



Writer's E-Mail Address: bkeating@gunster.com

October 10, 2022

**E-PORTAL**

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

**Re: Docket No. 20220153-GU-- Petition for approval of safety, access, and facility enhancement program true-up and 2023 cost recovery factors, by Florida City Gas.**

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida City Gas's responses to Staff's first data requests.

Thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

A handwritten signature in black ink, appearing to read 'Beth Keating', with a long horizontal flourish extending to the right.

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

MEK  
Enclosure  
cc://OPC

QUESTION:

Referring to paragraph 18 of the petition, please state what the 2023 SAFE factors would be prior to FCG moving the investment as of December 31, 2022, from the SAFE program to rate base.

RESPONSE:

Please see below for the 2023 SAFE factors prior to moving the investment as of December 31, 2022, from the SAFE program to rate base.

<u>Rate Class</u>	<u>SAFE Factor</u>
RS-1	\$3.98
RS-100	\$3.98
RS-600	\$3.98
GS-1	\$3.98
GS-6K	\$8.80
GS-25K	\$8.80
GS-120K	\$8.80
GS-1250K	\$8.80
GS-11M	\$8.80
GS-25M	\$8.80
Gas Lighting	\$3.98

**QUESTION:**

Please confirm that the projected 2023 investment is \$11,758,527 and is for the two projects discussed on page 2 of Attachment B to the petition SAFE 45 and SAFE 47 projects.

**RESPONSE:**

As shown on page 1 and 2 of Attachment B to FCG's petition, the 2023 investment of \$11,758,527 will not only include SAFE 45 and SAFE 47 projects but also the continuation of SAFE 42 and SAFE 44 projects.

**QUESTION:**

Please provide Attachment C to the petition, the SAFE Schedules 1 through 7, in Excel format with formulas intact.

**RESPONSE:**

Please see the attached responsive document.

Attachment C, Schedule 1 - SAFE Program Revenue Requirement  
January 2021 through December 2021

Line	Description	Beginning of Period Amount	Actual	End of Period Total											
			January-21	February-21	March-21	April-21	May-21	June-21	July-21	August-21	September-21	October-21	November-21		December-21
1.	Investments														
a.	Eligible Replacements - Mains	13,283,695	272,672	92,575	(143,914)	5,984,325	647,391	441,373	2,579,333	194,422	617,386	927,644	1,593,322	(75,873)	26,414,352
b.	Eligible Replacements - Services, Plastic	1,851,676	1,480	-	(64,966)	1,802,705	171,399	141,087	1,082,331	94,173	218,032	348,371	271,640	2,071,896	7,989,823
c.	Eligible Replacements - Services, Steel	690	-	-	-	-	-	-	-	-	-	-	-	-	690
d.	Eligible Replacements - Meters	425,669	289	-	(11,564)	371,058	21,855	2,129	172,176	14,650	12,283	58,966	43,460	(155,500)	955,471
e.	Land Rights	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		<u>15,561,730</u>	<u>274,441</u>	<u>92,575</u>	<u>(220,444)</u>	<u>8,158,089</u>	<u>840,646</u>	<u>584,589</u>	<u>3,833,839</u>	<u>303,245</u>	<u>847,701</u>	<u>1,334,982</u>	<u>1,908,422</u>	<u>1,840,522</u>	<u>35,360,337</u>
2.a	Gross Plant-in-Service/Depreciation Base - Mains	13,283,695	13,556,367	13,648,943	13,505,029	19,489,354	20,136,746	20,578,119	23,157,451	23,351,873	23,969,259	24,896,903	26,490,226	26,414,352	26,414,352
