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DIVISION OF ECONOMICS
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Public Service Commission

October 1, 2024

J. Jeffry Whalen
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123 S. Calhoun St.
Tallahassee, FL 32301-1517

STAFF'S THIRD 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. Is the utility officially removing the retirement of inactive service lines from the petition? Please explain.
2. Please file all excel spreadsheets from Peoples' responses to staff's second data request in the docket file.
3. Referring to paragraph 23 of the petition, which states that capital investment for pipeline replacement costs due to third-party damages and other leaks have increased over 100 percent since 2019. Please state what costs for pipeline replacement, due to third-party damages, were included in Peoples' MFRs for its 2023 rate case. If none, please explain why Peoples did not request recovery of these costs at that time.
4. Referring to Peoples' response to staff's second data request No. 7, please clarify whether any dollar amount is currently in base rates for each new activity requested (meaning the dollar amounts projected in the SAFIR petition represent incremental amounts to what is already in base rates).

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5. Please explain why the transmission pipeline validation work must be completed by 2028, as stated in paragraph 18 of the petition.

Please file all responses electronically no later than October 8, 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
Karen L. Bramley, Peoples Gas System, Inc.
Matthew E. Elliott, Peoples Gas System, Inc.