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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

September 22, 2022

Jeff Wahlen  
Ausley McMullen  
123 S. Calhoun St.  
Tallahassee, FL 32301  
jwahlen@ausley.com

**STAFF'S FIRST DATA REQUEST**  
*Via E-mail*

**Re: Re: Docket No. 20220152-GU: Petition for approval of 2021 true-up, the projected 2022 true-up and 2023 revenue requirements and surcharges associated with cast iron/bare steel replacement rider, by Peoples Gas System**

Dear Mr. Wahlen:

By this letter, Commission staff respectfully requests that Peoples Gas System (Peoples) provide responses to the following data requests.

1. Please provide the Excel spreadsheets for petition Exhibits A, B, and C with formulas unlocked.
2. Referring to paragraph 12 of the petition, please explain the factors that led to the \$563,794 under-recovery (including interest) in 2021.
3. Please discuss the progress of Cast Iron/Bare Steel Pipe Replacement Rider projects and Problematic Plastic Pipe replacement projects in 2021, 2022, and those planned for 2023.
4. Please update the tables below, contained in Peoples' response to Staff's First Data Request No. 1, in Docket No. 20210148-GU.

	CI/BS Miles Replaced	PPP Miles Replaced	CI/BS Investment***	PPP Investment	CI/BS Revenue Requirement	PPP Revenue Requirement
2017	51	*	\$17,588,366	\$2,915,802	\$6,868,302	\$74,021
2018	62	56	\$27,035,678	\$15,890,424	\$8,510,823	\$848,201
2019	52	42	\$35,821,371	\$17,425,589	\$11,075,229	\$2,706,161
2020	55	43	\$32,317,184	\$11,115,571	\$14,817,804	\$4,358,010
2021 (projected)	34	50	\$22,276,649	\$15,615,604	\$1,424,567	\$(161,100)
2022	7	50	\$6,866,249	\$20,424,766	\$3,141,854	\$1,909,621
2023		50		\$18,167,124	\$3,596,461	\$3,969,687
2024		50		\$18,621,303	\$3,561,044	\$5,921,914
2025		50		\$19,086,835	\$3,512,324	\$7,897,652
2026		45		\$17,766,986	\$3,463,181	\$9,820,999
2027		45		\$18,047,796	\$3,414,026	\$11,661,302
2028**		24		\$14,276,750	\$3,364,870	\$13,330,589

\*2017 investment costs for retiring PPP in early 2018.

\*\*2028 PPP investment includes rollover costs to occur in 2029.

\*\*\*CI/BS Investment includes removal of initial \$1M.

Year	Main Replacements					Service Replacements	
	Replaced Cast Iron (miles)	Replaced Bare Steel (miles)	Remaining Cast Iron at Year End (miles)	Remaining Bare Steel at Year End (miles)	Total Miles Remaining of CI/BS Mains	Replaced Number of Bare Steel Services	Total Number of Remaining Bare Steel Services
2012			100	354	454		14978
2013	13	38	87	316	403	907	14071
2014	2	15	85	298	383	7964	6107
2015	26	60	59	238	297	1019	5088
2016	15	35	44	203	247	1050	6963
2017	15	36	29	178	207	1135	4279
2018	10	52	18*	126	144	1970	2309
2019	8	44	10	83**	93	649	1660
2020	4	51	6	35**	41	423	1237
2021	4	30	2	5	7	800	437
2022	2	5	0	0	0	437	0

	<b>PPP (miles)</b>	<b>Total Remaining PPP Mains (miles)</b>	<b>Replaced Number of PPP Services</b>	<b>Total Number of Remaining PPP Services*</b>
2016	0	551	0	-
2017	***	509	1,396	26,841
2018	56	461	3,941	24,741
2019	42	418****	2,349	20,420
2020	43	370****	2,046	18,374
2021	51	319	Not yet Determined**	-
2022	55	264	Not yet Determined**	-
2023	50	214	Not yet Determined**	-
2024	50	164	Not yet Determined**	-
2025	50	114	Not yet Determined**	-
2026	45	69	Not yet Determined**	-
2027	45	24	Not yet Determined**	-
2028	24	0	Not yet Determined**	-

Please file all responses electronically no later than October 6, 2022 via the Commission’s website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please call me at 850.413.6554 if you have any questions.

Thank you,

/s/Oakley Ward  
Public Utility Analyst II  
[oward@psc.state.fl.us](mailto:oward@psc.state.fl.us)

cc: Office of Commission Clerk