

STATE OF FLORIDA

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Public Service Commission

August 30, 2024

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

STAFF'S THIRD 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. Please refer to MFR Schedule C-17. The note at the bottom of this page references an Order and a Docket that pertain to two separate filings 4 years apart. Please clarify the source of the depreciation rates found in the "% Rate" Column of this schedule.
2. Please refer to MFR Schedule G-2, page 23 of 31. Please state the source of the depreciation rates found on this schedule
3. Please refer to MFR Schedule B-4 and St. Joe's 2022 Annual Depreciation Status Report (ADSR). Please explain why the ADSR reflects a 2022 closing balance of \$3,149 for Account 301 and \$0 for Account 303, while MFR Schedule B-4 reflects balances of \$0 and \$13,149 for Accounts 301 and 303, respectively.
4. Please refer to MFR Schedule B-9. Please explain why the Company booked a negative reserve accrual for Account 397 – Communication Equipment beginning in December 2021 through December 2022.
5. Please refer to MFR Schedule G-1, pages 9 and 10 of 28. Please explain why the December 2023 balances for Accounts 376 – Mains (Steel) and Account 376 – Mains (Plastic) on page 9 of 28, do not match the Beginning Balances on page 10 of 28.

6. Please refer to witness Andy Shoaf's direct testimony, page 9. Please elaborate on the "discussions with Company employees" which were the basis for St. Joe's forecasted residential customer additions. Please also explain the methodology for how those discussions were converted into a numerical forecast of additional customers for the projected test year.
7. Please explain the process for how St. Joe arrived at the monthly projected therm sales (for each customer class) for the projected test year, as shown on MFR Schedule G-2, pages 8-9 of 31.
8. Please provide the Company's actual monthly customer and therm sales totals (by customer class) for 2024 year-to-date.
9. Please refer to witness Stuart Shoaf's direct testimony, Exhibit SLS-1. Please explain the projected decrease of approximately 31.7 percent in therm sales for the GS-4 rate class for the 2024 test year compared to the 2023 historical base year (159,131 therm sales in 2023 decreasing to 108,755 projected therm sales in 2024).
10. Referring to Staff Data Requests Nos. 6 and 7, please provide all documents in the Company's possession that were utilized to provide guidance to the company employees in the development of St. Joe's customer and therm sales projections for the 2024 test year.

Please file all responses electronically no later than Friday, September 13, 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