



Christopher T. Wright
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May 31, 2022

VIA ELECTRONIC FILING

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

Re: In re: Petition by Florida City Gas for Base Rate Increase
Docket No. 20220069-GU

Dear Mr. Teitzman:

Enclosed for filing on behalf of Florida City Gas (“FCG”) in the above-referenced docket is FCG’s Petition for Base Rate Increase, together with supporting testimonies, exhibits, and Minimum Filing Requirements. This filing includes the following documents:

1. Petition for Base Rate Increase
2. Direct Testimony of Kurt S. Howard and Exhibit KSH-1
3. Direct Testimony of Mark Campbell and Exhibits MC-1 through MC-6
4. Direct Testimony of Liz Fuentes and Exhibits LF-1 through LF-6
5. Direct Testimony of Tara DuBose and Exhibits TBD-1 through TBD-6
6. Direct Testimony of Jennifer Nelson and Exhibits JEN-1 through JEN-10
7. Direct Testimony of Ned Allis and Exhibits NWA-1 (2022 Depreciation Study) through NWA-5
8. Minimum Filing Requirements, Schedule A
9. Minimum Filing Requirements, Schedule B
10. Minimum Filing Requirements, Schedule C

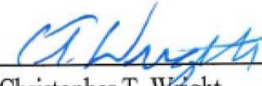
11. Minimum Filing Requirements, Schedule D
12. Minimum Filing Requirements, Schedule E
13. Minimum Filing Requirements, Schedule G
14. Minimum Filing Requirements, Schedule H
15. Minimum Filing Requirements, Schedule I

FCG is not seeking interim rate relief and, therefore, is not providing Minimum Filing Requirements, Schedule F. Each of the above-referenced documents are being separately filed in this docket.

Please note that certain Minimum Filing Requirements contain confidential information and data, which has been redacted and will be provided with a Request for Confidential Classification filed under separate cover.

If you or your staff have any question regarding this filing, please contact me at (561) 691-7144.

Respectfully submitted,



Christopher T. Wright
Authorized House Counsel No. 1007055

Enclosed: [Document 15 of 15]

CERTIFICATE OF SERVICE

20220069-GU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 31st day of May 2022 to the following parties:

<p>Ashley Weisenfeld Walt Trierweiler Florida Public Service Commission Office of the General Counsel 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 awaisenf@psc.state.fl.us wtrierwe@psc.state.fl.us</p> <p><i>For Commission Staff</i></p>	<p>Office of Public Counsel Richard Gentry Patricia A. Christensen c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Gentry.richard@leg.state.fl.us christensen.patty@leg.state.fl.us</p> <p><i>For Office of Public Counsel</i></p>
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s/ Christopher T. Wright _____

Christopher T. Wright
Fla. Auth. House Counsel No. 1017875
Florida Power & Light Company
700 Universe Boulevard (JB/LAW)
Juno Beach, Florida 33408

Attorney for Florida City Gas

Florida Public Service Commission

Explanation: Provide a list of any interruptions in services affecting the lesser of ten percent or 500 or more of division meters.

Type of Data Shown:
Historic Base Year Data: 12/31/21
Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Description

Cause

Date

Duration

There have not been any service interruptions affecting the lesser of ten percent or 500 or more meters since the previous rate case filing.

Florida Public Service Commission

Explanation: Provide a summary of notices received back to the last rate case not to exceed five years.

Type of Data Shown:

Historic Base Year Data: 12/31/21

His. Yr. Last Rate Case: 12/31/16

Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Date & Notice Number	Summary	Current Status
GS-1440 2019 FCGHD	June 19, 2019 One violation of 192.465(b) External corrosion control: Monitoring	Violation notice closed

Florida Public Service Commission

Company: Florida City Gas

Docket No.: 20220069-GU

Explanation: Of those meters with a rated capacity of 250 CFH or less and not included in an approved statistical sampling plan, provide a list of all meters that have not been tested for accuracy within 120 months (as of test year end).

Type of Data Shown:
Historic Base Year Data: 12/31/2021
Witness: Kurt S. Howard

Company Identification Number:

Manufacturer

Type/Size

All meters sized 250 CFH or less are included in an approved statistical sampling plan.

Schedule I-3 (2 of 3)

Meter Testing - Periodic Testing

Florida Public Service Commission

Explanation: Provide a list of all meters with a rated capacity of 251 CFH through 2500 CFH that have not been tested for accuracy within 120 months (as of test year end).