2.b	Gross Plant-in-Service/Depreciation Base - Services, Plastic	1,851,676	1,853,156	1,853,156	1,788,189	3,590,894	3,762,294	3,903,381	4,985,711	5,079,884	5,297,916	5,646,288	5,917,928	7,989,823	7,989,823
2.c	Gross Plant-in-Service/Depreciation Base - Services, Steel	690	690	690	690	690	690	690	690	690	690	690	690	690	690
2.d	Gross Plant-in-Service/Depreciation Base - Meters	425,669	425,958	425,958	414,394	785,452	807,307	809,436	981,612	996,262	1,008,545	1,067,511	1,110,971	955,471	955,471
2.e	Gross Plant In-Service-Land Rights	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3.	Less: Accumulated Depreciation	(439,513)	(473,713)	(508,295)	(542,738)	(585,639)	(638,121)	(692,104)	(750,787)	(813,881)	(878,188)	(944,809)	(1,014,865)	(1,088,915)	(1,088,915)
4.	CWIP - NonInterest Bearing	7,596,257	7,647,049	9,685,485	10,449,240	2,724,385	3,368,444	3,411,042	152,451	115,343	683,379	1,018,229	-	148,063	148,063
5.	Net Book Value (Lines 2 + 3 + 4)	<u>22,718,474</u>	<u>23,009,507</u>	<u>25,105,935</u>	<u>25,614,803</u>	<u>26,005,138</u>	<u>27,437,360</u>	<u>28,010,564</u>	<u>28,527,129</u>	<u>28,730,171</u>	<u>30,081,602</u>	<u>31,684,813</u>	<u>32,504,950</u>	<u>34,419,484</u>	<u>34,419,484</u>
6.	Average Net Investment		22,863,990	24,057,721	25,360,369	25,809,971	26,721,249	27,723,962	28,268,846	28,628,650	29,405,887	30,883,208	32,094,881	33,462,217	
7.	Return on Average Net Investment														
a.	Equity component Grossed up for taxes - reduced for tax reform (A)		106,843	112,421	118,508	120,609	124,868	129,553	132,100	133,781	137,413	144,316	149,979	156,368	1,566,760
b.	Debt component (B)		20,114	21,165	22,311	22,706	23,508	24,390	24,869	25,186	25,870	27,169	28,235	29,438	294,960
8.	Investment Expenses														
a.	Depreciation (C)		34,200	34,582	34,443	42,901	52,482	53,983	58,684	63,094	64,307	66,621	70,056	74,051	649,403
b.	Amortization		-	-	-	-	-	-	-	-	-	-	-	-	-
c.	Property Taxes (D)		34,487	36,287	38,252	38,930	40,305	41,817	42,639	43,182	44,354	46,582	48,410	50,472	505,715
d.	Other		-	-	-	-	-	-	-	-	-	-	-	-	-
9.	Revenue Requirements (Lines 7 + 8)		<u>195,644</u>	<u>204,455</u>	<u>213,514</u>	<u>225,146</u>	<u>241,162</u>	<u>249,743</u>	<u>258,291</u>	<u>265,242</u>	<u>271,943</u>	<u>284,689</u>	<u>296,679</u>	<u>310,329</u>	<u>3,016,838</u>
10.	Collections		(215,092)	(209,861)	(224,085)	(218,178)	(216,279)	(218,230)	(218,820)	(219,691)	(218,919)	(219,088)	(210,837)	(226,804)	(2,615,885)
11.	Estimated Net under(over) collection booked		(34,891)	2,092	6,205	12,728	35,336	47,913	55,717	64,622	64,847	75,319	98,392	91,216	
12.	Actual Net under(over) collection (Lines 9 + 10)		(19,449)	(5,406)	(10,572)	6,968	24,883	31,513	39,471	45,551	53,025	65,600	85,843	83,525	400,953
13.	True-Up (Lines 12 - 11)	7,789	15,443	(7,497)	(16,777)	(5,760)	(10,453)	(16,400)	(16,247)	(19,071)	(11,823)	(9,718)	(12,549)	(7,690)	
14.	Cumulative Net under(over) collection		(117,328)	(99,800)	(101,099)	(105,152)	(75,579)	(38,121)	1,194	49,569	95,346	158,845	247,525	326,202	326,202
15.	Interest		(7)	(6)	(4)	(3)	(3)	(2)	(1)	1	3	6	11	14	10
16.	Cumulative Net under(over) collection (Lines 14 + 15)	(90,225)	(117,334)	(99,806)	(101,103)	(105,155)	(75,582)	(38,123)	1,194	49,570	95,349	158,851	247,536	326,217	326,217

