

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 24, 2024

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

**STAFF'S FIRST DATA REQUEST**  
**Via E-mail**

**Re: Docket No. 20240133-GU: Petition of Peoples Gas System, Inc. for Approval of 2023 True-Up, the Projected 2024 True-Up, and 2025 Revenue Requirements and Surcharges Associated with Cast Iron/Bare Steel Replacement Rider.**

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 provide the "Calculation of Long-term Debt True-up Cost Recovery via Base Rates" document in excel format, which was provided to staff in Docket No. 20240028-GU. Please also include the PDF version in your response to staff's data requests.
2. Please describe any potential impacts to the Cast Iron/Bare Steel Rider (CI/BSR) or Peoples' workload if the Commission ordered the utility to file its future annual true-up petitions on August 1 of each year, as opposed to September 1. How would this affect the calculation of the projected true-up?
3. Please refer to paragraph 7, pages 3-4, for the following questions.
  - a. Please identify all remaining activities under the utility's current CI/BSR. As part of this response, please identify the current status and the estimated completion date for each remaining activity.
  - b. Please identify which components of the SAFIR program are currently included under the CI/BSR.
  - c. Provide the total CI/BSR investment to date (2012-2024).
4. Please discuss the progress of CI/BSR replacement projects and Problematic Plastic Pipe (PPP) replacement projects in 2023, 2024, and those planned for 2025.

Jeff Wahlen  
Page 2  
September 24, 2024

5. Please provide the Excel spreadsheets for petition exhibits A, B, C, and D with formulas unlocked.
6. Please provide an Excel spreadsheet showing the calculation of the \$476,034 under-recovery related to the LTDR true-up mechanism.
7. Referring to paragraph 13 of the petition, please explain the factors that led to the \$102,499 under-recovery (including interest) in 2023.
8. Please update the tables contained in Peoples' response to Staff's First Data Request No. 4, in Docket No. 20230098-GU.

Please file all responses electronically no later than October 7, 2024 via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web Form. Please call me at 850.413.6554 if you have any questions.

Thank you,

/s/Oakley Ward  
Public Utility Analyst III  
[oward@psc.state.fl.us](mailto:oward@psc.state.fl.us)

CC: Office of Commission Clerk  
Paula K. Brown, Peoples Gas System, Inc.  
Karen L. Bramley, Peoples Gas System, Inc.  
Matthew E. Elliott, Peoples Gas System, Inc.