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April 1, 2021

VIA E-PORTAL FILING

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

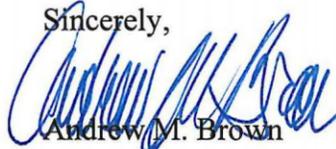
Re: Docket No. 20210042-GU – In re: Petition for approval of Firm Service Agreement with Peoples Gas System, by SeaCoast Gas Transmission, L.L.C.

Dear Mr. Teitzman:

Attached for filing in the above docket on behalf of SeaCoast Gas Transmission, L.L.C. please find its Notice of Intent to Request Confidential Treatment in this case.

Your assistance in this matter is greatly appreciated.

Sincerely,



Andrew M. Brown

AB/plb
Attachment

cc: Oakley Ward (via email: oward@psc.state.fl.us)
Richard Gentry, Esq. (via email: gentry.richard@leg.state.fl.us)
Ms. Kandi M. Floyd
Ms. Paula K. Brown
Ms. Karen Bramley
Mr. Luke Buzard

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of Firm Service :
Agreement with Peoples Gas System, by : Docket No.:20210042-GU
SeaCoast Gas Transmission, L.L.C. : Submitted for Filing: April 1, 2021

SEACOAST GAS TRANSMISSION, L.L.C.'S
NOTICE OF INTENT TO REQUEST CONFIDENTIAL TREATMENT

Pursuant to Sections 366.093 and 119.07, *Florida Statutes* and 25-22.006, *Florida Administrative Code*, SeaCoast Gas Transmission, L.L.C. ("Seacoast" or the "Company") submits the following Request for Confidential Treatment of Response Number 1a of Peoples' Response of April 1, 2021 to Staff's First Data Request dated March 18, 2021 (the "Response").

1. Attached hereto as Exhibit A is a copy of the Response with portions redacted.
2. The material for which confidential classification is sought is intended to be and is treated as private by Seacoast because it contains proprietary confidential business information under Section 366.093(3), *Florida Statutes*.
3. Seacoast requests that the information for which it seeks confidential classification not be declassified until 18 months after the date of the Commission's order granting this request (see Section 366.093(4), *Florida Statutes*). The time period requested is necessary to protect the competitive information regarding the pricing of Seacoast's pipeline facilities. The period of time requested will ultimately protect Seacoast and its customers.

WHEREFORE, Seacoast submits the foregoing as its request for confidential treatment of the information identified in Exhibit A to this request.

Respectfully submitted,



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Attorneys for SeaCoast Gas Transmission, L.L.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing has been furnished via electronic mail, this 1st day of April, 2021, to the following:

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Andrew M. Brown, Esq.

EXHIBIT A

REDACTED COPIES

PEOPLES GAS SYSTEM
SEACOAST GAS TRANSMISSION
DOCKET NO. 20210042-GU
STAFF'S FIRST DATA REQUEST
REQUEST NO. 1
BATE PAGE: 1
FILED: APRIL 1, 2021

1. Regarding the proposed pipeline extensions discussed in paragraph 9 of the petition, please respond to the following:

- a. What is the cost to Seacoast to construct/install the new 2.5 mile 6-inch steel extension (including any necessary appurtenances) from the tap-in to the 4-inch FGT pipeline lateral to the new interconnection with Peoples' new high pressure main pipeline at the Polk-Hillsborough County Line? Please include a general description of the types of costs that will be incurred (e.g., materials, labor, permitting, secure right-of-way, etc.). Also, please confirm that the pipeline material will not consist of "bare steel" construction.
- b. Are the pipeline extensions sized to meet the current capacity needs of Peoples or is it built to allow for potential future capacity requests by other customers?
- c. Has Seacoast engaged in discussions with FGT regarding the tap-in to the 4-inch pipeline lateral and the recommission of the gate station? Please explain.

A. a. The cost to construct/install the new 2.5 mile 6-inch steel extension (including necessary appurtenances) from the FGT tap to the new interconnection with Peoples new high pressure main is [REDACTED], broken down as follows:

Description	Cost
Materials	[REDACTED]
Labor	[REDACTED]
Interconnect Facilities	[REDACTED]
Right of Way	[REDACTED]
Miscellaneous	[REDACTED]

The new pipeline material will not consist of bare steel construction.

- b. The pipeline extensions are sized to meet both existing needs, as well as the needs of unserved and underserved customers.
- c. Yes, Seacoast has engaged in discussions with FGT with regards to the tap-in to their 4-inch pipeline lateral and the Company will be working with FGT to refurbish the gate station and the associated lateral in connection with this project.

PEOPLES GAS SYSTEM
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STAFF'S FIRST DATA REQUEST
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2. Please refer to paragraph 10 of the petition.
- a. Please identify other state or local agencies from which approval will be needed to construct the pipeline extensions and provide a brief description of the approvals that will be required.
 - b. If there is a delay in the construction of the pipeline extensions, what impact will this have on the pending agreement request in the instant petition? Please explain.
- A. a. Seacoast will seek the following permits from the following agencies which are needed to construct the pipeline extensions:

Agencies	Permits
Florida Department of Environmental Protection (FDEP)	<ul style="list-style-type: none"> 1. Individual Environmental Resource Permit (ERP) 2. 404 Permit (formerly USACE 404 permit) 3. Notice of intent to use Generic Dewatering Permit
Hillsborough County	<ul style="list-style-type: none"> 1. Miscellaneous Activities in Wetlands Permit 2. Right of Way Use Permit 3. Tree Permit

- b. Peoples has no payment obligation under the pending agreement until the pipeline extension is in service. The payment obligation is contingent on project completion; therefore, any construction delay would delay the date Peoples needs to start making payments to Seacoast.

**PEOPLES GAS SYSTEM
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DOCKET NO. 20210042-GU
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- 3.** Has Peoples included any charges that would be paid to Seacoast under the proposed agreement in the 2022 PGA cap proposed in Docket No. 210003-GU? If yes, please state the total amount included (in dollars) in the PGA cap and the impact in cents per therm on the 2022 PGA cap. If not, please state when the charges will begin to be included in the PGA cap and state the projected impact on the PGA cap in cents per therm.
- A.** Peoples has not filed the 2022 PGA cap proposal and no charges have been included in Docket 210003-GU for this project. If approved, Peoples intends to include the charges under this project in the 2022 PGA cap when it is filed in September 2021 for commencement January 2022. The impact on the PGA cap is estimated to be \$0.0073 per therm.

**PEOPLES GAS SYSTEM
SEACOAST GAS TRANSMISSION
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- 4.** Did Peoples issue a Request for Proposals (RFP) to obtain construction cost estimates for the pipeline from other entities? If so, please identify all respondents to the RFP and provide an explanation regarding why their proposals were rejected. If not, please state why Peoples did not solicit competitive bids.

- A.** FGT provided a proposal to Peoples to expand its pipeline in order to meet the requirements of this project. The FGT proposal for this project was not cost-effective in comparison to proposal from Seacoast and could not be completed within the Company's time requirements.

**PEOPLES GAS SYSTEM
SEACOAST GAS TRANSMISSION
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5. Please discuss how many residential, commercial, and industrial customers are expected to take service from this expansion project.
- A. The project will allow Peoples to improve system reliability and allow the Company the opportunity to respond to customer growth. The approximate projected number of customers to benefit from this expansion project are:

Customer Class	Count
Residential	4,750
Commercial / Industrial	730
Total	5,480