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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

March 8, 2023

Beth Keating, Esq.
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STAFF'S FIRST DATA REQUEST
Via E-mail

Jason Bennett
AVP - Regulatory Affairs
1635 Meathe Drive
West Palm Beach, FL 33411

Re: Docket No. 20230032-GU: Petition for Approval of Transportation Service Agreement with the Florida Public Utilities Company by Peninsula Pipeline Company, Inc. for service in and around the City of Lake Wales.

Dear Ms. Keating & Mr. Bennett:

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

1. Please explain why FPUC believes it is more appropriate for Peninsula to purchase the pipeline instead of continuing the lease agreement with Citrusuco. In your response, also explain the benefits to the general body of ratepayers of Peninsula owning the pipeline.
2. Please explain why Peninsula will purchase the pipeline, instead of FPUC.
3. Please identify and explain the types of costs that the monthly reservation charge as shown on Exhibit A to the Agreement is designed to recover.
4. Please explain how FPUC plans to recover from its customers the Monthly Reservation Charge to Peninsula, pursuant to the Firm Transportation Service Agreement.
5. Paragraph 13 of the petition states that the estimated cost for FPUC to build pipeline facilities similar to the Lake Wales system would be \$15.46 million. Please discuss how that cost estimate was determined.

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6. Please provide the purchase price and explain how the cost to purchase the pipeline facilities was determined.
7. Are there any other facilities besides the pipeline that are part of the acquisition agreement between Peninsula and Citrosuco? Please explain.
8. Please state when, assuming the Commission approves the proposed Transportation Service Agreement, Peninsula will finalize the Acquisition Agreement with Citrosuco.
9. Please explain which tariff schedule and associated rates Citrosuco would be served under, following the Commission's approval of the proposed firm transportation agreement and Peninsula's acquisition of the pipeline. Additionally, will there be a filing for approval?

Please file all responses electronically no later than March 13, 2023, via the Commission's website at 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

Oakley Ward

Public Utility Analyst II