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IN REPLY REFER TO:

Ansley Watson, Jr.  
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December 18, 2015

**VIA E-PORTAL FILING**

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

**Re: Docket No. 150259-GU -- Petition for the Commission to issue an order to show cause against Peoples Gas System for violations of Chapter 25-12, F.A.C., request for imposition of fines, and request for rate relief, by Office of Public Counsel**

Dear Ms. Stauffer:

Attached for filing with the Commission on behalf of Peoples Gas System, please find its Response to Citizens' First Request for Production of Documents (Nos. 1-7) in the above docket.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a  
Enclosures

cc: Danielle M. Roth, Esquire  
J.R. Kelly, Esquire  
Charles Rehwinkel, Esquire  
Bianca Lherisson, Esquire  
Keino Young, Esquire  
Kelley Corbari, Esquire  
Ms. Kandi M. Floyd

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition for the Commission to issue an order to )  
show cause against Peoples Gas System for violations ) Docket No. 150259-GU  
of Chapter 25-12, F.A.C., request for imposition of fines, )  
and request for rate relief, by Office of Public Counsel. ) Filed: December 18, 2015  
\_\_\_\_\_ )

**PEOPLES GAS SYSTEM'S RESPONSE TO CITIZENS'  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-7)**

Peoples Gas System ("Peoples" or the "Company") submits the following Response to Citizens' Second Request for Production of Documents (Nos. 56-75), and says, with respect to the correspondingly numbered categories of the request:

1. Please provide a list of all internal audits performed or scheduled to be performed by PGS or any affiliate of PGS for the years 2011-2015 (to date).

Response: A list responsive to this category of the request will be provided to the Office of Public Counsel.

2. Please provide copies of all documents produced for or by management discussing the subject of the September 2013 and November 2015 Florida Public Service Commission review/audits of the PGS Distribution Facility Inspections. This request includes documents prepared by management for senior executives and member of the Board of Directors of TECO Energy.

Response: Copies of documents responsive to this category of the request will be provided to the Office of Public Counsel.

3. Please provide all documents discussing or analyzing the use of contractors to conduct distribution facility inspections for the period 2012-2016.

Response: Copies of documents responsive to this category of the request will be provided to the Office of Public Counsel.

4. Please provide all documents evaluating the use of tracking software (such as GLE Essentials and other similar software tools) for use in your process of conducting

distribution facility inspections in compliance with your internal standards, industry standards and FPSC rules.

Response: Copies of documents responsive to this category of the request will be provided to the Office of Public Counsel.

5. Please provide all documents describing efficiency measures that PGS implemented since the final order was issued in your most recent rate case before the Florida Public Service Commission which impacted each operations and maintenance expense account affected by your distribution facilities inspections.

Response: Copies of documents responsive to this category of the request will be provided to the Office of Public Counsel.

6. Please provide all documents provided to Emera, Inc. or any of its nominees, agents and/or representatives in conjunction with any pre-acquisition due-diligence activities to the extent such documents discuss or otherwise describe the subject of the September 2013 and November 2015 Florida Public Service Commission review/audits of the PGS Distribution Facility Inspections.

Response: Copies of documents responsive to this category of the request will be provided to the Office of Public Counsel.

7. Please provide all documents discussing or describing the changes PGS made to the compliance review process related to the distribution facilities inspections (reference: Finding 4 of the November 2015 Florida Public Service Commission audit of the PGS Distribution Facility Inspections).

Response: Copies of documents responsive to this category of the request will be provided to the Office of Public Counsel.

DATED this 18th day of December, 2015.

Respectfully submitted,



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Attorneys for Peoples Gas System

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the forgoing Response has been furnished by electronic mail this 18<sup>th</sup> day of December, 2015, to J.R. Kelly, Esquire, Charles Rehwinkel, Esquire, and Danielle M. Roth, Esquire, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison St., Room 812, Tallahassee, Florida 32399-1400, and to Bianca Lherisson, Esquire, Keino Young, Esquire, and Kelley Corbari, Esquire, Office of General Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.



Ansley Watson, Jr.