanta, GA 30309

**Re: Docket No. 150232-GU - Petition for approval of variance to delay Area Extension Program (AEP) true-up and extend amortization period by Florida City Gas.**

Dear Ms. Keating & Ms. Pierce:

By this letter, Commission staff requests the following information from Florida City Gas (FCG).

1. What is USSC stated in paragraph 12?
2. Paragraph 10 of the petition states that the AEP has not been frequently utilized by the Company. Please state how often FCG has used the AEP since its approval in 1995.
3. Paragraph 13 of the petition refers to a surcharge of \$0.241/therm calculated according to FCGs tariff. Please explain how the \$0.241/therm was derived.
4. Paragraph 15 of the petition refers to the recalculated AEP surcharge of \$0.515/therm. Please explain how the \$0.515/therm was derived.
5. Is FCG now charging the \$0.515 surcharge effective November 1, 2015 as stated in paragraph 15 of the petition?
6. Paragraph 16 of the petition states that the actual project cost increases were related to unanticipated environmental issues. Please explain what those environmental issues were.

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7. Has FCG performed the October 31, 2015 AEP true-up as required by the AEP tariff or is FCG waiting on a Commission decision to defer the recalculation until October 31, 2017?
8. Please provide a description of the facilities FCG installed to provide service to the Target Customer.

Please file all responses electronically no later than Wednesday, December 9, 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  
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cc: Office of Commission Clerk