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Public Service Commission

August 12, 2019

Beth Keating
Gunster Law Firm
215 South Monroe St., Ste. 601
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STAFF'S FIFTH DATA REQUEST
via e-mail

RE: Docket No. 20190083-GU – Application for rate increase in Highlands, Hardee, and Desoto Counties, by Sebring Gas System, Inc.

Dear Ms. Keating:

By this letter, the Commission staff requests that Sebring Gas System, Inc. (Sebring or Utility) provide responses to the following data requests:

1. Please provide a map of the Utility's service territory showing existing and proposed lines, existing customers, and proposed customers.
2. Please refer to MFR Schedule I-2. Please provide further details on the Commission rule violations for notice numbers: SEBGS GS-2117, SEBGS GS-1384, SEBGS GS-1420, and SEBGS GS-1433.
3. For each cost identified on Schedule G-1 page 23, please provide the following (if available):
 - a. Bids associated with the Purchase Price or Construction Cost.
 - b. Invoices associated with the Purchase Price or Construction Cost.
4. For each cost identified on Schedule G-1 page 26, please provide the following (if available):
 - a. Bids associated with the Purchase Price or Construction Cost.
 - b. Invoices associated with the Purchase Price or Construction Cost.

5. Please refer to pages 4 and 8 of witness Christmas' direct testimony. For Account 376.1 – Mains – Plastic, witness Christmas provides an estimate of \$551,875 for Historic Base Year + 1 additions and \$773,125 for Projected Test Year additions. For each main size (4", 2", and 1-1/4"), please provide a detailed explanation of how the per foot costs were derived. Also, please provide an explanation of why these costs are reasonable.
6. Please refer to page 4 of witness Christmas' direct testimony. For Account 376.0 – Mains – Steel, witness Christmas provides an estimate of \$425,600 for Historic Base Year + 1 additions. Please provide a detailed explanation of how the cost of \$40/foot was derived. Also, please provide an explanation of why this cost is reasonable.

For questions 7 – 9, please refer to the testimony filed by witness Christmas, page 6, lines 23 – 26, and page 7, lines 1 – 3.

7. Please provide the breakdown for the projected cost per meter and per regulator. Please provide the information in the following format.

Description	Gas Meter	Gas Regulator
Model		
Meter Cost		
Labor Cost		
Miscellaneous Expense		
Number Purchased		
Total cost of Purchase		

8. Please provide an example calculation for the installation of one meter.
9. Please explain how the "typical cost of Meter and Regulator Installations" was derived.

Please refer to the testimony filed by witness Christmas, page 7, lines 5 – 17.

10. Witness Christmas testified that various types of equipment would be purchased for two new field employees, which include a line locator, CGI, Sensit Leak Detection Equipment, Electro-fusion Equipment, Socket fusion Equipment, and generator.
 - a. Please provide a description of how each type of equipment will be utilized by the field employees.
 - b. Please describe how the cost was developed for each type of equipment.

Please refer to the testimony filed by witness Christmas, page 7, lines 18 – 22.

11. Witness Christmas testified that the projected cost for the two Ford trucks (type to be determined) is \$110,000.

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- a. Please explain how the expected cost of \$55,000 for each truck was derived.
- b. Please provide a description of the any equipment that will be included with each truck.
- c. Please provide a description, including estimated cost, of the other types of trucks being considered.

Please refer to the testimony filed by witness Christmas, page 8, lines 1 – 4.

12. Witness Christmas testified that “Any service lines that are coming due for retirement are expected to be reactivated through the Company's Energy Conservation Cost Recovery Program.”
 - a. Please explain what it means to reactivate a line after retirement.
 - b. Please explain how the cost of the reactivation will be recoverable through the Utility’s Energy Conservation Cost recovery Program.
 - c. Will the service line reactivation be done unilaterally, or upon need?

Please refer to the testimony filed by witness Christmas, page 10, lines 1 – 5.

13. Witness Christmas testified that Sebring plans to re-build a regulated bypass at its interconnection with Peoples Gas. Please explain why re-build of the regulated bypass is prudent at this time.

Please refer to the testimony filed by witness Christmas, page 4, lines 4 – 9.

14. Please provide a copy of the detailed engineering and design study.

Please file all responses electronically no later than Monday, September 2, 2019, through the Commission’s website at www.floridapsc.com, by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6212 if you have any questions.

Sincerely,

/s/ Rachael A. Dziechciarz

Rachael A. Dziechciarz
Senior Attorney

RAD/csc

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