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STATE OF FLORIDA



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

Public Service Commission

March 28, 2024

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

STAFF'S SECOND DATA REQUEST VIA E-MAIL

Matt Everngam
Director, Regulatory Affairs
208 Wildlight Avenue
Yulee, FL 32097

Re: Docket No. 20240039-GU: Petition for approval of transportation service agreements between Peninsula Pipeline Company, Inc. and Pivotal Utility Holdings, Inc. d/b/a Florida City Gas.

Dear Ms. Keating and Mr. Everngam:

By this letter, Commission staff respectfully requests that Peninsula Pipeline Company, Inc. (Peninsula) and Florida City Gas (FCG) provide responses to the following questions.

1. Will FCG purchase the alternative natural gas directly from the owners and/or operators of each landfill or from third party suppliers?
2. Referring to paragraphs 14, 17, and 20 of the petition, is the producer of gas different or separate from the landfill owner or operator? Please explain.
3. Will FCG include the cost of the purchased landfill gas in the next Purchased Gas Adjustment proceeding?
4. Please discuss the cost differences between purchasing natural gas from locally produced alternative gas (i.e., landfill gas) and from traditional out of state gas sources.
5. Please discuss for each project all other options FCG considered to bring additional gas into the area.

Keating & Everngam

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6. Please discuss for each project whether Peninsula is sizing the pipeline based solely on FCG's needs, or whether Peninsula is sizing the pipeline with sufficient capacity to attract additional transportation customers.

Please file all responses electronically no later than April 11, 2024 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 sguffey@psc.state.fl.us or at 850.413.6204 if you have any questions.

Thank you.

/s/Sevini Guffey

Sevini Guffey

Public Utility Analyst IV

cc: Office of Commission Clerk