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June 19, 2024

E-PORTAL

Mr. Adam Teitzman, Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Docket No. 20240050-GU - Petition for approval of transportation service agreement with Florida Public Utilities Company by Peninsula Pipeline Company, Inc.

Dear Mr. Teitzman:

Attached for filing, please find the Revised Joint Response of FPUC and PPC to Staff's First Data Requests, No. 2. It has come to our attention that the original response was not entirely clear and could be misinterpreted, which was an inadvertent error. As such, we are providing a revised response for purposes of clarity in the record.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 (850) 521-1706

Attachments

Docket No. 20240050-GU - Petition for approval of transportation service agreement with Florida Public Utilities Company by Peninsula Pipeline Company, Inc.

## <u>REVISED Joint Responses of Florida Public Utilities Company and Peninsula Pipeline to</u> <u>Staff's First Data Requests, No. 2</u>

2. Paragraph 11 of the petition states, "FPUC wishes to maintain and enhance the ability to transport the commodity across the Pioneer header." Please explain whether FPUC's ability to transport natural gas to the delivery points listed in Exhibit A is dependent upon the asset transfer in 20240051-GU.

## Company Response

FPUC's ability to transport gas is not dependent on the asset transfer discussed in docket 20240051-GU. FCG would continue to serve FPUC as a customer under their existing arrangement. The transfer mentioned will, however, facilitate the ability of Peninsula to enhance the system for both utilities, and for FPUC, that is through the activation of two additional Points of Delivery. Customer growth opportunities in the West Palm Beach area are available to FPUC and the additional supply and delivery points to the FPUC distribution system will allow for growth throughout the distribution in the region, which could otherwise be somewhat delayed without the transfer and installation of additional delivery points. As such, FPUC's access to transportation service and supply is not dependent on the transfer, but the transfer will result in an improvement to FPUC's existing ability to access gas, and the transfer of the asset itself necessitates the new transportation agreement with PPC.