Type of Data Shown:
 Historic Base Year Data: 12/31/21
 Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	Company Identification Number:	Manufacturer	Type/Size
1	3113179	American	AT1000
2	3086530	American	AT1000
3	3113178	American	AT1000
4	3091725	American	AT1000
5	3113117	American	AT1000
6	3113107	American	AT1000
7	3038941	American	AT1000
8	3095641	American	AT1000
9	3113137	American	AT1000
10	3113181	American	AT1000
11	3039853	American	AT1000
12	3039857	American	AT1000
13	3031223	American	AT1000
14	3091783	American	AT1000
15	3113211	American	AT1000
16	3039859	American	AT1000
17	3095679	American	AT1000
18	3113133	American	AT1000
19	3113116	American	AT1000
20	3113226	American	AT1000
21	3113232	American	AT1000
22	3091784	American	AT1000
23	3095648	American	AT1000
24	3116064	American	AT1000
25	3122867	American	AT1000
26	3097134	American	AT1000

Schedule I-3 (2 of 3)

Meter Testing - Periodic Testing

Florida Public Service Commission

Explanation: Provide a list of all meters with a rated capacity of 251 CFH through 2500 CFH that have not been tested for accuracy within 120 months (as of test year end).

Type of Data Shown:
 Historic Base Year Data: 12/31/21
 Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	Company Identification Number:	Manufacturer	Type/Size
27	3113113	American	AT1000
28	3039854	American	AT1000
29	3113147	American	AT1000
30	3113228	American	AT1000
31	3040165	American	AT1000
32	3095647	American	AT1000
33	3039848	American	AT1000
34	3116059	American	AT1000
35	3113174	American	AT1000
36	3040659	American	AT1000
37	3122879	American	AT1000
38	3113122	American	AT1000
39	3086506	American	AT1000
40	3113131	American	AT1000
41	3116091	American	AT1000
42	3113175	American	AT1000
43	3113216	American	AT1000
44	3039863	American	AT1000
45	3091786	American	AT1000
46	3113101	American	AT1000
47	3041039	American	AT1000
48	3041078	American	AT1000
49	3086503	American	AT1000
50	3116117	American	AT1000
51	3116101	American	AT1000
52	3086505	American	AT1000

Schedule I-3 (2 of 3)

Meter Testing - Periodic Testing

Florida Public Service Commission

Explanation: Provide a list of all meters with a rated capacity of 251 CFH through 2500 CFH that have not been tested for accuracy within 120 months (as of test year end).

Type of Data Shown:
 Historic Base Year Data: 12/31/21
 Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	Company Identification Number:	Manufacturer	Type/Size
53	3086502	American	AT1000
54	2992762	American	AT1000
55	3116054	American	AT1000
56	3113177	American	AT1000
57	3041084	American	AT1000
58	3113141	American	AT1000
59	3041061	American	AT1000
60	3040208	American	AT1000
61	3041077	American	AT1000
62	3113132	American	AT1000
63	3113227	American	AT1000
64	3041080	American	AT1000
65	3039856	American	AT1000
66	3095642	American	AT1000
67	3113221	American	AT1000
68	3116119	American	AT1000
69	3096591	American	AT1000
70	3042588	American	AC630
71	3042565	American	AC630
72	3042554	American	AC630
73	3042561	American	AC630
74	3045468	American	AC630
75	3045466	American	AC630
76	3042552	American	AC630
77	3047578	American	AC630
78	3045452	American	AC630

Schedule I-3 (2 of 3)

Meter Testing - Periodic Testing

Florida Public Service Commission

Explanation: Provide a list of all meters with a rated capacity of 251 CFH through 2500 CFH that have not been tested for accuracy within 120 months (as of test year end).

Type of Data Shown:
 Historic Base Year Data: 12/31/21
 Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	Company Identification Number:	Manufacturer	Type/Size
79	3045471	American	AC630
80	3047588	American	AC630
81	2813564	American	AL425
82	3042553	American	AC630
83	2567134	American	AL1000
84	3042587	American	AC630
85	3047527	American	AC630
86	2865328	American	AC630
87	3045467	American	AC630
88	3047591	American	AC630
89	3042513	American	AC630
90	3048132	American	AC630
91	3042539	American	AC630
92	3048069	American	AC630
93	3047584	American	AC630
94	3042276	American	AC630
95	3047320	American	AC630
96	3042569	American	AC630
97	3045455	American	AC630
98	3048067	American	AC630
99	3047534	American	AC630
100	3045462	American	AC630
101	2776323	American	AL1000
102	3048080	American	AC630
103	2887793	American	AL425
104	3048089	American	AC630

Schedule I-3 (2 of 3)

Meter Testing - Periodic Testing

Florida Public Service Commission

Explanation: Provide a list of all meters with a rated capacity of 251 CFH through 2500 CFH that have not been tested for accuracy within 120 months (as of test year end).

