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STATE OF FLORIDA



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Public Service Commission

April 15, 2024

Beth Keating, Esq.
Gunster Law Firm
215 South Monroe Street
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Tallahassee, Florida 32301
bkeating@gunster.com

STAFF'S FIRST DATA REQUEST
via e-mail

Re: 20240051-GU - Petition for approval of transportation service agreement with Florida City Gas by Peninsula Pipeline Company, Inc.

Dear Ms. Keating:

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

1. Please explain the confidential dollar amount in parentheses next to the Total Monthly Reservation Charge on the first page of Exhibit A to the firm transportation service agreement (Agreement) between Peninsula and Florida City Gas (FCG). If that amount is a charge to FCG, please explain how FCG will recover those costs.
2. Please explain in detail how Peninsula will recover the cost of the pipeline acquisition from FCG.
3. Is the Pioneer Pipeline Supply Header currently in service? Please explain.
4. Please discuss approximately how many commercial and industrial customers are expected to take service from this pipeline.
5. Please clarify if there will be any new construction as part of the Agreement. If so, please explain how these costs will be recovered from customers.
6. Please refer to Exhibit A to the Agreement. Please explain the difference between Transporter Delivery Points and Points of Delivery.
7. Please explain how FCG plans to recover from customers any Monthly Reservation Charge charged by Peninsula to FCG pursuant to the Agreement.

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8. Please provide a copy of the pipeline purchase and sale agreement between FCG and Peninsula for the Pioneer Supply Header Pipeline. Please provide any additional agreement(s) that detail the transfer of pipeline assets.
9. Referring to paragraph 13 of the petition, please discuss the costs and benefits to the general body of ratepayers of Peninsula owning Pioneer Header, as opposed to FCG. In your discussion, include rate impacts and recovery method (base rates vs. clause) comparing the different ownerships.
10. Referring to paragraph 13 of the petition, please explain the statement that as an FCG asset, the "Pioneer Header's potential deliverability has not been fully leveraged." Why would Peninsula be in better position to utilize the transmission line compared to FCG?
11. Does FCG plan to sell other transmission assets to Peninsula? If yes, please discuss.

Please file all responses electronically no later than **April 29, 2024** through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. In addition, please email the filed response to discovery-gcl@psc.state.fl.us and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please feel free to call me at (850) 413-6187 if you have any questions.

Sincerely,

/s/ Shaw Stiller
Shaw Stiller
Special Counsel

SPS/crv

cc: Office of Commission Clerk