



January 30, 2025

VIA ELECTRONIC FILING

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

Re: Docket No. 20250020-GU
Staff Rule Development Workshop Re: Rule 25-7.150, Florida Administrative Code
(F.A.C.), Natural Gas Facilities Relocation Cost Recovery Clause.

Dear Mr. Teitzman:

Attached for filing on behalf of Peoples Gas System, Inc. are the company's answers to Staff's First Data Request (Nos. 1-14) served via email on January 16, 2025.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'V. Ponder'.

Virginia Ponder

VLP/dh
Attachment

cc: Sevini Guffey, sguffey@psc.state.fl.us

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250020-GU
STAFF'S FIRST DATA REQUEST
REQUEST NO. 1
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- 1.** Referring to Rule 25-7.150, (1), F.A.C., regarding providing supportive testimony with details of the faculties to be relocated and their associated costs, please provide the estimated cost to comply with this task.

- A.** The company may incur incremental legal and other administrative costs; however, they are not expected to be material.

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- 2.** Referring to Rule 25-7.150, (2)(a), F.A.C., regarding notification, please provide the estimated cost to provide the information to the PSC.

- A.** Facility relocation projects are required and must be completed, independent of the rule's implementation. The company has established internal systems and processes to track project-specific data and does not foresee any material incremental costs to provide notification under paragraph (2)(a).

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- 3.** Referring to Rule 25-7.150, (2)(b), what is the estimated cost to prepare a description of the scope of the facilities relocation to be undertaken per the requirements imposed by the authority?
 - A.** Facility relocation projects are required and must be completed, independent of the rule's implementation. The company has established internal systems and processes to track project-specific data and does not foresee any material incremental costs to prepare a description of the scope of the facilities relocation under paragraph (2)(b).

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- 4.** Referring to Rule 25-7.150,(2)(c), please provide the estimated cost to your utility to prepare an estimate of the costs associated with the relocation of the natural gas facilities.
 - A.** Facility relocation projects are required and must be completed, independent of the rule's implementation. The company has established systems and processes to track project-specific data and does not foresee any material incremental costs to prepare an estimate of the costs associated with the relocation of facilities under paragraph (2)(c).

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- 5.** What is the estimated cost to annually file your utility's NGFRCRC petition as prescribed in Rule 25-7.150(3)(a) through (e), F.A.C.?
 - A.** The company may incur incremental legal and other administrative costs; however, they are not expected to be material.

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- 6.** With reference to Rule 25-7.150(5), F.A.C., what is the estimated cost to your utility to maintain subaccounts for all item subject to cost recovery using the NGFRCRC, consistent with the Uniform System of Accounts prescribed by the PSC pursuant to Rule 25-7.014, F.A.C.?
 - A.** Facility relocation projects are required and must be completed, independent of the rule's implementation. The company has established internal systems and processes to track project-specific costs and does not foresee any material incremental costs to maintain subaccounts consistent with Rule 25-7.014, F.A.C.

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- 7.** Would the proposed new Rule 25-7.150, F.A.C., directly or indirectly result in new regulatory costs to your utility in excess of \$200,000 in the aggregate in Florida within 1 year after implementation of the rule?
- A.** No, the company does not foresee incremental regulatory costs in excess of \$200,000 within the first year subsequent to implementation of the proposed new rule.

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REQUEST NO. 8
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A "Small Business" is defined by Section 288.703, F.S., as an independently owned and operated business concern that employs 200 or fewer permanent full-time employees and that, together with its affiliates, has a net worth of not more than \$5 million or any firm based in this state, which has a Small Business Administration 8(a) certification. As to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments.

- 8.** Considering the above stated definition of a Small Business, please state if your natural gas utility is a small business.

- A.** Peoples Gas System, Inc. is a local natural gas distribution company and is not a "small business" as defined by Section 288.703, F.S.

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- 9.** If yes, please state if the proposed new rule would have an adverse, minimal, or no financial impact on your utility.
- A.** Not applicable. See answer to Data Request No. 8.

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- 10.** Would the proposed new rule have an adverse financial impact on economic growth, private-sector job creation or employment, and private-sector investment in excess of \$1 million in the aggregate within 5 years after implementation of the rule?
- A.** No, the company does not foresee an adverse financial impact on economic growth, private-sector job creation or employment, or private-sector investment in excess of \$1 million in the aggregate within 5 years after implementation of the rule.

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- 11.** Would the proposed new rule have an adverse financial impact on business competitiveness, productivity, and innovation in excess of \$1 million in the aggregate within 5 years after implementation of the rule?
 - A.** No, the company does not foresee an adverse financial impact on business competitiveness, productivity, or innovation in excess of \$1 million in the aggregate within 5 years after implementation of the rule.

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- 12.** Would the proposed new rule result in new regulatory costs, including any transactional costs (Transactional costs” include filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used, procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring or reporting, and any other costs necessary to comply with the rule) to your utility, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule? If yes, please explain.
- A.** No, the company does not foresee that the new rule would result in new regulatory costs, including transactional costs to the utility, in excess of \$1 million in the aggregate within 5 years after implementation of the rule.

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A "Small City" is defined by Section 120.52, F.S., as any municipality that has an unincarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by Section 120.52, F.S., as any county that has an unincarcerated population of 75,000 or less according to the most recent decennial census.

- 13.** Considering the above definition of a Small City, please state if your utility serves a small city or several small cities, or a small county/counties? Would the small city/cities/county/counties served by your utility have financial impacts or no impacts due to the proposed rule revisions?
- A.** The company does serve "small cit[ies]" and "small counties" as defined by Section 120.52, F.S. The company does not foresee financial impacts to these cities and counties based on the proposed new rule.

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- 14.** Please provide any additional information, including any tasks not identified above, which would result in new costs to you utility, due to the proposed new rule, which the Commission may determine useful. [Section 120.541(2)(f), F.S.].
- A.** Peoples does not have any additional information that would result in material new costs to the company as a result of the proposed new rule.