

STATE OF FLORIDA

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(850) 413-6199

Public Service Commission

October 8, 2024

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

STAFF'S EIGHTH 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 refer to Supplemental MFR Schedule G-3, page 3 of 11, Long-Term Debt Outstanding.
 - a) Please explain what the Maturity Date in column (3) refers to.
 - b) Please explain why the loans listed on lines 1 and 2 are included in the amount of principal outstanding in column (10), line 16, if the loans matured on 12/31/2023.
 - c) Please explain if the Company is continuing to pay interest on the loans from the Shoaf Family Trust and the Costin Family Trust during the 2024 projected test year.
 - d) Please explain how the Company determined the estimated interest rate of 8.50 percent for the Centennial Bank Loans included on lines 3 and 4. Please provide any documents that support the estimated interest rate.

2. Please refer to the direct testimony of witness Stitt, Page 12, lines 19 through 22, and the Company's response to Staff's Second Data Request dated September 9, 2024, Number 6. Please provide the loan document indicating the interest rate of 8.50 percent.
3. Has St. Joe Natural Gas Company revised its estimate of its long-term debt interest rate of 8.50 percent to reflect the Federal Reserve's action on September 18, 2024 to lower the Federal Funds Rate by 50 basis points? If yes, please provide the revised estimate.
4. In reference to Schedule C-13, line 3, can you please provide a breakdown of what is included in other expenses? Please provide any additional documentation to support the expense.
5. In reference to Schedule C-13, line 2, can you please provide a breakdown of the cost included in legal service? Please provide any additional documentation to support the expense.
6. In reference to MFR Schedule G-2, Page 18 of 31, line 9, can you explain the calculation for the \$19,500 rate case amortization?
7. In reference to MFR Schedule G-2, Page 1, line 10, can you please provide an explanation for the difference of the amounts for taxes other than income stated in the original MFR filing, amount is reflected as \$128,363, and the supplemental MFR filing, amount is reflected as \$170,353?

Staff's Eighth Data Request

October 8, 2024

Page 3

Please file all responses electronically no later than Tuesday, October 22, 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