Type of Data Shown:
 Historic Base Year Data: 12/31/21
 Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	Company Identification Number:	Manufacturer	Type/Size
105	2996394	Itron	SR400
106	2996060	Itron	SR400
107	2996144	Itron	SR400
108	3116548	Itron	SR400
109	2996393	Itron	SR400
110	2992271	Itron	SR400
111	3116211	Itron	SR400
112	3042396	American	AC630

Supporting Schedules:

Recap Schedules:

Florida Public Service Commission

Company: Florida City Gas

Docket No.: 20220069-GU

Explanation: Provide a list of all meters with a rated capacity of over 2500 CFH that have not been tested for accuracy within 60 months (as of test year end).

Type of Data Shown:

Historic Base Year Data: 12/31/21

Witness: Kurt S. Howard

Company Identification Number:

Manufacturer

Type/Size

All meters sized above 2500 CFH have been tested within 60 months.

Florida Public Service Commission

Explanation: Provide a list of vehicles including a description and any allocation of use to non-utility accounts.

Type of Data Shown:

Historic Base Year Data: 12/31/2021

Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	VEHICLE IDENTIFICATION (MAKE & MODEL)	DESCRIPTION OF USE	UTILITY %	NON UTILITY %	NON UTILITY ACCOUNTS
1	FORD F-250	Measurement & Integrity	100	0	n/a
2	FORD F-350	Measurement & Integrity	100	0	n/a
3	FORD F-250	Measurement & Integrity	100	0	n/a
4	CHEVROLET SILVERADO	Measurement & Integrity	100	0	n/a
5	CHEVROLET SILVERADO	Measurement & Integrity	100	0	n/a
6	CHEVROLET SILVERADO	Measurement & Integrity	100	0	n/a
7	FORD F-250	Measurement & Integrity	100	0	n/a
8	CHEVROLET SILVERADO	Measurement & Integrity	100	0	n/a
9	FORD F-250	Measurement & Integrity	100	0	n/a
10	RAM 4500 CHASSIS	Measurement & Integrity	100	0	n/a
11	FORD TRANSIT VAN	Measurement & Integrity	100	0	n/a
12	FORD F-250	Construction	100	0	n/a
13	FORD F-250	Construction	100	0	n/a
14	FORD F-250	Construction	100	0	n/a
15	CHEVROLET SILVERADO	Construction	100	0	n/a
16	FORD F-150	Construction	100	0	n/a
17	FORD F-150	Construction	100	0	n/a
18	FORD F-150	Construction	100	0	n/a
19	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
20	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
21	RAM 4500 CHASSIS	Operations - Gas Infrastructure	100	0	n/a
22	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
23	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
24	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
25	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
26	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
27	DODGE GRAND CARAVAN	Operations - Gas Infrastructure	100	0	n/a
28	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
29	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
30	FORD F-250	Operations - Gas Infrastructure	100	0	n/a

Florida Public Service Commission

Explanation: Provide a list of vehicles including a description and any allocation of use to non-utility accounts.

Type of Data Shown:

Historic Base Year Data: 12/31/2021

Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	VEHICLE IDENTIFICATION (MAKE & MODEL)	DESCRIPTION OF USE	UTILITY %	NON UTILITY %	NON UTILITY ACCOUNTS
31	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
32	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
33	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
34	RAM 4500 CHASSIS	Operations - Gas Infrastructure	100	0	n/a
35	FORD TRANSIT VAN	Operations - Gas Infrastructure	100	0	n/a
36	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
37	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
38	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
39	FORD F-750	Operations - Gas Infrastructure	100	0	n/a
40	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
41	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
42	FORD F-750	Operations - Gas Infrastructure	100	0	n/a
43	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
44	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
45	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
46	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
47	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
48	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
49	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
50	DODGE RAM PICKUP	Operations - Gas Infrastructure	100	0	n/a
51	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
52	FORD TRANSIT VAN	Operations - Gas Infrastructure	100	0	n/a
53	FORD TRANSIT VAN	Operations - Gas Infrastructure	100	0	n/a
54	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
55	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
56	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
57	TOYOTA RAV4	Business Development	100	0	n/a
58	TOYOTA RAV4	Business Development	100	0	n/a
59	TOYOTA RAV4	Business Development	100	0	n/a
60	TOYOTA RAV4	Business Development	100	0	n/a

Florida Public Service Commission

Explanation: Provide a list of vehicles including a description and any allocation of use to non-utility accounts.