Notes:	Jan 2021 - Dec 2021
(A) Cost of Equity	5.60757%
(B) WACC	1.05569%
(C.1) Applicable Mains depreciation rate	2.50000%
(C.2) Applicable Services, Plastic depreciation rate	2.54000%
(C.3) Applicable Services, Steel depreciation rate	2.70000%
(C.4) Applicable Meters depreciation rate	6.10000%
(D) Ad Valorem Tax Rate	1.81000%

Florida City Gas  
Attachment C, Schedule 2 - SAFE Program Revenue Requirement  
January 2022 through December 2022

Line	Description	Beginning of	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	End of Period
		Period Amount	January-22	February-22	March-22	April-22	May-22	June-22	July-22	August-22	September-22	October-22	November-22	December-22	Total
1.	Investments														
	a. Eligible Replacements - Mains	26,414,352	(815,613)	848,689	943,670	267,697	415,279	241,494	559,719	949,625	841,443	534,221	321,911	193,350	31,715,837
	b. Eligible Replacements - Services, Plastic	7,989,823	(141,874)	218,617	364,053	92,195	87,359	88,869	371,409	511,664	543,897	202,299	136,648	-	10,464,959
	c. Eligible Replacements - Services, Steel	690	-	-	-	-	-	-	-	-	-	-	-	-	690
	d. Eligible Replacements - Meters	955,471	(23,094)	35,345	6,285	4,163	3,091	(181)	-	-	-	-	-	-	981,080
	e. Land Rights	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		<u>35,360,337</u>	<u>(980,581)</u>	<u>1,102,651</u>	<u>1,314,008</u>	<u>364,055</u>	<u>505,729</u>	<u>330,182</u>	<u>931,128</u>	<u>1,461,289</u>	<u>1,385,340</u>	<u>736,520</u>	<u>458,559</u>	<u>193,350</u>	<u>43,162,567</u>
2.a	Gross Plant-in-Service/Depreciation Base - Mains	26,414,352	25,598,739	26,447,428	27,391,098	27,658,795	28,074,074	28,315,568	28,875,287	29,824,912	30,666,355	31,200,576	31,522,487	31,715,837	31,715,837
2.b	Gross Plant-in-Service/Depreciation Base - Services, Plastic	7,989,823	7,847,949	8,066,566	8,430,619	8,522,814	8,610,173	8,699,042	9,070,451	9,582,115	10,126,012	10,328,311	10,464,959	10,464,959	10,464,959
2.c	Gross Plant-in-Service/Depreciation Base - Services, Steel	690	690	690	690	690	690	690	690	690	690	690	690	690	690
2.d	Gross Plant-in-Service/Depreciation Base - Meters	955,471	932,377	967,722	974,007	978,170	981,261	981,080	981,080	981,080	981,080	981,080	981,080	981,080	981,080
2.e	Gross Plant In-Service-Land Rights	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3.	Less: Accumulated Depreciation	(1,088,915)	(1,163,915)	(1,239,049)	(1,316,728)	(1,396,167)	(1,476,519)	(1,557,746)	(1,641,115)	(1,726,990)	(1,815,849)	(1,906,929)	(1,999,261)	(2,092,274)	(2,092,274)
4.	CWIP - NonInterest Bearing	148,063	214,538	742,928	159,130	191,897	474,329	553,659	465,564	730,645	692,670	368,260	229,279	96,675	96,675
5.	Net Book Value (Lines 2 + 3 + 4)	<u>34,419,484</u>	<u>33,430,378</u>	<u>34,986,285</u>	<u>35,638,816</u>	<u>35,956,199</u>	<u>36,664,008</u>	<u>36,992,293</u>	<u>37,751,958</u>	<u>39,392,452</u>	<u>40,650,959</u>	<u>40,971,988</u>	<u>41,199,235</u>	<u>41,166,968</u>	<u>41,166,968</u>
6.	Average Net Investment		33,924,931	34,208,332	35,312,551	35,797,508	36,310,104	36,828,151	37,372,125	38,572,205	40,021,706	40,811,474	41,085,611	41,183,101	
7.	Return on Average Net Investment														
	a. Equity component Grossed up for taxes - reduced for tax reform (A)		161,527	162,876	168,134	170,443	172,883	175,350	177,940	183,654	190,555	194,316	195,621	196,085	2,149,383
	b. Debt component (B)		29,789	30,038	31,007	31,433	31,883	32,338	32,816	33,870	35,142	35,836	36,076	36,162	396,390
8.	Investment Expenses														
	a. Depreciation (C)		75,000	75,134	77,679	79,439	80,352	81,227	83,369	85,875	88,858	91,081	92,331	93,013	1,003,358
	b. Amortization		-	-	-	-	-	-	-	-	-	-	-	-	-
	c. Property Taxes (D)		50,674	51,098	52,747	53,471	54,237	55,011	55,824	57,616	59,781	60,961	61,370	61,516	674,307
	d. Other		-	-	-	-	-	-	-	-	-	-	-	-	-
9.	Revenue Requirements (Lines 7 + 8)		<u>316,990</u>	<u>319,145</u>	<u>329,567</u>	<u>334,786</u>	<u>339,356</u>	<u>343,926</u>	<u>349,948</u>	<u>361,015</u>	<u>374,337</u>	<u>382,193</u>	<u>385,399</u>	<u>386,776</u>	<u>4,223,438</u>
10.	Collections		(378,770)	(355,269)	(405,396)	(381,008)	(354,187)	(407,444)	(389,058)	(389,058)	(389,058)	(389,058)	(389,058)	(389,058)	(4,616,422)
11.	Estimated Net under(over) collection booked		(35,903)	(19,267)	(55,464)	(22,226)	7,684	(38,872)	(39,110)	(28,043)	(14,721)	(6,865)	(3,659)	(2,282)	
12.	Actual Net under(over) collection (Lines 9 + 10)		(61,780)	(36,124)	(75,829)	(46,222)	(14,831)	(63,518)	(39,110)	(28,043)	(14,721)	(6,865)	(3,659)	(2,282)	(392,984)
13.	True-Up (Lines 12 - 11)	(7,690)	(25,877)	(16,857)	(20,365)	(23,996)	(22,515)	(24,646)	-	-	-	-	-	-	
14.	Cumulative Net under(over) collection		282,623	237,493	165,206	122,666	106,407	45,087	(18,594)	(46,620)	(61,383)	(68,318)	(72,060)	(74,433)	(74,433)
15.	Interest		14	34	50	53	67	76	17	(42)	(70)	(84)	(91)	(95)	(70)
16.	Cumulative Net under(over) collection (Lines 14 + 15)	326,217	282,637	237,527	165,257	122,719	106,474	45,163	(18,577)	(46,662)	(61,453)	(68,401)	(72,151)	(74,528)	(74,528)

Notes:	Jan 2022 - Dec 2022
(A) Cost of Equity, See Attachment C, Schedule 3.1	5.71356%
(B) WACC See Attachment C, Schedule 3.1	1.05370%
(C.1) Applicable Mains depreciation rate	2.50000%
(C.2) Applicable Services, Plastic depreciation rate	2.54000%
(C.3) Applicable Services, Steel depreciation rate	2.70000%
(C.4) Applicable Meters depreciation rate	6.10000%
(D) Ad Valorem Tax Rate	1.79246%



