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October 1, 2024

**BY ELECTRONIC FILING**

Mr. Adam Teitzman, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

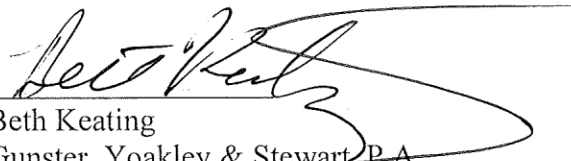
**Re: Docket No. 20240134-GU - Petition for approval of safety, access, and facility enhancement program true-up and 2025 cost recovery factors, by Florida City Gas.**

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida City Gas's Responses to Staff's First Data Requests in the referenced docket.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

  
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
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Cc: Office of General Counsel (Dose)  
Division of Economics (Kelley)  
(certain attachments delivered by email only)

Docket No. 20240134-GU - Petition for approval of safety, access, and facility enhancement program true-up and 2025 cost recovery factors, by Florida City Gas.

FLORIDA CITY GAS'S RESPONSES TO STAFF'S FIRST DATA REQUESTS

1. Please confirm that the total projected 2025 investment shown on attachment C-2, Schedule 4 is \$21,682,612 and is for the nine projects discussed on pages 4 and 5 of Attachment B to the petition (Miami SAFE 51, Miami SAFE 52, Miami SAFE 54, Brevard SAFE 8, Miami Orange 1, Miami Orange 2, Brevard Orange 1, Brevard Orange 2, and Brevard Orange 3).

FCG Response:

Yes. The forecasted investment for 2025 reflected on attachment C-2, Schedule 4 is \$21,682,612, but the projected investments inclusive of the problematic pipe are the following as reflected in Attachment B-2: Miami SAFE 54, Miami SAFE 52, Brevard SAFE 8, Miami Orange 2, Brevard Orange 1, Brevard Orange 2, Miami Span 1, Miami Span 2 and Miami Problematic Xtrubed Area 3.

2. Please provide Attachment C and C-2 to the petition, including all schedules in Excel format with formulas intact.

FCG Response:

Attached are the C and C-2 schedules in Excel format

3. Please describe any potential impacts to the SAFE program or FCG's 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.

FCG Response:

FCG would have some concerns due to the fact that the annual true-ups for the Energy Conservation Cost Recovery (ECCR) and Purchased Gas Adjustment (PGA) are due on the same date. Adding SAFE would add pressure to obtain all the information timely and most importantly to the review process for accuracy.