

STATE OF FLORIDA

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Public Service Commission

September 10, 2024

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

STAFF'S FIFTH 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 proposed First Revised Sheet No. 27, please add the word "charge" to state "Residential Reconnection Charge". Please include that correction in the final tariff filing that reflects the Commission vote on the all issues.
2. Regarding the proposed deletion of Rate Schedule RS-1, should proposed Rate Schedule RS-2 be applicable to annual gas usage between 0 and less than 300 therms? If yes, please include that correction in the final tariff filing that reflects the Commission vote on the all issues.
3. With reference to the proposed Realtor Inspection Charge of \$105 on First Revised Sheet No. 28, please respond to the following questions.

- a. Provide detailed cost support for the proposed charge, similar to a Schedule E-3 that provides the cost support for the miscellaneous service charges.
 - b. Explain whether there is a differentiation between a residential and non-residential inspection to facilitate a real estate transaction.
 - c. Explain whether SJNG currently charges the customer when an establishment connects and disconnects gas service within a 7 day period for sole purpose of a real estate inspection. If so, please state how much is charged and how the charge is classified.
 - d. Discuss who would be responsible for the charge; potential owner, buyer, realtor or agent?
4. Referring to MFR Schedule E-1, Page 1 of 3, line 14, please explain what Other Gas Revenues-FCPC is.
 5. Referring to Schedule H-2, please provide the monthly sales by rate class for 2024 and show the calculation of the Peak and Average Monthly Sales Volumes (therms) shown on line 7 of H-2.
 6. Referring to Schedule H-3, the GS-2 rate class receives a 110.04 percent increase. It has been typical Commission practice to limit a rate classes increase to 1.5 times the system total revenue increase (to avoid rate shock), which would be $49.93 \text{ percent} \times 1.5 = 74.89 \text{ percent}$. Please explain if St. Joe would agree with that approach, referred to as "gradualism."

7. The petition states on page 12 that projected rate base is \$3,381,746; Schedule H-3 shows rate case as \$3,516,497. Please explain the difference in numbers.

8. Schedule H-3 shows a system rate of return of 6.53 percent; the petition on page 6 requests a rate of return of 6.05 percent. Please explain the difference in numbers as the rate of returns should be the same.

Please file all responses electronically no later than Tuesday, September 24, 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