**Florida City Gas**  
Attachment C, Schedule 3.2 - Cost of Capital and Ad Valorem Tax Rate for 2022  
January 2022 through December 2022  
2021 YE Surveillance with ADFIT Consistency and Proration Adjustments adjusted to 48% Equity Ratio

	System Per Sys Per Book	Consistency & Proration Adj.	System Per Books Adj'd	Retail Per Books	Pro Rata Adj	Specific Adj	Adjusted Retail	Cap Ratio	Reallocation to 48% Equity Ratio	Revised Cap Ratio	Cost Rate	Weighted Cost
Common Equity	168,681,216	(307,447)	168,373,769	165,274,189	(18,264,101)	-	147,010,089	41.69%	144,918,644	41.10%	10.19%	4.19%
Long Term Debt	100,068,353	(182,390)	99,885,963	99,872,870	(10,554,041)	(4,368,004)	84,950,826	24.09%	86,097,795	24.42%	3.60%	0.88%
Short Term Debt	78,798,077	(143,621)	78,654,456	78,643,674	(8,690,746)	-	69,952,928	19.84%	70,897,403	20.11%	0.75%	0.15%
Cust Dep Active	3,610,301	(6,580)	3,603,721	3,603,227	(398,185)	-	3,205,042	0.91%	3,205,042	0.91%	2.77%	0.03%
Cust Dep InActive	-	-	-	-	-	-	-	0.00%	-	0.00%	0.00%	0.00%
Invest Tax Cr	-	-	-	-	-	-	-	0.00%	-	0.00%	0.00%	0.00%
Deferred Inc Tax	52,735,908	640,038	53,375,946	53,368,630	(5,897,654)	-	47,470,975	13.46%	47,470,975	13.46%	0.00%	0.00%
<b>Total</b>	<b>403,893,854</b>	<b>-</b>	<b>403,893,854</b>	<b>400,762,589</b>	<b>(43,804,726)</b>	<b>(4,368,004)</b>	<b>352,589,859</b>	<b>100.00%</b>	<b>352,589,859</b>	<b>100.00%</b>		<b>5.24%</b>

Attachment C, Schedule 3.3 - Calculation of Interest Provision  
January 2022 through December 2022

2022 Interest Calculation	January	February	March	April	May	June	July	August	September	October	November	December	Total
1. Beginning True-up Amount	326,217	282,637	237,527	165,257	122,719	106,474	45,163	(18,577)	(46,662)	(61,453)	(68,401)	(72,151)	(74,528)
2. Ending True-up Amount Before Interest	282,623	237,493	165,206	122,666	106,407	45,087	(18,594)	(46,620)	(61,383)	(68,318)	(72,060)	(74,433)	(74,528)
3. Total of Beginning & Ending True-up	608,840	520,130	402,733	287,922	229,126	151,561	26,569	(65,197)	(108,045)	(129,770)	(140,462)	(146,584)	(149,055)
4. Average True-up Amount (50% of Line 3)	304,420	260,065	201,367	143,961	114,563	75,780	13,284	(32,598)	(54,023)	(64,885)	(70,231)	(73,292)	(74,528)
5. Interest Rate-First day of reporting business month	0.05%	0.06%	0.25%	0.35%	0.54%	0.86%	1.55%	1.55%	1.55%	1.55%	1.55%	1.55%	
6. Interest Rate-First day of subsequent business month	0.06%	0.25%	0.35%	0.54%	0.86%	1.55%	1.55%	1.55%	1.55%	1.55%	1.55%	1.55%	
7. Total (Line 5 & 6)	0.11%	0.31%	0.60%	0.89%	1.40%	2.41%	3.10%	3.10%	3.10%	3.10%	3.10%	3.10%	0.00%
8. Average Interest Rate (50 % of Line 7)	0.06%	0.16%	0.30%	0.45%	0.70%	1.21%	1.55%	1.55%	1.55%	1.55%	1.55%	1.55%	0.00%
9. Monthly Average Interest Rate (Line 8/12)	0.005%	0.013%	0.025%	0.037%	0.058%	0.100%	0.129%	0.129%	0.129%	0.129%	0.129%	0.129%	0.000%
10. Interest Provision for the month (Line 4 *Line 9)	14	34	50	53	67	76	17	(42)	(70)	(84)	(91)	(95)	

