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STATE OF FLORIDA



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Public Service Commission

September 22, 2022

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STAFF'S FIRST DATA REQUEST
via e-mail

Re: Docket No. 20220159-GU - Joint petition by Peoples Gas System and Florida Public Utilities Company for approval of special contract.

Dear Ms. Keating:

By this letter, Commission staff requests that Florida Public Utilities Company (FPUC) provide responses to the following data requests:

1. Please explain why FPUC now needs uninterruptible gas service from Peoples Gas System (PGS) as set forth in the proposed 2022 Gas Transportation Agreement (Special Contract), as opposed to the interruptible gas service FPUC received under the September 2021 Gas Transportation Agreement.
2. Please explain why the term of the Special Contract is 19 months.
3. Please explain FPUC's plans to maintain its natural gas supply when the term of the Special Contract expires, including whether FPUC will negotiate a new contract with PGS or will seek alternative transportation options.
4. Please explain how FPUC plans to recover payments made to PGS pursuant to the Special Contract.
5. Please discuss the benefits to FPUC's general body of ratepayers flowing directly from the Special Contract.
6. Please discuss all relevant facts considered by PGS and FPUC when negotiating the amount of the monthly charge to FPUC for reservation of firm capacity and transportation service on the PGS distribution system as set forth in Section 5.1 of the Special Contract, and then explain how FPUC and PGS used those facts to calculate the monthly charge.

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Please file all responses electronically no later than Thursday, September 29, 2022, from the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6187 if you have any questions.

Sincerely,

/s/ Shaw Stiller

Shaw Stiller

Senior Attorney

SPS/crv

cc: Office of Commission Clerk