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November 1, 2024

**BY E-FILING**

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

Re: **Docket No. 20240046-GU - Petition for rate increase by St. Joe Natural Gas Company, Inc.**

Dear Mr. Teitzman:

Attached, for electronic filing in the referenced docket on behalf of St. Joe Natural Gas, please find the Company's Responses to Staff's 11<sup>th</sup> Set of Data Requests.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

**Re: Docket No. 20240046-GU - Petition for rate increase by St. Joe Natural Gas Company, Inc.**

1. SJNG included an invoice dated June 9, 2023, for the past purchase of two toroidal tanks. Please explain how these tanks are used and why they are needed.

Response: The Toroidal tanks are a component that is part of a propane conversion kit for our service trucks. They are the fuel tank that holds the propane that is being used to power the trucks while they are running on propane is why they are needed.

2. Please state whether or not a “conversion kit” is required for each toroidal tank.

Response: The word toroidal refers to the shape because they offer several different shapes of tanks. The toroidal is a circular or donut shaped and fits in the place of the spare tire under the rear of the truck. When converting a vehicle to run on a different fuel other than gas you need a “conversion kit” that actually injects the new fuel (propane) into the engine and you need a storage tank to hold the new fuel while driving. These toroidal tanks are just the gas tank that stores the propane on the truck. Every vehicle needs a conversion kit as well as a fuel tank in order to work properly.

3. Exhibits A1 and A2, show a quote provided to SJNG for the purchase of a tractor and other equipment from Crystal Tractor & Equipment that reflected a “trade value” of \$20,000. Please state what equipment was traded-in, including the original purchase price of that equipment.

Response: See attachment for tractor traded in

4. It appears, from the invoices provided, that the new proposed standard cab F150 will have multiple new toolboxes installed. Please confirm if the number and documented cost of each toolbox that will be installed in this vehicle reflected below is correct. If not, please explain.

Standard Cab

Toolbox – Drawer Unit \$1,428.77

Toolbox 2 @ \$412.95 \$825.90

Toolbox \$545.95

Response: this is correct

5. SJNG states the F150 trucks varied by \$30,000 because one is a standard single cab service truck and the other is a Manager's truck with a crew cab 4x4. Please elaborate on the need and purpose of a “Manager’s Truck” and how often it is used.

Response: This Truck is for our Operations Manager. It is his primary vehicle that is used every day. The operations manager drives across our entire distribution system in remote and offroad areas requiring four wheel drive to access many of our gate stations and farm taps. He sometimes carries personnel and equipment. He drives daily to job sites to oversee all outside work performed and to check on service work. He responds to call outs after hours. This vehicle is used all day every day and the operations manager would not be able to do his job without it. It is probably the most important vehicle in the fleet.

6. SJNG provided a single Devtech quote for the Check Meter Station. Did SJNG obtain quotes from other vendors? If not, please explain why not.

Response: We received another verbal quote that was much higher and selected the vendor listed because of the price and quality of work performed in the past. Since we are not a government entity under specific rules requiring multiple quotes we were unaware of needing to keep copies of quotes in this case. If there is a specific rule requiring this please advise and we will produce more quotes.

7. For each pro forma project in which SJNG submitted an invoice from a previous purchase, please explain why multiple current bids were not obtained and submitted.

Response: Similar to Number 6 above we are not aware of any rules requiring this multiple bids. We maintain a working relationship with multiple vendors and keep up with going rates throughout the year. This allows us to always choose the best priced products as well as labor quotes from competent and economical vendors. We also discuss the going rate being paid of price per foot quotes with other companies to make sure we are in line and getting the best price for jobs.



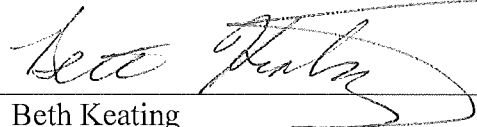
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing filing has been served by E-Mail this 1<sup>st</sup> day of November, 2024, upon the following:

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