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DIVISION OF ECONOMICS
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Public Service Commission

September 22, 2023

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

**Staff's Second 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. In Docket No. 20220153-GU, on Attachment A to the petition, there were actual and forecasted data for both main replacements and service replacements. For the instant docket (20230097-GU), on Attachment B to the petition, there are actual and forecasted replacement data for main replacements and orange pipe replacements, but service replacements were not included. Please provide a revised Attachment B to include the data for service replacements from 2014 to 2035.
2. Please explain in detail whether FCG intends to use in-house or contracted labor to complete the relocation of mains and services from rear lot easements to front and replacement of orange pipe. If applicable, please provide the name of the contractors.
3. Please clarify whether the workers that will be used for the relocation of mains and services and the replacement of orange pipe, are the same as those who worked on the original SAFE program.
4. Please explain in detail how FCG determined that a 10-year replacement schedule and recovery period was appropriate, as opposed to a shorter time period.

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5. Please explain why the forecasted SAFE replacements per year are estimated at an average rate of 15 miles per year, while the average rate of SAFE replacements was approximately 28.26 miles per year during the original program.

Please file all responses electronically no later than September 29, 2023, via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at 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-GU)