



Writer's E-Mail Address: bkeating@gunster.com

October 8, 2020

E-PORTAL

Mr. Adam Teitzman, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20200204-GU - Petition for Approval of the Safety, Access, and Facility Enhancement Program True-Up and 2021 Cost Recovery Factors, by Florida City Gas

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida City Gas's Response to Staff's First Data Request, No. 6.

Thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

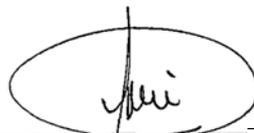
Sincerely,

s/Beth Keating _____
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

DECLARATION

I sponsored the answers to Interrogatory No. 6 from **STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-6)** to Florida City Gas in Docket No. 20200204-GU. The responses are true and correct based on my personal knowledge.

Under penalties of perjury, I declare that I have read the foregoing declaration and the interrogatory answers identified above, and that the facts stated therein are true.

A handwritten signature in black ink, appearing to read 'Miguel', is enclosed within a hand-drawn oval. A horizontal line is drawn below the signature.

Miguel Bustos

Date: 10/7/2020

Florida City Gas
Docket No: 20200204
Staffs DR1
Request No: 6

QUESTION:

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.

RESPONSE:

The -4,791,888 reflected on Attachment C Schedule 1 for Eligible Replacement-Mains in December 2019 represents investment costs, not feet of Mains. In December 2019, FCG identified that certain SAFE assets were inadvertently recorded to an incorrect SAFE work order type. FCG transferred the SAFE assets to the correct work order, which transfer in FCG's system automatically puts the assets in CWIP rather than plant in service. FCG then makes a manual adjustment to properly reflect that the assets are in plant in service and not CWIP. This manual adjustment was not completed until January 2020. As a result of the timing difference, Attachment C, Schedule 1 reflects a credit to Eligible Replacement-Mains for December 2019 and an increase in CWIP for December 2019; and Attachment C, Schedule 2 reflects a reversal to the Eligible Replacement-Mains and CWIP balances for January 2020. But for the timing of when the manual adjustment was completed, the transfer to correct the work order would not have been apparent on the schedules because the transfer of the amounts results in a wash.