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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

October 28, 2019

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706
BKeating@gunster.com

STAFF'S FIRST DATA REQUEST
via e-mail

Christopher Wright
Senior Attorney
Florida Power & Light Company
700 Universe Blvd (JB/LAW)
Juno Beach, Florida 33408
(561) 691-7144
Christopher.Wright@fpl.com

RE: Docket No. 20190191-GU – Petition for Approval to Amend Tariff Provisions on Capacity for Transportation Service to be Consistent with Tariff Filed with Rate Case Settlement, by Florida City Gas.

Dear Ms. Keating and Mr. Wright:

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

1. Has FCG released any capacity to Third Party Suppliers in the past calendar year?
2. Please explain how much capacity FCG currently holds and whether it is enough to serve all its sales customers, all or most essential use transportation customers, and all other transportation customers.
3. Has FCG purchased any additional capacity since the 2017 rate case? Please explain.
4. On page 4 of the petition, FCG references additional capacity. Please discuss any plans to acquire additional capacity and whether any additional capacity will be released to third party suppliers.

5. If FCG acquires additional capacity and has adequate capacity to meet the sales and essential use customers' needs, will third party suppliers that serve non-essential use transportation customers be required to purchase capacity from FCG?
6. Please describe FCG's process of releasing capacity to Third Party Suppliers, including how often capacity is released (i.e., is it done monthly, daily, when are nominations due, etc.)
7. Please explain how FCG determines who is considered "Essential Use".
8. Please explain the nature of the "operational issues" mentioned in paragraph 12 of the petition.
9. Please explain which customer group bears the cost for extra capacity if it is purchased and not released.
10. Please describe the circumstances under which FCG can release capacity under the current tariff.
11. Please describe the circumstances under which FCG is required to release capacity under the current tariff.
12. Please describe the circumstances under which FCG can release capacity under the proposed tariff.
13. Please describe the circumstances under which FCG is required to release capacity under the proposed tariff.
14. Has FCG notified its Third Party Suppliers of the proposed tariff provision and explained how it could potentially impact them? Please explain.

Please file all responses electronically no later than November 6, 2019 via the Commission's website at www.floridapsc.com by selecting the Clerk's office tab and Electronic Filing Web Form. If you have any questions, I can be reached at 850-413-6554.

Sincerely,

/s/Oakley Ward
Public Utility Analyst 1
oward@psc.state.fl.us

cc: Office of Commission Clerk