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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

October 2, 2020

Beth Keating  
Gunster, Yoakley, & Stewart, P.A.  
215 South Monroe St. Suite 601  
Tallahassee, FL 32301

## STAFF'S FIRST DATA REQUEST

Christopher Wright  
Senior Attorney Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408

Dear Ms. Keating and Mr. Wright:

### **Re: Petition of Florida City Gas for Approval of the Safety, Access, and Facility Enhancement Program True-up and 2021 Cost Recovery Factors**

By this letter, Commission staff requests that Florida City Gas (FCG or utility) provide responses to the following questions by October 7, 2020.

1. Please provide attachment C SAFE schedules 1 through 7 in Excel format with the formulas intact .
2. In paragraph 13 of the petition it states "For purposes of the 2021 SAFE Program surcharge factors FCG has not met or exceeded the limitation/exemption provision of the Internal Revenue Code and, therefore, FCG has modified the calculation of the WACC for purposes of the 2021 SAFE Program surcharge factors consistent with the proration formula required by the normalization rules of the Internal Revenue Code." Please clarify this statement and
  - A) Explain how FCG has not met this provision.
  - B) Explain the methodology used in calculating the WACC for 2021.
  - C) Explain how the change in methodology used affects FCG SAFE Program factors.
3. Please confirm that the projected number of mains for FCG to be completed in 2021 is 128,772 feet.
4. Please confirm that the projected number of services to be installed in 2021 is 1,386.

5. Please confirm that FCG is projected to retire 137,332 feet of rear easement mains in 2021.
6. In the company's petition Attachment C Schedule 1 "SAFE Program Revenue Requirement" the company notes that in December of 2019 the mains eligible for replacement was negative 4,791,888 feet. Please explain in detail the circumstances that lead to this and why this is a negative number.

Please file all responses electronically by October 7, 2020, 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 contact me at [hforrest@psc.state.fl.us](mailto:hforrest@psc.state.fl.us) or at 850.413.6808 if you have any questions.

Sincerely,

/s/ Holly Forrest  
Holly Forrest  
Public Utility Analyst

cc: Office of the Commission Clerk