Type of Data Shown:

Historic Base Year Data: 12/31/2021

Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	VEHICLE IDENTIFICATION (MAKE & MODEL)	DESCRIPTION OF USE	UTILITY %	NON UTILITY %	NON UTILITY ACCOUNTS
61	TOYOTA RAV4	Business Development	100	0	n/a
62	TOYOTA RAV4	Business Development	100	0	n/a
63	TOYOTA RAV4	Business Development	100	0	n/a
64	FORD FUSION	Business Development	100	0	n/a
65	CHEVROLET EQUINOX	Business Development	100	0	n/a
66	TOYOTA RAV4	Business Development	100	0	n/a
67	TOYOTA RAV4	Business Development	100	0	n/a
68	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
69	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
70	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
71	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
72	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
73	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
74	FORD F-750	Operations - Gas Infrastructure	100	0	n/a
75	INTERNATIONAL DURASTAR 4400	Operations - Gas Infrastructure	100	0	n/a
76	INTERNATIONAL DURASTAR 4400	Operations - Gas Infrastructure	100	0	n/a
77	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
78	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
79	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
80	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
81	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
82	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
83	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
84	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
85	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
86	FORD F-350	Operations - Gas Infrastructure	100	0	n/a
87	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
88	FORD F-550	Operations - Gas Infrastructure	100	0	n/a
89	FORD FUSION	Operations - Gas Infrastructure	100	0	n/a
90	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a

Florida Public Service Commission

Explanation: Provide a list of vehicles including a description and any allocation of use to non-utility accounts.

Type of Data Shown:

Historic Base Year Data: 12/31/2021

Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	VEHICLE IDENTIFICATION (MAKE & MODEL)	DESCRIPTION OF USE	UTILITY %	NON UTILITY %	NON UTILITY ACCOUNTS
91	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
92	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
93	DODGE GRAND CARAVAN	Operations - Gas Infrastructure	100	0	n/a
94	DODGE GRAND CARAVAN	Operations - Gas Infrastructure	100	0	n/a
95	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
96	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
97	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
98	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
99	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
100	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
101	TOYOTA TACOMA	Operations - Gas Infrastructure	100	0	n/a
102	RAM 4500 CHASSIS	Operations - Gas Infrastructure	100	0	n/a
103	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
104	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
105	FORD TRANSIT VAN	Operations - Gas Infrastructure	100	0	n/a
106	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
107	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
108	DODGE DAKOTA	Operations - Gas Infrastructure	100	0	n/a
109	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
110	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
111	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
112	FORD TRANSIT VAN	Operations - Gas Infrastructure	100	0	n/a
113	FORD TRANSIT VAN	Operations - Gas Infrastructure	100	0	n/a
114	FORD TRANSIT VAN	Operations - Gas Infrastructure	100	0	n/a
115	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
116	CHEVROLET SILVERADO	Operations - Gas Infrastructure	100	0	n/a
117	FORD TRANSIT VAN	Operations - Gas Infrastructure	100	0	n/a
118	FORD F-250	Operations - Gas Infrastructure	100	0	n/a
119	CHEVROLET CRUZE	Operations - Gas Infrastructure	100	0	n/a
120	FORD F-150	Operations - Gas Infrastructure	100	0	n/a

Florida Public Service Commission

Explanation: Provide a list of vehicles including a description and any allocation of use to non-utility accounts.

Type of Data Shown:
 Historic Base Year Data: 12/31/2021
 Witness: Kurt S. Howard

Company: Florida City Gas

Docket No.: 20220069-GU

Line No.	VEHICLE IDENTIFICATION (MAKE & MODEL)	DESCRIPTION OF USE	UTILITY %	NON UTILITY %	NON UTILITY ACCOUNTS
121	CHEVROLET IMPALA	Operations - Gas Infrastructure	100	0	n/a
122	FORD ESCAPE	Operations - Gas Infrastructure	100	0	n/a
123	FORD F-150	Operations - Gas Infrastructure	100	0	n/a
124	FORD F-150	Operations - Gas Infrastructure	100	0	n/a