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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

August 23, 2022

Staff's First Data Request
Via E-mail

Beth Keating, Esq.
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Matt Everngam
Director – Regulatory Affairs
500 Energy Lane
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Re: Docket No. 20220144-GU - Joint petition for approval of firm transportation between Florida Public Utilities Company and Peninsula Pipeline Company, Inc. to reflect expansion of Wildlight development in Nassau County.

Dear Ms. Keating:

By this letter, Commission staff respectfully requests that Florida Public Utilities Company (FPUC) and Peninsula Pipeline Company, Inc. (PPC) (collectively, Petitioners) provide responses to the following data requests:

1. Please provide project maps that label each segment of pipeline, as described in Exhibit A to the Firm Transportation Agreement (Agreement). In the Petitioner's response, please also indicate the approximate location of the Transponder Delivery Points and the Points of Delivery.
2. Did FPUC issue a Request for Proposals or initiate discussions with other parties to obtain construction cost estimates for the proposed pipeline? If so, please identify all respondents and provide an explanation regarding why their proposals were rejected. If not, please justify and explain why FPUC did not solicit competitive bids from other parties.

3. Please provide a brief description of the approvals required by PPC or FPUC from any other state or local agencies to complete the proposed projects.
4. Please refer to Section 2.2 of the Firm Transportation Agreement as well as the joint responses of FPUC and Peninsula Pipeline to staff's first data request in Docket 20190128-GU, response No. 6.¹ Staff notes that Section 2.2 of the Agreement states that unauthorized use of transportation quantities shall be billed at a rate of 2.0 the rate to be charged for each Dekatherm of the Maximum Daily Transportation Quantity. Is this process less administratively burdensome for the Company compared to previous agreements? Please explain.
5. Please refer to Section 4.2 of the Firm Transportation Agreement. Do the Petitioners believe additional Commission approval would be required if a modification of the rates in the Agreement is negotiated?
6. In previous transportation service agreements between the Petitioners, the Maximum Hourly Transportation Percentage (MHTP) in Exhibit A to the Agreement was not considered confidential information by the Petitioners.² Please explain why the MHTP is now considered confidential information by the Petitioners in this docket. If the Petitioners believe this redaction was in error, please file a revised redacted Exhibit A to the Agreement.
7. Please refer to Exhibit A to the Firm Transportation Agreement. Please explain the difference between Transporter Delivery Points and Points of Delivery.
8. Please explain how FPUC plans to recover from customers the Monthly Reservation Charge to PPC, pursuant to the Firm Transportation Service Agreement provided in Attachment A to the Petition.

¹ Joint responses of FPUC and Peninsula Pipeline to staff's first data request in Docket 20190128-GU (DN 05308-2019).

² See Docket Nos. 20210106-GU, 20190145-GU, 20190128-GU, 20190127-GU, 20180016-GU, 20180015-GU, and 20170193-GU.

9. Please provide the length and type of pipeline, cost estimates, the percent breakdown of labor and materials, and the contemplated completion date for each segment of the proposed projects as listed in Exhibit A tot the Agreement:

Phase	Segment Number	Description	Length and Type of Pipe	Cost	Labor/Materials Cost Breakdown	Location	Contemplated Completion Date
Phase 1	1	Transporter Delivery Point	N/A			At or near Radio Road and SR 17	
	2	Transporter Delivery Point	N/A			Secondary Alternate Fuel Injection Point	
	1	Point of Delivery	N/A			At or near Crosstown Avenue and SR 200 (a)	
	2	Point of Delivery	N/A			At or near Still Quarters Road and SR 200 (b)	
	3	Point of Delivery	N/A			At or near Pages Dairy Road and Felmor Road (d)	
Phase 2	1	Point of Delivery	N/A			Location TBD at or near the Chester Road and Heron Isles Parkway	
Phase 1	1(a)	Pipeline Segment				Near Crosstown Avenue and SR 200	
	1(b)	Pipeline Segment				Near Felmore Road and SR 200	
	1(c)	Pipeline Segment				Secondary Alternate Fuel Injection Point	
	1(d)	Pipeline Segment				Near Pages Dairy and Felmore Road	
Phase 2	2(a)	Pipeline Segment				TBD near Chester and Heron Isles Parkway	

Beth Keating
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Please file all responses electronically no later than September 9, 2022, via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. If you have any questions please contact me at champson@psc.state.fl.us or at (850) 413-6676.

Thank you,

/s/Corey Hampson
Corey Hampson
Public Utility Analyst III