\*Totals may not match Revenue Req due to rounding\*

**Florida City Gas**  
Attachment C, Schedule 4 - SAFE Program Revenue Requirement  
January 2023 through December 2023

Line	Description	Beginning of	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	End of Period	
		Period Amount	January-23	February-23	March-23	April-23	May-23	June-23	July-23	August-23	September-23	October-23	November-23	December-23	Total
1.	Investments														
	a. Eligible Replacements - Mains		340,206	523,996	724,726	447,677	865,720	321,091	768,279	1,143,657	1,132,460	473,731	337,440	144,356	7,223,339
	b. Eligible Replacements - Services, Plastic		39,821	35,111	264,756	491,341	532,455	380,930	342,917	358,573	1,208,112	408,183	238,517	234,475	4,535,189
	c. Eligible Replacements - Services, Steel		-	-	-	-	-	-	-	-	-	-	-	-	-
	d. Eligible Replacements - Meters		-	-	-	-	-	-	-	-	-	-	-	-	-
	e. Land Rights		-	-	-	-	-	-	-	-	-	-	-	-	-
			<u>380,027</u>	<u>559,106</u>	<u>989,482</u>	<u>939,018</u>	<u>1,398,176</u>	<u>702,020</u>	<u>1,111,195</u>	<u>1,502,230</u>	<u>2,340,572</u>	<u>881,914</u>	<u>575,956</u>	<u>378,831</u>	<u>11,758,527</u>
2.a	Gross Plant-in-Service/Depreciation Base - Mains	-	340,206	864,202	1,588,927	2,036,605	2,902,325	3,223,416	3,991,694	5,135,352	6,267,811	6,741,543	7,078,982	7,223,339	7,223,339
2.b	Gross Plant-in-Service/Depreciation Base - Services, Plastic	-	39,821	74,931	339,687	831,028	1,363,483	1,744,413	2,087,330	2,445,903	3,654,014	4,062,197	4,300,714	4,535,189	4,535,189
2.c	Gross Plant-in-Service/Depreciation Base - Services, Steel	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2.d	Gross Plant-in-Service/Depreciation Base - Meters	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2.e	Gross Plant In-Service-Land Rights	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3.	Less: Accumulated Depreciation	-	(397)	(1,773)	(4,767)	(9,782)	(17,250)	(26,920)	(38,491)	(52,796)	(71,130)	(92,848)	(116,095)	(140,344)	(140,344)
4.	CWIP - NonInterest Bearing	-	190,013	279,553	494,741	469,509	699,088	351,010	555,598	751,115	1,170,286	440,957	287,978	189,415	189,415
5.	Net Book Value (Lines 2 + 3 + 4)	-	<u>569,643</u>	<u>1,216,914</u>	<u>2,418,589</u>	<u>3,327,359</u>	<u>4,947,647</u>	<u>5,291,919</u>	<u>6,596,131</u>	<u>8,279,573</u>	<u>11,020,982</u>	<u>11,151,850</u>	<u>11,551,580</u>	<u>11,807,599</u>	<u>11,807,599</u>
6.	Average Net Investment		284,822	893,278	1,817,751	2,872,974	4,137,503	5,119,783	5,944,025	7,437,852	9,650,278	11,086,416	11,351,715	11,679,589	
7.	Return on Average Net Investment														
	a. Equity component Grossed up for taxes-reduced for tax reform (A)		1,397	4,381	8,914	14,089	20,291	25,108	29,150	36,476	47,325	54,368	55,669	57,277	354,445
	b. Debt component (B)		1,448	1,378	2,805	4,433	6,384	7,899	9,171	11,476	14,890	17,106	17,515	18,021	112,525
8.	Investment Expenses														
	a. Depreciation (C)		397	1,376	2,994	5,016	7,467	9,670	11,571	14,305	18,334	21,718	23,247	24,250	140,344
	b. Amortization		-	-	-	-	-	-	-	-	-	-	-	-	-
	c. Property Taxes (D)		422	1,322	2,691	4,253	6,125	7,579	8,799	11,011	14,286	16,412	16,805	17,290	106,996
	d. Other		-	-	-	-	-	-	-	-	-	-	-	-	-
9.	Revenue Requirements (Lines 7 + 8)		<u>3,663</u>	<u>8,457</u>	<u>17,404</u>	<u>27,791</u>	<u>40,267</u>	<u>50,257</u>	<u>58,691</u>	<u>73,268</u>	<u>94,835</u>	<u>109,604</u>	<u>113,236</u>	<u>116,838</u>	<u>714,310</u>
10.	Collections		(53,315)	(53,315)	(53,315)	(53,315)	(53,315)	(53,315)	(53,315)	(53,315)	(53,315)	(53,315)	(53,315)	(53,315)	(639,783)
11.	Net under(over) collection		(49,652)	(44,858)	(35,911)	(25,525)	(13,049)	(3,059)	5,376	19,952	41,520	56,289	59,921	63,523	
11	a. Cumulative Net under(over) collection		(124,180)	(169,038)	(204,949)	(230,473)	(243,522)	(246,581)	(241,204)	(221,252)	(179,732)	(123,444)	(63,523)	-	-
12	Interest		-	-	-	-	-	-	-	-	-	-	-	-	-
13	Cumulative Net under(over): SAFE Clause	(74,528)	(124,180)	(169,038)	(204,949)	(230,473)	(243,522)	(246,581)	(241,204)	(221,252)	(179,732)	(123,444)	(63,523)	-	-

Notes: Jan 2023 - Dec 2023

(A) Cost of Equity, See Attachment C, Schedule 5.1	5.88486%
(B) WACC See Attachment C, Schedule 5.1.	1.85152%
(C.1) Applicable Mains depreciation rate	2.50000%
(C.2) Applicable Services, Plastic depreciation rate	2.54000%
(C.3) Applicable Services, Steel depreciation rate	2.70000%
(C.4) Applicable Meters depreciation rate	6.10000%
(D) Ad Valorem Tax Rate	1.77646%

