

STATE OF FLORIDA

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Public Service Commission

August 29, 2024

Beth Keating, Esq.
Gunster Law Firm
215 South Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

STAFF'S SECOND DATA REQUEST
via email

Re: Docket No. 20240046-GU - Petition for rate increase by St. Joe Natural Gas Company, Inc.

Dear Ms. Keating:

By this letter, the Commission staff requests that St. Joe Natural Gas Company, Inc. (SJNG) provide responses to the following data requests:

1. On MFR Schedule G-1 page 1 of 28, the company shows a projected test year amount of \$140,262 in construction work in progress. Provide a list of projects included in this CWIP amount.
2. On MFR Schedule G-2 page 18 of 31, the company shows an increase to \$41,000 in the projected test year for pension – utility in account 926. Please explain the trend basis for this increase.
3. Please explain the allocation method used for removing non-utility activities from the projected test year plant in service, accumulated depreciation, and working capital.
4. Please explain the allocation method used for removing non-utility activities from the projected test year O&M expense, including depreciation and amortization expense.
5. Please refer to the direct testimony of witness Stitt, page 12, lines 5 through 11. Please explain why all sources of capital were used, and not exclusively investor sources.

6. Please refer to the direct testimony of witness Stitt, page 12, lines 19 through 22. Please cite where the loan in February 2024 from Centennial Bank for \$248,111 is reflected in the MFRs.
7. On MFR Schedule G-3, page 2 of 11, please explain why the cost rate for long-term debt of 8.50% does not reflect the embedded cost of long-term debt on MFR Schedule G-3, page 3 of 11?
8. On MFR Schedule G-3, page 3 of 11, line 3, has the loan from Centennial Bank for \$500,000 been executed?
9. On MFR Schedule G-3, page 2 of 11, please explain for what purpose is the non-utility debt included on the company's books. What is its purpose?
10. On MFR Schedule G-2, page 31 of 31, why is SJNG using a state tax rate of 4.46%?
11. On MFR Schedule G-3, page 2 of 11, please explain what the "Deferred Credits – FCPC" are and from where did they originate?
12. Please provide a copy of the loan agreement with Centennial Bank as reflected on MFR Schedule G-3, page 3 of 11, lines 3 and 4.

Please file all responses electronically no later than Thursday, September 12, 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.*

Please feel free to call me at (850) 413-6846 if you have any questions.

Sincerely,

/s/ Daniel Dose

Daniel Dose

Attorney

DD/ds

cc: Office of Commission Clerk