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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

May 14, 2024

Beth Keating, Esq.  
Gunster, Yoakley & Stewart, P.A.  
2015 South Monroe St., Suite 601  
Tallahassee, FL 32301

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

Miguel Bustos  
Florida City Gas  
208 Wildlight Ave  
Yulee, FL 32097

**Re: Docket No. 20240071-GU: Petition for Approval of Safety, Access, and Facility Enhancement Program (SAFE) Modifications.**

Dear Ms. Keating and Mr. Bustos:

By this letter, Commission staff requests that Florida City Gas (FCG or utility) provide responses regarding the petition for approval of modifications to the SAFE program.

1. Please provide a construction timeline detailing anticipated activities throughout the term of the proposed expansion to the SAFE program.
2. Please refer to paragraph six of FCG's petition. Please provide a copy of FCG's most recent Distribution Integrity Management Program risk assessment model identifying the additional safety risks on FCG's system.
3. Please provide maps of where the facility replacements will take place.
4. Please refer to paragraph seven of FCG's petition for the following questions.
  - a. Please identify the outside contractor utilized and detail how this contractor was selected. As part of this response, please identify the contractor cost and all alternative contractors considered, if any, along with the associated cost and reason they were not selected for each.
  - b. Please detail the current status of the outside contractor's assessment.

- c. Please identify when FCG anticipates that the outside contractor's assessment will be complete.
  - d. Please explain why FCG is requesting to modify its SAFE program prior to completion of the outside contractor's assessment.
5. Please refer to paragraph nine of the petition for the following questions.
  - a. Please explain why FCG is requesting to modify its SAFE program prior to having a cost estimate of the proposed modifications.
  - b. Please explain how FCG determined that the overall surcharge increase should be no more than 10 percent if the cost estimate has not yet been finalized.
  - c. Please provide a preliminary estimate of the amount of previously unidentified bare steel mains, steel tubing, span pipe, shallow and exposed pipe, and other obsolete pipe and facilities FCG intends to replace under its proposed modifications to its SAFE program. If unknown, please explain why.
  - d. Please explain the process the utility intends to use to select construction contractors for the proposed modifications to its SAFE program.
  - e. Please explain why FCG believes that the Commission should approve the proposed modifications to its SAFE program if the contractor's assessment is not yet complete and an estimate of costs is not yet available.
6. Please refer to Attachment A of the petition. Please indicate if the depicted facilities are owned and maintained by FCG. Furthermore, please explain if the depicted facilities could be addressed through the currently approved SAFE program.

Please file all responses electronically no later than May 28, 2024 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. In addition, please email the file response to [discoverygcl@psc.state.fl.us](mailto:discoverygcl@psc.state.fl.us) and add this email address on the service list block associated with the PSC attorney assigned to this docket. 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 II

cc: Office of Commission Clerk (Docket No. 20240071-GU)