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STATE OF FLORIDA



DIVISION OF ECONOMICS  
ELISABETH J. DRAPER  
DIRECTOR  
(850) 413-6410

# Public Service Commission

September 13, 2023

Beth Keating  
Gunster, Yoakley, & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301

## **STAFF'S FIRST DATA REQUEST VIA EMAIL**

Christopher Wright  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408

**Re: Docket No. 20230097-GU - Petition for approval of safety, access, and facility enhancement program true-up and 2024 cost recovery factors, by Florida City Gas.**

Dear Ms. Keating and Mr. Wright:

By this letter, Commission staff requests that Florida City Gas (FCG) provide responses regarding the petition for approval of safety, access, and facility enhancement (SAFE) program true-up and 2024 cost recovery factors.

1. Please confirm that the total projected 2024 investment is \$17,403,332 and is for the six projects discussed on page 3 of Attachment C to the petition (SAFE 48, SAFE 49, BRE SAFE 7, Orange 1, Orange 2, and Orange 3).
2. Please confirm that the projected 2024 SAFE investment is \$11,827,885.
3. Please confirm that the projected 2024 orange pipe investment is \$5,574,447.
4. Please provide Attachments A and D to the petition, including all schedules in Excel format with formulas intact.
5. Please explain how FCG determined that 10 years was a suitable amount of time for the continuation of the SAFE program and for the replacements of orange pipes.

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Please file all responses electronically no later than September 20, 2023, 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 contact me at [pkelley@psc.state.fl.us](mailto:pkelley@psc.state.fl.us) or at 850.413.6495 if you have any questions.

Thank you,

*/S/Patrick Kelley*  
Patrick Kelley  
Public Utility Analyst I

cc: Office of Commission Clerk (Docket No. 20230097)