Florida City Gas  
Attachment C, Schedule 5.1 - Cost of Capital and Ad Valorem Tax Rate for 2023  
January 2023 through December 2023

Line No.	AVERAGE	RATIO (%)	Midpoint		WEIGHTED COST (%)	Revenue Expansion Factor	Cost of Equity
			COST RATE (%)				
1	EQUITY CAPITAL	42.33%	42.33%	10.19%	4.3138%	1.36420	5.8849%
2							
3	LONG TERM DEBT	40.54%	4.28%		1.7364%		
4							
5	SHORT TERM DEBT	5.32%	1.78%		0.0946%		
6							
7	PREFERRED STOCK	0.00%	0.00%		0.0000%		
8							
9	CUSTOMER DEPOSITS	0.78%	2.64%		0.0205%		
10							
11	TAX CREDITS - ZERO COST	0.00%	0.00%		0.0000%		
12							
13	TAX CREDITS - WEIGHTED COST	0.00%	0.00%		0.0000%		
14							
15	ACC DEF INC TAXES- ZERO COST	11.03%	0.00%		0.0000%		
16	TOTAL	100.00%			6.17%		

Weighted Average Cost of Debt  
1.8515%

Ad Valorem Tax Rate Calculation

2021 Property Tax Expense \$ 2,744,994  
2021 Property Value \$ 154,520,865  
Applicable Ad Valorem Tax Rate: 1.7765%

2023 Clause Projection Filing												
2023 Projected WACC at current approved ROE % midpoint and adjusted to 48% Equity Ratio												
	Sys Per Book	Retail Per Book	Pro Rata Adj	Specific Adj.	Adj'd Retail	Cap Ratio	Reallocation to 48% Equity Ratio	Revised Cap Ratio	Cost Rate	Weighted Cost		
Common Equity	262,522,863	262,522,863	(6,369,972)	-	256,152,891	52.55%	206,315,237	42.33%	10.19%	4.31%		
Long Term Debt	165,323,588	165,323,588	(3,818,009)	(7,973,660)	153,531,918	31.50%	197,590,464	40.54%	4.28%	1.74%		
Short Term Debt	20,639,405	20,639,405	(500,804)	-	20,138,602	4.13%	25,917,709	5.32%	1.78%	0.09%		
Cust Dep Active	3,881,270	3,881,270	(94,177)	-	3,787,093	0.78%	3,787,093	0.78%	2.64%	0.02%		
Cust Dep InActive	-	-	-	-	-	0.00%	-	0.00%	0.00%	0.00%		
Invest Tax Cr	-	-	-	-	-	0.00%	-	0.00%	0.00%	0.00%		
Deferred Inc Tax	55,150,517	55,150,517	(1,338,197)	-	53,812,321	11.04%	53,812,321	11.04%	0.00%	0.00%		
<b>Total</b>	<b>507,517,644</b>	<b>507,517,644</b>	<b>(12,121,159)</b>	<b>(7,973,660)</b>	<b>487,422,825</b>	<b>100.00%</b>	<b>487,422,825</b>	<b>100.00%</b>			pretax WACC 7.74%	
2023 Projected WACC with ADFTT Consistency and Proration Adjustments adjusted to 48% Equity Ratio												
	System Per Sys Per Book	Consistency & Proration Adj.	System Per Books Adj'd	Retail Per Books	Pro Rata Adj	Specific Adj	Adjusted Retail	Cap Ratio	Reallocation to 48% Equity Ratio	Revised Cap Ratio	Cost Rate	Weighted Cost
Common Equity	262,522,863	27,373	262,550,237	262,550,237	(6,362,789)	-	256,187,448	52.56%	206,342,845	42.33%	10.19%	4.31%
Long Term Debt	165,323,588	16,653	165,340,241	165,340,241	(3,814,248)	(7,973,660)	153,552,332	31.50%	197,617,055	40.54%	4.28%	1.74%
Short Term Debt	20,639,405	2,044	20,641,450	20,641,450	(500,303)	-	20,141,146	4.13%	25,921,026	5.32%	1.78%	0.09%
Cust Dep Active	3,881,270	400	3,881,670	3,881,670	(94,075)	-	3,787,595	0.78%	3,787,595	0.78%	2.64%	0.02%
Cust Dep InActive	-	-	-	-	-	-	-	0.00%	-	0.00%	0.00%	0.00%
Invest Tax Cr	-	-	-	-	-	-	-	0.00%	-	0.00%	0.00%	0.00%
Deferred Inc Tax	55,150,517	(46,471)	55,104,047	55,104,047	(1,349,743)	-	53,754,304	11.03%	53,754,304	11.03%	0.00%	0.00%
<b>Total</b>	<b>507,517,644</b>	<b>0</b>	<b>507,517,644</b>	<b>507,517,644</b>	<b>(12,121,159)</b>	<b>(7,973,660)</b>	<b>487,422,825</b>	<b>100.00%</b>	<b>487,422,825</b>	<b>100.00%</b>		pretax WACC 7.74%
Proration Adjustment and Consistency Adjustment to Reflect Projected ADFTT Consistent with Projection Year												
	Month	ADIT Bal	Deprec-Related ADFTT Bal *	Deprec-Related ADFTT Activity	Days to Prorate	Future Days in Period	Prorated Deprec-Related ADFTT Activity	Prorated Deprec-Related ADFTT Bal				
projected	Dec-22	54,270,459	54,270,459					54,270,459				
projected	Jan-23	54,390,656	54,421,228	150,769	31	335	138,377	54,408,836				
projected	Feb-23	54,528,388	54,568,763	147,535	28	307	124,091	54,532,927				
projected	Mar-23	54,964,078	54,700,485	131,722	31	276	99,603	54,632,530				
projected	Apr-23	55,066,428	54,816,979	116,494	30	246	78,514	54,711,044				
projected	May-23	55,157,311	54,930,742	113,763	31	215	67,011	54,778,055				
projected	Jun-23	55,244,728	55,041,932	111,190	30	185	56,357	54,834,412				
projected	Jul-23	55,327,934	55,150,566	108,634	31	154	45,835	54,880,246				
projected	Aug-23	55,406,689	55,256,648	106,082	31	123	35,748	54,915,995				
projected	Sep-23	55,523,104	55,360,159	103,511	30	93	26,374	54,942,369				
projected	Oct-23	55,611,548	55,461,038	100,879	31	62	17,136	54,959,504				
projected	Nov-23	55,690,645	55,559,236	98,198	30	32	8,609	54,968,113				
projected	Dec-23	55,774,760	55,654,760	95,524	31	1	262	54,968,375				
		55,150,517	55,014,846	1,384,302	365		697,917	54,968,375				
2023 (13 mo. Avg.)		55,150,517	55,014,846					13 Mo Avg Bal	55,014,846			
Consistency/Proration Total Adjustment			(46,471)					Proration Adj.	(46,471)			

