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DIVISION OF ECONOMICS
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Public Service Commission

June 7, 2021

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

Matthew Everngam, Director
Regulatory Strategy & Alternative Energy
500 Energy Lane, Suite 100
Dover, Delaware 19901

Re: 20210088-GU: Joint Petition of Florida Public Utilities Company (All Natural Gas Divisions) and the Florida Division of Chesapeake Utilities Corporation for Approval of Tariff Modifications to Address Receipt and Transportation of Renewable Natural Gas

Ms. Keating and Mr. Everngam:

By this letter, Commission staff requests that Florida Public Utilities Company (All Natural Gas Divisions) and the Florida Division of Chesapeake Utilities Corporation (jointly, the Companies) provide responses to the following questions in the above referenced docket.

1. In original tariff sheet No. 7.506--Applicability, please explain what is meant by "eligible customers" and what criteria would deem a potential customer not eligible to take service under the proposed RNGS tariff.
2. Has the Companies had discussions with potential biogas producers to provide conditioning service under the proposed RNGS tariff? If so, please state how many customers does the companies expects to take service under the proposed tariff?
3. Please state the estimated total cost to construct (or range of possible costs) the facilities under the proposed RNGS tariff.
4. Please describe the anticipated routine maintenance to maintain the facilities and provide the estimated annual cost to operation and maintain these facilities.

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5. Will the Companies use employees to complete the installation of these facilities? If not, is the intent of the utilities to hire outside contractors to complete part or all of the construction and installation process? Please explain.
6. Please confirm that all labor cost (FPUC labor and outside labor) will be included in the calculation of the monthly services charge.
7. What internal controls and mechanisms are in place to ensure that the biogas that is conditioned and treated is up to gas quality and safety standards?
8. What internal mechanisms and controls does the Companies have in place, or will implement, to ensure the credit worthiness of customers to be served under the RNGS tariff?
9. How would the utility handle a customer who may enter default and no longer pay the monthly services charge?
10. In paragraph 10 of the petition, the Companies state that a “Customer may require an agreement between the Company and the Customer to purchase RNG services for minimum period of time, to take or pay for a minimum amount of RNG service, to pay contribution in aid of construction, to furnish a guarantee, and to comply with other service.” Please explain how the Companies will make these determinations.

Please file all responses electronically by June 22, 2021 via the Commission’s website at www.floridapsc.com by selecting the Clerk’s Office tab and electronic Filing Web Form. Please contact me at 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