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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

March 17, 2025

Beth Keating, Esq.  
Gunster, Yoakley, & Stewart, P.A.  
2015 South Monroe St., Suite 601  
Tallahassee, FL 32301

**STAFF'S FIRST DATA REQUEST  
VIA EMAIL**

Michael Cassel  
Florida Public Utilities Company  
208 Wildlight Avenue  
Yulee, Florida 32097

**Re: Docket No. 20240159-GU: Joint Petition by Florida Public Utilities Company and Florida City Gas for Approval of Tariff Changes to Standardize and Align Florida Public Utilities Company and Florida City Gas's Transportation Service Tariffs and to Implement a Flexible Gas Service Tariff for Florida City Gas.**

Dear Ms. Keating and Mr. Cassel:

By this letter, Commission staff requests that Florida Public Utilities Company (FPUC) and Florida City Gas (FCG), (jointly, the Utilities) provide responses to the below questions regarding Docket No. 20240159-GU.

1. Please explain why FCG is currently using the Gastar software system rather than the Convergence Gas Transportation software system.
2. Please provide FPUC's proposed tariff sheet Nos. 6.527 and 8.177, in both clean and legislative formats.
3. Referring to tariff sheet No. 6.031, please explain why section ii. Shipper Administrative Service was not applicable to flexible gas service (FGS) and special contract service.
4. Please explain why FCG's customers are categorized into two different transportation programs while FPUC only has one.
5. Please explain how further consolidating the tariffs benefits the general body of ratepayers and the Utilities.
6. Have the Utilities previously experienced technical issues by having two different sets of tariffs? Please explain.

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7. Please explain whether FPUC or FCG will still have any company specific transportation tariff sheets if the petition is approved by the commission.
8. Footnote 5 of the petition states that FCG cancelled the Flexible Gas Service, because at the time, it was not being utilized.
  - a. Have any FCG customers inquired about receiving Flexible Gas Service? Please explain.
  - b. Approximately how many current and future customers does FCG expect to request Flexible Gas Service over the next year?

Please file all responses electronically no later than March 31, 2025 via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web Form. In addition, please email the file response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us) and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please contact me at [pkelley@psc.state.fl.us](mailto:pkelley@psc.state.fl.us) or at 850.413.6495 if you have any questions.

Thank you,

*/S/ Patrick Kelley*  
Patrick Kelley  
Public Utility Analyst II

cc: Office of Commission Clerk (Docket No. 20240159-GU)