**Florida City Gas**  
 Attachment C, Schedule 5.2 - Cost of Capital and Ad Valorem Tax Rate for 2023  
 January 2023 through December 2023  
 2023 Projected WACC with ADFIT Consistency and Proration Adjustments adjusted to 48% Equity Ratio

	System Per	Consistency &	System Per	Retail Per	Pro Rata	Specific	Adjusted	Cap	Reallocation to	Revised Cap	Cost	Weighted
	Sys Per Book	Proration Adj.	Books Adj'd	Books	Adj	Adj	Retail	Ratio	48% Equity Ratio	Ratio	Rate	Cost
Common Equity	262,522,863	27,373	262,550,237	262,550,237	(6,362,789)	-	256,187,448	52.56%	206,342,845	42.33%	10.19%	4.31%
Long Term Debt	165,323,588	16,653	165,340,241	165,340,241	(3,814,248)	(7,973,660)	153,552,332	31.50%	197,617,055	40.54%	4.28%	1.74%
Short Term Debt	20,639,405	2,044	20,641,450	20,641,450	(500,303)	-	20,141,146	4.13%	25,921,026	5.32%	1.78%	0.09%
Cust Dep Active	3,881,270	400	3,881,670	3,881,670	(94,075)	-	3,787,595	0.78%	3,787,595	0.78%	2.64%	0.02%
Cust Dep InActive	-	-	-	-	-	-	-	0.00%	-	0.00%	0.00%	0.00%
Invest Tax Cr	-	-	-	-	-	-	-	0.00%	-	0.00%	0.00%	0.00%
Deferred Inc Tax	55,150,517	(46,471)	55,104,047	55,104,047	(1,349,743)	-	53,754,304	11.03%	53,754,304	11.03%	0.00%	0.00%
<b>Total</b>	<b>507,517,644</b>	<b>0</b>	<b>507,517,644</b>	<b>507,517,644</b>	<b>(12,121,159)</b>	<b>(7,973,660)</b>	<b>487,422,825</b>	<b>100.00%</b>	<b>487,422,825</b>	<b>100.00%</b>		<b>6.17%</b>

**Florida City Gas Company**  
**Docket No. 20220153-GU**  
**Staff's First Data Request**  
**Request No. 3**  
**Attachment No. 1 of 1**  
**Tab 9 of 10**

**Florida City Gas**  
 Attachment C, Schedule 6 - 2022 SAFE Program Rates  
 January 2023 through December 2023

Class	Percentage Allocation to Customer Class	Revenue to be collected From Rate Class	Total Annual Billing Units (1)	Monthly Customer Surcharge
RS-1	25.61%	\$163,821	370,532	\$0.44
RS-100	63.77%	\$407,982	922,780	\$0.44
RS-600	1.12%	\$7,159	16,192	\$0.44
GS-1	4.80%	\$30,717	69,476	\$0.44
GS-6K	3.85%	\$24,625	25,198	\$0.98
GS-25K	0.66%	\$4,217	4,315	\$0.98
GS-120K	0.18%	\$1,149	1,176	\$0.98
GS-1250K	0.02%	\$106	108	\$0.98
GS-11M	0.00%	\$1	1	\$0.98
GS-25M	0.00%	\$1	1	\$0.98
Gas Lighting	0.00%	\$5	12	\$0.44
<b>Total</b>	<b>100%</b>	<b>\$639,783</b>		
2023 Revenue Requirement		\$714,310		
2022 Projected under(over) recovery		(\$74,528)		

