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STATE OF FLORIDA



DIVISION OF ECONOMICS
ELISABETH J. DRAPER
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Public Service Commission

January 16, 2025

Karen L. Bramley
Director, Regulatory Affairs
Peoples Gas System, Inc.
Post Office Box 2562
Tampa, FL 33601-2562
klbramley@tecoenergy.com

STAFF'S SECOND DATA REQUEST
via email

RECEIVED-FPSC
2025 JAN 16 PM 1:58
COMMISSION
CLERK

RE: Docket No. 20240157-GU - Petition for Approval to Establish a New Regulatory Subaccount and an Amortization Rate and to Reclassify Customer Software Investment and Reserve Balance, by Peoples Gas System, Inc.

Dear Ms. Bramley,

By this letter, the Commission staff requests that Peoples Gas System, Inc. (PGS) provide responses to the following data requests:

1. If the Commission were to approve PGS's request in this docket, please identify the resulting benefits and detriments to the Company, as well as to the Company's customers and shareholders.
2. Please refer to the Company's petition, paragraph 12. PGS indicates a \$650,159 reduction in depreciation/amortization expense results from the proposed increase in service life of the WAM software from 15 to 20 years. Absent a customer base rate change, will the Company's customers continue to pay this excess depreciation/amortization expense annually until the Company's next rate case?

3. Please refer to the Company's petition, paragraph 12. Assuming the Commission were to approve PGS's proposed depreciation rate change with the resulting reduction to depreciation/amortization expense, what would be the monthly bill impact on a residential customer bill (at 20 therms) if the Company were to credit the reduction in depreciation/amortization expense to customers via a bill credit or other means? Please provide the calculations.
4. Did PGS consider deferring its request for a new subaccount at a lower depreciation rate for WAM software investment until the time it files its next rate case or depreciation study? Please explain.
5. Please refer to PGS' response to Staff's First Data Request in the instant docket, specifically Question 4.(b) and identify the "peer utility" referenced in the company's answer.

Please file all responses electronically no later than Thursday, January 30, 2025, 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 discoverygl@psc.state.fl.us.*

Please feel free to call me at (850) 413- 6648 if you have any questions.

Sincerely,

/s/ Andrew Kunkler

Andrew Kunkler

Public Utility Analyst

Florida Public Service Commission

2540 Shumard Oak Blvd.

Tallahassee, FL 32399

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cc: Office of Commission Clerk