

STATE OF FLORIDA

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Public Service Commission

October 2, 2024

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

STAFF'S SEVENTH 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. Please provide the Company's actual monthly number of customers (by customer class) for 2024 year-to-date.
2. Please refer to SJNG's response to Staff's 3rd Data Request, Question No. 7. In its response, SJNG stated that after examining previous therm sales and number of customers, it determined that 14 percent growth for therm sales and 5 percent growth for customers were appropriate for the 2024 test year. The data sourced from SJNG's MFRs appears to result in different growth percentages. Please refer to the table below and

explain how SJNG calculated the aforementioned 14 percent growth for therm sales and the 5 percent growth for customers.

	2023 Historical (MFR G-2, pg 6 of 31)	2024 Projected (MFR G-2, pg 8 of 31)	Percent Growth ((2024 – 2023)/2023)
Customers	38,232	40,943	7.09%
Therm Sales	1,045,764	1,103,397	5.51%

3. Please refer to SJNG's response to Staff's 3rd Data Request, Question No. 8, specifically Attachment #8, "THERM SALES & CUSTOMER DATA." Please explain the addition of the "GS-4 SHH" customer class, which does not appear in the G-Schedules of SJNG's MFRs, and how this customer class relates to the GS-4 customer class.

4. Please refer to SJNG's response to Staff's 3rd Data Request, Question No. 9. In explaining its projected 31.7 percent reduction in therm sales for the GS-4 rate class for the 2024 test year compared to the 2023 historical year, the Company stated that it did not project Gas South for GS-4 therms, only transport therms (FTS-4).
 - a. Please explain in detail the business relationship that exists between Gas South and SJNG, and the specific regulated services provided from and to each entity.
 - b. Please explain why the Company did not project "Gas South" for the GS-4 therm sales.

- c. Please explain the Company's reasoning for its 31.7 percent reduction in 2024 test year therm sales for the GS-4 customer class.
 - d. Please explain the relationship, if any, between the GS-4 rate class and the FTS-4 rate class which includes the sole customer, Gulf Correctional Institute, according to witness Stuart Shoaf's direct testimony, Page 12.
5. Please refer to SJNG's response to Staff's 3rd Data Request, Question Nos. 6, 7, and 10. In the Company's response to Question No. 6, SJNG stated that Company employees examined previous therm sales and data to determine a forecast for residential customers. SJNG also stated it examined previous therm sales and customers to project therm sales in its response to Question 7. In addition, in its response to Question No. 10, the Company states that it also referenced "public knowledge of proposed residential and non-residential projects" when estimating future therm sales and number of customers by class. Please identify:
 - a. The proposed residential and non-residential projects that were taken into account when estimating the Company's 2024 test year customers and therm sales,
 - b. The quantitative impact such projects had on SJNG 2024 test year projections of therm sales number of customers by class.
 - c. The source of the public knowledge of such projects.

Staff's Seventh Data Request

October 2, 2024

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Please file all responses electronically no later than Wednesday, October 16, 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) 413-6214 if you have any questions.

Sincerely,

/s/ Saad Farooqi

Saad Farooqi

Senior Attorney

SF/ds

cc: Office of Commission Clerk