Note:

(1) 12 months ending December 2023

**Florida City Gas**  
Attachment C, Schedule 7 - Pipe Allocated to all Customers  
January 2023 through December 2023

**All Customers**

Material	Mileage	Footage	Current Budget Cost per Foot	Total Cost
2"	209.2	1,104,576	\$68.38	\$75,530,907
Grand Total	254.5	1,343,760		\$75,530,907

**Larger Customers Only**

Material	Mileage	Footage	Incremental Cost per Foot	Total Cost
4"	45.3	239,184	\$8.35	\$1,997,186
Grand Total	45.3	239,184	\$76.73	\$1,997,186

**Billing Unit Allocation Percentages**

Class	Annual Billing Units	Minimum Size 2" Pipe Cost	Incremental 4" Pipe Cost	Total	Percentage Allocation
RS-1	370,532	19,851,612		\$19,851,612	25.61%
RS-100	922,780	49,438,824		\$49,438,824	63.77%
RS-600	16,192	867,492		\$867,492	1.12%
GS-1	69,476	3,722,251		\$3,722,251	4.80%
GS-6K	25,198	1,350,007	\$1,633,985	\$2,983,992	3.85%
GS-25K	4,315	231,180	\$279,810	\$510,990	0.66%
GS-120K	1,176	63,005	\$76,259	\$139,264	0.18%
GS-1250K	108	5,786	\$7,003	\$12,790	0.02%
GS-11M	1	54	\$65	\$118	0.00%
GS-25M	1	54	\$65	\$118	0.00%
Gas Lighting	12	643		\$643	0.00%
Total	1,409,791	75,530,907	\$1,997,186	\$77,528,093	100.0%

**QUESTION:**

If the Commission approves FCG's request in rate case docket No. 20220069-GU to expand and continue the SAFE program, please explain whether any additional investments would start to be included in the September 2023 petition for 2024 SAFE factors or after the current SAFE program expires in 2025.

**RESPONSE:**

The information requested in Staff's First Data Request No. 4 is not relevant to FCG's request or the issues to be decided in this proceeding. FCG's request to expand and continue the SAFE program is currently pending and will be fully addressed in Docket No. 20220069-GU. Further, the information requested is premature as FCG has not requested approval of any additional investments to be included in the September 2023 petition for 2024 SAFE factors. Notwithstanding, and without waiver of any objection, FCG responds as follows:

If the Commission approves FCG's request in rate case docket No. 20220069-GU to expand and continue the SAFE program, FCG intends to update its SAFE program in the next annual SAFE filing in September 2023. As stated in the direct testimony of FCG witness Howard in Docket No. 20220069-GU, as part of that annual SAFE filing, FCG will propose a new investment/construction schedule and term for the SAFE program, including whether any additional incremental investments would start in 2024. The reasonableness and prudence of the annual projected and actual costs incurred for the SAFE program will continue to be reviewed as part of FCG's annual SAFE filing.

**QUESTION:**

Please state if any of the 2021 or 2022 true-up amounts have been folded into rate base in Docket No. 20220069-GU or whether the amounts are all included in the 2023 SAFE factors.

**RESPONSE:**

The 2021 Final True-up and 2022 Actual/Estimated True-up amounts are included in the calculation of FCG's 2023 SAFE factors. As stated in the direct testimony of FCG witness Fuentes in Docket No. 20220069-GU, FCG has moved the projected SAFE clause investments as of December 31, 2022 from SAFE cost recovery to base rates as required by Commission Order No. PSC-15-0390. To reflect that the SAFE clause investment has been rolled into base rates as required, FCG reflected a \$0.0 beginning of period amount for 2023 as shown on Schedule 4 of Attachment C to FCG's SAFE petition.

**QUESTION:**

If FGC's request in rate case docket No. 20220069-GU to expand and continue the SAFE program is approved, please confirm that FCG would still be subject to the original order approving the SAFE program, Order No. PSC-15-0390-TRF-GU, requiring the true-up for any over- or under- recovery.

**RESPONSE:**

The information requested in Staff's First Data Request No. 6 is not relevant to FCG's request or the issues to be decided in this proceeding. FCG's request to expand and continue the SAFE program is currently pending and will be fully addressed in Docket No. 20220069-GU. Notwithstanding, and without waiver of any objection, FCG responds as follows:

Although FCG cannot predict how the Commission will decide on FCG's proposal in Docket No. 20220069-GU to expand and continue the SAFE program or whether the Commission will impose any conditions or requirements on the SAFE program, FCG has not proposed any changes or modifications to the true-up of any over- or under-recovery of the SAFE program. As stated in the direct testimony of FCG witness Howard in Docket No. 20220069-GU, if the Commission approves the proposal to expand and continue the SAFE program, the reasonableness and prudence of the projected and actual SAFE program costs will continue to be reviewed in FCG's annual SAFE filing. Absent being ordered otherwise, it is FCG's intent to continue the true-up for any SAFE program over- or under-recoveries in its annual SAFE filings.