

COMMISSIONERS:
MIKE LA ROSA, CHAIRMAN
ART GRAHAM
GARY F. CLARK
ANDREW GILES FAY
GABRIELLA PASSIDOMO

STATE OF FLORIDA



DIVISION OF ECONOMICS
ELISABETH J. DRAPER
DIRECTOR
(850) 413-6410

Public Service Commission

September 6, 2024

J. Jeffry Wahlen
Virginia L. Ponder
Malcolm N. Means
Ausley McMullen
123 S. Calhoun St.
Tallahassee, FL 32301-1517

STAFF'S SECOND DATA REQUEST
Via E-mail

Paula K. Brown
Manager, Regulatory Coordination
Peoples Gas System, Inc.
Post Office Box 111
Tampa, FL 33601-0111

Re: Docket No. 20240107-GU: Petition for Cast Iron/Bare Steel Pipe Replacement Rider Expansion by Peoples Gas System, Inc.

To whom it may concern:

By this letter Commission staff respectfully requests that Peoples Gas System, Inc. (Peoples) provide responses to the following data requests:

1. Please refer to Peoples Gas System, Inc. (Peoples or Utility) petition for approval of the Safety of Facilities and Infrastructure Replacement Rider (SAFIR). Please indicate whether or not each of the capital activities proposed under Peoples' SAFIR program are the result of an official regulatory requirement (such as a requirement from the Pipeline and Hazardous Materials Safety Administration (PHMSA) or other regulatory authority). If so, please identify each requirement and the regulatory authorities that issued each requirement for each proposed capital activity. If not, please provide Peoples' perceived justification for each requested capital activity.
2. Please identify and provide any studies conducted supporting the need for the proposed SAFIR improvements and its benefits to the general body of ratepayers.
3. Please refer to Peoples' petition, paragraph 3, page 2, for the following question. Please explain how the 10-year term was determined for the SAFIR program. For each alternative term considered, please explain why it was not selected.

J. Jeffry Wahlen
Page 2
September 6, 2024

4. Please provide a general description of the locations of proposed SAFIR projects to be completed from September 2024 to December 2025.
5. Please provide Exhibits 2, 3, and 4 in Excel format.
6. Assuming Peoples does not petition the Commission for a rate case (which would move rider investment into rate base) in the next 10 years, what is Peoples' estimated average annual customer rate impact of the proposed SAFIR for each customer class for 2025 through 2035?
7. Referring to Exhibit 2 of the petition, please list for each new activity requested the amount that was approved to be included in base rates in PGS's most recent rate case, Docket No. 20230023-GU. In your response, identify all relevant testimony and MFR schedules that include any costs related to each new activity requested.

Please file all responses electronically no later than September 17, 2024 via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at oward@psc.state.fl.us or at 850.413.6554 if you have any questions.

Thank you.

/s/Oakley Ward
Oakley Ward
Public Utility Analyst III

cc: Office of Commission Clerk